



PUBLIC DISCLOSURE

February 6, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Wells Fargo Bank, National Association
Charter Number: 1

101 North Phillips Avenue
Sioux Falls, South Dakota 57104

Office of the Comptroller of the Currency

Large Bank Supervision
400 7th Street, SW
Washington, DC 20219

NOTE: This document is an evaluation of this 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. 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.

Table of Contents

Overall CRA Rating	4
Description of Institution	5
Scope of the Evaluation	6
Discriminatory or Other Illegal Credit Practices Review.....	16
Multistate Metropolitan Statistical Area Ratings.....	17
Allentown-Bethlehem-Easton, PA-NJ MSA (Allentown Multistate MSA)	18
Augusta-Richmond County, GA-SC MSA (Augusta Multistate MSA)	28
Charlotte-Concord, NC-SC CSA (Charlotte Multistate CSA).....	38
Columbus-Auburn-Opelika, GA-AL CSA (Columbus Multistate CSA).....	49
Davenport-Moline, IA-IL MSA (Davenport Multistate MSA).....	59
Fargo-Wahpeton, ND-MN CSA (Fargo Multistate CSA).....	69
Grand Forks, ND-MN MSA (Grand Forks Multistate MSA)	79
Logan, UT-ID MSA (Logan Multistate MSA)	88
Memphis, TN-MS MSA (Memphis Multistate MSA)	98
Minneapolis-St. Paul, MN-WI CSA (Minneapolis Multistate CSA)	108
Myrtle Beach-Conway, SC-NC CSA (Myrtle Beach Multistate CSA)	119
New York-Newark, NY-NJ-CT-PA CSA (New York Multistate CSA).....	129
Omaha-Council Bluffs, NE-IA MSA (Omaha Multistate MSA).....	143
Philadelphia-Reading-Camden, PA-NJ-DE CSA (Philadelphia Multistate CSA).....	153
Portland-Vancouver-Salem, OR-WA CSA (Portland Multistate CSA).....	166
Texarkana, TX-AR MSA (Texarkana Multistate MSA).....	177
Washington-Baltimore-Arlington, DC-MD-VA CSA (Washington Multistate CSA)	186
State Ratings.....	198
State of Alabama	199
State of Alaska	220
State of Arizona	239
State of California	260
State of Colorado	303
State of Connecticut	317
State of Delaware	327
State of Florida	336
State of Georgia	368
State of Idaho	390
State of Illinois	409
State of Iowa	421
State of Kansas.....	441
State of Minnesota	458
State of Mississippi	477
State of Montana	495
State of Nebraska	514
State of Nevada	531
State of New Mexico.....	551
State of North Carolina	572
State of North Dakota.....	602
State of Oregon	619

State of Pennsylvania	644
State of South Carolina	664
State of South Dakota.....	693
State of Tennessee	712
State of Texas.....	722
State of Utah.....	761
State of Virginia	774
State of Washington	801
State of Wisconsin	823
State of Wyoming	843
Appendix A: Scope of Examination	A-1
Appendix B: Summary of Multistate MSA/CSA and State Ratings.....	B-1
Appendix C: Definitions and Common Abbreviations	C-1
Appendix D: Tables of Performance Data.....	D-1

Overall CRA Rating

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

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

Performance Levels	Wells Fargo Bank, N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	X
High Satisfactory			
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:

Lending Test

- Lending levels reflected excellent responsiveness to credit needs in the majority of assessment areas (AAs). In most AAs, the bank's percentile of its market share ranking of home mortgage and small loans to businesses by number of loans exceeded its percentile of deposit market share ranking among depository financial institutions.
- The bank exhibited good geographic distributions of home mortgage loans, small loans to businesses, and small loans to farms in a majority of AAs.
- The bank exhibited good distributions of home mortgage loans, small loans to businesses, and small loans to farms to borrowers of different incomes.
- The bank was a leader in making community development (CD) loans. The bank had excellent levels of CD loans that had a positive effect on the Lending Test performance in a majority of AAs.
- The bank used flexible lending practices to serve credit needs in a majority of AAs.

Investment Test

- The bank provided an excellent volume of qualified CD investments that were made during the evaluation period or made during prior evaluation periods that remained outstanding and continued to provide benefit.
- The bank exhibited excellent responsiveness to credit and community economic development needs. The bank used innovative and/or complex investments to support CD initiatives.

Service Test

- Service delivery systems were readily accessible to geographies and individuals of different income levels in a majority of AAs, when also considering the additional access to retail banking services provided through alternative delivery systems.
- The bank provided relatively high levels of CD services targeted to low- and moderate-income individuals.

Lending in Assessment Areas

A substantial majority of the bank's loans were in its AAs.

The bank originated and purchased 86 percent of its total loans by number and 87.6 percent by dollar inside the bank's AAs during the evaluation period. This analysis was performed at the bank level, rather than the AA level. These percentages do not include extensions of credit by affiliates that may be considered under the other performance criteria.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total	Dollar Amount of Loans				Total
	Inside		Outside			Inside		Outside		
	#	%	#	%		#	\$	%	\$	
Home Mortgage	1,774,525	81.0	417,349	19.0	2,191,874	637,752,785,091	87.3	92,398,695,394	12.7	730,151,480,485
Small Business	1,584,763	93.2	115,035	6.8	1,699,798	46,524,930,000	91.6	4,239,064,000	8.4	50,763,994,000
Small Farm	24,774	59.5	16,839	40.5	41,613	1,074,914,000	61.1	683,682,000	38.9	1,758,596,000
Total	3,384,062	86.0	549,223	14.0	3,933,285	685,352,629,091	87.6	97,321,441,394	12.4	782,674,070,485
Source: Bank Data Due to rounding, totals may not equal 100.0% Dollar amounts for Small Business, Small Farm and Consumer loans are multiplied by 1000.										

Description of Institution

Wells Fargo & Company (WFC) is a leading financial services company that had approximately \$1.9 trillion in total assets as of December 31, 2021, and served one in three U.S. households and more than 10 percent of small businesses in the U.S. Based on total assets, WFC was the fourth largest bank holding company in the U.S. WFC employed approximately 238,000 individuals, with approximately 81 percent of employees based in the U.S. WFC's principal banking subsidiary, WFBNA, is an interstate financial institution headquartered in Sioux Falls, South Dakota. WFBNA or "the bank" offered a broad spectrum of financial products and services to consumers and businesses, including checking and savings accounts, credit and debit cards, as well as auto, mortgage, home equity, and small business lending. WFBNA also offered financial planning, private banking, investment management, and fiduciary services. WFBNA provided financial solutions to businesses through commercial loans and lines of credit, letters of credit, asset-based lending, trade financing, treasury management, and investment banking services. As of December 31, 2021, the bank had total assets of \$1.7 trillion, total deposits of \$1.4 trillion, and \$161.4 billion in equity capital. U.S.-based deposits totaled \$1.4 trillion.

The bank reported \$140.6 billion in tier 1 capital. WFBNA operated 4,859 branches and 12,672 Automated Teller Machines (ATMs) across 37 states, including the District of Columbia.

The bank has no known legal or financial impediments that would have hindered its ability to meet the credit and CD needs of its AAs during this evaluation period. The Office of the Comptroller of the Currency (OCC) rated WFBNA “Outstanding” overall in its most recent Performance Evaluation (PE), dated February 4, 2019.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This evaluation covers the bank’s CRA-related activities from January 1, 2019, through December 31, 2021. The OCC considered the bank’s home mortgage lending, small business lending, small farm lending, CD lending, grants, donations, and other investments for CRA purposes. The evaluation includes consideration of CD grants made through the Wells Fargo Foundation, a WFBNA affiliate. Please refer to appendix A for a complete list of affiliates. Management did not request consideration for other lending activities, including letters of credit or consumer lending, which would include consumer credit cards and vehicle loans. Farm lending was not a major loan category for the bank as small loans to farms represented approximately one percent by number and less than one percent by dollar volume of total loans originated or purchased. Small loans to farms are included in the lending tables in appendix D. An analysis of farm lending was completed for AAs where the bank originated or purchased at least 20 small loans to farms during the evaluation period.

The OCC generally gave equal weighting to geographic and borrower distribution components of the Lending Test unless performance context factors indicated the OCC considered one more than the other. When there were differences in performance between loan products in a specific AA, the OCC determined the overall conclusion by weighting the products based on the loan mix by number of loans over the evaluation period. Weighting by number of loans gives consideration for each lending decision regardless of the loan’s dollar amount. When there were performance differences between low- and moderate-income geographies, the OCC placed more emphasis on the geographic category with more lending opportunities (e.g., higher percentage of businesses or owner-occupied housing units). The OCC described any variations within the narrative comments of each rating area.

For the home mortgage borrower distribution analysis, the OCC considered the impact that income, poverty levels, and housing costs have on limiting homeownership opportunities of low- and moderate-income individuals and families. Additionally, the OCC considered the impact of home affordability for low- and moderate-income borrowers in higher cost areas when comparing the distribution of home mortgage loans to the demographics. In these higher cost markets, it is difficult for many low- and moderate-income borrowers to afford a home as the area’s median housing value is typically too high for conventional mortgage loan qualifications.

The OCC relied on records provided by the bank, public loan and financial information, demographic data from the U.S. Census Bureau, Dun & Bradstreet (D&B), community contacts, and loan information reported under HMDA and CRA. The scope of this evaluation is summarized in appendix A, Summary of Multistate Metropolitan Statistical Area (MMSA) and State Ratings is summarized in appendix B, definitions and common abbreviations used in this evaluation are further defined in appendix C, and Tables of Performance Data are in appendix D.

Selection of Areas for Full-Scope Review

This evaluation assessed performance in 205 AAs across 49 rating areas that comprise 32 states and 17 MMSAs. The OCC selected 84 AAs for full-scope reviews and the remaining 121 AAs for limited-scope reviews. In each state where the bank had a branch or deposit-taking ATM, the OCC selected at least one AA within that state for a full-scope review. If the bank had branches or deposit-taking ATMs in two or more states of a MMSA, the OCC selected the MMSA for a full-scope review. For purposes of this evaluation, the OCC combined, analyzed, and presented bank delineated metropolitan AAs at the Combined Statistical Area (CSA) level where possible. This resulted in 76 CSAs. Similarly, the OCC combined bank delineated non-MSAs within the same state as a single AA.

Refer to the “Scope” section under each State Rating section for details regarding how full-scope AAs were selected and refer to appendix A, Scope of Examination, for a complete list of full- and limited-scope AAs.

Ratings

The bank’s overall rating is a blend of the state ratings, and where applicable, multistate ratings.

The multistate and state ratings are based on performance in all bank AAs. Refer to the “Scope” section under each State and MMSA Rating section for details regarding how the OCC weighted the areas in arriving at the respective ratings.

The six largest rating areas, accounting for 61.9 percent of the bank’s domestic deposits, were the state of California (29.2 percent), state of Florida (9.1 percent), state of Texas (8.2 percent), New York Multistate CSA (7.2 percent), state of Georgia (4.1 percent), and Washington DC Multistate CSA (4.1 percent). These rating areas represented the bank’s most significant markets in terms of lending, deposits, and branches and therefore carried the greatest weight in the overall conclusions.

Flexible Lending Programs and Other Lending Information

The bank’s use of flexible lending programs positively enhanced the bank’s lending performance in multiple AAs. The flexible lending programs included the following:

yourFirst Mortgage – The program was launched in May 2016 to address barriers and expand sustainable homeownership. It was designed to assist borrowers with overcoming obstacles to purchasing a home by only requiring a three percent down payment if the customer used an approved down payment assistance program. While there were no requirements to be a first-time homebuyer or to purchase in a specific census tract, many low- and moderate-income borrowers took advantage of the program as it was responsive to their needs. The program provided alternatives to up-front mortgage insurance with both borrower and lender paid options which often resulted in lower monthly payments and a lower principal balance than up-front mortgage insurance financed with the loan. In addition, the borrower-paid options allow private mortgage insurance to end when the loan-to-value (LTV) dropped below 78 percent. Exclusive to WFBNA, the program encouraged customer preparedness through HUD-approved homeownership counseling and education. Although homeownership counseling was not required for the program, if successfully completed, borrowers received a \$750 credit for closing costs. Over 77 percent of borrowers in the program elected to complete counseling and received the closing cost benefit. The bank retired the program in February 2021 and replaced it with the Dream.Plan.Home

program, which exclusively focused on low- and moderate-income borrowers and allowed the bank to continue to improve and create sustainable low- and moderate-income homeowners.

Dream.Plan.Home Mortgage Program – The program was an affordable financing option available to low- and moderate-income borrowers that launched nationally in February 2021 which has helped increase sustainable homeownership for low- and moderate-income individuals and families. The program offers flexible underwriting, including the fact that rental income from an accessory unit or boarder may be included in the credit decision. Borrowers are able to use gifts, grants, down payment assistance programs, and cash on-hand as sources to cover closing costs and/or down payment requirements. The property must be owner-occupied and the borrower's primary residence. Homebuyer education is required for first-time homebuyers and/or for borrowers with non-traditional credit. During the evaluation period, the bank funded 5,565 loans to low- and moderate-income borrowers totaling over \$1 billion.

Dream.Plan.Home Closing Cost Program – This program was designed to help more Americans achieve successful homeownership. Borrowers in select markets receive up to \$5,000 in closing cost credit that may be applied towards their non-recurring closing costs on primary, owner-occupied residence purchase transactions. Select markets included Houston, Los Angeles, Minneapolis, New York City, Oakland, Philadelphia, Seattle, and Washington DC. The program is restricted to low- and moderate-income borrowers. During the evaluation period, the bank provided 1,381 closing cost credits totaling \$5.6 million.

NeighborhoodLIFT - In a collaborative effort between WFBNA, local nonprofits, and NeighborWorks America, the NeighborhoodLIFT program created new homeowners by providing down payment assistance for first-time homebuyers and potential homebuyers ready to re-enter the market. Initially launched in February 2012 in the wake of the housing crisis, it has evolved to help address affordability challenges for low- and moderate-income homeowners by reducing out-of-pocket costs when purchasing a home through down-payment assistance grants and homebuyer education. During the evaluation period, the bank provided more than \$83.5 million in down payment assistance, housing counseling, homebuyer support, and education.

Paycheck Protection Program (PPP) – In 2020, the Small Business Association (SBA) implemented the PPP under the Coronavirus Aid, Relief, and Economic Security (CARES) Act, to provide small businesses with forgivable loans and assist businesses to stay afloat when the economy was impacted by the COVID-19 pandemic crisis. The SBA guaranteed the loan, and the business had to certify it met the eligibility requirements of the PPP. The business also had to certify that the funds were utilized only for allowable uses, including but not limited to payroll costs, mortgage interest or rent obligations, utilities, and any other interest payment on debt obligations. The ultimate goal of the PPP was to prevent mass unemployment, enabling businesses to survive the economic uncertainty, and retain their workforces. In 2020 and 2021, WFBNA provided approximately 282,000 PPP loans totaling nearly \$14 billion. The bank's lending helped support and retain 1.7 million jobs to keep Americans employed. The average loan amount was \$50,000, which was the lowest among all large financial institutions, and 42 percent of loans were for small businesses in low- and moderate-income neighborhoods, minority or women-owned, or those historically underserved. In addition, WFBNA used the gross processing fees from the PPP loans it made in 2020 to donate approximately \$420 million in grants to nonprofits that supported small businesses, through Wells Fargo's Open for Business Fund. WFBNA developed a marketing campaign to generate awareness about the PPP loans to underserved populations. The bank sent 1.6 million emails to customers located in low- and moderate-income or majority minority communities.

The marketing campaign resulted in more than 35,000 new PPP applications and 9,600 loan originations.

Innovative or Complex CD Investment Initiatives

Low-Income Housing Tax Credits (LIHTC) – WFBNA makes significant use of responsive and complex CD programs, including LIHTCs, providing both debt and equity to LIHTC developments across the country responding to the identified need for affordable housing. These tax credit investments are a critical financing tool to create and preserve safe, quality affordable housing and often involve many government, public, and private organizations. Many LIHTC developments include set-asides for special populations including senior citizens, veterans, disabled individuals, people with developmental disabilities, and formerly homeless individuals and offer onsite supportive services including healthcare, employment assistance, and financial literacy fostering positive outcomes for these residents. The bank has built many long-term relationships with affordable housing developers as noted in the market highlights. WFBNA is a leader in financing affordable housing. During the evaluation period, the bank provided nearly \$14 billion in more than 800 LIHTC developments through direct loans, investments, and fund investments. In addition to LIHTC investments, the bank also provides critically needed CD construction loans to many LIHTC properties. Additionally, more than 1,500 LIHTC investments originated during prior exam periods, with a book balance of approximately \$6.4 billion, were outstanding at the end of the exam period. WFBNA was ranked the number one affordable housing lender by the Mortgage Bankers Association for Commercial Real Estate/Multifamily Finance Annual Origination Volumes under the Multifamily-Affordable category for both 2019 and 2020. The bank was ranked second in 2021, with volumes near the top lender.

New Markets Tax Credit (NMTC) Program - The NMTC program, authorized by the U.S. Treasury, incentivizes investment in low-income communities through federal tax credits. These tax credits are a valuable instrument in revitalizing economically distressed and underserved communities likely to be food deserts, lack quality jobs, and/or have limited public transportation. NMTC credits are a critical financing tool in filling gaps in development costs that could prevent projects from otherwise happening. NMTC investments finance community facilities that provide essential services to neighborhoods such as learning centers, health care clinics, transitional housing, and businesses that bring much needed jobs to low-income communities. NMTC investments reduce borrowing costs for nonprofits and entrepreneurs by offering below-market rate financing on more favorable credit terms than what is conventionally available to smaller community-focused projects. During the evaluation period, WFBNA's NMTC investments totaled \$1.1 billion. These investments created and/or saved an estimated 10,400 jobs. Additionally, the bank had 76 NMTC investments totaling more than \$1 billion outstanding from prior periods.

Municipal Securities - Municipal bonds are an important financing vehicle to respond to community needs such as affordable housing and community facilities such as public schools, hospitals, and mental healthcare facilities and to provide support to a variety of municipal entities, including housing finance authorities, healthcare facilities, and schools. The bank invests in municipal bonds, with the majority being long-term investments, classified as held-to-maturity securities. During the exam period, the bank provided \$2.3 billion in CRA qualified municipal bonds.

Community Development Financial Institutions (CDFI) - WFBNA provides long-term and multifaceted support to CDFIs through investments, loans, grants, and services. CDFIs provide capital to minority and underserved communities supporting small businesses, affordable housing, and community

facilities. These organizations provide technical assistance, financial education and personalized coaching and specialize in lending to people and businesses in under-resourced communities. During the evaluation period, the bank provided more than \$520 million in CD loans, including patient capital to support lending programs; almost \$340 million in grants, including through the Open for Business Fund; and 633 hours of CD services to CDFIs. Additionally, WFBNA invested \$47 million in Minority Depository Institutions (MDIs) that are also CDFIs to bolster their ability to provide critical service to communities around the country. The bank's support of CDFIs is exhibited through the following initiatives highlighted below: Patient Capital, Open for Business Fund, MDIs, and Project REACH.

Patient Capital - WFBNA has been a leading provider of patient capital to nonprofits around the country for two decades, serving CDFIs and nonprofit affordable housing developers with long-term, low-rate, unsecured, capital. Annually, WFBNA provides an average of \$40 million in patient capital to approximately 40 nonprofit organizations nationwide. The bank serves nonprofits with total assets from a few million up to hundreds of millions in both urban and rural markets. These organizations serve key communities and sectors including Appalachia and other rural and persistent poverty areas, and small businesses. Examples are included within the CD lending sections within some of the AAs.

Open for Business Fund - In 2020, WFBNA established the innovative Open for Business Fund to respond to the urgent needs of small businesses during the COVID-19 pandemic by voluntarily donating all gross processing fees from PPP loans to nonprofit organizations supporting small businesses. The bank provided roughly \$420 million in Open for Business grants. More than \$250 million was directed to CDFIs to reach racially and ethnically diverse small business owners who were disproportionately affected by the pandemic. WFBNA offered three rounds of funding to support CDFIs, provide technical assistance to small businesses, and provide recovery and resilience funds for small businesses. The program increased access to capital by fortifying nonprofit loan funds; provided small business payment relief; and provided small business owners with education, training and other support services needed to successfully navigate a new economic reality. On a national basis, Open for Business grants reached more than an estimated 152,000 small business owners, helping to maintain an estimated 255,000 jobs. Roughly 85 percent of small businesses served by grantees were projected to be African American, Hispanic, Asian American, and Native American small business owners. These innovative grants are highly qualitative and responsive to the identified need to support small business growth and stability.

Minority Depository Institutions (MDI) - WFBNA responded to the needs of MDIs for capital and technical assistance by investing \$50 million in 13 MDIs in 2020 and 2021. The support bolstered these MDIs' abilities to provide critical service to communities around the country. The investments supported branch expansion, products and services enhancement, and technology upgrades. WFBNA was one of the first banks to sign the OCC's Project REACH MDI Pledge, which encourages all large and midsize banks to develop meaningful partnerships with MDIs. The bank established a dedicated team to deepen the relationships and provide technical assistance to support the evolving strategic priorities of each MDI. MDIs, which are often CDFIs, play a vital role in providing banking services, mortgage, commercial real estate, and small business lending to minority and low- and moderate-income communities. According to a 2019 study conducted by the FDIC, MDIs have a substantial impact on the communities they serve and originate a greater share of their mortgages to borrowers who live in low- and moderate-income census tracts and to minority borrowers, compared with non-MDI institutions. The overall number of MDI charters has decreased by over 30 percent since 2008. Over this time, African American MDI charters have declined at an even faster rate than their peers. During the pandemic, communities of color were disproportionately impacted, and supporting MDIs was part of the bank's efforts to generate a more inclusive recovery across the country. WFBNA allows MDI customers to

withdraw funds from WFBNA ATMs nationwide without incurring fees from WFBNA. During 2021, customers from 11 MDIs have benefitted from more than \$31,000 in waived fees for nearly 10,500 withdrawal transactions.

Innovative Retail Service Programs

Banking Inclusion Initiative – In May 2021, WFBNA launched the Banking Inclusion Initiative, a 10-year program to help unbanked in the U.S. gain access to affordable, mainstream, digitally enabled transactional accounts, which are an entry point to achieving financial stability. The initiative is focused on removing barriers to financial inclusion in African American, Hispanic, and Native American households that account for a disproportionate percentage of the country's unbanked households. It will also assist those who are underbanked or underserved such as individuals who may have a bank account yet continue to use high-cost, non-bank services. The initiative centers on the following three areas:

- Increase access to affordable products and digital solutions. Increase awareness and outreach about low-cost, no overdraft fee accounts, such as Clear Access Banking that WFBNA introduced in 2020 to offer an affordable account designed for those who are new to banking or have encountered past challenges opening or keeping a bank account. Deepen existing relationships with MDIs to support their work in the communities they serve, including providing their customers access to WFBNA ATMs with no WFBNA fees.
- Make financial education and advice accessible. Launched the first phase of planning for HOPE Inside centers within diverse and low- and moderate-income neighborhoods across the U.S., starting in Atlanta, Houston, Los Angeles, Oakland, and Phoenix. The centers are designed to foster inclusion through free financial education workshops and one-on-one coaching. Collaborated with Historically Black Colleges and Universities (HBCUs) Community Development Action Coalition to provide Our Money Matters at HBCUs and Minority Serving Institutions (MSIs). The program was live in 10 schools at the end of the evaluation period.
- Convening a national unbanked task force. Formed the task force to develop solutions to bring more people into the banking system and provide feedback on initiatives and ways to measure success. The task force includes leaders from many national nonprofit organizations.

Small Business Resource Center – WFBNA responded to the challenges small business owners faced during the COVID-19 pandemic by developing the Small Business Resource Center website in July 2020. The website features dedicated videos and articles covering educational information on business planning and strategy; finances and cash flow; raising capital; marketing; and management to help them rebuild stronger. The website helped small business owners adapt and pivot their business models, keeping their employees paid and their doors open during the pandemic and beyond. The website was named the 2021 Apex Award and the 2021 Gramercy Banking and Credit Union Award winner.

Connect to More for Women Entrepreneurs – The Connect to More Program provides women-owned small businesses with access to valuable knowledge, in addition to networking opportunities and mentorship, in one convenient program. Women entrepreneurs experienced different hurdles and challenges. WFBNA developed a designated section for women-owned business resources where these businesses can access articles, videos, and worksheets designed to help guide them through the business cycle including starting, running, and building a small business, managing money, and building a network. Additionally, business owners have access to a 12-week program, Milestone Mapping

Coaching Circles, where women entrepreneurs can set critical milestones specific to their business and connect with peer business owners who can help solve common business challenges.

Hands on Banking – WFBNA’s free, non-commercial web-based financial education program, teaches money management skills for all life stages. Its goal is to increase financial knowledge as the first step toward greater financial capability and financial health. The Spanish version of the resources is known as *El futuro en tus manos*®. According to a recent report published by the Financial Educators Council, lack of financial literacy contributed to more than 77 million Americans not paying their bills on time, 39 percent carrying credit card debt from month to month, and 41 percent of Americans not having a savings account. According to the FDIC Survey, unbanked rates were higher among lower-income households, less-educated households, Black households, Hispanic households, working-age households with a disability, and single-mother households. *Hands on Banking* is a public service supported by the Wells Fargo Foundation and content does not refer to specific Wells Fargo products or services and it has no advertising.

Other Special Programs or Initiatives

Project REACH - The OCC created Roundtable for Economic Access and Change (REACH) to remove structural barriers to financial inclusion, resulting in broader participation in the economy and helping millions of people, previously left out of the system to pursue their American dream. Project REACH brought together leaders from the banking industry; national civil rights organizations; and business and technology sectors to help solve policy problems so that underserved populations have the same opportunities to succeed and benefit from the nation’s financial system as others. The group identifies and works to reduce barriers to access credit and capital. Specifically, Project REACH focuses on addressing the lack of usable credit scores for 45 million individuals; low rates of homeownership for minorities; the need to strengthen and revitalize MDIs; and poor access to capital for minority-owned small businesses and entrepreneurs. WFBNA employees are engaged in all the Project REACH work streams, with the bank demonstrating leadership. WFBNA was among the first large banks to commit investments to MDIs with the goal of strengthening the MDI Sector through financing, technical assistance, and capacity building. MDIs serve as trusted banks to underserved communities, providing critical credit and financial services. See the MDI highlight above for additional details.

Performance Context

In March 2020, the spread of COVID-19 created considerable challenges for the global economy. As the COVID-19 pandemic spread across the U.S., both the federal and state governments shut down large portions of local economies and implemented social distancing and stay-at-home policies to limit virus transmission. These actions resulted in workers’ inability to go to their jobs, causing job losses and lost wages and affecting their ability to make mortgage and rent payments, buy food, and pay utilities. As the unemployment rate grew, needs across the country increased rapidly for mortgage and rental assistance, small business assistance, food pantry aid, homeless services, and emergency small dollar loans. The impacts were compounded for the low- and moderate-income population.

Mortgage - Throughout the evaluation period, significant housing affordability challenges, increased by the COVID-19 pandemic, impacted the immediate needs of communities across the country, most notably low- and moderate-income individuals. During COVID-19, the bank paused cash-out refinances and home equity loans to limit the credit exposure of the bank.

Mortgage Payment Suspension - In response to the ongoing needs of its customers, the bank granted customers impacted by COVID-19 an initial three-month payment suspension on their WFBNA mortgage or home equity loan, if requested. The bank did not charge late fees on these accounts or report a past-due status to the consumer reporting agencies for payments missed during the suspension period. Following the three-month suspension, if customers were still unable to make payments, the bank offered a number of potential options, including a continuation of the payment suspension up to an additional six-months. Customers had the option to move the missed payments to the end of the existing loan term. If customers were ready to resume payments, but needed a reduced payment, the bank reviewed their loan for a mortgage modification to adjust the loan terms based on investor guidelines to provide an affordable payment. Through December 31, 2021, the bank assisted over 1 million existing mortgage customers to enter a forbearance plan.

Home Affordability - The lack of available affordable housing was a significant performance factor when comparing the distribution of WFBNA's mortgage loans, as well as that of the industry, to the demographics. Over the evaluation period, the number of listings declined, and median list prices steadily increased. While affordability was an issue throughout the country, it was particularly dramatic in California, Oregon, Washington, and New York where the assessment area's affordability ratio was 150 percent or above when compared to the national ratio.

Other Information

2020 CRA Rule - On June 5, 2020, the OCC published a modernized CRA Rule. The June 2020 CRA Rule was subsequently rescinded on December 14, 2021. The Rule was in effect from October 1, 2020, until December 31, 2021. While in force, the rule expanded bank lending, investment, and services activities that qualified for positive CRA consideration. This included other activities that met the credit needs of economically disadvantaged individuals and entities, low- and moderate-income census tracts, and other identified areas of need in banks' communities. The proposal also expanded the circumstances in which banks received pro-rata credit for qualifying activities beyond those activities that receive consideration under the current framework. Certain CD activities that provided some benefit to, but did not primarily benefit, specified populations, entities, or areas would receive pro-rata credit equal to the partial benefit provided. Finally, the Rule allowed for allocation of an activity across all of a bank's assessment areas and other metropolitan statistical areas (MSAs) or non-MSAs served by the activity according to the share of the bank's deposits in those areas, to the extent the bank cannot document that the services or funding it provided was allocated to a particular project. An activity that met these qualifying criteria under the June 2020 CRA rule and was conducted between October 1, 2020, and December 31, 2021, remained a qualifying activity, even after rescission of the June 2020 CRA rule and received consideration in this evaluation.

Adjacent Branches - Primary consideration in determining the bank's performance in delivering retail products and services to geographies and individuals of different income levels was through the bank's distribution of branches. While the analyses primarily focused on branches located in low- and moderate-income geographies, quantitative performance consideration was given to 486 branches the bank identified as being within close proximity (generally across the street or within a block of a street or intersection) to low- and moderate-income geographies that did not already have a branch and that were reasonably likely to serve the low- and moderate-income area. Branches were not considered adjacent if there were barriers that impacted access such as rivers or Interstate highways. Through sampling, the OCC reviewed maps and verified and confirmed those branches were in close enough

proximity to reasonably serve low- and moderate-income geographies. The bank received positive consideration for those branches in the service delivery systems conclusion.

Assessment Areas - The OCC determined that all AAs consisted of whole geographies and met the requirements of the regulation. The areas reasonably reflected the different trade areas that the bank's branches serve and did not arbitrarily exclude any low- and moderate-income areas.

Allocated tier 1 capital - To help analyze the levels of CD lending and investments, the OCC compared the dollar volumes of CD loans and investments in each AA against the tier 1 risk-based capital allocated to the AA based on the AA's deposits as a percentage of total deposits. High levels of tier 1 capital can cause the ratio of CD lending and investments relative to tier 1 capital to appear low when compared to the CD ratios at other banks. The length of an evaluation period can also impact the levels of CD activity relative to tier 1 capital as banks with longer evaluation periods have more time to make more loans and investments relative to a bank with a shorter evaluation period. The OCC also considered the impact and responsiveness of CD loans and investments and any relevant performance context impacting the level of CD activities.

Alternative Delivery Systems (ADS) – As consumers increasingly have shifted their banking transactions from being conducted in branches to ATMs and digital banking channels such as online banking, mobile banking, and telephone banking), these digital channels have become more effective delivery channels for the delivery of retail banking services. As of December 31, 2021, more than 33 million customers actively used the bank's digital banking platforms. No data was available to demonstrate customer usage, or the extent ADS was used to improve access to retail banking services particularly for low- and moderate-income individuals or in low- and moderate-income areas in each AA. Therefore, the bank only received positive consideration for ADS at the institution level.

Community Contacts - The OCC reviewed and considered community contacts available from the OCC, Federal Deposit Insurance Corporation (FDIC), and Board of Governors of the Federal Reserve System that were made during the evaluation period with community groups, local government representatives, realtors, and business leaders within the various AAs as well as community needs assessments performed by the bank. Community contacts were utilized to ascertain the AA's credit needs, demographics, and economic conditions. Within the evaluation, applicable community contacts are referenced in each AA that received a full-scope review. The community contacts indicated that affordable housing, small business financing, and financial education continued to be the primary credit and CD needs in many AAs.

CD Lending – The Lending Test considers the number and amount of CD loans, and in full-scope AAs, the complexity and innovation involved in making the loans. The OCC determines the percentage of tier 1 capital that CD lending represents in each AA to obtain perspective regarding the relative level of CD lending. CD lending can have a positive, neutral, or negative impact on the overall Lending Test rating.

Corporate and Nonretail Deposits – In three AAs, the bank maintained approximately \$320.1 billion in deposits of large national corporations that did not originate in those AAs, including the Charlotte-Concord, NC-SC CSA (\$32.1 billion), Minneapolis-St. Paul, MN-WI CSA (\$39.1 billion), and Sioux Falls, SD MSA (\$249 billion). While the OCC did not exclude these out of area deposits when determining the allocated tier 1 capital, the OCC considered those deposits as performance context when arriving at conclusions.

Deposit Market Share – The OCC used summary deposit data reported to the FDIC as of June 30, 2021, which was the most recent public deposit data available during the evaluation period.¹ Some rating areas included AAs that only had deposit-taking ATMs and no branches. For these AAs, no deposit market share information was available.

Employment, housing, and economic data – To provide an overview of general employment, housing, and other economic data for full-scope AAs, the OCC relied in part on reports produced by Moody's Analytics², Bureau of Labor Statistics (BLS)³, and Data USA⁴.

Lending Activity Analysis - The OCC determined lending activity responsiveness in each AA by comparing the bank's market rank percentage for deposits to each lending product's market rank percentage. The OCC divided the bank's market rank by the total number of depository institutions or lenders, respectively. This approach takes into consideration the differences between the number of insured depository institutions and the number of home mortgage, small business, and small farm lenders within the AA.

Lending Gap Analysis - The OCC reviewed summary reports and maps and analyzed home mortgages, small loans to businesses, and small loans to farms lending activity to identify any gaps in the geographic distribution of loans in AAs. The OCC did not identify any unexplained conspicuous gaps in lending in any AAs reviewed.

Minimum Loan Volume - The OCC did not analyze or conclude on Lending Test performance for any loan product in AAs where the bank originated or purchased fewer than 20 loans during the evaluation period. This typically affected small loans to farms. In applicable AAs, any analysis of the loan product would not be meaningful and was therefore omitted.

Qualified Investments – Includes investments that meet the definition of CD and were made prior to the current evaluation period and are still outstanding or were made during the current evaluation period. Prior-period investments are considered at the book value of the investment at the end of the current evaluation period. Current-period investments are considered at their original investment amount, even if that amount is greater than the current book value of the investment. Evaluation of a bank's performance of qualified investments is subjective and considers the number and amount of investments, and the extent the investments meet the credit and CD needs of an AA. Similar to CD lending, the OCC determines the percentage of tier 1 capital that the dollar volume of qualified investments represents in each AA to obtain perspective regarding the relative level of CD investments.

¹ FDIC, Deposit Market Share Reports; <https://www7.fdic.gov/sod/sodMarketBank.asp?baritem=2>

² Moody's Analytics, US Precise Metro & State, 2020; <https://www.moodyanalytics.com/product-list/us-precis-metro-state>

³ Bureau of Labor Statistics; <http://data.bls.gov>

⁴ Data USA, <http://datausa.io>

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. § 25.28(c), in determining a national bank or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau (CFPB), as applicable.

The OCC identified the following public information regarding non-compliance with the statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to this institution:

On December 20, 2022, the CFPB issued a consent order against Wells Fargo Bank, N.A for multiple violations across several of the bank's largest consumer product lines, which led to billions of dollars in financial harm and, in some cases, the loss of customers' vehicles and homes.⁵ Specifically, with respect to auto loan servicing, the CFPB found that Wells Fargo engaged in unfair acts and practices in violation of the Consumer Financial Protection Act of 2010, 12 CFR 1036(a)(1)(B) by incorrectly applying consumer payments; charging borrowers incorrect fees, interest, or other amounts; wrongly repossessing borrowers' vehicles; and failing to refund consumers who had paid certain fees upfront to automobile dealers when warranted. The CFPB also found that Wells Fargo engaged in unfair practices by improperly denying mortgage loan modifications, miscalculating fees and other charges, and assessing unwarranted charges and fees. The order noted the acts and practices which resulted in customer harm, required the bank to address the issues, and pay a civil money penalty. Wells Fargo has paid or committed to pay over \$1.5 billion to consumers specifically associated with these acts and practices.

The OCC considered the nature, extent, and strength of the evidence of the practices; the extent to which the institution had policies and procedures in place to prevent the practices; and the extent to which the institution has taken or has committed to take corrective action, including voluntary corrective action resulting from self-assessment; and other relevant information. Taking into account these considerations and the facts, including the bank's remediation to affected customers, the OCC did not downgrade the bank's performance rating.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

⁵ [Wells Fargo Bank, N.A. | Consumer Financial Protection Bureau \(consumerfinance.gov\)](https://www.consumerfinance.gov/about-us/newsroom/cfpb-issues-consent-order-against-wells-fargo-bank-na/)

Multistate Metropolitan Statistical Area Ratings

Allentown-Bethlehem-Easton, PA-NJ MSA (Allentown Multistate MSA)

CRA rating for the Allentown Multistate MSA⁶: Satisfactory

The Lending Test is rated: Outstanding

The Investment Test is rated: Needs to Improve

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited an excellent geographic distribution of loans in its AA.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank made an adequate level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.
- The bank had a poor level of qualified CD investments and grants and not in a leadership position. The bank exhibited adequate responsiveness to credit and community economic development needs. The bank rarely used innovative or complex investments to support CD initiatives.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.
- The bank provided an adequate level of CD services.

Description of Institution's Operations in the Allentown Multistate MSA

The Allentown Multistate MSA was WFBNA's 29th largest rating area based on its total deposits in the rating area. As of June 30, 2021, WFBNA maintained approximately \$4.6 billion or 0.3 percent of its total domestic deposits in the rating area. Of the 31 depository financial institutions operating in this rating area, WFBNA with a deposit market share of 20.5 percent, was the largest. Other top depository financial institutions in this rating area based on market share were PNC Bank, N.A. (11.5 percent), Truist Bank (11.4 percent), and Fulton Bank, N.A. (8.7 percent). As of December 31, 2021, WFBNA operated 32 branches and 51 ATMs in this rating area. WFBNA delineated one AA within the Allentown Multistate MSA and included the Allentown-Bethlehem-Easton, PA-NJ MSA. The AA met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

The following table provides a summary of the demographics, including housing and business information for the Allentown Multistate MSA.

⁶ This rating only reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Allentown Multistate MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	179	8.9	19.0	43.6	28.5	0.0
Population by Geography	828,232	7.6	19.1	40.5	32.8	0.0
Housing Units by Geography	343,976	7.3	19.4	42.5	30.8	0.0
Owner-Occupied Units by Geography	220,521	3.1	14.0	44.1	38.8	0.0
Occupied Rental Units by Geography	93,784	15.4	29.5	39.2	16.0	0.0
Vacant Units by Geography	29,671	13.1	28.6	40.9	17.4	0.0
Businesses by Geography	82,045	7.0	16.2	39.2	37.6	0.0
Farms by Geography	2,450	1.8	8.2	44.7	45.4	0.0
Family Distribution by Income Level	214,409	20.5	18.1	21.1	40.3	0.0
Household Distribution by Income Level	314,305	23.5	16.2	18.8	41.5	0.0
Median Family Income MSA - 10900 Allentown-Bethlehem-Easton, PA-NJ MSA		\$71,539	Median Housing Value			\$194,955
			Median Gross Rent			\$947
			Families Below Poverty Level			7.9%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$35,770 and moderate-income families earned at least \$35,770 to \$57,231 in the AA. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$894 for low-income borrowers and \$1,431 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment of a home at the median housing value would be \$1,047. Low-income borrowers would be challenged to afford a mortgage loan in this AA.

Information from Moody's Analytics indicated that at the end of the evaluation period, the Allentown Multistate MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Job growth accelerated during the second half of 2021, leisure and hospitality employment rose, supported by increased revenues at Wind Creek Casino. The housing market had cooled, with house price appreciation no longer accelerating, but hovered around the state average. The Allentown Multistate MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Professional and Business Services, Government, Manufacturing, Transportation/Utilities, and Leisure and Hospitality Services. Major employers in the Allentown Multistate MSA include Lehigh Valley Health Network, St Luke's University Health Network, and Sands Bethworks Gaming LLC. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Allentown Multistate MSA was 4.3 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by three local organizations that were contacted during the evaluation period and served the Allentown Multistate MSA. The organizations included two affordable housing organizations and one community action coalition that helped address the causes and conditions of poverty. The bank also provided an assessment of community needs based on research it completed in the AA.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Down payment and closing cost assistance
- Financial literacy
- Affordable housing and utility assistance
- Transitional housing
- Small business working capital assistance
- Workforce development

Opportunities for participation by financial institutions included the following:

- Lending and investment in affordable housing
- Funding and supporting community development services such as financial literacy

Scope of Evaluation in the Allentown Multistate MSA

During the evaluation period, the bank originated or purchased 4,367 home mortgage, small loans to businesses, and small loans to farms totaling \$547.1 million within the Allentown Multistate MSA. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within the AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. The OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE ALLENTOWN MULTISTATE MSA

LENDING TEST

The bank's performance under the Lending Test in the Allentown Multistate MSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Allentown MSA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Allentown MSA	8,684	5,673	55	23	14,435	100.0	100.0
Total	8,684	5,673	55	23	14,435	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Allentown MSA	1,735,445	139,723	993	24,340	1,900,501	100.0	100.0
Total	1,735,445	139,723	993	24,340	1,900,501	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

As of June 30, 2021, WFBNA had a deposit market share of 20.5 percent. The bank ranked first among 31 depository financial institutions placing it in the top 4 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 6.5 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked second among 623 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. The other top lenders in this AA based on market share were Rocket Mortgage (7.9 percent) and Cross Country Mortgage, LLC (3.2 percent).

According to peer small business data for 2021, WFBNA had a market share of 8.6 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked second out of 157 small business lenders, which placed it in the top 2 percent of lenders. The other top lenders in this AA based on market share were American Express National Bank (16.2 percent) and JPMorgan Chase Bank, N.A. (7.3 percent).

According to peer small farm data for 2021, WFBNA had a market share of 17.2 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked second out of 20 small farm lenders, which placed it in the top 10 percent of lenders. The other top lenders in this AA based on market share were JPMorgan Chase Bank, N.A. (19.5 percent) and U.S. Bank, N.A. (16.7 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O in the Allentown Multistate MSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans in low-income geographies was equal to both the percentage of owner-occupied housing units and the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was near to both the percentage of owner-occupied housing units and the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the Allentown Multistate MSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies was below the percentage of businesses in low-income geographies but it was equal to the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies approximated the percentage of businesses in moderate-income geographies and it exceeded the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the Allentown Multistate MSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was good.

The bank's percentage of small loans to farms in low-income geographies was equal to the percentage of farms in low-income geographies and it exceeded the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-income geographies was significantly below the percentage of farms in moderate-income geographies but it was near to the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the Allentown Multistate MSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and it was near to the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was near to both the percentage of moderate-income families and the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the Allentown Multistate MSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 25.3 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the Allentown Multistate MSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was poor.

The bank did not collect or consider the GAR in the underwriting of approximately 60 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below both the percentage of farms in the AA with GAR of \$1 million or less and the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Community Development Lending

The bank made an adequate level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

WFBNA made 23 CD loans totaling \$24.3 million, which represented 4.1 percent of allocated tier 1 capital. By dollar volume, 60.8 percent of CD loans funded economic development, 37 percent funded community services, 1.5 percent funded affordable housing, and 0.6 percent funded revitalization and stabilization. The following are examples of CD loans made in this AA:

- WFBNA financed a \$1.1 million SBA 504 bridge loan and a \$1.1 million SBA 504 term loan to expand a daycare. The daycare accommodated up to 181 children and participated in a federal and state subsidized childcare program to help low-income families pay for childcare.
- WFBNA annually renewed a \$2 million line of credit (total funding of \$6 million) to a nonprofit organization and its subsidiary. The organization provided educational resources to small business entrepreneurs, promoted neighborhood revitalization, and supported families transitioning from shelter to stable housing throughout Lehigh Valley.

Product Innovation and Flexibility

WFBNA used flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 1,014 loans under its flexible lending programs totaling \$56.3 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	104	21,700
Dream. Plan. Home.	18	2,700
PPP	919	31,900
Total	1,014	56,300

INVESTMENT TEST

The bank's performance under the Investment Test in the Allentown Multistate MSA is rated Needs to Improve.

Based on a full-scope review, the bank's performance in the Allentown MSA was poor.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Allentown MSA	21	3,312	68	6,156	89	100.0	9,468	100.0	1	170
Total	21	3,312	68	6,156	89	100.0	9,468	100.0	1	170
* '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 tracked and recorded by the institution's financial reporting system. Due to rounding, totals may not equal 100.0%										

The bank had a poor level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$9.5 million and represented 1.6 percent of the bank's tier 1 capital allocated to the AA. The investments also included 64 grants and donations totaling \$670,000 to a variety of organizations that primarily supported affordable housing, economic development, and community services targeted to low- and moderate-income individuals.

The bank exhibited adequate responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 38.2 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 36 percent that focused on community services targeted to low- and moderate-income individuals, and 25.9 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 104 units of affordable housing in the AA.

The bank rarely used innovative and complex investments to support CD initiatives. The following are examples of CD investments made in this AA:

- WFBNA provided four grants totaling more than \$52,000 to support new home construction and rehabilitation of existing homes. The organization built affordable housing for low-income families and provided zero interest rate mortgages. These grants responded to an identified need for affordable housing.
- WFBNA provided 10 grants totaling \$115,000 to support financial education, employment referral, and food distribution programs. The organization provided educational resources to small business entrepreneurs, promoted neighborhood revitalization, and supported families transitioning from shelter to stable housing throughout Lehigh Valley, and its subsidiary focused on the city of Allentown.

SERVICE TEST

The bank's performance under the Service Test in the Allentown Multistate MSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Allentown MSA was excellent.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Allentown MSA	100.0	32	15.0	9.4	15.6	56.3	18.8	7.6	19.1	40.5	32.8
Total	100.0	32	15.0	9.4	15.6	56.3	18.8	7.6	19.1	40.5	32.8
Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Allentown MSA	0	8	0	-2	-3	-3
Total	0	8	0	-2	-3	-3

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Allentown MSA. WFBNA operated 32 branches in the AA, comprising three branches in low-income geographies, five branches in moderate-income geographies, 18 branches in middle-income geographies, and six branches in upper-income geographies. The distribution of branches in low-income geographies exceeded the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies was near to the distribution of the population in moderate-income geographies. The distribution was augmented by four branches in middle- and upper-income geographies that were within close proximity and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations. Despite the closures, its service delivery systems remained readily accessible.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 12:00 p.m. Monday through Friday. Of the 28 branches opened on Saturdays, two were located in low-income geographies and three were located in moderate-income geographies.

Community Development Services

WFBNA provided a relatively high level of CD services in the Allentown Multistate MSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 117 CD service activities to 19 organizations during the evaluation period, logging a total of 263 qualified hours within this AA. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families; however, the bank also provided service hours for organizations that provided affordable housing, economic development, and revitalization and stabilization to low- and moderate-income individuals and families. The bank's assistance provided was responsive to the identified needs in the AA. The following are examples of CD services provided in this AA:

- WFBNA employees helped an organization that provided educational resources to small business entrepreneurs, promoted neighborhood revitalization, and supported families transitioning from shelter to stable housing throughout Lehigh Valley, and its subsidiary focused on the city of Allentown. Bank employees provided 68 community service hours teaching financial education to the organization's clients in transitional housing. The bank had demonstrated active involvement, evidenced by its long-term working relationship with this organization, dating back to 2013. The CD service was responsive to the identified need for access to nutritional resources, small business growth, transitional housing, and homebuyer assistance.
- A WFBNA employee provided 20 hours of financial education to a school where 78.6 percent of students qualified for the federal free- and reduced-lunch (FRL) program which served the needs of low- and moderate-income individuals and families. The CD service was responsive to the identified need for financial education.

Augusta-Richmond County, GA-SC MSA (Augusta Multistate MSA)

CRA rating for the Augusta Multistate MSA⁷: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Needs to Improve

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AA.
- The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank made an adequate level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.
- The bank had a poor level of qualified CD investments and grants and not in a leadership position. The bank exhibited adequate responsiveness to credit and community economic development needs. The bank rarely used innovative or complex investments to support CD initiatives.
- Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AA.
- The bank provided a limited level of CD services.

Description of Institution's Operations in the Augusta Multistate MSA

The Augusta Multistate MSA was the bank's 35th largest rating area based on its total deposits in the rating area. As of June 30, 2021, the bank maintained more than \$2.4 billion or 0.2 percent of its total domestic deposits in branches in the rating area. Of the 21 depository financial institutions operating in the rating area, the bank, with a deposit market share of 21.5 percent, was the largest. Other top depository financial institutions operating in this rating area based on market share were South State Bank, N.A. (14.1 percent), Bank of America, N.A. (11.7 percent), and Queensborough National Bank & Trust (9.1 percent). As of December 31, 2021, the bank operated nine branches and 45 ATMs in this rating area. WFBNA delineated one AA within the Augusta Multistate MSA and includes the Augusta-Richmond County, GA-SC MSA. The AA met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

The following table provides a summary of the demographics, including housing and business information for the Augusta Multistate MSA.

⁷ This rating only reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Augusta Multistate MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	119	9.2	31.9	36.1	21.8	0.8
Population by Geography	580,178	6.6	27.9	37.8	27.6	0.0
Housing Units by Geography	247,354	7.0	29.6	36.4	27.0	0.0
Owner-Occupied Units by Geography	141,106	3.7	25.9	38.3	32.1	0.0
Occupied Rental Units by Geography	68,566	12.7	34.9	33.3	19.1	0.0
Vacant Units by Geography	37,682	8.9	33.9	34.9	22.4	0.0
Businesses by Geography	48,952	7.0	24.0	32.3	36.6	0.0
Farms by Geography	1,677	4.1	30.4	37.1	28.4	0.0
Family Distribution by Income Level	142,657	24.6	16.2	17.9	41.4	0.0
Household Distribution by Income Level	209,672	25.9	15.0	16.4	42.7	0.0
Median Family Income MSA - 12260 Augusta-Richmond County, GA-SC MSA		\$58,059	Median Housing Value			\$129,179
			Median Gross Rent			\$783
			Families Below Poverty Level			15.2%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$29,030 and moderate-income families earned at least \$29,030 to \$46,447 in the AA. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$726 for low-income borrowers and \$1,161 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$693. Low- and moderate-income borrowers could afford a mortgage loan for a median-priced home in this AA.

Information from Moody's Analytics indicated that at the end of the evaluation period, the Augusta Multistate MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Overall, about four-fifths of the jobs lost during the crisis had returned. The area had a large public sector, supplying nearly one-fifth of all jobs. The housing market was undervalued and more affordable than average. The Augusta Multistate MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Government, Education and Health Services, Professional and Business Services, Retail Trade, Leisure and Hospitality Services, and Manufacturing. Major employers in the Augusta Multistate MSA include U.S. Army Cyber Center of Excellence & Fort Gordon, Augusta University, and Augusta University Hospitals. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Augusta Multistate MSA was 3.2 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by three local organizations that were contacted during the evaluation period and served the Augusta Multistate MSA. The organizations include one affordable housing organization and two economic development organizations that assist attract and retain businesses in the area. The bank also provided an assessment of community needs based on research it completed in the AA. A review of community contacts and the bank's needs assessment indicate that the following are identified needs within the community:

- Rental assistance
- Rehabilitation of housing units/improvement of quality housing stock
- Construction of affordable housing units
- Financial literacy
- Transitional housing
- Workforce development
- Working capital financing for small businesses

Opportunities for participation by financial institutions included the following:

- Lending and investment in affordable housing
- Funding and supporting community development services such as financial literacy
- Department of Housing and Urban Development's HOME Investment Partnership Program

Scope of Evaluation in the Augusta Multistate MSA

During the evaluation period, the bank originated or purchased 7,436 home mortgage, small loans to businesses, and small loans to farms totaling \$885.6 million within the Augusta Multistate MSA. The bank's primary loan products in the rating area were small loans to businesses and home mortgage loans. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within the AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. The OCC placed more weight based on the number of loans on small loans to businesses versus home mortgage loans and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE AUGUSTA MULTISTATE MSA

LENDING TEST

The bank's performance under the Lending Test in the Augusta Multistate MSA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the Augusta MSA was good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Augusta MSA	4,518	2,830	88	11	7,447	100.0	100.0
Total	4,518	2,830	88	11	7,447	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Augusta MSA	805,774	76,648	3,217	14,206	899,845	100.0	100.0
Total	805,774	76,648	3,217	14,206	899,845	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

As of June 30, 2021, WFBNA had a deposit market share of 21.5 percent. The bank ranked first among 21 depository financial institutions placing it in the top 4 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 4 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked fourth among 521 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. Other top lenders in this AA based on market share were Rocket Mortgage (7.2 percent), PennyMac Loan Services, LLC (5.7 percent), and Queensborough National Bank (4.4 percent).

According to peer small business data for 2021, WFBNA had a market share of 8.8 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked third out of 119 small business lenders, which placed it in the top 3 percent of lenders. Other top lenders in this AA based on market share were American Express National Bank (19.7 percent) and Bank of America, N.A. (9.4 percent).

According to peer small farm data for 2021, WFBNA had a market share of 19.8 percent based on the number of small loans to farms originated or purchased. The bank ranked second out of 17 small farm lenders, which placed it in the top 12 percent of lenders in this AA. Other top lenders in this AA based on market share were John Deere Financial, FSB (20.9 percent) and JPMorgan Chase Bank, N.A. (12.2 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O in the Augusta Multistate MSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentages of home mortgage loans in low- and moderate-income geographies were well below the percentages of owner-occupied housing units in low- and moderate-income geographies but they exceeded the aggregate distributions of home mortgage loans in low- and moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the Augusta Multistate MSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentages of small loans to businesses in low- and moderate-income geographies were below the percentages of businesses in low- and moderate-income geographies and they were near to the aggregate distributions of small loans to businesses in low- and moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the Augusta Multistate MSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was good.

The bank did not originate or purchase any small loans to farms in low-income geographies. However, performance in low-income geographies was consistent with aggregate lenders. The bank's percentage of small loans to farms in moderate-income geographies exceeded the percentage of farms in moderate-income geographies and it was near to the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the Augusta Multistate MSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but it was near to the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was below both the percentage of moderate-income families and the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the Augusta Multistate MSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 26.4 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the Augusta MSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was poor.

The bank did not collect or consider the GAR in the underwriting of approximately 79.5 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was significantly below the percentage of farms in the AA with GAR of \$1 million or less and it was well below the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Community Development Lending

The bank made an adequate level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

WFBNA made 11 CD loans totaling \$14.2 million, which represented 4.5 percent of allocated tier 1 capital. By dollar volume, 99.4 percent of CD loans funded affordable housing, 0.5 percent funded revitalization and stabilization, and less than 1 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$9.5 million loan to refinance a multifamily housing development. This 160-unit housing development, originally constructed in 1984, consisted of 138 units with 76.9 percent of the actual rent rates below the HUD 2018 Fair Market Rent for the area.
- WFBNA provided a \$4.6 million loan extension for a multifamily housing development. This development was located in a moderate-income census tract in Augusta, Georgia and consisted of 131 units with 98 percent of the units affordable to tenants earning up to 80 percent of the AMI.

Product Innovation and Flexibility

WFBNA used flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 512 loans under its flexible lending programs totaling \$36.2 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	104	18,900
Dream. Plan. Home.	12	1,600
PPP	396	15,700
Total	512	36,200

INVESTMENT TEST

The bank's performance under the Investment Test in the Augusta Multistate MSA is rated Needs to Improve.

Based on a full-scope review, the bank's performance in the Augusta MSA was poor.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Augusta MSA	27	1,721	37	3,938	64	100.0	5,659	100.0	1	29
Total	27	1,721	37	3,938	64	100.0	5,659	100.0	1	29
* '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 tracked and recorded by the institution's financial reporting system. Due to rounding, totals may not equal 100.0%										

The bank had a poor level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$5.7 million and represented 1.8 percent of the bank's tier 1 capital allocated to the AA. The investments also included 33 grants and donations totaling \$518,000 to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited adequate responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 60.9 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 17.2 percent that focused on community services targeted to low- and moderate-income individuals and 21.9 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 177 units of affordable housing in the AA.

The bank rarely used innovative and complex investments to support CD initiatives. The following are examples of CD investments made in this AA:

- WFBNA provided a \$250,000 grant to rehabilitate four homes to be sold to low- and moderate-income individuals and provide homebuyer education workshops and pre-purchase counseling. The organization provided resources to area residents including Head Start, energy assistance, homeownership preservation, and homebuyer workshops. During the evaluation period, the bank also provided the organization with three additional grants totaling \$42,500. These funds supported the organization's financial education and housing counseling programs.
- WFBNA invested \$2.8 million in a FHLMC multifamily security. This underlying mortgage was made to a mobile home community located in Grovetown, Georgia, with 121 units restricted to tenants earning less than 80 percent of the area median family income.

SERVICE TEST

The bank's performance under the Service Test in the Augusta Multistate MSA is rated Low Satisfactory.

Based on a full-scope review, the bank's performance in the Augusta MSA was adequate.

Retail Banking Services

Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Augusta MSA	100.0	12	11.4	0.0	25.0	25.0	50.0	6.6	27.9	37.8	27.6
Total	100.0	12	11.4	0.0	25.0	25.0	50.0	6.6	27.9	37.8	27.6
Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Augusta MSA	0	5	0	-2	-1	-2
Total	0	5	0	-2	-1	-2

WFBNA's service delivery systems were accessible to geographies and individuals of different income levels in the Augusta MSA. WFBNA operated 12 branches in the AA, comprising no branches in low-income geographies, three branches in moderate-income geographies, three branches in middle-income geographies, and six branches in upper-income geographies. The distribution of branches in low-income geographies was significantly below the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies approximated the distribution of the population in moderate-income geographies. The distribution was augmented by two branches in middle- and upper-income geographies that were within close proximity to serve low-income areas and one branch in middle- and upper-income geographies that were within close proximity and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches had adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed two branches in moderate-income geographies primarily due to low customer traffic, poor operating performance, or to reduce redundancy.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were

opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the seven branches opened on Saturdays, two were located in moderate-income geographies.

Community Development Services

WFBNA provided a limited level of CD services in the Augusta Multistate MSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 19 CD service activities during the evaluation period. All of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The bank's assistance provided was responsive to the identified needs in the AA. The following are examples of CD services provided in this AA:

- WFBNA employees provided 44 hours conducting financial education training to 2,072 students in various schools within the AA. This activity was responsive to the identified need for community services as a substantial majority of the students who attended these schools qualified for the federal free or reduced lunch program.
- WFBNA employees provided 14 hours of tax preparation services through the VITA Program during the 2019 tax season that benefited low- and moderate-income individuals and families. VITA sites were usually located at community and neighborhood centers, libraries, schools, shopping malls, and other convenient locations and the Program offered free tax help to low- and moderate-income families who needed assistance in preparing their tax returns. IRS-certified bank volunteers provided free basic income tax return preparation with electronic filing to qualified individuals in local communities. Volunteers educated taxpayers about special tax credits for which they could qualify, including the Earned Income Tax Credit, Child Tax Credit, and Credit for the Elderly or the Disabled.

Charlotte-Concord, NC-SC CSA (Charlotte Multistate CSA)

CRA rating for the Charlotte Multistate CSA⁸: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited an adequate geographic distribution of loans in its AA.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments and grants, often in a leadership position. The bank exhibited excellent responsiveness to credit and community economic development needs. The bank occasionally used innovative or complex investments to support CD initiatives.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.
- The bank provided a relatively high level of CD services.

Description of Institution's Operations in Charlotte Multistate CSA

The Charlotte Multistate CSA was the bank's 10th largest rating area based on its total deposits in the rating area. As of June 30, 2021, the bank maintained approximately \$44.2 billion or 3 percent of its total domestic deposits in branches in the rating area; however, \$32.1 billion originated from non-retail depositors outside of the rating area. The OCC considered these non-local deposits as performance context when arriving at conclusions for community development lending and qualified investments. Of the 47 depository financial institutions operating in the rating area, Wells Fargo Bank, N.A., with a deposit market share of 13.9 percent, was the third largest. Other top depository financial institutions in this AA based on market share were Bank of America, N.A. (61.2 percent) and Truist Bank (16.3 percent). As of December 31, 2021, the bank operated 80 branches and 268 ATMs in this rating area. WFBNA delineated three AAs within the Charlotte Multistate CSA and includes the Albemarle, NC Micro Area, Charlotte-Concord-Gastonia, NC-SC MSA (Charlotte MSA), and Shelby, NC Micro Area. The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. The OCC combined, analyzed, and presented the AAs at the CSA level for purposes of this evaluation. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

The following table provides a summary of the demographics, including housing and business information for the Charlotte Multistate CSA.

⁸ This rating only reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Charlotte Multistate CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	580	7.8	26.9	34.7	29.8	0.9
Population by Geography	2,522,691	6.4	25.2	36.1	32.1	0.3
Housing Units by Geography	1,044,029	6.6	25.8	36.5	31.1	0.1
Owner-Occupied Units by Geography	621,850	2.9	21.1	39.5	36.6	0.0
Occupied Rental Units by Geography	320,300	12.8	33.1	30.9	23.1	0.1
Vacant Units by Geography	101,879	9.7	31.7	35.9	22.6	0.1
Businesses by Geography	268,592	6.3	19.7	30.3	43.1	0.6
Farms by Geography	6,698	3.6	19.5	45.8	30.9	0.2
Family Distribution by Income Level	636,607	22.6	17.2	18.9	41.4	0.0
Household Distribution by Income Level	942,150	23.9	16.2	17.5	42.4	0.0
Median Family Income MSA - 16740 Charlotte-Concord-Gastonia, NC-SC MSA		\$64,187	Median Housing Value			\$178,086
Median Family Income Non-MSAs - NC		\$47,217	Median Gross Rent			\$867
			Families Below Poverty Level			11.6%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$23,609 to \$32,094 and moderate-income families earned at least \$23,609 to \$32,094 and less than \$37,774 to \$51,350 in the AA, depending on the metropolitan or non-metropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$590 to \$802 for low-income borrowers and ranging from \$944 to \$1,284 for moderate-income borrowers in the AA. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the media housing value would be \$956. Low- and moderate-income families in the non-metropolitan areas would be challenged to afford a mortgage loan for a median-priced home in this AA.

Charlotte MSA

Information from Moody's Analytics indicated that at the end of the evaluation period, the Charlotte MSA's economy was recovering ahead of the state and national level. Recovery in construction, logistics, finance, and insurance industries contributed to the increased payrolls. The strong labor market was increasing the demand for housing. The housing prices were exceeding previous highs and continued to increase despite a peak in the national house price growth. The Charlotte MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Professional and Business Services, Government, Retail Trade, Education and Health Services, Leisure and Hospitality Services, and Financial Activities. Major employers in the Charlotte MSA include Atrium

Health, Wells Fargo Bank, N.A., and Walmart. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Charlotte MSA was 4.6 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Charlotte Multistate CSA. The organizations included one community development organization that revitalize existing housing stock and one organization assist with economic development and affordable housing project. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing units
- Single-family affordable housing
- Rental assistance
- Rehabilitation of housing units/improvement of the quality of housing stock
- Workforce development
- Financial literacy

Opportunities for participation by financial institutions included the following:

- Home-ownership counseling
- Closing cost assistance
- Affordable home mortgage loans

Scope of Evaluation in the Charlotte Multistate CSA

During the evaluation period, the bank originated or purchased 59,306 home mortgage loans, small loans to businesses, and small loans to farms totaling \$10.7 billion in the Charlotte Multistate CSA. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within the AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. The OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CHARLOTTE MULTISTATE CSA

LENDING TEST

The bank's performance under the Lending Test in the Charlotte Multistate CSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Charlotte CSA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Charlotte CSA	33,478	25,534	294	31	59,337	100.0	100.0
Total	33,478	25,534	294	31	59,337	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Charlotte CSA	9,995,224	715,540	8,129	137,355	10,856,248	100.0	100.0
Total	9,995,224	715,540	8,129	137,355	10,856,248	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

As of June 30, 2021, WFBNA had a deposit market share of 13.9 percent. The bank ranked third among 47 depository financial institutions placing it in the top 7 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 5.2 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked second among 882 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. Other top lenders in this AA based on market share were Rocket Mortgage (9.1 percent) and Movement Mortgage, LLC (4.8 percent).

According to peer small business data for 2021, WFBNA had a market share of 9.3 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked third out of 231 small business lenders, which placed it in the top 2 percent of lenders. Other top lenders in this AA based on market share were American Express National Bank (16.2 percent) and Bank of America, N.A. (12.1 percent).

According to peer small farm data for 2021, WFBNA had a market share of 15.1 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked second out of 31 small farm lenders, which placed it in the top 7 percent of lenders. Other top lenders in this AA based on market share were John Deere Financial, FSB (18.7 percent) and First Citizens Bank & Trust (12.6 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AA. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O in the Charlotte Multistate CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans in low-income geographies was below both the percentage of owner-occupied housing units and the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was well below the percentage of owner-occupied housing units in moderate-income geographies and it was below the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the Charlotte Multistate CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

The bank's percentages of small loans to businesses in low- and moderate-income geographies were below both the percentages of businesses and the aggregate distributions of small loans to businesses in low- and moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the Charlotte Multistate CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was good.

The bank's percentage of small loans to farms in low-income geographies was significantly below the percentage of farms in low-income geographies but it exceeded the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-income geographies exceeded both the percentage of farms and the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the Charlotte Multistate CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but it was near to the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families and it was near to the aggregate distribution of home mortgage loans to moderate-income families by all lenders. Consideration was given to homeownership affordability challenges especially for low-income borrowers. The OCC placed more weight on the bank's performance against aggregate lenders in lending to low-income borrowers.

Small Loans to Businesses

Refer to Table R in the Charlotte Multistate CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 26.9 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the Charlotte Multistate CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was poor.

The bank did not collect or consider the GAR in the underwriting of approximately 73.1 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was significantly below the percentage of farms in the AA with

GAR of \$1 million or less and it was well below the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

WFBNA made 31 CD loans totaling approximately \$137.4 million, which represented 8.7 percent of the allocated tier 1 capital when considering the volume of deposits that originated outside of the AA. CD loans were primarily made for affordable housing purposes. By dollar volume, 96.9 percent of these loans funded affordable housing that provided 1,314 units of affordable housing, 1.1 percent funded revitalization and stabilization efforts, and 2 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$13.5 million loan followed in April 2020 by a \$7.2 million bridge loan to acquire and rehabilitate an affordable housing development in Charlotte, North Carolina. The 99-unit development was restricted to tenants earning up to 80 percent of the AMI. The development also upgraded five units for mobility impaired individuals.
- WFBNA provided a \$15 million construction loan to finance an affordable housing development. This 78-unit development in Charlotte, North Carolina was restricted to tenants earning up to 80 percent of the AMI. This activity was complex due to the multiple funding sources that included the city of Charlotte, Mecklenburg County, and the North Carolina Workforce Housing Loan Program.

Product Innovation and Flexibility

WFBNA made extensive use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 5,436 loans under its flexible lending programs totaling \$403.8 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	845	217,500
Dream. Plan. Home.	114	20,100
PPP	4,477	166,200
Total	5,436	403,800

INVESTMENT TEST

The bank's performance under the Investment Test in the Charlotte Multistate CSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Charlotte CSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Charlotte CSA	113	33,113	370	198,435	483	100.0	231,547	100.0	14	16,542
Total	113	33,113	370	198,435	483	100.0	231,547	100.0	14	16,542
* '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 tracked and recorded by the institution's financial reporting system. Due to rounding, totals may not equal 100.0%										

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$231.5 million and represented 14.6 percent of the bank's tier 1 capital allocated to the AA when considering the volume of deposits that originated outside of the AA. The investments also included 353 grants and donations totaling \$31.6 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 37.5 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 54.5 percent that focused on community services targeted to low- and moderate-income individuals, and 8.1 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 2,984 units of affordable housing in the AA.

The bank occasionally used innovative and complex investments to support CD initiatives. Approximately 17.4 percent of current period investments were complex LIHTC and NMTC investments. The following are examples of CD investments made in this AA:

- WFBNA provided a \$20 million grant through the Open for Business fund to a nonprofit in Charlotte, North Carolina. The organization worked with individuals, nonprofits, and companies to revitalize communities and drive civic engagement. The bank's investment through the Open for Business Fund enabled the organization to create multiple grant programs that helped diverse small business owners in the Charlotte-Mecklenburg area purchase assets, including inventory, specialty equipment or new office space. The organization prioritized providing grants to businesses in Charlotte's Corridors of Opportunity, a city initiative encouraging investment and neighborhood revitalization within specific Charlotte neighborhoods. During the evaluation period, the bank provided five additional grants totaling \$250,000 to support the organization's operations and financial education programs.
- WFBNA made a \$9.5 million NMTC investment to finance the expansion of a nonprofit community facility in Concord, North Carolina. The nonprofit, an affiliate of a national organization, provided after-school and summer academic and recreational programs for low-income children, with 76 percent of the students participating in the Free and Reduced Lunch program. The facility was

located in a severely distressed census tract and qualified Opportunity Zone. This project created 26 full-time and retained 37 full-time jobs.

- WFBNA made a \$9.6 million LIHTC investment to finance an affordable housing development. This 78-unit development in Charlotte, North Carolina was restricted to tenants earning up to 80 percent of the AMI. The development was adjacent to a bus stop and within 1.5 miles of a pharmacy, grocery store, park, and library. This activity was complex due to the inherent nature of LIHTC transactions and the multiple funding sources including the city of Charlotte, Mecklenburg County, and the North Carolina Workforce Housing Loan Program.

SERVICE TEST

The bank's performance under the Service Test in the Charlotte Multistate CSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Charlotte CSA was excellent.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Charlotte CSA	100.0	80	13.8	11.3	23.8	25.0	37.5	6.4	25.2	36.1	32.1
Total	100.0	80	13.8	11.3	23.8	25.0	37.5	6.4	25.2	36.1	32.1
Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Charlotte CSA	1	9	0	-4	-1	-3
Total	1	9	0	-4	-1	-3

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Charlotte CSA. WFBNA operated 80 branches in the AA, comprising nine branches in low-income geographies, 19 branches in moderate-income geographies, 20 branches in middle-income geographies, 30 branches in upper-income geographies, and two branches in geographies without an income designation. The distribution of branches in low-income geographies exceeded the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies approximated the distribution of the population in moderate-income geographies. The distribution was augmented by four branches in middle- and upper-income geographies that were within close proximity and served low-income areas and six branches in middle- and upper-income

geographies that were within close proximity to and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations. Despite the closures, its service delivery systems remained readily accessible.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the 25 branches opened on Saturdays, seven were located in low-income geographies and six were located in moderate-income geographies.

Community Development Services

WFBNA provided a relatively high level of CD services in the Charlotte Multistate CSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 203 CD service activities during the evaluation period. A majority (89 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The other CD services were targeted to affordable housing (10 percent). The bank's assistance provided was responsive to the identified needs in the AA. The following are examples of CD services provided in this AA:

- WFBNA employees provided 173 hours of technical expertise for an organization that pursued justice for people who could not afford legal services and served over 5,000 individuals annually. The organization accomplished its mission via pro bono attorneys and through a variety of individual- and community-based advocacy strategies, such as community education and outreach, and consultation and representation of low- and moderate-income individuals and groups. This activity was responsive to the identified need for community services for low- and moderate-income and underserved communities within the AA because without representation, these individuals could lose financial security.
- WFBNA team members provided 37 hours of financial expertise to an organization that helped more low- and moderate-income and minority students attend and graduate from college. The organization's mission included providing financial assistance to these students, raising operating funds for member colleges and universities, and increasing access to technology for students and faculty at historically HBCUS. This activity was responsive to the identified need of community services within the AA.
- WFBNA employees responded to the identified needs for financial education and mental health services by helping an organization that provided early childhood and family stability, and trauma-

informed and evidence-based mental health services for low- and moderate-income and underserved communities across the AA. Among other services, the organization offered an enhanced residential treatment center, crisis stabilization programs, teen unit case management, and therapeutic foster care services. The employees provided 22 hours of technical expertise for this organization.

Columbus-Auburn-Opelika, GA-AL CSA (Columbus Multistate CSA)

CRA rating for the Multistate CSA⁹: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Needs to Improve

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AA.
- The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank made a relatively high level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.
- The bank had a poor level of qualified CD investments and grants and not in a leadership position. The bank exhibited poor responsiveness to credit and community economic development needs. The bank did not use innovative or complex investments to support CD initiatives.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.
- The bank provided a low level of CD services.

Description of Institution's Operations in the Columbus Multistate CSA

The Columbus Multistate CSA was the bank's 38th largest rating area based on its total deposits in the rating area. As of June 30, 2021, the bank maintained approximately \$1.4 billion or 0.1 percent of its total domestic deposits in branches within the rating area. Of the 29 depository financial institutions operating in the rating area, WFBNA, with a deposit market share of 9.6 percent, was the third largest. Other top depository financial institutions in this rating area based on market share were Synovus Bank (34.1 percent), Truist Bank (21.3 percent), and Auburn Bank (5.9 percent). As of December 31, 2021, the bank operated 11 branches and 29 ATMs in the rating area. The bank delineated the entire Multistate CSA as its AA. The AA met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries. WFBNA delineated two AAs within the Columbus Multistate CSA and includes the Auburn-Opelika, AL MSA (Auburn MSA) and Columbus, GA-AL MSA (Columbus MSA). The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. The OCC combined, analyzed, and presented the AAs at the CSA level for purposes of this evaluation. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

The following table provides a summary of the demographics, including housing and business information for the Columbus Multistate CSA.

⁹ This rating only reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Columbus Multistate CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	110	11.8	28.2	40.0	17.3	2.7
Population by Geography	475,356	6.4	25.2	43.2	23.9	1.3
Housing Units by Geography	201,627	7.2	26.0	42.1	23.4	1.2
Owner-Occupied Units by Geography	98,916	3.0	21.0	45.0	30.9	0.2
Occupied Rental Units by Geography	74,876	11.9	30.5	39.7	15.9	2.1
Vacant Units by Geography	27,835	9.6	31.8	38.3	17.5	2.8
Businesses by Geography	36,580	6.1	24.4	39.5	29.5	0.5
Farms by Geography	1,034	3.1	20.2	44.1	32.4	0.2
Family Distribution by Income Level	112,445	23.4	17.1	18.3	41.2	0.0
Household Distribution by Income Level	173,792	26.1	14.9	16.2	42.8	0.0
Median Family Income MSA - 12220 Auburn-Opelika, AL MSA		\$61,141	Median Housing Value			\$137,160
Median Family Income MSA - 17980 Columbus, GA-AL MSA		\$52,902	Median Gross Rent			\$810
			Families Below Poverty Level			14.8%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$26,451 to \$30,571 and moderate-income families earned at least \$26,451 to \$30,571 and less than \$42,322 to \$48,913, depending on the metropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$661 to \$764 for low-income borrowers and ranging from \$1,058 to \$1,223 for moderate-income borrowers, depending on the metropolitan area. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$736. Low-income borrowers in the Columbus MSA would be challenged to afford a mortgage loan for a median-priced home in this AA.

Columbus MSA

Information from Moody's Analytics indicated that at the end of the evaluation period, the Columbus MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Columbus MSA's weaknesses included job losses and industrial structures that left the economy susceptible to business cycle downturns. Automakers, such as Kia, had plans to increase production but were impacted by the computer chip shortage. The textile industry struggled to compete with larger producers in China, Bangladesh, Vietnam, and Egypt. The area's job recovery lagged the U.S. and younger educated workers tended to leave the area. The Columbus MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Government, Education and Health Services, Professional and Business Services, Leisure and Hospitality Services, Financial

Activities, and Retail Trade. Major employers in the Columbus MSA include Fort Benning, TSYS, and Aflac. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Columbus MSA was 3.8 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by four local organizations that were contacted during the evaluation period and served the Columbus Multistate CSA. The organizations included three community development organizations that provided assistance with economic development and one organization that focuses on providing essential services to low- and moderate-income individuals. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Construction of affordable rental housing units
- Development of single-family affordable housing
- Financial literacy
- Access to flexible, affordable home loan products, down payment assistance and closing cost programs
- Workforce development

Opportunities for participation by financial institutions included the following:

- Small business lending
- Various state and local government partnership opportunities

Scope of Evaluation in the Columbus Multistate CSA

During the evaluation period, the bank originated or purchased 5,283 home mortgage loans, small loans to businesses, and small loans to farms totaling \$651.2 million in the Columbus Multistate CSA. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within the AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. The OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE COLUMBUS MULTISTATE CSA

LENDING TEST

The bank's performance under the Lending Test in the Columbus Multistate CSA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the Columbus CSA was good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Columbus CSA	2,932	2,312	39	10	5,293	100.0	100.0
Total	2,932	2,312	39	10	5,293	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Columbus CSA	594,032	54,945	2,179	9,303	660,459	100.0	100.0
Total	594,032	54,945	2,179	9,303	660,459	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

As of June 30, 2021, WFBNA had a deposit market share of 9.6 percent. The bank ranked third among 29 depository financial institutions placing it in the top 11 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 3.5 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked sixth among 462 home mortgage lenders in the AA, which placed it in the top 2 percent of lenders. Other top lenders in this AA based on market share were Rocket Mortgage (7.3 percent), PennyMac Loan Services LLC (7 percent), and Synovus Bank (5.4 percent).

According to peer small business data for 2021, WFBNA had a market share of 8.4 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked third out of 118 small business lenders, which placed it in the top 3 percent of lenders. Other top lenders in this AA based on market share were American Express National Bank (17.2 percent) and Synovus Bank (9.4 percent).

According to peer small farm data for 2021, WFBNA had a market share of 14.9 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked second out of 20 small farm lenders, which placed it in the top 10 percent of lenders. The top lenders in this AA were John Deere Financial, FSB (18.8 percent) and Trustmark National Bank (12.9 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O in the Columbus Multistate CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was significantly below the percentage of owner-occupied housing units in low-income geographies but it was equal to the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied housing units in moderate-income geographies but it exceeded the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the Columbus Multistate CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was below the percentage of businesses in low-income geographies but it approximated the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in moderate-income geographies and the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the Columbus Multistate CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was excellent.

The bank's percentage of small loans to farms in low-income geographies exceeded both the percentage of farms in low-income geographies and the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-income geographies was near to the percentage of farms in moderate-income geographies and it approximated the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the Columbus Multistate CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was poor.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and it was below the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was significantly below the percentage of moderate-income families and it was well below the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the Columbus Multistate CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 26.6 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with gross annual revenues of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the Columbus Multistate CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was adequate.

The bank did not collect or consider the GAR in the underwriting of approximately 51.3 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below the percentage of farms in the AA with gross annual revenues of \$1 million or less but it was near to the aggregate distribution of small loans to farms with gross annual revenues of \$1 million or less by all lenders.

Community Development Lending

The bank made a relatively high level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

WFBNA made 10 CD loans totaling approximately \$9.3 million, which represented 5.2 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing, revitalization and stabilization, and community service purposes. By dollar volume, 99.5 percent of these loans funded affordable housing that provided 165 units of affordable housing, less than 1 percent funded revitalization and stabilization efforts, and less than 1 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA granted an extension of a \$4.6 million construction loan originally provided in 2018. This 82-unit LIHTC development in Phenix City, Alabama, restricted all units to tenants earning 60 percent or less of AMI. Five units were configured to Americans with Disabilities Act (ADA) compliance. The development was part of a larger initiative to replace over 300 public housing units in Phenix City. This activity was complex due to the inherent nature of LIHTC transactions and the multiple funding sources, including the Phenix City Housing Authority.
- WFBNA provided a \$10 million term loan to a national organization with \$12,863 allocated to the Columbus CSA. The organization bridged the gap between private capital markets and low-income neighborhoods by investing capital and providing technical assistance for affordable housing, childcare, education, and other community development needs.

Product Innovation and Flexibility

WFBNA used flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 466 loans under its flexible lending programs totaling \$23.8 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	72	11,600
Dream. Plan. Home.	9	1,100
PPP	385	11,100
Total	466	23,800

INVESTMENT TEST

The bank's performance under the Investment Test in the Columbus Multistate CSA is rated Needs to Improve.

Based on a full-scope review, the bank's performance in the Columbus CSA was poor.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Columbus CSA	6	167	36	776	42	100.0	943	100.0	0	0
Total	6	167	36	776	42	100.0	943	100.0	0	0
* '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 tracked and recorded by the institution's financial reporting system. Due to rounding, totals may not equal 100.0%										

The bank had a poor level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$943,000 and represented 0.5 percent of the bank's tier 1 capital allocated to the AA. The investments also included 33 grants and donations totaling \$498,000 to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited poor responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 50 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 42.9 percent that focused on community services targeted to low- and moderate-income individuals, and 7.1 percent that focused on revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain seven units of affordable housing in the AA.

The bank did not use innovative or complex investments to support CD initiatives. The following are examples of CD investments made in this AA:

- WFBNA provided four grants totaling \$55,000 to a nonprofit organization in Columbus, Georgia. The organization was a CDFI, a HUD certified housing counseling organization, and a Community Housing Development Organization that developed affordable housing and provided financial education. The grants responded to an identified need for homebuyer education.
- WFBNA provided three grants totaling \$160,000 to a nonprofit organization that provided housing to veterans. The grants supported the construction of new homes designated for veterans. The grants responded to an identified need for affordable housing.

SERVICE TEST

The bank's performance under the Service Test in the Columbus Multistate CSA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the Columbus CSA was good.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Columbus CSA	100.0	11	12.5	9.1	45.5	27.3	18.2	6.4	25.2	43.2	23.9
Total	100.0	11	12.5	9.1	45.5	27.3	18.2	6.4	25.2	43.2	23.9
Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Columbus CSA	0	3	-1	0	-2	0
Total	0	3	-1	0	-2	0

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Columbus CSA. WFBNA operated 11 branches in the AA, comprising one branch in low-income geographies, five branches in moderate-income geographies, three branches in middle-income geographies, and two branches in upper-income geographies. The distribution of branches in low-income geographies exceeded the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies. The distribution was augmented by one branch in a middle- or upper-income geography that was within close proximity to serve a low-income geography and four branches in middle- and upper-income geographies that were within close proximity to and served moderate-income geographies. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations. Despite the closures, its service delivery systems remained readily accessible.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the six branches opened on Saturdays, one was located in a low-income geography and three were located in moderate-income geographies.

Community Development Services

WFBNA provided a limited level of CD services in the Columbus Multistate CSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for six CD service activities during the evaluation period. A majority (83 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The other CD services were targeted to affordable housing (17 percent). Financial education comprised all of the CD service activities. The bank's assistance provided was responsive to the identified needs in the AA. The following is an example of CD services provided in this AA:

- WFBNA employees responded the community need for financial education during the evaluation period by providing 12 hours of financial education at a school in Columbus, Georgia at which all of students qualified for the federal free- and reduced-lunch program. The bank demonstrated active involvement, evidenced by its long-term relationship providing financial education to students at this school since 2017.

Davenport-Moline, IA-IL MSA (Davenport Multistate MSA)

CRA rating for the Davenport MSA¹⁰: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AA.
- The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank made a relatively high level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments and grants, occasionally in a leadership position. The bank exhibited excellent responsiveness to credit and community economic development needs. The bank made significant use of innovative or complex investments to support CD initiatives.
- Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AA.
- The bank provided an adequate level of CD services.

Description of Institution's Operations in the Davenport Multistate MSA

The Davenport Multistate MSA was the bank's 39th largest rating area based on its total deposits in the rating area. As of June 30, 2021, the bank maintained approximately \$1.4 billion or 0.1 percent of its total domestic deposits in branches within the rating area. Of the 31 depository financial institutions operating in the rating area, WFBNA, with a deposit market share of 13.1 percent was the second largest. Other top depository financial institutions in this rating area based on market share were Quad City Bank and Trust Company (17.4 percent), Blackhawk Bank & Trust (11.9 percent), and U.S. Bank, N.A. (11.9 percent). The bank operated eight branches and 14 ATMs in this rating area. WFBNA delineated one AA within the Davenport Multistate MSA and includes the Davenport-Moline-Rock Island, IA-IL MSA. The AA met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

The following table provides a summary of the demographics, including housing and business information for the Davenport Multistate MSA.

¹⁰ This rating only reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Davenport Multistate MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	104	3.8	28.8	51.9	15.4	0.0
Population by Geography	383,145	2.3	22.4	56.4	18.8	0.0
Housing Units by Geography	168,062	2.7	22.3	56.9	18.1	0.0
Owner-Occupied Units by Geography	109,060	0.7	18.0	60.0	21.3	0.0
Occupied Rental Units by Geography	45,817	6.2	29.4	52.0	12.5	0.0
Vacant Units by Geography	13,185	7.2	32.7	48.4	11.6	0.0
Businesses by Geography	29,377	5.5	18.3	50.6	25.5	0.0
Farms by Geography	1,694	1.1	7.4	67.2	24.3	0.0
Family Distribution by Income Level	98,409	19.9	18.1	21.7	40.3	0.0
Household Distribution by Income Level	154,877	23.4	16.5	18.7	41.4	0.0
Median Family Income MSA - 19340 Davenport-Moline-Rock Island, IA-IL MSA		\$66,600	Median Housing Value			\$130,830
			Families Below Poverty Level			9.4%
			Median Gross Rent			\$701
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$33,300 and moderate-income families earned at least \$33,300 and less than \$53,280 in the AA. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$833 for low-income borrowers and \$1,332 for moderate-income borrowers in the AA. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$702. Low- and moderate-income borrowers could afford a mortgage loan for a median-priced home in this AA.

Information from Moody's Analytics indicated that at the end of the evaluation period, the Davenport Multistate MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The metropolitan area's economy was recovering slowly due to a small labor force and underperforming housing market. The area housing prices were appreciating slower than nationally. Manufacturing and agriculture contributed to above average income growth in the AA. Logistics shipment of goods and demand for warehouse space and transportation contributed to the job growth. The Davenport MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Government, Professional and Business Services, Manufacturing, and Retail Trade. Major employers in the Davenport Multistate MSA include John Deere, Rock Island Arsenal, and UnityPoint Health. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Davenport Multistate MSA was 4.1 percent compared to the national unemployment of 3.7 percent.

Community Contacts

This evaluation considered comments provided by five local organizations that were contacted during the evaluation period and served the Davenport Multistate MSA. The organizations included four community development organizations promoted economic development and one organization that focused on affordable housing. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing units
- Rehabilitation of housing units/improvement of quality of housing stock
- Rental assistance

Opportunities for participation by financial institutions included the following:

- Financial literacy
- Savings programs
- Check-cashing services
- Various state and local government partnership opportunities
- Small business lending

Scope of Evaluation in the Davenport Multistate MSA

During the evaluation period, the bank originated or purchased 2,793 home mortgage loans, small loans to businesses, and small loans to farms totaling \$339 million in the Davenport Multistate MSA. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within the AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. The OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE DAVENPORT MULTISTATE MSA

LENDING TEST

The bank's performance under the Lending Test in the Davenport Multistate MSA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the Davenport MSA was good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Davenport MSA	1,498	1,246	49	13	2,801	100.0	100.0
Total	1,498	1,246	49	13	2,801	100.0	100.0
Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Davenport MSA	293,474	41,377	4,187	10,244	349,282	100.0	100.0
Total	293,474	41,377	4,187	10,244	349,282	100.0	100.0
Source: Bank Data; Due to rounding, totals may not equal 100.0%							

As of June 30, 2021, WFBNA had a deposit market share of 13.1 percent. The bank ranked second among 31 depository financial institutions placing it in the top 7 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 2.4 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked 13th among 328 home mortgage lenders in the AA, which placed it in the top 4 percent of lenders. The top lenders in this AA based on market share were GreenState Credit Union (9.6 percent), IH Mississippi Valley Credit Union (8.6 percent), and U.S. Bank, N.A. (5.2 percent).

According to peer small business data for 2021, WFBNA had a market share of 6.4 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked sixth out of 103 small business lenders, which placed it in the top 6 percent of lenders. The top lenders in this AA based on market share were Blackhawk Bank & Trust (16.9 percent), U.S. Bank, N.A (12 percent), and American Express National Bank (10.9 percent).

According to peer small farm data for 2021, WFBNA had a market share of 3.2 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked seventh out of 20 small farm lenders, which placed it in the top 35 percent of lenders. The top lenders in this AA based on market share were Blackhawk Bank & Trust (33.9 percent), John Deere Financial, FSB (25.9 percent) and Morton Community Bank (8.5 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O in the Davenport Multistate MSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was below the percentage of owner-occupied housing units in low-income geographies but it was equal to the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied housing units in moderate-income geographies but it approximated the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the Davenport Multistate MSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies was near to the percentage of businesses in low-income geographies but it was equal to the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies approximated the percentage of businesses in moderate-income geographies and it was near to the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the Davenport Multistate MSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was very poor.

The bank did not originate or purchase any small loans to farms in low- and moderate-income geographies.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the Davenport Multistate MSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and it was below the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was below both the percentage of moderate-income families and the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the Davenport Multistate MSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 22.5 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with gross annual revenues of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the Davenport Multistate MSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was poor.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 55.1 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below both the percentage of farms in the AA with GAR of \$1 million or less and the aggregate distribution of small loans to farms with gross annual revenues of \$1 million or less by all lenders.

Community Development Lending

The bank made a relatively high level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

WFBNA made 13 CD loans totaling approximately \$10.2 million, which represented 5.7 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing, revitalization/stabilization, and community service purposes. By dollar volume, 96.7 percent of these loans funded affordable housing that provided 64 units of affordable housing, 3.2 percent funded revitalization and stabilization efforts, and less than 1 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$9.8 million construction loan for an LIHTC project located in Davenport, Iowa. The development included 64 affordable units targeted to residents earning between 40 percent to 80 percent of the AMI. This loan was complex due to the inherent nature of LIHTC transactions and the additional funding sources needed, including State and Federal Historic Tax Credits, and Iowa Grayfield Tax Credits.
- WFBNA provided a \$4 million term loan to a regional nonprofit CDFI with \$67,344 allocated to the Davenport MSA. The purpose of the loan was to help provide for business growth and stability. The CDFI was a lender, real estate consultant, and developer that helped create opportunities for low-income communities and people with disabilities.

Product Innovation and Flexibility

WFBNA used flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 210 loans under its flexible lending programs totaling \$13.6 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	44	7,400
Dream. Plan. Home.	2	176
PPP	164	6,000
Total	210	13,576

INVESTMENT TEST

The bank's performance under the Investment Test in the Davenport Multistate MSA is rated Outstanding,

Based on a full-scope review, the bank's performance in the Davenport MSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Davenport MSA	18	1,150	47	12,116	65	100.0	13,265	100.0	2	8,177
Total	18	1,150	47	12,116	65	100.0	13,265	100.0	2	8,177
* '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 tracked and recorded by the institution's financial reporting system. Due to rounding, totals may not equal 100.0%										

The bank had an excellent level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private.

The current and prior period qualified investments totaled \$13.3 million and represented 7.4 percent of the bank's tier 1 capital allocated to the AA. The investments also included 45 grants and donations totaling \$489,000 to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 44.6 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 47.7 percent that focused on community services targeted to low- and moderate-income individuals, and 7.7 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 141 units of affordable housing in the AA.

The bank made significant use of innovative and complex investments to support CD initiatives. Approximately 89.3 percent of current period investment dollars were complex LIHTCs. The following are examples of CD investments made in this AA:

- WFBNA provided a \$10.8 million equity investment for an LIHTC project located in Davenport, Iowa. The development included 64 affordable units targeted to residents earning between 40 percent to 80 percent of the AMI. This investment was complex due to the inherent nature of LIHTC transactions and the additional funding sources required, including State and Federal Historic Tax Credits, and Iowa Grayfield Tax Credits.
- WFBNA provided three grants totaling \$31,000 to an organization that coordinated volunteers working to preserve affordable homeownership by repairing the homes of low-income elderly and disabled individuals, providing them with a safe and healthy residence. One grant supported the enhancement in the organization's technology infrastructure that included donor databases, volunteer management systems, and project management platforms creating a solution that reduced administrative work and increased the organization's capacity.

SERVICE TEST

The bank's performance under the Service Test in the Davenport Multistate MSA is rated Low Satisfactory.

Based on a full-scope review, the bank's performance in the Davenport MSA was adequate.

Retail Banking Services

Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Davenport MSA	100.0	8	7.5	12.5	00.0	87.5	00.0	2.3	22.4	56.4	18.8
Total	100.0	8	7.5	12.5	00.0	87.5	00.0	2.3	22.4	56.4	18.8
Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Davenport MSA	0	4	0	-2	-2	0
Total	0	4	0	-2	-2	0

WFBNA's service delivery systems were accessible to geographies and individuals of different income levels in the Davenport MSA. WFBNA operated eight branches in the AA, comprising one branch in low-income geographies, and seven branches in moderate-income geographies. The distribution of branches in low-income geographies exceeded the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies was significantly below the distribution of the population in moderate-income geographies. The distribution was augmented by two branches in middle- and upper-income geographies that were within close proximity to and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches had significantly adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed branches primarily due to low customer traffic, poor operating performance, or to reduce redundancy in branching locations.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank

offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the seven branches opened on Saturdays, none were located in low- and moderate-income geographies.

Community Development Services

WFBNA provided an adequate level of CD services in the Davenport Multistate MSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 57 CD service activities during the evaluation period. A majority (56 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The other CD services were targeted to affordable housing (44 percent). Financial education comprised almost all of the CD service activities. The bank's assistance provided was responsive to the identified needs in the AA. The following are examples of CD services provided in this AA:

- WFBNA employees served 32 hours on the Board of Directors of an organization with which the bank had a long-term working relationship since 2013. The organization coordinated volunteers to preserve affordable homeownership by repairing the homes of low-income elderly and disabled individuals, providing them with a safe and healthy residence. According to the organization's Executive Director, as of February 2018, all of its clients were low- and moderate-income as they earned less than 80 percent of the area median family income. The CD service was responsive to the identified need for affordable housing.
- WFNBA employees provided 64 hours of financial education to low- and moderate-income students in schools in the AA. According to 2017-2018 NCES data, a majority of students in these schools qualified for the federal free- and reduced-lunch program. The CD service was responsive to the identified need for financial health.

Fargo-Wahpeton, ND-MN CSA (Fargo Multistate CSA)

CRA rating for the Fargo Multistate CSA¹¹: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected good responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AA.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank made a relatively high level of CD loans. CD lending had a positive effect on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments and grants, often in a leadership position. The bank exhibited excellent responsiveness to credit and community economic development needs. The bank made significant use of innovative or complex investments to support CD initiatives.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.
- The bank provided an adequate level of CD services.

Description of Institution's Operations in the Fargo Multistate CSA

The Fargo Multistate CSA was the bank's 43rd largest rating area based on its total deposits in the rating area. As of June 30, 2021, the bank maintained approximately \$963.3 million of its total domestic deposits in branches within the rating area. Of the 31 depository financial institutions operating in the rating area, WFBNA, with a deposit market share of 7.2 percent, was the third largest. Other top depository financial institutions in this rating area based on market share were Bell Bank (40.1 percent), First International Bank & Trust (7.7 percent), Gate City Bank (6.9 percent), and U.S. Bank, N.A. (6.7 percent). As of December 31, 2021, the bank operated seven branches and 11 ATMs in this rating area. WFBNA delineated two AAs within the Fargo Multistate CSA and includes the Fargo, ND-MN MSA (Fargo MSA) and Wahpeton, ND Micro Area. The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. The OCC combined, analyzed, and presented the AAs at the CSA level for purposes of this evaluation. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

The following table provides a summary of the demographics, including housing and business information for the Fargo Multistate CSA.

¹¹ This rating only reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Fargo Multistate CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	52	0.0	23.1	55.8	19.2	1.9
Population by Geography	239,696	0.0	20.4	47.3	30.9	1.3
Housing Units by Geography	105,497	0.0	22.1	48.9	27.5	1.5
Owner-Occupied Units by Geography	56,496	0.0	13.5	53.8	32.1	0.5
Occupied Rental Units by Geography	41,575	0.0	34.4	41.0	22.1	2.5
Vacant Units by Geography	7,426	0.0	18.1	55.9	22.4	3.6
Businesses by Geography	25,102	0.0	27.1	38.4	34.0	0.4
Farms by Geography	1,412	0.0	6.6	68.6	24.7	0.1
Family Distribution by Income Level	56,913	18.7	18.9	23.1	39.3	0.0
Household Distribution by Income Level	98,071	23.5	17.3	17.3	41.9	0.0
Median Family Income MSA - 2020 Fargo, ND-MN MSA		\$75,010	Median Housing Value			\$161,410
Median Family Income Non-MSAs - ND		\$72,414	Median Gross Rent			\$700
			Families Below Poverty Level			6.7%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$36,207 to \$37,505 and moderate-income families earned at least \$36,207 to \$37,505 and less than \$57,931 to \$60,008 depending on the metropolitan or non-metropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$905 to \$938 for low-income borrowers and ranging from \$1,448 to \$1,500 for moderate-income borrowers depending on the metropolitan or non-metropolitan area. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$866. Low- and moderate-income borrowers should be able to qualify for a mortgage loan on a median priced home in this AA.

Information from Moody's Analytics indicated that at the end of the evaluation period, the Fargo Multistate CSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The metropolitan area was in close proximity to the Canadian border, which contributed to transportation, warehousing, and wholesale trade. Fargo had a well-educated workforce, and the labor force growth was slow due to employers' inability to create high-paying jobs. Employment gains in 2021 were in line with rest of the nation. The Fargo Multistate CSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Educational and Health Services, Government, Retail Trade, and Professional and Business Services. Major employers in the Fargo Multistate CSA include Sanford Health, Essentia Health, and North Dakota State University. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Fargo MSA was 2.2 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by four local organizations that were contacted during the evaluation period and served the Fargo Multistate CSA. The organizations included two affordable housing organizations, one economic development organization, and one organization that focused on providing services to low- and moderate-income families. The bank also provided an assessment of community needs based on research it completed in the AA.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Down payment and closing cost assistance
- Financial literacy
- Affordable housing and utility assistance
- Transitional housing
- Small business working capital assistance
- Workforce development

Opportunities for participation by financial institutions included the following:

- Lending and investment in affordable housing
- Funding and supporting community development services such as financial literacy

Scope of Evaluation in the Fargo Multistate CSA

During the evaluation period, the bank originated or purchased 2,940 home mortgage loans, small loans to businesses, and small loans to farms totaling \$445 million in the Fargo Multistate CSA. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within the AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. The OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE FARGO MULTISTATE CSA

LENDING TEST

The bank's performance under the Lending Test in the Fargo Multistate CSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Fargo CSA was excellent.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Fargo CSA	1,564	1,147	229	14	2,954	100.0	100.0
Total	1,564	1,147	229	14	2,954	100.0	100.0
Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Fargo CSA	335,903	72,527	36,549	6,638	451,617	100.0	100.0
Total	335,903	72,527	36,549	6,638	451,617	100.0	100.0
Source: Bank Data; Due to rounding, totals may not equal 100.0%							

As of June 30, 2021, WFBNA had a deposit market share of 7.2 percent. The bank ranked third among 31 depository financial institutions placing it in the top 10 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 3.5 percent based on the number of home mortgage loans originated or purchased. The bank ranked ninth among 231 home mortgage lenders in the AA, which placed it in the top 4 percent of lenders. The top lenders in the AA based on market share were Gate City Bank (14.1 percent), Bell Bank (10.5 percent), and U.S. Bank, N.A. (8.4 percent).

According to peer small business data for 2021, WFBNA had a market share of 3.8 percent based on the number of small loans to businesses originated or purchased. The bank ranked ninth out of 86 small business lenders, which placed it in the top 11 percent of lenders. The top lenders in the AA based on market share were Bell Bank (21.2 percent), U.S. Bank, N.A. (10.3 percent), and American Express National Bank (9.4 percent).

According to peer small farm data for 2021, WFBNA had a market share of 2.4 percent based on the number of small loans to farms originated or purchased. The bank ranked eighth out of 22 small farm lenders, which placed it in the top 37 percent of lenders. The top lenders in the AA based on market share were Bell Bank (25.8 percent), Bremer Bank NA (23.3 percent), and John Deere Financial, FSB (17.9 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O in the Fargo Multistate CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

There were no low-income geographies in the AA. The bank's percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied housing units in moderate-income geographies but it approximated the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the Fargo Multistate CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

There were no low-income geographies in the AA. The bank's percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses in moderate-income geographies and the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the Fargo Multistate CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was very poor.

There were no low-income geographies in the AA. The bank's percentage of small loans to farms in moderate-income geographies was significantly below both the percentage of farms in moderate-income geographies and the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the Fargo Multistate CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families but it approximated the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was near to both the percentage of moderate-income families and the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the Fargo Multistate CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 32.7 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was well below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the Fargo Multistate CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

The bank did not collect or consider the GAR in the underwriting of approximately 19.7 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below the percentage of farms in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Community Development Lending

The bank made a relatively high level of CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

WFBNA made 14 CD loans totaling approximately \$6.6 million, which represented 5.3 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 80.7 percent of these loans funded affordable housing that provided 39 units of affordable housing, 1.2 percent funded revitalization and stabilization efforts, and 18.1 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA made a \$10 million loan to an organization, of which \$9,446 benefitted the AA. The organization invested capital and provided technical assistance to community development organizations for affordable housing, childcare, and education for low- and moderate-income families.
- WFBNA made a \$20 million loan to a CDFI, of which \$18,892 benefitted the AA. The CDFI provided funding to improve access to high-quality health and elder care, healthy foods, housing, and education for low-income communities.
- WFBNA provided a \$10 million line of credit to a CDFI, of which \$9,446 benefitted the AA. The organization provided flexible capital for development of affordable housing.

Product Innovation and Flexibility

WFBNA made limited use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 204 loans under its flexible lending programs totaling \$17.8 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	58	11,200
Dream. Plan. Home.	11	2,100
PPP	135	4,500
Total	204	17,800

INVESTMENT TEST

The bank's performance under the Investment Test in the Fargo Multistate CSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Fargo CSA was excellent.

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Fargo CSA	4	11,046	47	7,898	51	100.0	18,943	100.0	1	5,730
Total	4	11,046	47	7,898	51	100.0	18,943	100.0	1	5,730
* '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 tracked and recorded by the institution's financial reporting system. Due to rounding, totals may not equal 100.0%										

The current and prior period qualified investments totaled \$18.9 million and represented 15.1 percent of the bank's tier 1 capital allocated to the AA. The investments also included 41 grants and donations totaling \$945,000 to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 35.3 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 58.8 percent that focused on community services targeted to low- and moderate-income individuals, and 5.9 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 177 units of affordable housing in the AA.

The bank made significant use of innovative and complex investments to support CD initiatives. Approximately 86.4 percent of current period investment dollars were complex LIHTCs. The following are examples of CD investments made in this AA:

- WFBNA provided a \$6.8 million equity investment to finance the Homefield Senior III apartments; an LIHTC development located in Fargo, North Dakota. The development included 39 units restricted to seniors (62+) with incomes at or below 80 percent of the AMI.
- WFBNA provided five grants totaling \$242,000 to an organization that utilized community-led solutions to identify and resolve community concerns with a primary focus on education, financial stability, and health. Of the total grants, \$150,000 went directly to the Workforce Development Pathways program that trained individuals with the skills to fill the jobs that were currently open in the community. Additional grants went to COVID-19 response efforts, including a distance learning program to assist parents facing challenges when schools were closed.

SERVICE TEST

The bank's performance under the Service Test in the Fargo Multistate CSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Fargo CSA was excellent.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Fargo CSA	100.0	7	6.2	0.0	42.9	42.9	14.3	0.0	20.4	47.3	30.9
Total	100.0	7	6.2	0.0	42.9	42.9	14.3	0.0	20.4	47.3	30.9
Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Fargo CSA	0	0	0	0	0	0
Total	0	0	0	0	0	0

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Fargo CSA. WFBNA operated seven branches in the AA, comprising three branches in moderate-income geographies, three branches in middle-income geographies, and one branch in an upper-income geography. The distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies. The distribution was augmented by two branches in middle- and upper-income geographies that were within close proximity to serve moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

WFBNA did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the three branches opened on Saturdays, one was located in a moderate-income geography.

Community Development Services

WFBNA provided an adequate level of CD services in the Fargo Multistate CSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 89 CD service activities to five organizations, logging a total of 176 qualified hours within this AA during the evaluation period. A majority (69 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The other CD services were targeted for revitalization and stabilization (33 percent). Serving on institutions' Board of Directors and outreach activities to these institutions comprised all of the CD service activities. The

bank's assistance provided was responsive to the identified needs in the AA. The following are examples of CD services provided in this AA:

- WFBNA employees provided 92 hours serving in a leadership capacity as Board Chair and Chair of the Strategy Committee, and five hours of outreach for an institution that was an affiliate of a worldwide human rights organization. Services offered include shelter, food, clothing, childcare, education and employment services, health counseling, and transportation assistance for low- and moderate-income individuals and families. This activity was responsive to the identified need for community development services, and homeless services including transitional housing.
- WFNBA employees provided 28 hours of board service and 32 hours of outreach activities for a community development organization that provided strategic leadership in community economic development policies, programs, and projects within a designated Distressed Non-Metropolitan Area. This activity was responsive to the identified need of revitalization and stabilization.

Grand Forks, ND-MN MSA (Grand Forks Multistate MSA)

CRA rating for the Grand Forks Multistate MSA¹²: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited an adequate geographic distribution of loans in its AA.
- The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments and grants, occasionally in a leadership position. The bank exhibited good responsiveness to credit and community economic development needs. The bank rarely used innovative or complex investments to support CD initiatives.
- Delivery systems were reasonably accessible to geographies and individuals of different income levels in its AA.
- The bank provided a low level of CD services.

Description of Institution's Operations in the Grand Forks Multistate MSA

The Grand Forks Multistate MSA was the bank's 49th largest rating area based on its total deposits in the rating area. As of June 30, 2021, the bank maintained approximately \$158.7 million or less than 0.1 percent of its total domestic deposits in branches within the rating area. Of the 19 depository financial institutions operating in the rating area, WFBNA, with a deposit market share of 4.2 percent, was the ninth largest. The top depository financial institutions in this rating area based on market share were Alerus Financial, N.A. (21.3 percent), Bremer Bank, N.A. (20.8 percent), U.S. Bank, N.A. (8.3 percent), Gate City Bank (7.2 percent), Choice Financial Corp (6.9 percent), Frandsen Bank & Trust (5.9 percent), and American Federal Bank (5.4 percent). The bank operated one branch and three ATMs in this rating area. WFBNA delineated one AA within the Grand Forks Multistate MSA and includes the Grand Forks, ND-MN MSA. The AA met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

The following table provides a summary of the demographics, including housing and business information for the Grand Forks Multistate MSA.

¹² This rating only reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Grand Forks Multistate MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	28	3.6	17.9	64.3	14.3	0.0
Population by Geography	100,526	5.5	20.1	56.4	18.0	0.0
Housing Units by Geography	45,371	2.9	21.2	60.1	15.7	0.0
Owner-Occupied Units by Geography	23,457	0.3	15.0	61.9	22.7	0.0
Occupied Rental Units by Geography	17,787	5.9	29.6	56.6	7.9	0.0
Vacant Units by Geography	4,127	4.5	20.3	65.2	10.0	0.0
Businesses by Geography	8,374	2.1	16.0	56.9	25.0	0.0
Farms by Geography	807	0.0	10.8	73.6	15.6	0.0
Family Distribution by Income Level	23,958	20.2	19.0	21.1	39.7	0.0
Household Distribution by Income Level	41,244	26.0	14.0	18.1	41.9	0.0
Median Family Income MSA - 24220 Grand Forks, ND-MN MSA		\$70,827	Median Housing Value			\$150,403
			Families Below Poverty Level			8.6%
			Median Gross Rent			\$741
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$35,414 and moderate-income families earned at least \$35,414 and less than \$56,662. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$885 for low-income borrowers and \$1,417 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$807. Low- and moderate-income borrowers should be able to afford a mortgage loan for a median-priced home in this AA.

Information from Moody's Analytics indicated that at the end of the evaluation period, the Grand Forks Multistate MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Grand Fork's recovery lagged behind the nation and state. Weak performance in agriculture and a declining labor force were key contributors. Consumer services, retail, and leisure/hospitality continued to perform and contribute to stabilize the unemployment rate. The reopening of the Canadian border increased exporting of farm goods, travel, and shipping. The worker shortage was due to a skill mismatch as competition from growing metropolitan areas in the Midwest and the number of job openings were contributing factors. The Grand Forks Multistate MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Government, Education and Health Services, and Retail Trade. Major employers in the Grand Forks Multistate MSA include Altu Health System, University of North Dakota, and Grand Forks Air Force Base. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Grand Forks Multistate MSA was 2.7 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by three local organizations that were contacted during the evaluation period and served the Grand Forks Multistate MSA. The organizations included two economic development organizations and one agency that provided operating loans to local farmers. The bank also provided an assessment of community needs based on research it completed in the AA.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Down payment and closing cost assistance
- Financial literacy
- Affordable housing and utility assistance
- Home equity lending
- Small business working capital assistance
- Workforce development

Opportunities for participation by financial institutions included the following:

- Lending and investment in affordable housing
- Lender participation in farm loan programs

Scope of Evaluation in the Grand Forks Multistate MSA

During the evaluation period, the bank originated or purchased 624 home mortgage loans, small loans to businesses, and small loans to farms totaling \$92.8 million in the Grand Forks Multistate MSA. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within the AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. The OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE GRAND FORKS MULTISTATE MSA

LENDING TEST

The bank's performance under the Lending Test in the Grand Forks Multistate MSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Grand Forks MSA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Grand Forks MSA	372	242	10	8	632	100.0	100.0
Total	372	242	10	8	632	100.0	100.0
Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Grand Forks MSA	75,506	16,514	759	5,326	98,105	100.0	100.0
Total	75,506	16,514	759	5,326	98,105	100.0	100.0
Source: Bank Data; Due to rounding, totals may not equal 100.0%							

As of June 30, 2021, WFBNA had a deposit market share of 4.2 percent. The bank ranked ninth among 19 depository financial institutions placing it in the top 48 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 2.8 percent based on the number of home mortgage loans originated or purchased. The bank ranked 10th among 170 home mortgage lenders in the AA, which placed it in the top 6 percent of lenders. The top lenders in the AA based on market share were Newrez, LLC (0.7 percent), Merchants Bank, N.A. (0.7 percent), and CBNA (0.7 percent).

According to peer small business data for 2021, WFBNA had a market share of 3.3 percent based on the number of small loans to businesses originated or purchased. The bank ranked 11th out of 57 small business lenders, which placed it in the top 20 percent of lenders. The top lenders in the AA based on market share were Bremer Bank, N.A. (16.8 percent), U.S. Bank, N.A. (11.2 percent), and American Express National Bank (10.8 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AA. For this analysis, the OCC compared the bank's public data of HMDA and small loans to businesses with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O in the Grand Forks Multistate MSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

The bank did not originate or purchase any home mortgage loans in low-income geographies considering there were very few owner-occupied housing units. The bank's percentage of home

mortgage loans in moderate-income geographies was below the percentage of owner-occupied housing units in moderate-income geographies but it was near to the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the Grand Forks Multistate MSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was well below the percentage of businesses in low-income geographies but it exceeded the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in moderate-income geographies and the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the Grand Forks Multistate MSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but it exceeded the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers approximated the percentage of moderate-income families and it was near to the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the Grand Forks Multistate MSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 37.2 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was well below the percentage of businesses in the AA with GAR of \$1 million or less but it approximated the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

WFBNA made eight CD loans totaling approximately \$5.3 million, which represented 25.8 percent of the allocated tier 1 capital. However, this volume primarily comprised one loan. In June 2019, the bank provided an extension on a \$5.3 million construction loan for an affordable housing development located in Crookston, Minnesota. The development included 30 units restricted to incomes at or below 60 percent of the AMI. Four of those units were also designated for long-term homelessness, with supportive services provided. The remaining seven loans were made to organizations operating regionally of which only \$8,400 was specifically allocated to the Grand Forks Multistate MSA. Considering the bank's very limited presence in the AA, the level of CD lending was excellent.

Product Innovation and Flexibility

WFBNA made limited use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 41 loans under its flexible lending programs totaling \$4.1 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	12	1,700
Dream. Plan. Home.	1	130
PPP	28	2,300
Total	41	4,130

INVESTMENT TEST

The bank's performance under the Investment Test in the Grand Forks Multistate MSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Grand Forks MSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Grand Forks MSA	2	4,250	12	134	14	100.0	4,384	100.0	0	0
Total	2	4,250	12	134	14	100.0	4,384	100.0	0	0
* '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 tracked and recorded by the institution's financial reporting system. Due to rounding, totals may not equal 100.0%										

The bank had an excellent level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$4.4 million and represented 21.2 percent of the bank's tier 1 capital allocated to the AA. The investments also included 12 grants and donations totaling \$134,000 to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited good responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 21.4 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA and 78.6 percent that focused on community services targeted to low- and moderate-income individuals. In total, the bank's investments helped create or retain 31 units of affordable housing in the AA.

The bank rarely used innovative and complex investments to support CD initiatives. The following is an example of CD investments made in this AA:

- WFBNA provided two grants totaling \$77,500 to an organization that utilized community-led solutions to identify and resolve community concerns with a primary focus on education, financial stability, and health. In both grants, funding supported programs that helped citizens meet basic needs such as safe housing, adequate food, and healthcare and their Wheels for Work initiative that provided up to \$1,000 to assist individuals with critical car repair such as starters, fuel pumps, or unsafe tires that prevented its use.

SERVICE TEST

The bank's performance under the Service Test in the Grand Forks Multistate MSA is rated Low Satisfactory.

Based on a full-scope review, the bank's performance in the Grand Forks MSA was adequate.

Retail Banking Services

Delivery systems were reasonably accessible to geographies and individuals of different income levels in its AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Grand Forks MSA	100.0	1	2.2	0.0	0.0	100.0	0.0	5.5	20.1	56.4	18.0
Total	100.0	1	2.2	0.0	0.0	100.0	0.0	5.5	20.1	56.4	18.0
Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Grand Forks MSA	0	1	0	0	-1	0
Total	0	1	0	0	-1	0

WFBNA's service delivery systems were reasonably accessible to geographies and individuals of different income levels in the Grand Forks MSA. WFBNA operated one branch in the AA in a middle-income geography, which was within close proximity to serve low- and moderate-income areas. This branch was in close proximity to serve moderate-income geographies. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. This adjacent branch contributed positively to the service delivery systems conclusions.

To the extent changes have been made, the bank's record of opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. The branch was

opened for business 9:00 a.m. to 12:00 p.m. Monday through Friday and 9:00 a.m. to 12:00 p.m. on Saturdays.

Community Development Services

WFBNA provided a low level of CD services in the Grand Forks Multistate MSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 13 CD service activities during the evaluation period. All of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The bank's assistance provided was responsive to the identified needs in the AA. The following is an example of a CD service provided in this AA:

- A WFBNA employee provided 14 hours of financial education at a school in Grand Forks where 70 percent of its students qualified for the free and reduced lunch program. The CD service was responsive to the identified need for financial education.

Logan, UT-ID MSA (Logan Multistate MSA)

CRA rating for the Logan Multistate MSA¹³: Satisfactory

The Lending Test is rated: Outstanding

The Investment Test is rated: Needs to Improve

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited an excellent geographic distribution of loans in its AA.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank was a leader in making CD loans. CD lending had a neutral effect on the Lending Test conclusion as it further supported the bank's already excellent lending performance.
- The bank had a poor level of qualified CD investments and grants, and not in a leadership position. The bank exhibited adequate responsiveness to credit and community economic development needs. The bank did not use innovative or complex investments to support CD initiatives.
- Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the bank's AA.
- The bank provided a limited level of CD services.

Description of Institution's Operation in the Logan Multistate MSA

The Logan Multistate MSA was the bank's 47th largest rating area based on its total deposits in the rating area. As of June 30, 2021, the bank maintained approximately \$417 million or 10.7 of its total domestic deposits in branches within the rating area. Of the 11 depository financial institutions operating in the rating area, WFBNA, with a deposit market share of 14.1 percent, was the fourth largest. The top depository financial institutions in the rating area based on market share were Cache Valley Bank (33.1 percent), Zions Bancorporation, N.A. (21.3 percent), and Altabank (14.7 percent). As of December 31, 2021, the bank operated two branches and four ATMs in this rating area. WFBNA delineated one AA within the Logan Multistate MSA and includes the Logan, UT-ID MSA. The AA met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

The following table provides a summary of the demographics, including housing and business information for the Logan Multistate MSA.

¹³ This rating only reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Logan Multistate MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	28	7.1	17.9	46.4	28.6	0.0
Population by Geography	130,363	6.1	20.0	46.1	27.8	0.0
Housing Units by Geography	43,346	6.3	22.4	45.5	25.9	0.0
Owner-Occupied Units by Geography	26,639	1.3	11.1	53.9	33.7	0.0
Occupied Rental Units by Geography	13,282	15.9	44.6	29.9	9.6	0.0
Vacant Units by Geography	3,425	7.7	24.4	40.2	27.7	0.0
Businesses by Geography	12,824	5.7	17.4	45.7	31.3	0.0
Farms by Geography	689	1.3	5.2	71.8	21.6	0.0
Family Distribution by Income Level	29,962	19.5	18.8	22.5	39.1	0.0
Household Distribution by Income Level	39,921	21.6	17.9	19.6	40.9	0.0
Median Family Income MSA - 30860 Logan, UT-ID MSA		\$59,129	Median Housing Value			\$181,861
			Median Gross Rent			\$699
			Families Below Poverty Level			10.9%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$29,565 and moderate-income families earned at least \$29,565 and less than \$47,303. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$739 for low-income borrowers and \$1,183 for moderate-income borrowers. Assuming a 30-year with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$976. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA; however, moderate-income borrowers could afford a mortgage loan in this AA.

Information from Moody's Analytics indicated that at the end of the evaluation period, the Logan Multistate MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Logan area recovery was ahead of the state and the nation. Construction and professional services along with the low business cost and skilled workforce were contributors in the area's economy. Dairy farmers profitability was hampered by higher corn prices along with the Asian export markets. The Logan Multistate MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Government, Manufacturing, Professional and Business Services, Education and Health Services, and Retail Trade. Major employers in the Logan Multistate MSA include Utah State University, Conservice, and Swift Beef. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Logan Multistate MSA was 1.5 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by three local organizations that were contacted during the evaluation period and served the Logan Multistate MSA. The organizations included two economic development organizations and one affordable housing agency. The bank also provided an assessment of community needs based on research it completed in the AA.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable housing and utility assistance
- Small business working capital assistance
- Workforce development

Opportunities for participation by financial institutions included the following:

- Collaboration with local, state, and federal housing agencies to alleviate affordable housing needs

Scope of Evaluation in the Logan Multistate MSA

During the evaluation period, the bank originated or purchased 1,677 home mortgage loans, small loans to businesses, and small loans to farms totaling \$251.9 million in the Logan Multistate MSA. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within the AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. The OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE LOGAN MULTISTATE MSA

LENDING TEST

The bank's performance under the Lending Test in the Logan Multistate MSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Logan MSA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Logan MSA	1,030	618	29	11	1,688	100.0	100.0
Total	1,030	618	29	11	1,688	100.0	100.0

Source: Bank Data; Due to rounding, totals may not equal 100.0%

Dollar Volume of Loans (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Logan MSA	235,603	15,765	522	10,210	251,890	100.0	100.0
Total	235,603	15,765	522	10,210	262,100	100.0	100.0

Source: Bank Data; Due to rounding, totals may not equal 100.0%

As of June 30, 2021, WFBNA had a deposit market share of 14.1 percent. The bank ranked fourth among 11 depository financial institutions placing it in the top 37 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 2.6 percent based on the number of home mortgage loans originated or purchased. The bank ranked 13th among 235 home mortgage lenders in the AA, which placed it in the top 6 percent of lenders. The top lenders in the AA based on market share were Guild Mortgage Company LLC (7.3 percent), United Wholesale Mortgage (7.0 percent), and U.S. Bank, N.A. (6.8 percent).

According to peer small business data for 2021, WFBNA had a market share of 6.8 percent based on the number of small loans to businesses originated or purchased. The bank ranked sixth out of 61 small business lenders, which placed it in the top 10 percent of lenders. The top lenders in the AA based on market share were Cache Valley Bank (24 percent), American Express National Bank (16.7 percent), and JPMorgan Chase Bank, N.A. (12.5 percent).

According to peer small farm data for 2021, WFBNA had a market share of 3.3 percent based on the number of small loans to farms originated or purchased. The bank ranked seventh out of 13 small farm lenders, which placed it in the bottom 54 percent of lenders. The top lenders in the AA based on market share were Cache Valley Bank (65.9 percent), JPMorgan Chase Bank, N.A. (6.2 percent), and Zions Bancorporation, N.A. (5.5 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O in the Logan Multistate MSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

The bank's percentages of home mortgage loans in low- and moderate-income geographies exceeded both the percentages of owner-occupied units in low- and moderate-income geographies and the aggregate distributions of home mortgage loans by all lenders.

Small Loans to Businesses

Refer to Table Q in the Logan Multistate MSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was significantly below the percentage of businesses in low-income geographies and it was well below the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies approximated the percentage of businesses in moderate-income geographies and it exceeded the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the Logan Multistate MSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was excellent.

The bank's percentages of small loans to farms in low- and moderate-income geographies exceeded the percentages of farms in low- and moderate-income geographies and the aggregate distributions of small loans to farms in low- and moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the Logan Multistate MSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but it exceeded the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the Logan Multistate MSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 34.6 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was well below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the Logan Multistate MSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was adequate.

The bank did not collect or consider the GAR in the underwriting of approximately 27.6 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below the percentage of farms in the AA with GAR of \$1 million or less and it was near to the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a neutral effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

WFBNA made 11 CD loans totaling approximately \$10.2 million, which represented 18.8 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar

volume, 99.9 percent of these loans funded affordable housing that provided 149 units of affordable housing. Considering the bank's very limited presence in the AA, the level of CD lending was excellent. The following are examples of CD loans made in this AA:

- WFBNA made a \$7.9 million loan for an affordable housing development in Logan, Utah. The LIHTC development included 93 units restricted to tenants with incomes less than 60 percent of the AMI.
- WFBNA refinanced a \$2.3 million loan for an affordable housing development in Logan, Utah. All 56 units of the LIHTC development were restricted to tenants with incomes less than 36 percent of the AMI.

Product Innovation and Flexibility

WFBNA made limited use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 47 loans under its flexible lending programs totaling \$2.5 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	6	1,400
Dream. Plan. Home.	1	248
PPP	40	833
Total	47	2,481

INVESTMENT TEST

The bank's performance under the Investment Test in the Logan Multistate MSA is rated Needs to Improve.

Based on a full-scope review, the bank's performance in the Logan MSA was poor.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Logan MSA	1	12	14	149	15	100.0	160	100.0	0	0
Total	1	12	14	149	15	100.0	160	100.0	0	0

* '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 tracked and recorded by the institution's financial reporting system.
 Due to rounding, totals may not equal 100.0%

The bank had a poor level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$160,000 and represented 0.3 percent of the bank's tier 1 capital allocated to the AA. The investments also included 14 grants and donations totaling \$149,000 to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited adequate responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 53.3 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 33.3 percent that focused on community services targeted to low- and moderate-income individuals, and 13.3 percent that focused on revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain four units of affordable housing in the AA.

The bank did not use innovative and complex investments to support CD initiatives. The following are examples of CD investments made in this AA:

- WFBNA provided three grants totaling \$43,000 to an organization whose purpose was to develop, through counseling and education, a community of low- and moderate-income individuals and families who are knowledgeable about financial management and housing choices, and who effectively manage their resources. The grants supported COVID-19 efforts and important programs such as the Clearing Financial Hurdles workshop, which was a two-hour interactive workshop that helped strengthen participant's finances in the areas of: money management, navigating financial obstacles, accessing community resources, and increasing financial well-being.
- WFBNA provided six grants totaling \$67,500 to a nonprofit organization that provided affordable housing. Their mission was to create quality affordable housing opportunities, to enhance and stabilize communities and to provide households with the skills to become self-sufficient. Their programs worked to create independent living environments and to promote self-sufficiency for underserved markets such as very-low-income families, the elderly, persons with disabilities, and homeowners facing foreclosures. One specific grant for \$15,000 went to the organization's Owner-Builder Program, in which very-low and low-income households become homeowners by participating in the construction of their own homes, under the guidance of construction supervisors. This was especially responsive in this rural area.

SERVICE TEST

The bank's performance under the Service Test in the Logan Multistate MSA is rated Low Satisfactory.

Based on a full-scope review, the bank's performance in the Logan MSA was adequate.

Retail Banking Services

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Logan MSA	100.0	2	9.4	0.0	0.0	100.0	0.0	6.1	20.0	46.1	27.8
Total	100.0	2	9.4	0.0	0.0	100.0	0.0	6.1	20.0	46.1	27.8
Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Logan MSA	0	3	-1	0	-2	0
Total	0	3	-1	0	-2	0

WFBNA's service delivery systems were reasonably accessible to geographies and individuals of different income levels in the Logan MSA. WFBNA operated two branches in the AA, both of which were located in middle-income geographies. The bank also operated four ATMs with one ATM located in a low-income geography and the remaining three ATMs located in middle-income geographies.

To the extent changes have been made, the bank's record of opening and closing of branches had generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed one branch in a low-income geography, which was located within a grocery store that closed.

Services, including where appropriate, business hours did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the two branches opened on Saturdays, none were located in low- and moderate-income geographies.

Community Development Services

WFBNA provided a limited level of CD services in the Logan Multistate MSA. During the exam period, the bank's qualifying activities performed were significantly impacted by COVID-19 pandemic. Bank records showed that employees provided their financial or job-specific expertise and/or technical assistance for four CD service activities to two organizations, logging a total of seven qualified hours within this AA during the evaluation period. All of the bank's assistance was to organizations that provided community services to low- and moderate-income individuals and families. The following are examples of CD services provided in this AA:

- Two WFBNA employees provided two hours of financial education to students at an elementary school where the majority of the student population qualified for the free or reduced-price lunch program.

- A WFBNA employee provided two hours of Board service to a nonprofit organization that provided affordable housing. Their mission was to create quality affordable housing opportunities, to enhance and stabilize communities, and to provide households with the skills to become self-sufficient. Their programs worked to create independent living environments and to promote self-sufficiency for underserved markets such as very-low-income families, the elderly, persons with disabilities, and homeowners facing foreclosures.

Memphis, TN-MS MSA (Memphis Multistate MSA)

CRA rating for the Memphis Multistate MSA¹⁴: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Needs to Improve

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited an adequate geographic distribution of loans in its AA.
- The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.
- The bank had a poor level of qualified CD investments and grants, although rarely in a leadership position. The bank exhibited adequate responsiveness to credit and community economic development needs. The bank rarely used innovative or complex investments to support CD initiatives.
- Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AA.
- The bank provided a limited level of CD services.

Description of Institution's Operations in the Memphis Multistate MSA

The Memphis Multistate MSA was the bank's 46th largest rating area based on its total deposits in the rating area. As of June 30, 2021, the bank maintained approximately \$810 million or 2.1 percent of its total domestic deposits in branches within the rating area. Of the 48 depository financial institutions operating in the rating area, WFBNA, with a deposit market share of 2.1 percent in the MSA was the 10th largest. The top depository financial institutions in the rating area based on market share were First Horizon Bank (36.3 percent), Regions Bank (12.9 percent), and Truist Bank (5.1 percent). As of December 31, 2021, the bank operated seven branches and 12 ATMs in this rating area. WFBNA delineated one AA within the Memphis Multistate MSA and includes the Memphis, TN-MS MSA. The AA met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

The following table provides a summary of the demographics, including housing and business information for the Memphis Multistate MSA.

¹⁴ This rating only reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Memphis Multistate MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	292	22.6	21.2	24.0	29.8	2.4
Population by Geography	1,282,101	16.5	20.9	24.4	37.7	0.5
Housing Units by Geography	535,421	18.9	20.9	23.8	36.1	0.3
Owner-Occupied Units by Geography	289,778	9.8	17.4	26.5	46.2	0.1
Occupied Rental Units by Geography	180,976	27.4	25.1	21.5	25.8	0.3
Vacant Units by Geography	64,667	35.8	25.2	18.4	19.6	1.0
Businesses by Geography	104,885	12.0	16.9	22.4	47.8	0.9
Farms by Geography	2,566	6.2	16.4	29.9	46.8	0.6
Family Distribution by Income Level	311,208	24.3	15.7	17.4	42.5	0.0
Household Distribution by Income Level	470,754	25.3	15.4	16.5	42.8	0.0
Median Family Income MSA - 32820 Memphis, TN-MS-AR MSA		\$58,214	Median Housing Value			\$135,179
			Families Below Poverty Level			14.7%
			Median Gross Rent			\$863
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$29,107 and moderate-income families earned at least \$29,107 and less than \$46,571. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$728 for low-income borrowers and \$1,164 for moderate-income borrowers in the AA. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$726. Low- and moderate-income borrowers could afford a mortgage loan for a median-priced home in this AA.

Information from Moody's Analytics indicated that at the end of the evaluation period, the Memphis Multistate MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Memphis is a transportation hub with global connections. The MSA's central location produced robust transportation connections and had the world's busiest cargo airport. Logistically, Memphis competed nationally with the highest concentration of transportation and warehouse jobs. The Memphis MSA experienced labor shortages and low trucking capacity which impacted the economic recovery of the area. The Memphis Multistate MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Professional and Business Services, Government, and Transportation/Utilities. Major employers in the Memphis Multistate MSA include FedEx, United States Government, and Methodist LeBonheur Healthcare. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Memphis Multistate MSA was 4.2 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by five local organizations that were contacted during the evaluation period and served the Memphis Multistate MSA. The organizations included three economic development organizations and two organizations that provided community services to low- and moderate-income individuals. The bank also provided an assessment of community needs based on research it completed in the AA.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable housing and utility assistance
- Small business working capital assistance
- Small dollar consumer loans and small business loans
- Workforce development
- Financial literacy

Opportunities for participation by financial institutions included the following:

- Collaboration with local, state, and federal housing agencies to alleviate affordable housing needs

Scope of Evaluation in the Memphis Multistate MSA

During the evaluation period, the bank originated or purchased 13,001 home mortgage loans, small loans to businesses, and small loans to farms totaling \$2.4 billion in the Memphis Multistate MSA. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within the AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. The OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MEMPHIS MULTISTATE MSA

LENDING TEST

The bank's performance under the Lending Test in the Memphis Multistate MSA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the Memphis MSA was good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Memphis MSA	10,778	2,093	130	14	13,015	100.0	100.0
Total	10,778	2,093	130	14	13,015	100.0	100.0
Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Memphis MSA	2,267,853	80,205	4,059	18,479	2,370,596	100.0	100.0
Total	2,267,853	80,205	4,059	18,479	2,370,596	100.0	100.0
Source: Bank Data; Due to rounding, totals may not equal 100.0%							

As of June 30, 2021, WFBNA had a deposit market share of 2.1 percent. The bank ranked 10th among 48 depository financial institutions placing it in the top 21 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 4.6 percent based on the number of home mortgage loans originated or purchased. The bank ranked second among 639 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. Other top lenders in this AA based on market share were Rocket Mortgage (7.7 percent) and PennyMac Loan Services, LLC (4.3 percent).

According to peer small business data for 2021, WFBNA had a market share of 2.3 percent based on the number of small loans to businesses originated or purchased. The bank ranked 15th out of 168 small business lenders, which placed it in the top 9 percent of lenders. The top lenders in this AA based on market share were American Express National Bank (18.1 percent), Cross River (6.2 percent), and Capital One Bank, N.A. (6.2 percent).

According to peer small farm data for 2021, WFBNA had a market share of 12.5 percent based on the number of small loans to farms originated or purchased. The bank ranked third out of 25 small farm lenders, which placed it in the top 12 percent of lenders. Other top lenders in this AA based on market share were John Deere, FSB (21.9 percent) and Cadence Bank (16.9 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AA. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O in the Memphis Multistate MSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was poor.

The bank's percentage of home mortgage loans in low-income geographies was significantly below the percentage of owner-occupied housing units in low-income geographies and it was well below the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was significantly below the percentage of owner-occupied housing units in moderate-income geographies and it was below the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the Memphis Multistate MSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies was below the percentage of businesses in low-income geographies but it was near to the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was near to the percentage of businesses in moderate-income geographies and it approximated the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the Memphis Multistate MSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was good.

The bank's percentage of small loans to farms in low-income geographies was well below the percentage of farms in low-income geographies but it exceeded the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-income geographies was below the percentage of farms in moderate-income geographies but it was near to the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the Memphis Multistate MSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and it was below the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was well below the percentage of moderate-income families and it was below the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the Memphis Multistate MSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 44.1 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was well below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the Memphis Multistate MSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was very poor.

The bank did not collect or consider the GAR in the underwriting of approximately 99.2 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was significantly below both the percentage of farms in the AA with GAR of \$1 million or less and the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

WFBNA made 14 CD loans totaling approximately \$18.5 million, which represented 17.5 percent of the allocated tier 1 capital. CD loans were primarily made for economic development purposes. By dollar volume, 83.1 percent funded economic development, 6.6 percent funded revitalization and stabilization efforts, and 10.3 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$15 million line of credit to a CDFI, of which \$600,000 benefitted the AA. The CDFI partnered with community development organizations to provide grants, loans, equity, technical assistance, training opportunities, and policy support to low- and moderate-income communities.
- WFBNA provided a \$35 million line of credit to an organization, of which \$945,900 benefitted the AA. The organization funded training to ensure equitable education for low-income students.
- WFBNA made a \$20 million loan to a CDFI, of which \$14,167 benefitted the AA. The CDFI provided funding to improve access to high-quality health and elder care, healthy foods, housing, and education for low-income communities.

Product Innovation and Flexibility

WFBNA made extensive use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 363 loans under its flexible lending programs totaling \$26.1 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	77	18,200
Dream. Plan. Home.	9	1,100
PPP	277	6,800
Total	363	26,100

INVESTMENT TEST

The bank's performance under the Investment Test in the Memphis Multistate MSA is rated Needs to Improve.

Based on a full-scope review, the bank's performance in the Memphis MSA was poor.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Memphis MSA	3	90	52	1,540	55	100.0	1,631	100.0	0	0
Total	3	90	52	1,540	55	100.0	1,631	100.0	0	0
* '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 tracked and recorded by the institution's financial reporting system. Due to rounding, totals may not equal 100.0%										

The bank had a poor level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$1.6 million and represented 1.5 percent of the bank's tier 1 capital allocated to the AA. The investments also included 50 grants and donations totaling \$1.2 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited adequate responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 34.5 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 56.4 percent that focused on community services targeted to low- and moderate-income individuals, and 9.1 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 80 units of affordable housing in the AA.

The bank rarely used innovative and complex investments to support CD initiatives. The following are examples of CD investments made in this AA:

- WFBNA provided a \$645,000 grant to a nonprofit organization through the Open for Business Fund. The organization focused on regional agriculture by helping agricultural technology startups, facilitating the development of streamlined production, and building collaborative farmer networks. The funding supported the organization's capacity to provide technical assistance, including marketing, business planning, and legal assistance to startups.
- WFBNA provided three grants totaling \$40,000 to an organization that offered Free Tax Prep/VITA program. One grant for \$10,000 provided support for the organization's Financial Stability COVID-19 Response program.

SERVICE TEST

The bank's performance under the Service Test in the Memphis Multistate MSA is rated Low Satisfactory.

Based on a full-scope review, the bank's performance in the Memphis MSA was adequate.

Retail Banking Services

Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Memphis MSA	100.0	7	2.0	14.3	14.3	14.3	57.1	16.5	20.9	24.4	37.7
Total	100.0	7	2.0	14.3	14.3	14.3	57.1	16.5	20.9	24.4	37.7
Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Memphis MSA	0	1	0	0	0	-1
Total	0	1	0	0	0	-1

WFBNA's service delivery systems were accessible to geographies and individuals of different income levels in the Memphis MSA. WFBNA operated seven branches in the AA, comprising one branch in a low-income geography, one branch in a moderate-income geography, one branch in a middle-income geography, and four branches in upper-income geographies. The distribution of branches in low-income geographies was near to the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies was below the distribution of the population in moderate-income geographies.

To the extent changes have been made, the bank's record of opening and closing of branches had not affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. All branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the three branches opened on Saturdays, one was located in a moderate-income geography.

Community Development Services

WFBNA provided a limited level of CD services in the Memphis Multistate MSA. During the exam period, the bank's qualifying activities performed were significantly impacted by COVID-19 pandemic. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 27 CD service activities to three organizations, logging a total of 55 qualified hours within

this AA during the evaluation period. A significant majority (92.6 percent) of the bank's assistance was to organizations providing affordable housing targeted to low- and moderate-income individuals and families. The other CD service activities were community services targeted to low- and moderate-income individuals (7.4 percent). The following are examples of CD services provided in this AA:

- A WFBNA employee provided two hours of financial education to students at an elementary school where the majority of the student population qualified for the free or reduced lunch program.
- WFBNA employees provided 48 hours of board service to a community organization that worked to provide affordable housing and rehabilitate local neighborhoods. The mission of this organization was to bring people together to build homes, communities, and hope.

Minneapolis-St. Paul, MN-WI CSA (Minneapolis Multistate CSA)

CRA rating for the Minneapolis Multistate CSA¹⁵: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AA.
- The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank made a relatively high level of CD loans. CD lending had a neutral effect on the Lending Test conclusion as it further supported the bank's already excellent lending performance.
- The bank had an excellent level of qualified CD investments and grants, occasionally in a leadership position. The bank exhibited excellent responsiveness to credit and community economic development needs. The bank made significant use of innovative or complex investments to support CD initiatives.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.
- The bank was a leader in providing CD services.

Description of Institution's Operations in the Minneapolis Multistate CSA

The Minneapolis Multistate CSA was the bank's sixth largest rating area based on its total deposits in the rating area. As of June 30, 2021, the bank maintained approximately \$69.7 billion or 4.8 percent of its total domestic deposits in branches within the rating area. However, \$39.1 billion originated from non-retail depositors outside of the rating area. The OCC considered these non-local deposits as performance context when arriving at conclusions for community development lending and qualified investments. Of the 171 depository financial institutions operating in the rating area, WFBNA, with a deposit market share of 29.8 percent, was the second largest. The top depository financial institution in the rating area based on market share was U.S. Bank, N.A. (32.7 percent). As of December 31, 2021, the bank operated 101 branches and 476 ATMs in the rating area. WFBNA delineated six AAs within the Minneapolis Multistate CSA and includes the Faribault-Northfield, MN Micro Area, Hutchinson, MN Micro Area, Minneapolis-St. Paul-Bloomington, MN-WI MSA (Minneapolis MSA), Owatonna, MN Micro Area, Red Wing, MN Micro Area, and St. Cloud, MN MSA (St. Cloud MSA). The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. The OCC combined, analyzed, and presented the AAs at the CSA level for purposes of this evaluation. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

The following table provides a summary of the demographics, including housing and business information for the Minneapolis Multistate CSA.

¹⁵ This rating only reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Minneapolis Multistate CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	841	6.4	21.4	46.5	24.9	0.8
Population by Geography	3,718,485	5.1	18.7	48.8	27.1	0.3
Housing Units by Geography	1,516,439	4.8	19.6	49.5	25.8	0.3
Owner-Occupied Units by Geography	1,004,225	1.9	15.0	52.2	31.0	0.0
Occupied Rental Units by Geography	430,117	11.3	29.8	43.3	14.9	0.8
Vacant Units by Geography	82,097	7.1	23.7	50.2	18.4	0.6
Businesses by Geography	393,135	4.5	17.1	47.5	30.7	0.3
Farms by Geography	11,961	1.3	11.3	61.5	25.9	0.0
Family Distribution by Income Level	931,010	20.2	17.6	22.3	39.9	0.0
Household Distribution by Income Level	1,434,342	23.5	16.2	18.6	41.7	0.0
Median Family Income MSA - 33460 Minneapolis-St. Paul-Bloomington, MN- WI MSA		\$84,589	Median Housing Value			\$222,015
Median Family Income MSA - 41060 St. Cloud, MN MSA		\$69,359	Median Gross Rent			\$942
Median Family Income Non-MSAs - MN		\$63,045	Families Below Poverty Level			6.9%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$31,523 to \$42,295 and moderate-income families earned at least \$31,523 to \$42,295 and less than \$50,436 to \$67,671, depending on the metropolitan or non-metropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$788 to \$1,057 for low-income borrowers and ranging from \$1,261 to \$1,692 for moderate-income borrowers in the AA. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$1,192. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Minneapolis MSA

Information from Moody's Analytics indicated that at the end of the evaluation period, the Minneapolis MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Minneapolis MSA's recovery was losing steam. Job growth has moderated, and fewer industries were contributing to payroll gains. Weakness in finance and government was offsetting robust employment growth in professional/business services. The outsize healthcare sector was also shedding jobs largely because of worker burnout amid pandemic-related stress. The area has recouped only about 60 percent of pandemic job losses, compared with more than 80 percent nationally. House price appreciation remained in the double digits but lagged the national rate. Residential construction was

strong, with permitting remaining elevated. The Minneapolis MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Professional and Business Services, Government, Manufacturing, and Retail Trade. Major employers in the Minneapolis MSA include Fairview Health System, Allina Health System, Target Corp., University of Minnesota, HealthPartners, Wells Fargo & Co., UnitedHealth Group, 3M Co., U.S. Bancorp, and Medtronic Inc. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Minneapolis MSA was 2.7 percent compared to the national unemployment rate of 3.7 percent.

St. Cloud MSA

Information from Moody's Analytics indicated that at the end of the evaluation period, the St. Cloud MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. St. Cloud's recovery made slow progress. The area recovered a little more than 60 percent of lost jobs, a share that was well below the regional and national averages. The outsize manufacturing sector was trending in the right direction, but weakness in health services was dragging on growth. A contracting labor force has pushed the unemployment rate below 4 percent, overstating the labor market's recovery. Factory jobs did not reach pre-pandemic levels because of the closure of top employer Electrolux in 2020. Single-family permitting jumped in 2021 thanks to strong homebuyer demand fueled by low interest rates. Construction payrolls rose past their pre-pandemic level as a result. The St. Cloud MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Government, Manufacturing, and Retail Trade. Major employers in the St. Cloud MSA include St. Cloud Hospital/CentraCare Health, St. Cloud VA Health Care System, Fulfillment Distribution Center, and College St. Benedict/St. John's University. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the St. Cloud MSA was 3.3 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Minneapolis Multistate CSA. The organizations included one community development organization that helped to address the causes and conditions of poverty and one economic development organization that helped to attract and retain businesses in the area. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing units
- Single-family affordable housing
- Rental assistance
- Rehabilitation of housing units/improvement of the quality of housing stock
- Workforce development
- Financial literacy

Opportunities for participation by financial institutions included the following:

- Lending and investment in affordable housing.
- Lending and investment in economic development and workforce development.
- Small business lending.
- Supporting nonprofit health providers that also offer preventative services.
- Working with the area's community development corporation network.
- Various state and local government partnership opportunities.

Scope of Evaluation in the Minneapolis Multistate CSA

During the evaluation period, the bank originated or purchased 100,996 home mortgage loans, small loans to businesses, and small loans to farms totaling \$14.7 billion in the Minneapolis Multistate CSA. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within the AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. The OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MINNEAPOLIS MULTISTATE CSA

LENDING TEST

The bank's performance under the Lending Test in the Minneapolis Multistate CSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Minneapolis CSA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Minneapolis CSA	53,617	46,874	505	72	101,068	100.0	100.0
Total	53,617	46,874	505	72	101,068	100.0	100.0
Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Minneapolis CSA	13,476,829	1,205,316	22,110	247,678	14,951,933	100.0	100.0
Total	13,476,829	1,205,316	22,110	247,678	14,951,933	100.0	100.0

Source: Bank Data; Due to rounding, totals may not equal 100.0%

As of June 30, 2021, WFBNA had a deposit market share of 29.8 percent. The bank ranked second among 171 depository financial institutions placing it in the top 2 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 5.8 percent based on the number of home mortgage loans originated or purchased. The bank ranked second among 738 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. Other top lenders in the AA based on market share were U.S. Bank, N.A. (8.1 percent), Rocket Mortgage (4.9 percent), and Bell Bank (4.9 percent).

According to peer small business data for 2021, WFBNA had a market share of 15.7 percent based on the number of small loans to businesses originated or purchased. The bank ranked third out of 227 small business lenders, which placed it in the top 2 percent of lenders. Other top lenders in the AA based on market share were U.S. Bank, N.A. (18.5 percent) and American Express National Bank (16.3 percent).

According to peer small farm data for 2021, WFBNA had a market share of 7 percent based on the number of small loans to farms originated or purchased. The bank ranked sixth out of 41 small farm lenders, which placed it in the top 15 percent of lenders. The top lenders in the AA based on market share were John Deere Financial, F.S.B. (24.1 percent), Frandsen Bank & Trust (16.1 percent), and U.S. Bank, N.A. (11.9 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O in the Minneapolis Multistate CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was below both the percentage of owner-occupied housing units in low-income geographies and the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied housing units in moderate-income geographies but it was near to the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the Minneapolis Multistate CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was near to both the percentage of businesses in low-income geographies and the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in moderate-income geographies and the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the Minneapolis Multistate CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

The bank's percentage of small loans to farms in low-income geographies was significantly below the percentage of farms in low-income geographies and it was below the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-income geographies was significantly below the percentage of farms in moderate-income geographies and it was well below the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the Minneapolis Multistate CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but it approximated the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the Minneapolis Multistate CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 24.4 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the Minneapolis Multistate CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

The bank did not collect or consider the GAR in the underwriting of approximately 41 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below the percentage of farms in the AA with GAR of \$1 million or less but it approximated the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Community Development Lending

The bank made a relatively high level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

WFBNA made 72 CD loans totaling approximately \$247.7 million, which represented 6.2 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar

volume, 83.8 percent of these loans funded affordable housing that provided 1,422 units of affordable housing, 5.1 percent funded economic development, 3.6 percent funded revitalization and stabilization efforts, and 7.5 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA made a \$2.5 million loan to a CDFI, of which nearly \$277,778 benefitted the AA. The CDFI funded an affordable housing lending program to create permanent housing.
- WFBNA provided a \$15 million line of credit to an organization, of which \$600,000 benefitted the AA. The organization's mission was to transform distressed communities into good places to live, do business, and work and raise families. The organization worked with community development nonprofit partners, providing them with grants, loans, equity, technical assistance, training opportunities, and policy support for low- and moderate-income communities. According to the organization, approximately 70 percent of its clients were low- and moderate-income individuals. In March 2020, an additional \$600,000 was allocated to the AA.
- WFBNA made a \$20 million loan to a CDFI, of which \$628,075 benefitted the AA. The CDFI's purpose was to revitalize/stabilize low- and moderate-income communities by providing funding to improve access to high-quality health and elder care, healthy foods, housing, and education.

Product Innovation and Flexibility

WFBNA made extensive use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 7,844 loans under its flexible lending programs totaling \$600 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	1,047	252,500
Dream. Plan. Home.	623	133,800
PPP	6,174	214,000
Total	7,844	600,300

INVESTMENT TEST

The bank's performance under the Investment Test in the Minneapolis Multistate CSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Minneapolis CSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Minneapolis CSA	111	166,328	347	281,076	458	100.0	447,405	100.0	42	113,737
Total	111	166,328	347	281,076	458	100.0	447,405	100.0	42	113,737
* '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 tracked and recorded by the institution's financial reporting system. Due to rounding, totals may not equal 100.0%										

The bank had an excellent level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$447.4 million and represented 11.2 percent of the bank's tier 1 capital allocated to the AA. The investments also included 317 grants and donations totaling \$38 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 43.4 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 43 percent that focused on community services targeted to low- and moderate-income individuals, and 13.5 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 4,838 units of affordable housing in the AA.

The bank made significant use of innovative or complex investments to support CD initiatives. Approximately 78 percent of current period investment dollars were complex LIHTC and NMTC investments. The following are examples of CD investments made in this AA:

- WFBNA provided multifaceted support through a \$9.7 million equity investment for a 48-unit apartment LIHTC complex located in Minneapolis, Minnesota. Wells Fargo also financed the first phase of the development in 2018. The units were restricted to seniors earning up to 50 percent of the AMI. Four units were designated for high priority homeless and four units were designated to persons with disabilities. The bank also provided a \$9.4 million construction loan. The investment was responsive to the identified needs for affordable housing and homeless services.
- WFBNA launched its third Neighborhood LIFT® event in Minneapolis-St Paul, by providing over \$7 million in support. More than 400 homebuyers utilized the down payment assistance of up to \$15,000 to purchase a home. This initiative supported the OCC's Project REACH effort in the market. The investment was responsive to the need for homebuyer assistance.
- WFBNA provided a \$10.5 million investment for an affordable housing development. This LIHTC development was located in Forest Lake, Minnesota, with 88.7 percent of the units restricted to tenants earning up to 60 percent of the area median family income.

SERVICE TEST

The bank's performance under the Service Test in the Minneapolis Multistate CSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Minneapolis CSA was excellent.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Minneapolis CSA	100.0	101	11.1	5.0	22.8	49.5	22.8	5.0	18.3	49.3	27.1
Total	100.0	101	11.1	5.0	22.8	49.5	22.8	5.0	18.3	49.3	27.1
Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Minneapolis CSA	1	9	-1	-2	-1	-4
Total	1	9	-1	-2	-1	-4

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Minneapolis CSA. WFBNA operated 101 branches in the AA, comprising five branches in low-income geographies, 23 branches in moderate-income geographies, 50 branches in middle-income geographies, and 23 branches in upper-income geographies. The distribution of branches in low-income geographies was equal to the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies. The distribution was augmented by one branch in a middle- and upper-income geography that was within close proximity that served a low-income area and eight branches in middle- and upper-income geographies that were within close proximity to and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These adjacent middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations. Despite the closures, its service delivery systems remained readily accessible.

Services, including where appropriate, business hours did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. All branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the 69 branches opened on Saturdays, two were located in low-income geographies and 17 were located in moderate-income geographies.

Community Development Services

WFBNA was a leader in providing CD services in the Minneapolis Multistate CSA. During the exam period, the bank's qualifying activities performed were significantly impacted by COVID-19 pandemic. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 371 CD service activities to 66 organizations during the evaluation period, logging a total of 1,165 qualified hours within this AA. A majority (78.8 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The other CD services were targeted to affordable housing (15.6 percent), economic development (5.1 percent), and revitalize/stabilize (0.5 percent). The following are examples of CD services provided in this AA:

- A WFBNA employee provided 10 hours of financial education for an organization that protected and promoted the basic human needs of people in poverty through the power of legal volunteers. The organization clients were 95 percent low- and moderate-income individuals.
- A WFBNA employee provided four hours of financial education for an organization that provided a full spectrum of chemical and mental health services, career education, and employment services to individuals and families who faced complex barriers to success, poverty, homelessness, unemployment, chemical addiction, or mental health concerns. The organization served 400 participants who were 100 percent low- and moderate-income individuals.
- WFBNA also demonstrated active involvement and leadership with two bank employees who provided five hours of board service for a nonprofit housing organization that worked in partnership with people in need to build decent, affordable housing. The houses were sold to those in need at no profit and with no interest charged. The organization clients were 100 percent low- and moderate-income individuals. This activity was responsive to the identified need for affordable housing.

Myrtle Beach-Conway, SC-NC CSA (Myrtle Beach Multistate CSA)

CRA rating for the Myrtle Beach Multistate CSA¹⁶: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AA.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank made few, if any, CD loans. CD lending had a negative effect on the Lending Test conclusion.
- The bank had a significant level of qualified CD investments and grants, occasionally in a leadership position. The bank exhibited good responsiveness to credit and community economic development needs. The bank made significant use of innovative or complex investments to support CD initiatives.
- Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the bank's AA.
- The bank provided a relatively high level of CD services.

Description of Institution's Operations in the Myrtle Beach Multistate CSA

The Myrtle Beach Multistate CSA was WFBNA's 41st largest rating area based on its total deposits in the rating area. As of June 30, 2021, the bank maintained approximately \$1.3 billion or 0.1 percent of its total domestic deposits in branches within the rating area. Of the 23 depository financial institutions operating in the rating area, WFBNA, with a deposit market share of 9 percent, was the fourth largest. The top depository financial institutions in the rating area based on market share were Truist Bank (17 percent), The Conway National Bank (10 percent), and Bank of America N.A. (9.4 percent). As of December 31, 2021, the bank operated 11 branches and 26 ATMs in the rating area. WFBNA delineated two AAs within the Myrtle Beach Multistate CSA and includes the Georgetown, SC Micro Area and Myrtle Beach-Conway-North Myrtle Beach, SC-NC MSA (Myrtle Beach MSA). The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. The OCC combined, analyzed, and presented the AAs at the CSA level for purposes of this evaluation. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

The following table provides a summary of the demographics, including housing and business information for the Myrtle Beach Multistate CSA.

¹⁶ This rating only reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Myrtle Beach Multistate CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	120	1.7	17.5	55.8	20.8	4.2
Population by Geography	467,228	1.3	17.0	63.0	18.5	0.2
Housing Units by Geography	305,444	1.3	13.1	59.2	26.2	0.1
Owner-Occupied Units by Geography	137,495	0.4	14.4	63.5	21.6	0.1
Occupied Rental Units by Geography	54,002	3.2	19.0	60.9	16.7	0.2
Vacant Units by Geography	113,947	1.6	8.9	53.2	36.2	0.0
Businesses by Geography	41,283	3.3	14.2	55.5	26.6	0.4
Farms by Geography	1,311	0.8	21.7	60.0	17.0	0.5
Family Distribution by Income Level	127,144	19.8	17.8	20.8	41.6	0.0
Household Distribution by Income Level	191,497	22.7	16.1	18.5	42.6	0.0
Median Family Income MSA - 34820 Myrtle Beach-Conway-North Myrtle Beach, SC-NC MSA		\$53,695	Median Housing Value			\$197,339
Median Family Income Non-MSAs - SC		\$44,609	Median Gross Rent			\$846
			Families Below Poverty Level			13.1%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$22,305 to \$26,848 and moderate-income families earned at least \$22,305 to \$26,848 and less than \$35,687 to \$42,956 in the CSA, depending on the metropolitan or non-metropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$558 to \$671 for low-income borrowers and ranging from \$892 to \$1,074 for moderate-income borrowers in the AA. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$1,059. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA. Moderate-income borrowers would be challenged to afford a mortgage in the non-metropolitan area.

Myrtle Beach MSA

Information from Moody's Analytics indicated that at the end of the evaluation period, the Myrtle Beach MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Myrtle Beach MSA's economy had struggled. Employment had fallen in 2021, causing the area to surrender the lead it held over the South and U.S. Myrtle Beach MSA's reliance on tourism employment was among the highest in the country because a favorable climate, nearly 60 miles of beaches, ease of access to most of the East Coast, and the ability to cater to guests from across the socioeconomic spectrum make the metro area a mecca for travelers. Though tourism has recovered more than half of the jobs lost during the pandemic, it still had a way to go. Tourism employment at the end of 2021 was about 25 percent lower than at the start of 2020, which was a deeper hole than in the South

and the U.S. Fortunately, record-high household wealth, continuing job gains, and pandemic-accumulated savings gave consumers the means to release pent-up demand for vacations as public health conditions improve. As a result, tourism had recouped the majority of its losses. The Myrtle Beach MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Leisure and Hospitality Services, Retail Trade, Government, and Education and Health Services. Major employers in the Myrtle Beach MSA include Walmart, Inc., Coastal Carolina University, Conway Medical Center, and Grand Strand Regional Medical Center. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Myrtle Beach MSA was 4.4 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Myrtle Beach Multistate CSA. The organizations included one community development organization that helped to address the causes and conditions of poverty and one economic development organization that helped to attract and retain businesses in the area. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing units
- Single-family affordable housing
- Rental assistance
- Rehabilitation of housing units/improvement of the quality of housing stock
- Workforce development
- Financial literacy

Opportunities for participation by financial institutions included the following:

- Home-ownership counseling
- Closing cost assistance
- Affordable home mortgage loans

Scope of Evaluation in the Myrtle Beach Multistate CSA

During the evaluation period, the bank originated or purchased 9,111 home mortgage loans, small loans to businesses, and small loans to farms totaling \$1.5 billion in the Myrtle Beach Multistate CSA. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within the AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. The OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MYRTLE BEACH MULTISTATE CSA

LENDING TEST

The bank's performance under the Lending Test in the Myrtle Beach Multistate CSA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the Myrtle Beach CSA was good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Myrtle Beach CSA	6,205	2,857	49	11	9,122	100.0	100.0
Total	6,205	2,857	49	11	9,122	100.0	100.0

Source: Bank Data; Due to rounding, totals may not equal 100.0%

Dollar Volume of Loans (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Myrtle Beach CSA	1,415,307	71,598	1,878	339	1,489,122	100.0	100.0
Total	1,415,307	71,598	1,878	339	1,489,122	100.0	100.0

Source: Bank Data; Due to rounding, totals may not equal 100.0%

As of June 30, 2021, WFBNA had a deposit market share of 9 percent. The bank ranked fourth among 23 depository financial institutions placing it in the top 18 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 4.3 percent based on the number of home mortgage loans originated or purchased. The bank ranked second among 766 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. Other top lenders in the AA based on market share were Rocket Mortgage (8.2 percent) and Truist Bank (4.2 percent).

According to peer small business data for 2021, WFBNA had a market share of 6.3 percent based on the number of small loans to businesses originated or purchased. The bank ranked fourth out of 126 small business lenders, which placed it in the top 4 percent of lenders. The top lenders in the AA based on market share were American Express National Bank (22.4 percent), Truist Bank (8.3 percent), and Bank of America, N.A. (7 percent).

According to peer small farm data for 2021, WFBNA had a market share of 9.9 percent based on the number of small loans to farms originated or purchased. The bank ranked fourth out of 19 small farm lenders, which placed it in the top 22 percent of lenders. The top lenders in the AA based on market

share were First Citizens Bank and Trust (24.6 percent), The Conway National Bank (19.9 percent), and John Deere Financial, FSB (19.3percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O in the Myrtle Beach Multistate CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies exceeded both the percentage of owner-occupied housing units in low-income geographies and the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was well below the percentage of owner-occupied housing units in moderate-income geographies and it was below the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the Myrtle Beach Multistate CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies exceeded both the percentage of businesses in low-income geographies and the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was well below both the percentage of businesses in moderate-income geographies and the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the Myrtle Beach Multistate CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

The bank did not originate or purchase any small loans to farms in low-income geographies. The bank's percentage of small loans to farms in moderate-income geographies was below the percentage of farms in moderate-income geographies but it was near to the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the Myrtle Beach Multistate CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and it was near to the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families and it was near to the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the Myrtle Beach Multistate CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 27.5 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the Myrtle Beach Multistate CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was poor.

The bank did not collect or consider the GAR in the underwriting of approximately 85.7 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was significantly below the percentage of farms in the AA with GAR of \$1 million or less and it was well below the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Community Development Lending

The bank made few, if any, CD loans. CD lending had a negative effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

WFBNA made 11 CD loans totaling approximately \$339,330, which represented 0.2 percent of the allocated tier 1 capital. CD loans were primarily made for community services purposes. By dollar volume, 7.8 percent of these loans funded affordable housing, 11.2 percent funded revitalization and stabilization efforts, and 81 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA made a \$20 million loan to a CDFI, of which \$23,704 benefitted the AA. The CDFI provided funding to improve access to high-quality health and elder care, healthy foods, housing, and education for low-income communities.
- WFBNA made a \$10 million loan to an organization, of which nearly \$11,852 benefitted the AA. The organization invested capital and provided technical assistance to community development organizations for affordable housing, childcare, and education for low- and moderate-income families.
- WFBNA provided a \$4 million line of credit to an organization, of which \$4,741 benefitted the AA. The organization provided scholarships and a range of ancillary programs for low- and moderate-income candidates, scholars, and their families.

Product Innovation and Flexibility

WFBNA made limited use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 490 loans under its flexible lending programs totaling \$33.9 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	93	19,800
Dream. Plan. Home.	18	2,700
PPP	379	11,400
Total	490	33,900

INVESTMENT TEST

The bank's performance under the Investment Test in the Myrtle Beach Multistate CSA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the Myrtle Beach CSA was good.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Myrtle Beach CSA	8	4,919	43	3,545	51	100.0	8,465	100.0	3	2,950
Total	8	4,919	43	3,545	51	100.0	8,465	100.0	3	2,950
* '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 tracked and recorded by the institution's financial reporting system. Due to rounding, totals may not equal 100.0%										

The bank had a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$252 million and represented 5.2 percent of the bank's tier 1 capital allocated to the AA. The investments also included 39 grants and donations totaling \$475,000 to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited good responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 27.5 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 47.1 percent that focused on community services targeted to low- and moderate-income individuals, and 25.5 percent that focused on economic development and/or revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 252 units of affordable housing in the AA.

The bank made significant use of innovative or complex investments to support CD initiatives. Approximately 84.2 percent of current period investment dollars were complex LIHTC investments. The following are examples of CD investments made in this AA:

- WFBNA invested \$20 million into a regional LIHTC fund of which \$3 million was allocated to the AA. The LIHTC development was located in Calabash, North Carolina and it comprised 60 units restricted to tenants earning up to 60 percent of the AMI.
- WFBNA provided 39 grants to a variety of organizations, totaling \$475,000, that helped address immediate community needs due to COVID-19.

SERVICE TEST

The bank's performance under the Service Test in the Myrtle Beach Multistate CSA is rated Low Satisfactory.

Based on a full-scope review, the bank's performance in the Myrtle Beach CSA was adequate.

Retail Banking Services

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Myrtle Beach CSA	100.0	11	5.8	0.0	9.1	45.5	45.5	1.3	17.0	63.0	18.5
Total	100.0	11	5.8	0.0	9.1	45.5	45.5	1.3	17.0	63.0	18.5
Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Myrtle Beach CSA	0	1	0	0	0	-1
Total	0	1	0	0	0	-1

WFBNA's service delivery systems were reasonably accessible to geographies and individuals of different income levels in the Myrtle Beach CSA. WFBNA operated 11 branches in the AA, comprising no branches in low-income geographies, one branch in a moderate-income geography, five branches in middle-income geographies, and five branches in upper-income geographies. The distribution of branches in low-income geographies was significantly below the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies was below the distribution of the population in moderate-income geographies. Within the AA, one branch in middle- and upper-income geographies were within close proximity to serve low- and moderate-income areas. The bank had one branch in close proximity that served a low-income geography. Internal customer data for this branch demonstrated a reasonable level of service to customers in low- and moderate-income areas. These adjacent middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

Services, including where appropriate, business hours did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. All branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the three branches opened on Saturdays, none were located in low- and moderate-income geographies.

Community Development Services

WFBNA provided a relatively high level of CD services in the Myrtle Beach Multistate CSA. During the exam period, the bank's qualifying activities performed were significantly impacted by COVID-19 pandemic. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 42 CD service activities to five organizations, logging a total of 273 qualified hours within this AA during the evaluation period. All of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The following is an example of CD services provided in this AA:

- WFBNA employees provided 245 hours to a global organization that utilizes community-led solutions to identify and resolve community concerns with a primary focus on education, financial stability, and health.

New York-Newark, NY-NJ-CT-PA CSA (New York Multistate CSA)

CRA rating for the New York Multistate CSA¹⁷: Satisfactory

Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited an adequate geographic distribution of loans in its AA.
- The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments and grants, often in a leadership position. The bank exhibited excellent responsiveness to credit and community economic development needs. The bank made significant use of innovative or complex investments to support CD initiatives.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's full-scope AA.
- The bank provided a limited level of CD services.

Description of Institution's Operations in the New York Multistate CSA

The New York Multistate CSA was WFBNA's fifth largest rating area based on its total deposits in the rating area. As of June 30, 2021, the bank maintained approximately \$82.8 billion or 5.6 percent of its total domestic deposits in branches within the rating area. Of the 212 depository financial institutions operating in the rating area, WFBNA, with a deposit market share of 3 percent, was the 10th largest. The top depository financial institutions in the rating area based on market share were JPMorgan Chase Bank, N.A. (31.9 percent), Goldman Sachs Bank USA (7.5 percent), and Bank of America, N.A. (7.5 percent). As of December 31, 2021, the bank operated 343 branches and 642 ATMs in the rating area. WFBNA delineated 11 AAs within the New York Multistate CSA and includes the Bridgeport-Stamford-Norwalk, CT MSA (Bridgeport MSA), New Haven-Milford, CT MSA (New Haven MSA), Torrington, CT Micro Area, New Brunswick-Lakewood, NJ MD (New Brunswick MD), Newark, NJ-PA MD (Newark MD), Trenton-Princeton, NJ MSA (Trenton MSA), Kingston, NY MSA (Kingston MSA), Nassau County-Suffolk County, NY MD (Nassau County MD), New York-Jersey City-White Plains, NY-NJ MD (New York MD), Poughkeepsie-Newburgh-Middletown, NY MSA (Poughkeepsie MSA), and East Stroudsburg, PA MSA (East Stroudsburg MSA). The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. The OCC combined, analyzed, and presented the AAs at the CSA level for purposes of this evaluation. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

¹⁷ This rating only reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

The following table provides a summary of the demographics, including housing and business information for the New York Multistate CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: New York Multistate CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	5,309	11.2	21.0	33.9	32.1	1.9
Population by Geography	22,687,854	11.4	21.8	33.0	33.6	0.2
Housing Units by Geography	8,975,157	10.7	21.2	33.1	34.8	0.
Owner-Occupied Units by Geography	4,346,371	3.1	13.7	38.4	44.7	0.1
Occupied Rental Units by Geography	3,767,018	19.4	29.3	26.8	24.3	0.2
Vacant Units by Geography	861,768	11.5	23.3	34.1	31.0	0.2
Businesses by Geography	2,913,753	7.8	17.2	30.8	43.2	1.0
Farms by Geography	42,727	4.7	15.0	35.9	44.2	0.2
Family Distribution by Income Level	5,381,024	24.8	15.6	17.5	42.0	0.0
Household Distribution by Income Level	8,113,389	27.0	14.4	16.0	42.7	0.0
Median Family Income MSA - 14860 Bridgeport-Stamford-Norwalk, CT MSA		\$105,628	Median Housing Value			\$440,472
Median Family Income MSA - 20700 East Stroudsburg, PA MSA		\$66,783	Median Gross Rent			\$1,321
Median Family Income MSA - 28740 Kingston, NY MSA		\$74,546	Families Below Poverty Level			10.8%
Median Family Income MSA - 35004 Nassau County-Suffolk County, NY		\$108,193				
Median Family Income MSA - 35084 Newark, NJ-PA		\$90,570				
Median Family Income MSA - 35154 New Brunswick-Lakewood, NJ		\$95,564				
Median Family Income MSA - 35300 New Haven-Milford, CT MSA		\$80,739				
Median Family Income MSA - 35614 New York-Jersey City-White Plains, NY-NJ		\$67,560				
Median Family Income MSA - 39100 Poughkeepsie-Newburgh-Middletown, NY MSA		\$85,780				
Median Family Income MSA - 45940 Trenton-Princeton, NJ MSA		\$94,908				
Median Family Income Non-MSAs - CT		\$89,735				
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$33,392 to \$54,097 and moderate-income families earned at least \$33,392 to \$54,097 and less than \$53,426 to \$86,554 in the AA, depending on the metropolitan or non-metropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$835 to \$1,352 for low-income borrowers and ranging from \$1,336 to \$2,164 for moderate-income borrowers in the AA. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$2,365. Low- and moderate-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Information from Moody's Analytics indicated that at the end of the evaluation period, the New York Multistate CSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic.

Bridgeport MSA

The Bridgeport MSA recovered less than two-thirds of jobs lost at the height of the pandemic, placing it below the state and national averages. The Bridgeport MSA had been steadily adding payrolls, albeit at a slow pace. Leisure/hospitality led job gains, with health services also adding support, while financial services and retail were dragging growth. The housing market remained strong, and demand for housing kept builders busy. House prices in the Bridgeport MSA soared above the national pace, a notable achievement considering Fairfield County's lackluster growth over the last two decades. The renewed appeal of the suburbs had been supported by remote-and hybrid-work patterns making commutes more palatable. Existing-home sales skyrocketed at the end of 2020 and early 2021, but a shortage of supply kept transactions in check while pushing prices higher. In turn, additional building was likely. Construction payrolls in the Bridgeport MSA already surpassed their pre-pandemic levels. Government contracts supported hiring in the Bridgeport MSA's defense manufacturing industry. The Bridgeport MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Professional and Business Services, Retail Trade, Government, and Financial Activities. Major employers in the Bridgeport MSA included Sikorsky Aircraft Corp., ASM US, Inc., Ceci Brothers, Inc., and Deloitte. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Bridgeport MSA was 4.1 percent compared to the national unemployment rate of 3.7 percent.

New Haven MSA

New Haven MSA's economy made progress throughout 2021, recovering more of the jobs lost during the crisis than the state or region. The important education/healthcare industry was growing, as was hospitality. Elevated house prices were supporting homebuilding, with new permits for single-family homes picking up over the last six months, leading construction payrolls to surge past their early-2020 level. The large healthcare network primarily drove gains. Biotech remained a promising avenue for job growth. The healthcare and education industries drove the recovery. Higher education was a mainstay of the economy and the reopening of campuses and a return to in-person instruction fostered the return of many lost jobs. The New Haven MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Government, Professional and Business Services, and Retail Trade. Major employers in the New Haven MSA include Yale New Haven Health System and Yale University. According to the Bureau of Labor Statistics, the

December 2021 non-seasonally adjusted unemployment rate for the New Haven MSA was 3.8 percent compared to the national unemployment rate of 3.7 percent.

Trenton MSA

With more than two-thirds of the jobs recovered, the Trenton MSA was ahead of its regional peers, although that partly reflected a less severe decline early in the pandemic. Payroll growth in high-wage jobs was back in the driver's seat, bolstered by pharmaceutical research. Hiring in the pivotal public sector remained dormant, though it was suffering much less compared with the rest of the economy over the past year. Meanwhile, house price growth had started to cool in line with the national trend as single-family permits rose and supply pressures abated. As a state capital, Trenton boasted an above-average share of public sector employment, which provided the local economy a crucial anchor during the pandemic. Its proximity to key markets such as New York City and Philadelphia also helped to attract white-collar firms. The Trenton MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Government, Education and Health Services, and Professional and Business Services. Major employers in the Trenton MSA include Bank of America, Princeton University, and Bristol-Myers Squibb. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Trenton MSA was 3.4 percent compared to the national unemployment rate of 3.7 percent.

Kingston MSA

Kingston's recovery was treading water. The labor market was recouping jobs much more slowly than the U.S. Kingston got an early boost from leisure/hospitality, but the industry's ability to buoy the economy was diminishing. The Kingston MSA's share of vacation homes was higher than its Catskills neighbors, giving tourists more of the accommodations they demand. Government was the heaviest weight on the economy; payrolls were barely higher than they were at the trough of the recession. Leisure/hospitality was the largest source of job creation, and state government was poised for a rebound. State government and consumer services benefited as State University of New York at New Paltz's students returned to campus. The Kingston MSA's share of jobs in state government was double that of the U.S. and the university was one of the metro area's main sources of well-paying jobs. The Kingston MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Government, Education and Health Services, Retail Trade, and Leisure and Hospitality Services. Major employers in the Kingston MSA include Health Alliance of the Hudson Valley and State University of New York at New Paltz. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Kingston MSA was 2.8 percent compared to the national unemployment rate of 3.7 percent.

East Stroudsburg MSA

East Stroudsburg's recovery made steady gains, outperforming the region through midyear. Initial job losses were much more severe, but East Stroudsburg had closed the gap with the region in jobs recovered. Leisure/hospitality and retail trade grew at an above-average pace in the lead-up to the fall and winter tourism seasons. Manufacturing expanded and was at a decade high. The public sector had been the main drag and was considerably further from pre-pandemic levels than the nation. Rising house prices have not been enough to sustain homebuilder interest as single-family permits have fallen back from earlier highs. The East Stroudsburg MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Government, Leisure and Hospitality Services,

Retail Trade, and Education and Health Services. Major employers in the East Stroudsburg MSA include Tobyhanna Army Depot, Sanofi Pasteur, and Pocono Medical Center. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the East Stroudsburg MSA was 5.7 percent compared to the national unemployment rate of 3.7 percent.

Nassau County MD

The Nassau County MD's strengths included a robust healthcare sector, linkages to New York City that contributed to high per capita income, and a highly skilled workforce. Its weaknesses included high costs for residents and firms due to the tax burden and elevated housing prices, lack of developable land, and persistent out-migration and rapidly aging population. The area's economic slowdown spanned most sectors, but white-collar industries have performed worst. Leisure and retail were stable, but that was insufficient to overcome weakness elsewhere. Strong demand for housing kept builders busy even as a massive commercial project wound down. House prices in Nassau County were soaring at a rate that closely resembled the national figure. The Nassau County MD has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Government, Professional and Business Services, and Retail Trade. Major employers in the Nassau County MD include Northwell Health, Henry Schein, Inc., Volt Information Sciences, Inc., JetBlue Airways, Altice USA, and Broadridge Financial Solutions, Inc. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Nassau County MD was 2.7 percent compared to the national unemployment rate of 3.7 percent.

New Brunswick MD

The New Brunswick MD had a population of 2.4 million according to the U.S. Census. The median age in New Brunswick MD was 41.2. The area had 875,614 households with an average of 2.7 persons per household and 69 percent were married couples. New Brunswick MD had 980,073 housing units with 89 percent occupied and 72 percent owner occupied with 74 percent of structures being single units.

Newark MD

Newark was headed in the right direction with finance and government contributing valuable stability. Area strengths included an abundance of high-value-added industries, coastal location, Port of Newark that allowed the economy to benefit from trade, and a well-educated and productive workforce. The weaknesses included weak population growth, high business and living costs, and an unfavorable age structure. The Newark MD has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Professional and Business Services, Education and Health Services, and Government. Major employers in the Newark MD include Newark International Airport, University of Medicine and Dentistry of New Jersey, Verizon, and United Airlines, Inc. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Newark MD was 4.9 percent compared to the national unemployment rate of 3.7 percent.

New York MD

The New York MD was regaining some momentum after a late-summer slowdown. Payroll growth had outpaced that of the nation since the fall of 2020, helped by renewed in-person office work and the reopening of key attractions such as Broadway. Still, recent progress barely made a dent in the gap with the U.S. In fact, the New York MD was further from its pre-pandemic employment peak than any other

top 50 metropolitan area or division. While private services were faring well, the public sector and education slumped. Both were struggling to overcome a pickup in out-migration that had persisted in the aftermath of the pandemic. The silver lining, however, was that reduced overall demand was keeping inflation in check, with consumer prices rising far more slowly than they were nationally. The New York MD has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Professional and Business Services, and Government. Major employers in the New York MD include Montefiore Health System, Mount Sinai Health System, JPMorgan Chase & Co., Bank of America, New York-Presbyterian Healthcare System, NYU Langone Medical Center, and Macy's, Inc. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the New York MD was 5.4 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the New York Multistate CSA. The organizations included one community development organization that helped to address the causes and conditions of poverty and one economic development organization that helped to attract and retain businesses in the area. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing units
- Single-family affordable housing
- Rental assistance
- Rehabilitation of housing units/improvement of the quality of housing stock
- Workforce development
- Financial literacy

Opportunities for participation by financial institutions included the following:

- Home-ownership counseling
- Closing cost assistance
- Affordable home mortgage loans

Scope of Evaluation in the New York Multistate CSA

During the evaluation period, the bank originated or purchased 234,384 home mortgage loans, small loans to businesses, and small loans to farms totaling \$80.4 billion in the New York Multistate CSA. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within the AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. The OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NEW YORK MULTISTATE CSA

LENDING TEST

The bank's performance under the Lending Test in the New York Multistate CSA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the New York CSA was good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
New York CSA	155,421	78,587	376	153	234,537	100.0	100.0
Total	155,421	78,587	376	153	234,537	100.0	100.0

Source: Bank Data; Due to rounding, totals may not equal 100.0%

Dollar Volume of Loans (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
New York CSA	77,671,180	2,684,612	7,797	3,674,264	84,037,853	100.0	100.0
Total	77,671,180	2,684,612	7,797	3,674,264	84,037,853	100.0	100.0

Source: Bank Data; Due to rounding, totals may not equal 100.0%

As of June 30, 2021, WFBNA had a deposit market share of 3 percent. The bank ranked 10th among 212 depository financial institutions placing it in the top 5 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 7.2 percent based on the number of home mortgage loans originated or purchased. The bank ranked second among 1,041 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. The other top lenders in the AA based on market share were Rocket Mortgage (7.2 percent) and JPMorgan Chase Bank, N.A. (6.2 percent).

According to peer small business data for 2021, WFBNA had a market share of 2.4 percent based on the number of small loans to businesses originated or purchased. The bank ranked 10th out of 457 small business lenders, which placed it in the top 3 percent of lenders. The top lenders in the AA based on market share were American Express (24.3 percent), JPMorgan Chase Bank, N.A. (19.3 percent), and Bank of America, N.A. (7.5 percent).

According to peer small farm data for 2021, WFBNA had a market share of 9 percent based on the number of small loans to farms originated or purchased. The bank ranked fourth out of 46 small farm lenders, which placed it in the top 9 percent of lenders. The top lenders in the AA based on market share

were JPMorgan Chase Bank, N.A. (40.7 percent), Bank of America, N.A. (11.7 percent), and U.S. Bank, N.A. (9.4 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AA. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O in the New York Multistate CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans in low-income geographies was below the percentage of owner-occupied housing units in low-income geographies and it was well below the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was below both the percentage of owner-occupied housing units in moderate-income geographies and the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the New York Multistate CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was near to both the percentage of businesses in low-income geographies and the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was below the percentage of businesses in moderate-income geographies but it was near to the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the New York Multistate CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

The bank's percentage of small loans to farms in low-income geographies was significantly below the percentage of farms in low-income geographies and it was well below the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-income geographies was significantly below the percentage of farms in moderate-income geographies and it was below the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the New York Multistate CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and it was below the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was below both the percentage of moderate-income families and the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the New York Multistate CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 29.3 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was well below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the New York Multistate CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was adequate.

The bank did not collect or consider the GAR in the underwriting of approximately 48.7 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below the percentage of farms in the AA with GAR of \$1 million or less and it was below the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

WFBNA made 153 CD loans totaling approximately \$3.7 billion, which represented 34.1 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 96.7 percent of these loans funded affordable housing that provided 16,996 units of affordable housing, 1.2 percent funded economic development, 0.7 percent funded revitalization and stabilization efforts, and 1.4 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA made a \$56.7 million construction loan to finance the construction of two residential buildings in the AA. One building comprised 60 units all of which were set aside for affordable apartments and five units for formerly homeless tenants. The other building comprised 355-units with 190 units restricted to tenants earning up to 60 percent of the AMI and 10 percent of the affordable units for formerly homeless tenants.
- WFBNA made a \$4.1 million term loan and a \$3.3 million bridge loan to an organization that supported economic development in the AA. The organization promoted growth and job creation for New York small businesses. This financing was made in conjunction with the SBA's 504 Certified Development Company program, which is a long-term financing tool for economic development within a community.
- WFBNA made a \$20 million loan to support a new economic recovery program. The program provided working capital and access to credit to small businesses, nonprofits, and small residential landlords as they reopened in the aftermath of COVID-19. The program targeted residential landlords whose properties were in low- and moderate-income census tracts or who served low- and moderate-income tenants.

Product Innovation and Flexibility

WFBNA used flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 16,288 loans under its flexible lending programs totaling over \$1 billion. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	1,010	310,500
Dream. Plan. Home.	272	59,000
PPP	15,006	654,700
Total	16,288	1,024,200

INVESTMENT TEST

The bank's performance under the Investment Test in the New York Multistate CSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the New York CSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
New York CSA	206	1,458,132	989	1,726,366	1,195	100.0	3,184,497	100.0	112	1,565,029
Total	206	1,458,132	989	1,726,366	1,195	100.0	3,184,497	100.0	112	1,565,029
* '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 tracked and recorded by the institution's financial reporting system. Due to rounding, totals may not equal 100.0%										

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$3.2 billion and represented 29.5 percent of the bank's tier 1 capital allocated to the AA. The investments also included 908 grants and donations totaling \$95.7 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 37.7 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 44.4 percent that focused on community services targeted to low- and moderate-income individuals, and 17.9 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 40,741 units of affordable housing in the AA.

The bank made significant use of innovative or complex investments to support CD initiatives. Approximately 84.8 percent of current period investment dollars were complex LIHTC and NMTC investments. The following are examples of CD investments made in this AA:

- WFBNA provided 908 grants to a variety of organizations totaling nearly \$95.7 million, including 21 Open for Business grants totaling \$35.5 million responding to the immediate needs due to COVID-19. Additionally, the bank invested in an MDI and launched Neighborhood LIFT that benefitted this AA.
- WFBNA responded to the identified need for affordable housing by providing funding through the Housing Affordability Breakthrough Challenge to a New York City nonprofit. WFBNA provided \$15 million in grants to a national nonprofit for this initiative. The national organization then provided a \$2 million grant to a New York City organization to support developing a digital mortgage lending system that reduced differential pricing to minority borrowers; increase loan approvals for families of color and low- and moderate-income borrowers; and reduce home loan defaults by making lending non-discriminatory, at scale. The innovative technology used alternative credit data such as cash flow analysis to evaluate the client's financial health and increased access to credit, homeownership, and wealth building for minority families.
- WFBNA provided a \$68.3 million investment for an affordable housing development. This LIHTC development was located in Queens, New York, with 29.9 percent of the total units restricted to tenants earning up to 80 percent of the AMI.

SERVICE TEST

The bank's performance under the Service Test in the New York Multistate CSA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in New York CSA was good.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
New York CSA	100.0	343	6.0	7.3	16.3	27.4	48.1	11.4	21.8	33.0	33.6
Total	100.0	343	6.0	7.3	16.3	27.4	48.1	11.4	21.8	33.0	33.6
Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
New York CSA	3	39	-1	-5	-14	-16
Total	3	39	-1	-5	-14	-16

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the New York CSA. WFBNA operated 363 branches in the AA, comprising 25 branches in low-income geographies, 56 branches in moderate-income geographies, 94 branches in middle-income geographies, 165 branches in upper-income geographies, and three branches in geographies without an income designation. The distribution of branches in low-income geographies was below to the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies was near to the distribution of the population in moderate-income geographies. The distribution was augmented by four branches in middle- and upper-income geographies that were within close proximity to serve low-income areas and 18 branches in middle- and upper-income geographies that were within close proximity to and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches had generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations. Despite the closures, its service delivery systems remained readily accessible.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday and generally 9:00 a.m. to 12:00 p.m. Saturday. Of the 239 branches opened on Saturdays, 23 were located in low-income geographies and 46 were located in moderate-income geographies.

Community Development Services

WFBNA provided a limited level of CD services in the New York Multistate CSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 230 CD service activities to 59 organizations, logging a total of 641 qualified hours within this AA during the evaluation period. A majority (70 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The other CD services were targeted to revitalize/stabilize (20.4 percent), economic development (7.4 percent) and affordable housing (2.2 percent). The bank's assistance provided was responsive to the identified needs in the AA. The following are examples of CD services provided in this AA:

- A WFBNA employee provided two hours of financial education to an organization whose mission was to transform the lives of youth and poor communities through the developmental power of performance, in partnership with caring adults. According to the organization, 100 percent of its clients were low- and moderate-income as they earned less than 80 percent of the AMI. This activity was responsive to the identified need for financial health.
- A WFBNA employee provided four hours of board service for this organization whose mission was to transform at-risk communities through strategic investments of capital and knowledge. Data provided during the organization's grant application process stated 85 percent of its clients were low- and moderate-income individuals as they earned less than 80 percent of the AMI.

Omaha-Council Bluffs, NE-IA MSA (Omaha Multistate MSA)

CRA rating for the Omaha Multistate MSA¹⁸: Outstanding

Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected good responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AA.
- The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments and grants, often in a leadership position. The bank exhibited excellent responsiveness to credit and community economic development needs. The bank made significant use of innovative or complex investments to support CD initiatives.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.
- The bank provided a limited level of CD services.

Description of Institution's Operations in the Omaha Multistate MSA

The Omaha Multistate MSA was WFBNA's 30th largest rating area based on its total deposits in the rating area. As of June 30, 2021, the bank maintained approximately \$3.8 billion or 0.3 percent of its total domestic deposits in branches within the rating area. Of the 72 depository financial institutions operating in the rating area, WFBNA, with a deposit market share of 10.4 percent, was the second largest. Other top depository financial institutions in the rating area based on market share were First National Bank of Omaha (33.11 percent), U.S. Bank, N.A. (9.21 percent), and American National Bank (7.15 percent). As of December 31, 2021, the bank operated 19 branches and 41 ATMs in the rating area. WFBNA delineated one AA within the Omaha Multistate MSA and includes the Omaha-Council Bluffs, NE-IA MSA. The AA met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

The following table provides a summary of the demographics, including housing and business information for the Omaha Multistate MSA.

¹⁸ This rating only reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Omaha Multistate MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	255	11.8	21.2	42.7	24.3	0.0
Population by Geography	895,919	8.8	20.3	43.7	27.2	0.0
Housing Units by Geography	371,201	9.1	20.8	45.6	24.4	0.0
Owner-Occupied Units by Geography	226,803	4.6	17.5	46.2	31.7	0.0
Occupied Rental Units by Geography	117,621	15.6	26.7	44.8	12.9	0.0
Vacant Units by Geography	26,777	19.1	22.9	44.2	13.8	0.0
Businesses by Geography	75,301	6.2	15.0	47.5	31.3	0.0
Farms by Geography	4,177	2.1	8.4	61.5	28.0	0.0
Family Distribution by Income Level	225,879	20.4	17.9	21.5	40.2	0.0
Household Distribution by Income Level	344,424	23.3	16.7	18.4	41.6	0.0
Median Family Income MSA - 36540 Omaha-Council Bluffs, NE-IA MSA		\$73,632	Median Housing Value			\$152,092
			Families Below Poverty Level			8.6%
			Median Gross Rent			\$822
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$36,816 and moderate-income families earned at least \$36,816 and less than \$58,906 in the AA. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$920 for low-income borrowers and \$1,473 for moderate-income borrowers in the AA. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$816. Low- and moderate-income borrowers would be able to afford a mortgage loan for a median-priced home in this AA.

The Omaha MSA's strengths included low costs, skilled workforce, upbeat population growth, high-wage management jobs, above-average labor force participation, high housing affordability, and below-average employment volatility. Its weaknesses included tight labor market and below-average role for high tech. Omaha-Council Bluffs' recovery was gaining steam after a slow first half of 2021. Private services employment picked up, with growth tracking the state average. Job gains have been driven mainly by leisure/hospitality, which was closing in on pre-pandemic levels. Meanwhile, the key finance sector had struggled, and logistics was advancing at a fraction of the national rate. Goods-producing payrolls have also made little headway recently. The Omaha Multistate MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Professional and Business Services, Government, Retail Trade, and Financial Activities. Major employers in the Omaha MSA include Offutt Air Force Base, Nebraska Medicine, CHI, and Methodist Health System. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Omaha MSA was 2.2 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Omaha Multistate MSA. The organizations included one community development organization that helped to address the causes and conditions of poverty and one economic development organization that helped to attract and retain businesses in the area. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing units
- Single-family affordable housing
- Rental assistance
- Rehabilitation of housing units/improvement of the quality of housing stock
- Workforce development
- Financial literacy

Opportunities for participation by financial institutions included the following:

- Home-ownership counseling
- Closing cost assistance
- Affordable home mortgage loans

Scope of Evaluation in the Omaha Multistate MSA

During the evaluation period, the bank originated or purchased 16,555 home mortgage loans, small loans to businesses, and small loans to farms totaling \$2.6 billion in the Omaha Multistate MSA. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within the AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. The OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE OMAHA MULTISTATE MSA

LENDING TEST

The bank's performance under the Lending Test in the Omaha Multistate MSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Omaha MSA was excellent.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Omaha MSA	11,563	4,921	71	12	16,567	100.0	100.0
Total	11,563	4,921	71	12	16,567	100.0	100.0
Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Omaha MSA	2,511,874	136,230	3,740	40,833	2,692,677	100.0	100.0
Total	2,511,874	136,230	3,740	40,833	2,692,677	100.0	100.0
Source: Bank Data; Due to rounding, totals may not equal 100.0%							

As of June 30, 2021, WFBNA had a deposit market share of 10.4 percent. The bank ranked second among 72 depository financial institutions placing it in the top 5 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 5.9 percent based on the number of home mortgage loans originated or purchased. The bank ranked third among 427 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. Other top three lenders in the AA based on market share were First National Bank of Omaha (8.6 percent) and U.S. Bank, N.A. (6.8 percent).

According to peer small business data for 2021, WFBNA had a market share of 8.4 percent based on the number of small loans to businesses originated or purchased. The bank ranked fifth out of 134 small business lenders, which placed it in the top 4 percent of lenders. The top lenders in the AA based on market share were First National Bank of Omaha (14.4 percent), American Express (13.7 percent), and JPMorgan Chase Bank, N.A. (11.1 percent).

According to peer small farm data for 2021, WFBNA had a market share of 2 percent based on the number of small loans to farms originated or purchased. The bank ranked 10th out of 30 small farm lenders, which placed it in the top 34 percent of lenders. The top lenders in the AA based on market share were John Deere Financial (18.5 percent), Union Bank and Trust (18.5 percent), and Cornerstone Bank (10.8 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O in the Omaha Multistate MSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans in low-income geographies was significantly below the percentage of owner-occupied housing units in low-income geographies and it was well below the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was well below the percentage of owner-occupied housing units in moderate-income geographies and it was below the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the Omaha Multistate MSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies was below the percentage of businesses in low-income geographies but it was near to the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies approximated the percentage of businesses in moderate-income geographies and it exceeded the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the Omaha Multistate MSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

The bank's percentage of small loans to farms in low-income geographies exceeded both the percentage of farms in low-income geographies and the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-income geographies was significantly below both the percentage of farms in moderate-income geographies and the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the Omaha Multistate MSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but it approximated the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the Omaha Multistate MSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 32 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the Omaha Multistate MSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms poor.

The bank did not collect or consider the GAR in the underwriting of approximately 54.9 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below both the percentage of farms in the AA with GAR of \$1 million or less and the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

WFBNA made 12 CD loans totaling approximately \$40.8 million, which represented 8.2 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 58.1 percent of these loans funded affordable housing that provided 143 units of affordable housing, 0.2 percent funded revitalization and stabilization efforts, and 41.7 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA made a \$13.7 million construction loan to finance two LIHTC developments. The project consisted of an 84-unit apartment LIHTC complex located in Omaha, Nebraska, of which 67 units were for tenants with incomes up to 60 percent of the AMI.
- WFBNA made a \$8.1 million construction loan for an LIHTC development located in Omaha, Nebraska. The project consisted of 75 units, of which 67 units were targeted to seniors 55 and older earning up to 60 percent the AMI.
- WFBNA provided a \$17 million line of credit to an organization that provided community services for low- and moderate-income individuals with intellectual disabilities in the AA. The organization offered vocational training, independent living skills training and assistance, as well as supported residential services.

Product Innovation and Flexibility

WFBNA used flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 949 loans under its flexible lending programs totaling \$75.7 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	232	46,700
Dream. Plan. Home.	61	9,900
PPP	656	19,100
Total	949	75,700

INVESTMENT TEST

The bank's performance under the Investment Test in the Omaha Multistate MSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Omaha MSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Omaha MSA	46	53,578	127	36,851	173	100.0	90,429	100.0	28	18,151
Total	46	53,578	127	36,851	173	100.0	90,429	100.0	28	18,151
* '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 tracked and recorded by the institution's financial reporting system. Due to rounding, totals may not equal 100.0%										

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$90.4 million and represented 18.2 percent of the bank's tier 1 capital allocated to the AA. The investments also included 118 grants and donations totaling \$4.8 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 42.2 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 49.1 percent that focused on community services targeted to low- and moderate-income individuals, and 8.7 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 1,701 units of affordable housing in the AA.

The bank made significant use of innovative or complex investments to support CD initiatives. Approximately 83.3 percent of current period investment dollars were complex LIHTC investments. The following are examples of CD investments made in this AA:

- WFBNA provided a \$12.4 million equity investment for an 84-unit apartment LIHTC complex located in Omaha, Nebraska. Sixty-seven units were restricted to tenants with incomes up to 60 percent of the AMI. WFBNA also provided a \$13.6 million construction loan for this project.
- WFBNA provided the debt and equity financing totaling \$3.2 million for a 12-unit LIHTC development, located in Ashland, Nebraska, with nine units restricted to families with incomes up to 60 percent of the AMI.

- WFBNA responded to the identified need for homebuyer/owner assistance during the evaluation period by providing three grants totaling \$95,000 to an organization that was founded in 1968 to improve opportunities for low-income families to purchase homes in Omaha, Nebraska. One of the grants for \$75,000 was provided in September 2019 and expanded the organization's Pathways to Prosperity Program (P2P). P2P was a high-impact program that ensured access to affordable housing and opportunities for home ownership through financial education, homeownership education and counseling, asset development, free tax preparation, and individualized coaching. The remaining two grants supported homeownership counseling programs and general operating support.

SERVICE TEST

The bank's performance under the Service Test in the Omaha Multistate MSA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the Omaha MSA was good.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Omaha MSA	100.0	19	5.6	10.5	31.6	26.3	31.6	8.8	20.3	43.7	27.2
Total	100.0	19	5.6	10.5	31.6	26.3	31.6	8.8	20.3	43.7	27.2
Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Omaha MSA	0	1	0	0	-1	0
Total	0	1	0	0	-1	0

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Omaha MSA. WFBNA operated 19 branches in the AA, comprising two branches in low-income geographies, six branches in moderate-income geographies, five branches in middle-income geographies, and six branches in upper-income geographies. The distribution of branches in low-income geographies exceeded the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies. The distribution was augmented by one branch in middle- and upper-income geographies that were within close proximity that served a low-income area and one branch in middle- and upper-income geographies that served a moderate-income area. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income

areas. These adjacent middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed the branch primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations. Despite the closure, its service delivery systems remained readily accessible.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. All branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the 15 branches opened on Saturdays, two were located in low-income geographies and five were located in moderate-income geographies.

Community Development Services

WFBNA provided a limited level of CD services in the Omaha Multistate MSA. During the exam period, the bank's qualifying activities performed were significantly impacted by COVID-19 pandemic. Bank records showed that employees provided their financial or job-specific expertise and/or technical assistance for 56 CD service activities to 14 organizations, logging a total of 187 qualified hours within this AA during the evaluation period. A majority (78.6 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The other CD services were targeted to affordable housing (17.9 percent) and economic development (3.6 percent). The following are examples of CD services provided in this AA:

- A WFBNA employee provided four hours of financial education to 1,900 high school students where the majority of the student population qualified for the free or reduced lunch program.
- A WFBNA employee provided eight hours of technical expertise in financial education to a nonprofit organization, which served the affordable housing needs of 500 low- and moderate-income individuals and families. The organization focuses on comprehensive approaches to affordable housing and community development. Their mission was to lead in creating innovative housing solutions for underserved populations through strategic partnerships that contribute to building stronger communities.

Philadelphia-Reading-Camden, PA-NJ-DE CSA (Philadelphia Multistate CSA)

CRA rating for the Philadelphia Multistate CSA¹⁹: Outstanding

Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AA.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank made a relatively high level of CD loans. CD lending had a positive effect on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments and grants, often in a leadership position. The bank exhibited excellent responsiveness to credit and community economic development needs. The bank occasionally used innovative or complex investments to support CD initiatives.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.
- The bank provided a limited level of CD services.

Description of Institution's Operations in the Philadelphia Multistate CSA

The Philadelphia Multistate CSA was WFBNA's 12th largest rating area based on its total deposits in the rating area. As of June 30, 2021, the bank maintained approximately \$39.5 billion or 2.7 percent of its total domestic deposits in branches within the rating area. Of the 114 depository financial institutions operating in the bank's AAs within the state, WFBNA, with a deposit market share of 6.2 percent, was the third largest. Other top depository financial institutions in the rating area based on market share were Capital One, N.A. (26.8 percent), TD Bank, N.A. (26.78 percent) and PNC Bank, N.A. (5.19 percent). As of December 31, 2021, the bank operated 183 branches and 360 ATMs in the rating area. WFBNA delineated eight AAs within the Philadelphia Multistate CSA and includes the Dover, DE MSA (Dover MSA), Wilmington, DE MD (Wilmington MD), Atlantic City-Hammonton, NJ MSA (Atlantic City MSA), Camden, NJ MD (Camden MD), Ocean City, NJ MSA (Ocean City MSA), Montgomery County-Bucks County-Chester County, PA MD (Montgomery County MD), Philadelphia, PA MD (Philadelphia MD), and Reading, PA MSA (Reading MSA). The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. The OCC combined, analyzed, and presented the AAs at the CSA level for purposes of this evaluation. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

The following table provides a summary of the demographics, including housing and business information for the Philadelphia Multistate CSA.

¹⁹ This rating only reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Philadelphia Multistate CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,659	7.8	22.7	38.8	29.3	1.4
Population by Geography	6,823,255	7.2	21.4	40.4	30.6	0.3
Housing Units by Geography	2,833,073	7.4	22.2	40.1	30.1	0.2
Owner-Occupied Units by Geography	1,715,839	3.8	17.2	43.7	35.3	0.1
Occupied Rental Units by Geography	810,186	13.2	30.3	34.6	21.4	0.5
Vacant Units by Geography	307,048	12.7	29.2	34.0	23.9	0.3
Businesses by Geography	775,915	5.2	18.5	38.5	37.3	0.5
Farms by Geography	16,369	2.0	13.0	49.1	35.7	0.2
Family Distribution by Income Level	1,645,534	21.9	17.2	20.0	40.8	0.0
Household Distribution by Income Level	2,526,025	25.0	15.6	17.1	42.2	0.0
Median Family Income MSA - 12100 Atlantic City-Hammonton, NJ MSA		\$66,523	Median Housing Value			\$243,277
Median Family Income MSA - 15804 Camden, NJ		\$87,133	Median Gross Rent			\$1,039
Median Family Income MSA - 20100 Dover, DE MSA		\$64,252	Families Below Poverty Level			9.4%
Median Family Income MSA - 33874 Montgomery County-Bucks County- Chester County, PA		\$99,939				
Median Family Income MSA - 36140 Ocean City, NJ MSA		\$74,509				
Median Family Income MSA - 37964 Philadelphia, PA		\$56,411				
Median Family Income MSA - 39740 Reading, PA MSA		\$67,696				
Median Family Income MSA - 48864 Wilmington, DE-MD-NJ		\$80,707				
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$28,206 to \$49,970 and moderate-income families earned at least \$28,206 to \$69,970 and less than \$45,129 to \$79,951 in the AA, depending on the metropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$705 to \$1,249 for low-income borrowers and ranging from \$1,128 to \$1,999 for moderate-income borrowers in the AA. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$1,306. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Atlantic City MSA

After making steady progress during the first half of 2021, the Atlantic City MSA's economy was treading water. Although the recovery was in line with the regional pace, payrolls contracted slightly in the third quarter. The crucial leisure/hospitality sector recovered more than three-fourths of its massive early-pandemic job losses, but recent gains have been relatively muted. Increased competition from regional peers such as Pennsylvania and New York have harmed gaming locally, especially as online betting supplanted in-person gambling. Although New Jersey's strong market provided its betting industry with increased revenues, the Atlantic City MSA stood to suffer if the recent trend toward online betting, accelerated by the pandemic, became more pronounced. Meanwhile, house prices that grew at a faster clip than those of the nation since 2020 finally started to cool off, in contrast to the national trend, as residential permits caught up to buyer demand. The Atlantic City MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Leisure and Hospitality Services, Government, and Education and Health Services. Major employers in the Atlantic City MSA include Federal Aviation Administration, Shore Medical Center, Borgata Hotel Casino & Spa, and Hotel at Bally's Atlantic City. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Atlantic City MSA was 6.4 percent compared to the national unemployment rate of 3.7 percent.

Dover MSA

The Dover MSA was among Delaware's top performers. Leisure/hospitality accounted for most of the recent strength thanks to increased beach tourism in 2021. Overall, the recovery of private services was largely tracking the nationwide trend. The Dover MSA had recouped more than 80 percent of its recessionary job losses, ahead of both the state and national averages. The housing market was also strong, with house price growth surpassing 15 percent year over year, just shy of the state and national rates. The Dover MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Government, Education and Health Services, and Retail Trade. Major employers in the Dover MSA include Dover Air Force Base, Bayhealth Medical Center, Walmart Inc., and Perdue Farms. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Dover MSA was 4.6 percent compared to the national unemployment rate of 3.7 percent.

Philadelphia MSA

Information from Moody's Analytics indicated that at the end of the evaluation period, the Philadelphia MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic.

Philadelphia MD

Philadelphia's economic recovery remained sluggish. The pace of job growth in during late 2021 had been weak, lagging both the regional and U.S. rate. Among the top 50 metro areas and divisions in the U.S, the Philadelphia MD was the second furthest from pre-pandemic employment, leading only hard-hit New York City. Weaker than average hiring in office-using industries and the slow return of commuters have hampered the recovery of leisure/hospitality and retail payrolls. The Philadelphia MD has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Professional and Business Services, and Government. Major

employers in the Philadelphia MD include University of Pennsylvania Health System Thomas Jefferson University Health System Inc., Children's Hospital Philadelphia, and Comcast. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Philadelphia MD was 5.7 percent compared to the national unemployment rate of 3.7 percent.

Camden MD

The Camden MD's recovery picked up the pace, but soft spots remained. The metro area recovered 80 percent of jobs lost since the pandemic began, higher than the regional and national averages. However, unemployment remained above average, reflecting the hardship facing commuters into nearby cities, particularly Philadelphia. Payroll growth in late 2021 was supported by robust hiring in transportation and warehousing, while net hiring in manufacturing remained subpar. Housing permits were above their 10-year average and house price growth aligned with the robust national pace. The Camden MD has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Government, Professional and Business Services, and Retail Trade. Major employers in the Camden MD include Virtua Health, McGuire-Dix Air Force Base, Cooper Health Systems, and TD Bank Corp. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Camden MD was 4.1 percent compared to the national unemployment rate of 3.7 percent.

Montgomery County MD

Montgomery County MD's recovery was pushing forward at a healthy clip. Job growth in 2021 had been stronger than statewide and payrolls were closer to pre-pandemic levels than the regional average. The Montgomery County MD's critical information and financial activities industries were leading the charge. Public-sector payroll growth had been soft, as had hiring among the area's crucial healthcare providers. Improvement in the jobless rate has been sluggish; the Montgomery County MD was still closer to prerecession lows than the Northeast average. However, weaker labor force growth suggested the relative performance was not solely driven by hiring. The Montgomery County MD has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Professional and Business Services, Education and Health Services, Retail Trade, and Financial Activities. Major employers in the Montgomery County MD include Tower Health, The Vanguard Group, Einstein Healthcare Network, and Universal Health Services. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Montgomery County MD was 3.3 percent compared to the national unemployment rate of 3.7 percent.

Wilmington MD

After stalling earlier in 2021, the Wilmington MD's recovery had picked up the pace. Leisure/hospitality had been the source of strength thanks to rising consumer spending, but payrolls in the key finance sector were down since the start of 2021. Overall, Wilmington recovered a greater share of jobs lost than the state or nation. Meanwhile, the housing market was improving, with residential construction increasing. House price appreciation was firmly in the double digits but trailed the national rate. The Wilmington MD has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Professional and Business Services, and Government. Major employers in the Wilmington MD include Christiana Care Health System, JPMorgan Chase & Co, Bank of America Corp, and AstraZeneca. According to the Bureau of Labor

Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Wilmington MD was 4.2 percent compared to the national unemployment rate of 3.7 percent.

Ocean City MSA

Ocean City MSA's outsize tourism industry and healthcare provided the bulk of job gains, with modest help from the public sector. The tourism industry remained the primary source of new job gains. Tourism was the lifeblood of the Ocean City MSA's economy, with industry employment accounting for more than two-fifths of total jobs, one of the highest shares in the nation. Although leisure/hospitality employment had given up some recent gains, the industry's recovery was still well ahead of its national counterpart. The Ocean City MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Leisure and Hospitality Services, Government, Retail Trade, and Education and Health Services. Major employers in the Ocean City MSA include Morey Organization LLC, U.S. Coast Guard, Cape Regional Medical Center, and ACME Markets. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Ocean City MSA was 8.2 percent compared to the national unemployment rate of 3.7 percent.

Reading MSA

Payrolls in the Reading MSA were flat for most of 2021, leaving the jobs recovery lagging those of the state and nation. Although the U.S. unemployment rate had steadily declined, the Reading MSA's unemployment rate had barely budged. The critical manufacturing, education and healthcare industries have contributed to this weakness, with employment stagnating well below its pre-pandemic peak. Despite weakness in key industries, homeowners were still benefiting from a lack of supply. House price appreciation peaked after growing faster than the U.S. average and permitting weakened as a result. The Reading MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Manufacturing, Professional and Business Services, Government, and Retail Trade. Major employers in the Reading MSA include East Penn Manufacturing Co. Inc, Tower Health, St. Joseph Medical Center, and Carpenter Technology Corp. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Reading MSA was 4.5 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Philadelphia Multistate CSA. The organizations included one community development organization that helped to address the causes and conditions of poverty and one economic development organization that helped to attract and retain businesses in the area. The bank also provided an assessment of community needs based on research it completed in its AA.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing units
- Single-family affordable housing
- Rental assistance
- Rehabilitation of housing units/improvement of the quality of housing stock
- Workforce development

- Financial literacy

Opportunities for participation by financial institutions included the following:

- Home-ownership counseling
- Closing cost assistance
- Affordable home mortgage loans

Scope of Evaluation in the Philadelphia Multistate CSA

During the evaluation period, the bank originated or purchased 112,339 home mortgage loans, small loans to businesses, and small loans to farms totaling \$20.9 billion in the Philadelphia Multistate CSA. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within the AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. The OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE PHILADELPHIA MULTISTATE CSA

LENDING TEST

The bank's performance under the Lending Test in the Philadelphia Multistate CSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Philadelphia CSA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Philadelphia CSA	73,041	39,069	229	68	112,407	100.0	100.0
Total	73,041	39,069	229	68	112,407	100.0	100.0
Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Philadelphia CSA	19,714,917	1,197,380	6,300	279,186	21,197,783	100.0	100.0
Total	19,714,917	1,197,380	6,300	279,186	21,197,783	100.0	100.0
Source: Bank Data; Due to rounding, totals may not equal 100.0%							

As of June 30, 2021, WFBNA had a deposit market share of 6.2 percent. The bank ranked third among 114 depository financial institutions placing it in the top 3 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 5.6 percent based on the number of home mortgage loans originated or purchased. The bank ranked second among 921 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. Other top lenders in the AA based on market share were Rocket Mortgage (6.3 percent) and CBNA (3.9 percent).

According to peer small business data for 2021, WFBNA had a market share of 5.7 percent based on the number of small loans to businesses originated or purchased. The bank ranked fourth out of 323 small business lenders, which placed it in the top 2 percent of lenders. The top lenders in the AA based on market share were American Express National Bank (20.3 percent), JPMorgan Chase Bank, N.A. (7.6 percent), and Bank of America, N.A. (6.1 percent).

According to peer small farm data for 2021, WFBNA had a market share of 6.7 percent based on the number of small loans to farms originated or purchased. The bank ranked seventh out of 38 small farm lenders, which placed it in the top 19 percent of lenders. The top lenders in the AA based on market share were JPMorgan Chase Bank, N.A. (12.5 percent), Truist Bank (10.7 percent), and U.S. Bank, N.A. (10.3 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O in the Philadelphia Multistate CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was well below the percentage of owner-occupied housing units in low-income geographies and it was below the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied housing units in moderate-income geographies but it was near to the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the Philadelphia Multistate CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was below the percentage of businesses in low-income geographies but it was near to the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was near to both the percentage of businesses in moderate-income geographies and the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the Philadelphia Multistate CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

The bank's percentage of small loans to farms in low-income geographies was significantly below the percentage of farms in low-income geographies but it exceeded the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-income geographies was well below the percentage of farms in moderate-income geographies and it was below the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the Philadelphia Multistate CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but it was near to the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income

borrowers was near to both the percentage of moderate-income families and the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the Philadelphia Multistate CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 26 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the Philadelphia Multistate CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was adequate.

The bank did not collect or consider the GAR in the underwriting of approximately 40.2 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below the percentage of farms in the AA with GAR of \$1 million or less and it was below the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Community Development Lending

The bank made a relatively high level of CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

WFBNA made 68 CD loans totaling approximately \$279.2 million, which represented 5.4 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 90.7 percent of these loans funded affordable housing that provided 2,280 units of affordable housing, 1.4 percent funded economic development, 1.3 percent funded revitalization and stabilization efforts, and 6.6 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA made a \$8.9 million construction loan to finance an LIHTC housing development in the AA. The development comprised 64 units reserved for seniors with incomes at or below 60 percent of the AMI. Four of the units were targeted to senior households earning up to 20 percent of the AMI. The building included energy efficient features such as solar photovoltaic panels on the roof.
- WFBNA provided a \$4 million working capital line of credit for a nonprofit organization that provided legal services for low- and moderate-income individuals. The organization provided legal services in adult and juvenile state courts, civil and criminal mental health hearings, and as child advocates for dependent and neglected children.
- WFBNA made a \$2.1 million economic development loan to fund a small business in the AA. This loan was made in conjunction with the SBA's 504 Certified Development Company program and was targeted to expand the growth of small businesses in the local community.

Product Innovation and Flexibility

WFBNA used flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 8,040 loans under its flexible lending programs totaling \$459 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	576	128,400
Dream. Plan. Home.	189	32,100
PPP	7,275	298,500
Total	8,040	459,000

INVESTMENT TEST

The bank's performance under the Investment Test in the Philadelphia Multistate CSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Philadelphia CSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Philadelphia CSA	86	175,316	430	238,470	516	100.0	413,786	100.0	18	39,225
Total	86	175,316	430	238,470	516	100.0	413,786	100.0	18	39,225
* '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 tracked and recorded by the institution's financial reporting system. Due to rounding, totals may not equal 100.0%										

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$413.8 million and represented 8 percent of the bank's tier 1 capital allocated to the AA. The investments also included 416 grants and donations totaling \$51 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 38.4 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 37 percent that focused on community services targeted to low- and moderate-income individuals, and 24.6 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 3,090 units of affordable housing in the AA.

The bank occasionally used innovative or complex investments to support CD initiatives. Approximately 37 percent of current period investment dollars were complex LIHTC and NMTC investments. The following are examples of CD investments made in this AA:

- WFBNA provided a \$19.5 million NMTC investment an organization to finance a warehouse facility located in a Brownfield/ Opportunity Zone. The financing allowed the organization to move from a leased facility to a new headquarters with a pharmaceutical research cold storage warehouse. The new facility expanded the organization's operations, truck loading docks, and commercial product distribution, allowing the company to increase its competitiveness in the medical biological storage and transportation industry. The project created 45 jobs and included an initiative to hire recently incarcerated employees. This investment was highly complex because of the inherent nature of NMTC transactions and was responsive to the identified need for neighborhood revitalization.
- WFBNA invested \$250 million in a Freddie Mac (FHLMC) multifamily investment security. Of this total investment, \$21.8 million was allocated to the AA. This underlying mortgage was to finance an apartment complex located in East Norriton, Pennsylvania, with 142 units restricted to tenants earning less than 80 percent of the AMI.

SERVICE TEST

The bank's performance under the Service Test in the Philadelphia Multistate CSA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the Philadelphia CSA was good.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Philadelphia CSA	100.0	183	10.8	6.0	15.3	35.5	43.2	7.2	21.4	40.4	30.6
Total	100.0	183	10.8	6.0	15.3	35.5	43.2	7.2	21.4	40.4	30.6
Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Philadelphia CSA	0	31	-2	-4	-15	-10
Total	0	31	-2	-4	-15	-10

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Philadelphia CSA. WFBNA operated 183 branches in the AA, comprising 11 branches in low-income geographies, 28 branches in moderate-income geographies, 65 branches in middle-income geographies, and 79 branches in upper-income geographies. The distribution of branches in low-income geographies was near to the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies was near to the distribution of the population in moderate-income geographies. The distribution was augmented by 24 branches in middle- and upper-income geographies that were within close proximity that served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These adjacent middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches had generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed one branch in a low-income geography, which was a forced closure due to eminent domain by the city. WFBNA closed other branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations. Despite the closures, its service delivery systems remained readily accessible.

Services, including where appropriate, business hours did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. All branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the 118 branches opened on Saturdays, seven were located in low-income geographies and 18 were located in moderate-income geographies.

Community Development Services

WFBNA provided a limited level of CD services in the Philadelphia Multistate CSA. During the exam period, the bank's qualifying activities performed were significantly impacted by COVID-19 pandemic. Bank records showed that employees provided their financial or job-specific expertise and/or technical assistance for 100 CD service activities to 22 organizations during the evaluation period, logging a total of 213 qualified hours within this AA. A majority (86 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The other CD services were targeted to affordable housing (11 percent) and revitalize/stabilize (3 percent). The following are examples of CD services provided in this AA:

- A WFBNA employee provided eight hours of financial education to 111 students at a middle school where 62.6 percent of the students qualified for the federal free- and reduced-lunch program.
- Two WFBNA employees provided 10 hours each for board service on an organization whose mission was to nurture families, strengthen neighborhoods and drive change. For families, children, and youth experiencing homelessness, the organization offered more than 235 affordable housing units, job training, parenting and early childhood education, financial education and planning, life skills and technology classes. This activity was responsive to the identified need for homeless services.

Portland-Vancouver-Salem, OR-WA CSA (Portland Multistate CSA)

CRA rating for the Portland Multistate CSA²⁰: Outstanding

Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AA.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments and grants, often in a leadership position. The bank exhibited excellent responsiveness to credit and community economic development needs. The bank made significant use of innovative or complex investments to support CD initiatives.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.
- The bank provided a limited level of CD services.

Description of Institution's Operations in the Portland Multistate CSA

The Portland Multistate CSA was WFBNA's 19th largest rating area based on its total deposits in the rating area. As of June 30, 2021, the bank maintained approximately \$13.4 billion or 0.9 percent of its total domestic deposits in branches within the rating area. Of the 34 depository financial institutions operating in the rating area, WFBNA, with a deposit market share of 15.6 percent, was the third largest. Other top depository financial institutions in the rating area based on market share included U.S. Bank, N.A. (21.1 percent), Bank of America, N.A. (17.9 percent), and JPMorgan Chase Bank, N.A. (12.4 percent). As of December 31, 2021, the bank operated 60 branches and 152 ATMs in the rating area. WFBNA delineated four AAs within the Portland Multistate CSA and includes the Albany-Lebanon, OR MSA (Albany MSA), Corvallis, OR MSA (Corvallis MSA), Portland-Vancouver-Hillsboro, OR-WA MSA (Portland MSA), and Salem, OR MSA (Salem MSA). The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. The OCC combined, analyzed, and presented the AAs at the CSA level for purposes of this evaluation. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

The following table provides a summary of the demographics, including housing and business information for the Portland Multistate CSA.

²⁰ This rating only reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Portland Multistate CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	600	2.7	24.3	45.3	26.8	0.8
Population by Geography	2,926,312	2.4	25.2	45.9	26.3	0.2
Housing Units by Geography	1,180,083	2.3	24.7	45.6	27.0	0.3
Owner-Occupied Units by Geography	673,261	1.1	18.7	49.0	31.1	0.1
Occupied Rental Units by Geography	434,896	4.2	33.5	40.3	21.3	0.7
Vacant Units by Geography	71,926	2.6	27.5	46.0	23.1	0.9
Businesses by Geography	366,361	2.6	22.3	41.3	32.0	1.8
Farms by Geography	12,635	1.6	14.6	55.3	28.2	0.4
Family Distribution by Income Level	713,148	21.5	17.5	20.4	40.7	0.0
Household Distribution by Income Level	1,108,157	24.0	16.2	18.1	41.6	0.0
Median Family Income MSA - 10540 Albany-Lebanon, OR MSA		\$54,713	Median Housing Value			\$267,205
Median Family Income MSA - 18700 Corvallis, OR MSA		\$76,967	Median Gross Rent			\$979
Median Family Income MSA - 38900 Portland-Vancouver-Hillsboro, OR-WA MSA		\$73,089	Families Below Poverty Level			10.0%
Median Family Income MSA - 41420 Salem, OR MSA		\$58,033				
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$27,357 to \$38,484 and moderate-income families earned at least \$27,357 to \$38,484 and less than \$43,770 to \$61,574 in the AA, depending on the metropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$684 to \$962 for low-income borrowers and ranging from \$1,094 to \$1,539 for moderate-income borrowers in the AA. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$1,434. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Portland MSA

Information from Moody's Analytics indicated that at the end of the evaluation period, the Portland MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. With many people working from home and business travel resuming slowly, the urban core was playing catch-up with the suburbs. Fewer people were going to restaurants, shopping, or staying in hotels. Compared with 2019, the volume of seated diners tracked by OpenTable was down by twice as much as statewide and more than in almost any other major U.S. city. Rising demand for semiconductors has kept high-tech factory jobs open. The concentration of chip manufacturers anchored

the Portland MSA's large tech sector. Seven big semiconductor manufacturers operated fabrication plants in the metro area, including Intel. The Portland MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Professional and Business Services, Education and Health Services, Government, and Manufacturing. Major employers in the Portland MSA include Intel Corp., Providence Health Systems, Oregon Health & Science University, and Nike Inc. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Portland MSA was 3.5 percent compared to the national unemployment rate of 3.7 percent.

Albany MSA

Information from Moody's Analytics indicated that at the end of the evaluation period, the Albany MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Albany MSA was among the nation's most agriculture-reliant metro areas; its share of gross metro product tied to the industry placed it among the top 30 in the nation. The overreliance on farming left the Albany MSA highly exposed to climate impacts. Irrigation remained key for most crops, and livestock producers needed to haul water and hay to their cattle because of the extreme drought and poor pasture conditions. Ongoing labor shortages for farm workers were felt through the fall harvest while increasing mechanization trends by farmers limited the recovery in jobs. The Albany MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Manufacturing, Education and Health Services, Government, and Retail Trade. Major employers in the Albany MSA include Samaritan Health Services, ATI, Hewlett Packard, and Linn Benton Community College. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Albany MSA was 3.9 percent compared to the national unemployment rate of 3.7 percent.

Corvallis MSA

Information from Moody's Analytics indicated that at the end of the evaluation period, the Corvallis MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The metro area still lagged behind its state and national counterparts in its jobs recovery, but payroll growth accelerated in late 2021. Homebuilders have been busier than usual on residential projects, with permits tilting toward single-family units after years of robust multifamily activity. A preponderance of college students made the Corvallis MSA one of the most multifamily-dependent small metro areas in the nation. The Corvallis MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Government, Education and Health Services, Leisure and Hospitality Services, and Retail Trade. Major employers in the Corvallis MSA include Oregon State University, Samaritan Health Services, Hewlett Packard, and Corvallis Clinic. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Corvallis MSA was 2.5 percent compared to the national unemployment rate of 3.7 percent.

Salem MSA

Information from Moody's Analytics indicated that at the end of the evaluation period, the Salem MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The public sector represented a reliable pillar of job growth for the state capital region. The share of nonfarm employment in state government was quadruple the U.S. average, and the robust recovery in this subsector explained a good chunk of Salem's outperformance. The Salem MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Government, Education and Health Services, Retail Trade, Leisure and Hospitality Services, and Manufacturing.

Major employers in the Salem MSA include Salem Hospital, SuperMedia LLC, Association of Salem Keizer Education Support, and Fred Meyer Stores. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Salem MSA was 3.5 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Portland Multistate CSA. The organizations included one community development organization that helped to address the causes and conditions of poverty and one economic development organization that helped to attract and retain businesses in the area. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing units
- Single-family affordable housing
- Rental assistance
- Rehabilitation of housing units/improvement of the quality of housing stock
- Workforce development
- Financial literacy

Opportunities for participation by financial institutions included the following:

- Home-ownership counseling
- Closing cost assistance
- Affordable home mortgage loans

Scope of Evaluation in the Portland Multistate CSA

During the evaluation period, the bank originated or purchased 43,125 home mortgage loans, small loans to businesses, and small loans to farms totaling \$7.8 billion in the Portland Multistate CSA. The bank's primary loan products in the rating area were small loans to businesses and home mortgage loans. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within the AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. The OCC placed more weight based on the number of loans on small loans to businesses versus home mortgage loans and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE PORTLAND MULTISTATE CSA

LENDING TEST

The bank's performance under the Lending Test in the Portland Multistate CSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Portland CSA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Portland CSA	20,988	21,613	524	56	43,181	100.0	100.0
Total	20,988	21,613	524	56	43,181	100.0	100.0

Source: Bank Data; Due to rounding, totals may not equal 100.0%

Dollar Volume of Loans (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Portland CSA	6,983,720	770,509	21,891	379,939	8,156,059	100.0	100.0
Total	6,983,720	770,509	21,891	379,939	8,156,059	100.0	100.0

Source: Bank Data; Due to rounding, totals may not equal 100.0%

As of June 30, 2021, WFBNA had a deposit market share of 15.6 percent. The bank ranked third among 34 depository financial institutions placing it in the top 9 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 2.9 percent based on the number of home mortgage loans originated or purchased. The bank ranked seventh among 706 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. The top lenders in the AA based on market share were Rocket Mortgage (5.4 percent), Onpoint Community Credit Union (4.9 percent), and United Wholesale Mortgage (4.1 percent).

According to peer small business data for 2021, WFBNA had a market share of 8.1 percent based on the number of small loans to businesses originated or purchased. The bank ranked fifth out of 205 small business lenders, which placed it in the top 3 percent of lenders. The top lenders in the AA based on market share were U.S. Bank, N.A. (15.2 percent), JPMorgan Chase Bank, N.A. (14.1 percent), and American Express National Bank (12 percent).

According to peer small farm data for 2021, WFBNA had a market share of 11.2 percent based on the number of small loans to farms originated or purchased. The bank ranked fourth out of 26 small farm lenders, which placed it in the top 16 percent of lenders. The top lenders in the AA based on market share were U.S. Bank, N.A. (24.1 percent), Columbia State Bank (17.1 percent), and JPMorgan Chase Bank, N.A. (16.2 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O in the Portland Multistate CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was below both the percentage of owner-occupied housing units in low-income geographies and the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was near to both the percentage of owner-occupied housing units in moderate-income geographies and the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the Portland Multistate CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies exceeded the percentage of businesses in low-income geographies and it approximated the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies approximated both the percentage of businesses in moderate-income geographies and the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the Portland Multistate CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

The bank's percentage of small loans to farms in low-income geographies was significantly below both the percentage of farms in low-income geographies and the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-income geographies was below the percentage of farms in moderate-income geographies but it exceeded the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the Portland CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but it approximated the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the Portland Multistate CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 23.9 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the Portland Multistate CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was adequate.

The bank did not collect or consider the GAR in the underwriting of approximately 52.3 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below the percentage of farms in the AA with GAR of \$1 million or less and it was below the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

WFBNA made 56 CD loans totaling approximately \$379.9 million, which represented 21.7 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 95.7 percent of these loans funded affordable housing that provided 1,936 units of affordable housing, 2.5 percent funded economic development, 0.1 percent funded revitalization and stabilization efforts, and 1.7 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$11.6 million construction loan for an LIHTC affordable housing development in Beaverton, Oregon. This development comprised 54 units reserved for individuals and families earning up to 60 percent of the AMI.
- WFBNA provided a \$6 million line of credit for a nonprofit organization in Portland, Oregon. The organization provided assistance to low-income populations by increasing their economic self-sufficiency and community through microenterprise development and self-employment. The clients were low- and moderate-income and earned less than 80 percent of the AMI.
- WFBNA provided a \$1.2 million working capital line of credit for a nonprofit organization located in the AA. The organization provided residential care for adolescents struggling with homelessness and drug abuse. All clients were low- and moderate-income individuals earning less than 80 percent of the AMI.

Product Innovation and Flexibility

WFBNA used flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 4,116 loans under its flexible lending programs totaling \$297.7 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	250	85,300
Dream. Plan. Home.	92	22,600
PPP	3,774	189,800
Total	4,116	297,700

INVESTMENT TEST

The bank's performance under the Investment Test in the Portland Multistate CSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Portland CSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Portland CSA	36	88,668	305	177,661	341	100.0	266,328	100.0	29	115,616
Total	36	88,668	305	177,661	341	100.0	266,328	100.0	29	115,616
* '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 tracked and recorded by the institution's financial reporting system. Due to rounding, totals may not equal 100.0%										

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$266.3 million and represented 15.2 percent of the bank's tier 1 capital allocated to the AA. The investments also included 285 grants and donations totaling \$13.7 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 33.4 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 56.9 percent that focused on community services targeted to low- and moderate-income individuals, and 9.7 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 2,836 units of affordable housing in the AA.

The bank made significant use of innovative or complex investments to support CD initiatives. Approximately 82.5 percent of current period investment dollars were complex LIHTC investments. The following are examples of CD investments made in this AA:

- WFBNA provided a \$12.9 million equity investment for the construction of an LIHTC affordable housing development located in Vancouver, Washington. This development comprised 69 units reserved for families with income up to 50 percent of the AMI and it met Evergreen Sustainable Development Standards featuring Energy Star appliances, LED lighting and water-saving faucets and fixtures. The investment was responsive to the identified need for affordable multifamily housing. The bank also provided a \$11.5 million construction loan for this project.

- WFBNA provided a \$17.7 million equity investment for the development of a mixed-use LIHTC development located in Vancouver, Washington. This development comprised 106 units restricted to families with incomes up to 60 percent of the AMI with 57 units subsidized with project-based Section 8 vouchers. A nonprofit organization provided an onsite service coordinator and services including health education, food, employment assistance, and age-specific crisis services. The development included approximately 9,800 square feet of community-serving space on the ground floor with a commercial kitchen incubator to launch and support emerging food-based businesses, a shared office space for residents and businesses to access resources and to provide technical assistance to small businesses, and space occupied by Vancouver's Farmer's Market which offered fresh healthy food. The location was near primary and secondary schools, grocery stores, healthcare, public transit, and employment. This activity was complex due to the inherent nature of LIHTC transactions and involvement from multiple funding sources including the city of Vancouver and State Housing Trust Fund. The investment was responsive to the identified needs for affordable multifamily housing and small business growth. The bank also provided a \$28.5 million construction loan for this project.

SERVICE TEST

The bank's performance under the Service Test in the Portland Multistate CSA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the Portland CSA was good.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Portland CSA	100.0	60	11.2	5.0	36.7	30.0	26.7	2.4	25.2	45.9	26.3
Total	100.0	60	11.2	5.0	36.7	30.0	26.7	2.4	25.2	45.9	26.3
Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Portland CSA	0	20	0	-5	-9	-5
Total	0	20	0	-5	-9	-5

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Portland CSA. WFBNA operated 60 branches in the AA, comprising three branches in low-income geographies, 22 branches in moderate-income geographies, 18 branches in middle-

income geographies, 16 branches in upper-income geographies, and one branch in a geography without an income designation. The distribution of branches in low-income geographies exceeded the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies. The distribution was augmented by one branch in middle- and upper-income geographies that was within close proximity and served low-income areas and ten branches in middle- and upper-income geographies that were within close proximity to and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These adjacent middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations. Despite the closures, its service delivery systems remained readily accessible.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. All branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the 31 branches opened on Saturdays, two were located in low-income geographies and 15 were located in moderate-income geographies.

Community Development Services

WFBNA provided a limited level of CD services in the Portland Multistate CSA. During the exam period, the bank's qualifying activities performed were significantly impacted by COVID-19 pandemic. Bank records showed that employees provided their financial or job-specific expertise and/or technical assistance for 89 CD service activities to 25 organizations, logging a total of 175 qualified hours within this AA during the evaluation period. A majority (85.4 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The other CD services were targeted to affordable housing (9 percent) and economic development (6 percent). The following are examples of CD services provided in this AA:

- A WFBNA employee provided eight hours of financial education to 40 students in a middle school where a majority of the student population qualified for the free or reduced lunch program.
- A WFBNA employee provided seven hours of financial education to a nonprofit organization that provided education, counseling, and financial services to 250 first-time low- and moderate-income homebuyers in the AA.

Texarkana, TX-AR MSA (Texarkana Multistate MSA)

CRA rating for the Texarkana Multistate MSA²¹: Satisfactory

Lending Test is rated: Low Satisfactory

The Investment Test is rated: Needs to Improve

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected adequate responsiveness to AA credit needs.
- The bank exhibited a good distribution of loans in its AA.
- The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank made a low level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.
- The bank had a poor level of qualified CD investments and grants, rarely in a leadership position. The bank exhibited poor responsiveness to credit and community economic development needs. The bank rarely used innovative or complex investments to support CD initiatives.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.
- The bank provided few, if any, CD services.

Description of Institution's Operations in the Texarkana Multistate MSA

The Texarkana Multistate MSA was WFBNA's 45th largest rating area based on its total deposits in the rating area. As of June 30, 2021, the bank maintained approximately \$821 million or 0.1 percent of its total domestic deposits in branches within the rating area. Of the 16 depository financial institutions operating in the rating area, WFBNA, with a deposit market share of 25.9 percent, was the largest. Other top depository financial institutions in the rating area based on market share were Farmers Bank and Trust Company (14.8 percent), Guaranty Bank & Trust, N.A. (10.3 percent), and Bancorp South Bank (10 percent). As of December 31, 2021, the bank operated two branches and six ATMs in the rating area. WFBNA delineated one AA within the Texarkana Multistate MSA and includes the Texarkana, TX-AR MSA. The AA met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

The following table provides a summary of the demographics, including housing and business information for the Texarkana Multistate MSA.

²¹ This rating only reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Texarkana Multistate MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	34	2.9	26.5	52.9	14.7	2.9
Population by Geography	149,527	1.4	19.7	57.6	21.3	0.0
Housing Units by Geography	64,837	1.5	20.3	58.7	19.5	0.0
Owner-Occupied Units by Geography	36,835	0.8	13.2	61.8	24.2	0.0
Occupied Rental Units by Geography	18,799	3.0	32.6	51.7	12.7	0.0
Vacant Units by Geography	9,203	1.0	23.8	60.7	14.6	0.0
Businesses by Geography	9,717	0.6	23.5	51.2	24.6	0.2
Farms by Geography	383	0.5	11.0	63.7	24.8	0.0
Family Distribution by Income Level	37,736	23.0	16.1	19.5	41.4	0.0
Household Distribution by Income Level	55,634	25.6	15.5	16.9	42.1	0.0
Median Family Income MSA - 45500 Texarkana, TX-AR MSA		\$51,151	Median Housing Value			\$98,160
			Median Gross Rent			\$697
			Families Below Poverty Level			16.2%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$25,576 and moderate-income families earned at least \$25,576 and less than \$40,921 in the AA. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$639 for low-income borrowers and \$1,023 for moderate-income borrowers in the AA. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$527. Low- and moderate-income would be able to afford a mortgage loan for a median-priced home in this AA.

Information from Moody's Analytics indicated that at the end of the evaluation period, the Texarkana Multistate MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The outsized healthcare and transportation/warehousing sectors have underperformed, dragging the metro area's recovery. Retail and manufacturing have rebounded nicely, with both sectors having eclipsed pre-pandemic levels, but this has not been enough to offset weakness in other areas. The Texarkana Multistate MSA's labor force declined since the start of 2021, in contrast to the gains seen nationally, meaning that the metro area's unemployment rate overstated the recovery of its labor market. Key sectors of the economy by percentage of employment include Government, Education and Health Services, Retail Trade, and Leisure and Hospitality Services. Major employers in the Texarkana Multistate MSA include Red River Army Depot, Christus St. Michael Health System, Cooper Tire & Rubber Co., and Wal-Mart/Sam's. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Texarkana Multistate MSA was 4.2 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Texarkana Multistate MSA. The organizations included one community development organization that helped to address the causes and conditions of poverty and one economic development organization that helped to attract and retain businesses in the area. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing units
- Single-family affordable housing
- Rental assistance
- Rehabilitation of housing units/improvement of the quality of housing stock
- Workforce development
- Financial literacy

Opportunities for participation by financial institutions included the following:

- Home-ownership counseling
- Closing cost assistance
- Affordable home mortgage loans
- Working with the area's community development corporation network.
- Various state and local government partnership opportunities.

Scope of Evaluation in the Texarkana Multistate MSA

During the evaluation period, the bank originated or purchased 43,125 home mortgage loans, small loans to businesses, and small loans to farms totaling \$7.8 billion in the Texarkana Multistate MSA. The bank's primary loan products in the rating area were small loans to businesses and home mortgage loans. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within the AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. The OCC placed more weight based on the number of loans on small loans to businesses versus home mortgage loans and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE TEXARKANA MULTISTATE MSA

LENDING TEST

The bank's performance under the Lending Test in the Texarkana Multistate MSA is rated Low Satisfactory.

Based on a full-scope review, the bank's performance in the Texarkana MSA was adequate.

Lending Activity

Lending levels reflected adequate responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Texarkana MSA	326	278	29	7	640	100.0	100.0
Total	326	278	29	7	640	100.0	100.0

Source: Bank Data; Due to rounding, totals may not equal 100.0%

Dollar Volume of Loans (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Texarkana MSA	45,761	6,146	893	35	52,835	100.0	100.0
Total	45,761	6,146	893	35	52,835	100.0	100.0

Source: Bank Data; Due to rounding, totals may not equal 100.0%

As of June 30, 2021, WFBNA had a deposit market share of 25.9 percent. The bank ranked first among 16 depository financial institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 1.9 percent based on the number of home mortgage loans originated or purchased. The bank ranked 16th among 225 home mortgage lenders in the AA, which placed it in the top 8 percent of lenders. The top lenders in the AA based on market share were Rocket Mortgage (6.7 percent), Mortgage Financial Service, LLC (6.6 percent), and Red River Employees Federal Credit Union (6.4 percent).

According to peer small business data for 2021, WFBNA had a market share of 3.1 percent based on the number of small loans to businesses originated or purchased. The bank ranked ninth out of 81 small business lenders, which placed it in the top 12 percent of lenders. The top lenders in the AA based on market share were Farmers Bank & Trust Company (17.3 percent), American Express National Bank (13 percent), and Cadence Bank (12.8 percent).

According to peer small farm data for 2021, WFBNA had a market share of 3.7 percent based on the number of small loans to farms originated or purchased. The bank ranked sixth out of 15 small farm lenders, which placed it in the top 40 percent of lenders. The top lenders in the AA based on market share were Farmers Bank & Trust Company (37.5 percent), Cadence Bank (26.1 percent), Guaranty Bank & Trust (10 percent), and Arvest Bank (10 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited a good distribution of loans in its AA. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O in the Texarkana Multistate MSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank did not originate or purchase any home mortgage loans in low-income geographies where there were few opportunities to make home mortgage loans due to the limited number of owner-occupied housing units. The OCC placed more weight on performance in moderate-income geographies. The bank's percentage of home mortgage loans in moderate-income geographies was near to the percentage of owner-occupied housing units in moderate-income geographies and it exceeded the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the Texarkana Multistate MSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies exceeded both the percentage of businesses in low-income geographies and the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was below the percentage of businesses in moderate-income geographies but it approximated the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the Texarkana Multistate MSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

The bank did not originate any small loans to farms in low-income geographies where there were few opportunities to make small loans to farms due to the extremely limited number of farms. The OCC placed more weight on performance in moderate-income geographies. The bank's percentage of small loans to farms in moderate-income geographies was well below the percentage of farms in moderate-income geographies but it was near to the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the Texarkana Multistate MSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was poor.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and it was below the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was significantly below the percentage of moderate-income families and it was below the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the Texarkana Multistate MSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 27.0 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the Texarkana Multistate MSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was very poor.

The bank did not collect or consider the GAR in the underwriting of approximately 86.2 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was significantly below the percentage of farms in the AA with GAR of \$1 million or less and it was well below the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Community Development Lending

The bank made a low level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

WFBNA made seven CD loans totaling approximately \$35,200, which represented less than 0.1 percent of the allocated tier 1 capital. CD loans were primarily made for revitalization/stabilization purposes. By dollar volume, 42.9 percent of these loans funded affordable housing, 49.5 percent funded revitalization and stabilization efforts, and 7.6 percent funded community services targeted to low- and moderate-income individuals. The following is an example of a CD loan made in this AA:

- WFBNA made a \$20 million term loan to a nonprofit organization, of which \$13,400 was allocated to the AA. The organization's mission was to improve access to high-quality health and elder care, healthy foods, housing, and education for low- and moderate-income communities. The organization was most active in lending to charter schools and community health facilities.

Product Innovation and Flexibility

WFBNA made limited use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 41 loans under its flexible lending programs totaling \$1.1 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	1	120
PPP	40	981
Total	41	1,101

INVESTMENT TEST

The bank's performance under the Investment Test in the Texarkana Multistate MSA is rated Needs to Improve.

Based on a full-scope review, the bank's performance in the Texarkana MSA was poor.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Texarkana MSA	2	1,036	4	35	6	100.0	1,071	100.0	2	92
Total	2	1,036	4	35	6	100.0	1,071	100.0	2	92
* '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 tracked and recorded by the institution's financial reporting system. Due to rounding, totals may not equal 100.0%										

The bank had a poor level of qualified CD investments and grants, and not in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$1 million and represented 1 percent of the bank's tier 1 capital allocated to the AA. The investments also included four grants and donations totaling \$35,000 to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited poor responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 50 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 33.3 percent that focused on community services targeted to low- and moderate-income individuals, and 16.7 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 124 units of affordable housing in the AA.

The bank rarely used innovative and complex investments to support CD initiatives. None of the current period investments were complex.

SERVICE TEST

The bank's performance under the Service Test in the Texarkana Multistate MSA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the Texarkana MSA was good.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Texarkana MSA	100.0	2	3.7	0.0	50.0	50.0	0.0	1.4	19.7	57.6	21.3
Total	100.0	2	3.7	0.0	50.0	50.0	0.0	1.4	19.7	57.6	21.3
Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Texarkana MSA	0	0	0	0	0	0
Total	0	0	0	0	0	0

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Texarkana MSA. WFBNA operated two branches in the AA, comprising one branch in a moderate-income geography and one branch in a middle-income geography. The distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies. The branch located in a middle-income geography was in close enough proximity to a moderate-income geography to serve the moderate-income geography and low- and moderate-income individuals. Internal customer data for this branch demonstrated a reasonable level of service to customers in the moderate-income geography. This adjacent middle- and upper-income branch contributed positively to the service delivery systems conclusion.

WFBNA did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Both branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday and were opened for business 9:00 a.m. to 12:00 p.m. Saturday.

Community Development Services

WFBNA provided few, if any, CD services in the Texarkana Multistate MSA. During the exam period, the bank's qualifying activities performed were significantly impacted by COVID-19 pandemic. WFBNA did not provide any CD services during the evaluation period.

Washington-Baltimore-Arlington, DC-MD-VA CSA (Washington Multistate CSA)

CRA rating for the Washington Multistate CSA²²: Outstanding

Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AA.
- The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank was a leader in making CD loans. CD lending had a neutral effect on the Lending Test conclusion as it further supported the bank's excellent lending performance.
- The bank had an excellent level of qualified CD investments and grants, often in a leadership position. The bank exhibited excellent responsiveness to credit and community economic development needs. The bank occasionally used innovative or complex investments to support CD initiatives.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.
- The bank provided a limited level of CD services.

Description of Institution's Operations in the Washington Multistate CSA

The Washington Multistate CSA was WFBNA's eighth largest rating area based on its total deposits in the rating area. As of June 30, 2021, the bank maintained approximately \$46.4 billion or 3.2 percent of its total domestic deposits in branches within the rating area. Of the 96 depository financial institutions operating in the rating area, WFBNA, with a deposit market share of 10 percent, was the fourth largest. The top depository financial institutions in the rating area based on market share includes Bank of America, N.A. (16.2 percent), E*Trade Bank (15.2 percent), and Truist Bank (11.5 percent). As of December 31, 2021, the bank operated 204 branches and 377 ATMs in the rating area. WFBNA delineated four AAs within the Washington Multistate CSA and includes the Washington-Arlington-Alexandria, DC-VA-MD MD (Washington MD), Baltimore-Columbia-Towson, MD MSA (Baltimore MSA), Frederick-Gaithersburg-Rockville, MD MD (Frederick MD), and Winchester, VA MSA (Winchester MSA). The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. The OCC combined, analyzed, and presented the AAs at the CSA level for purposes of this evaluation. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

The following table provides a summary of the demographics, including housing and business information for the Washington Multistate CSA.

²² This rating only reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Washington Multistate CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2,048	10.6	22.1	34.7	30.9	1.7
Population by Geography	8,785,662	8.7	21.7	36.1	32.8	0.6
Housing Units by Geography	3,457,235	9.6	22.1	36.1	31.9	0.4
Owner-Occupied Units by Geography	2,055,979	4.1	17.6	38.9	39.3	0.1
Occupied Rental Units by Geography	1,140,725	17.1	29.3	32.1	20.7	0.8
Vacant Units by Geography	260,531	20.0	25.5	31.1	22.8	0.6
Businesses by Geography	1,075,312	5.3	19.0	36.7	38.4	0.5
Farms by Geography	20,313	3.2	18.8	41.3	36.6	0.1
Family Distribution by Income Level	2,100,896	22.1	16.9	20.1	40.8	0.0
Household Distribution by Income Level	3,196,704	23.7	16.2	18.3	41.8	0.0
Median Family Income MSA - 12580 Baltimore-Columbia-Towson, MD MSA		\$87,788	Median Housing Value			\$362,741
Median Family Income MSA - 23224 Frederick-Gaithersburg-Rockville, MD		\$112,655	Median Gross Rent			\$1,425
Median Family Income MSA - 47894 Washington-Arlington-Alexandria, DC- VA-MD-WV		\$106,105	Families Below Poverty Level			6.3%
Median Family Income MSA - 49020 Winchester, VA-WV MSA		\$69,817				
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$34,909 to \$56,328 and moderate-income families earned at least \$34,909 to \$56,328 and less than \$55,584 to \$90,124 in the AA, depending on the metropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$873 to \$1,408 for low-income borrowers and ranging from \$1,396 to \$2,253 for moderate-income borrowers in the AA. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$1,947. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Washington-Arlington-Alexandria, DC-VA-MD-WV MSA

Information from Moody's Analytics indicated that at the end of the evaluation period, the Washington Multistate CSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic.

Frederick MD

The Frederick MD's strengths included an established presence in biotech, pharmaceuticals, and medical research; high per capita income; highly skilled and well-educated workforce; and lower business costs than those in the neighboring Washington metropolitan division. Weaknesses included dependence on government spending; very high cost of living; and home equity that has not fully recovered. The metro division performed better than most of the country because of its high concentration of well-paying, stable federal government jobs. The metro area suffered relatively mild layoffs in early 2020 and has since recouped about half of the lost jobs, bringing total employment closer to precrisis levels than it is elsewhere. Leisure/hospitality and retail were the worst-faring industries, but since both were underrepresented in the metro area, the weakness was less damaging. The Frederick MD has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Professional and Business Services, Government, Education and Health Services, and Retail Trade. Major employers in the Frederick MD include National Institutes of Health, Food and Drug Administration, and Naval Support Activity Bethesda. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the metropolitan division was 2.9 percent compared to the national unemployment rate of 3.7 percent.

Washington MD

The Washington MD's strengths included high per capita income and educated workforce; major center for computer systems design and tech-related professional services; and popular tourist destination. Weaknesses included exposure to downturn in tourism; above-average living costs; high exposure to federal government; and high business and regulatory costs. The Washington MD has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Professional and Business Services, Government, and Education and Health Services. Major employers in the Washington MD include Naval Support Activity Washington, Joint Base Andrews – Naval Air Facility, MedStar Health, Marriott International, Inc., and Inova Health System. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Washington MD was 3 percent compared to the national unemployment rate of 3.7 percent.

Baltimore MSA

Information from Moody's Analytics indicated that at the end of the evaluation period, the Baltimore MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Baltimore MSA's overall recovery compared favorably with the Northeast, but job growth slowed measurably in 2021, trailing the Northeast average. Manufacturing and logistics have backtracked since the start of 2021, but continued progress in leisure/hospitality was keeping modest job growth afloat. Due to a smaller initial drop, payrolls were closer to pre-pandemic levels than the regional average. The Baltimore MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Professional and Business Services, and Government. Major employers in the Baltimore MSA include Fort George G. Meade, Johns Hopkins University, Johns Hopkins Health System, University of Maryland Medical System, and Aberdeen Proving Ground. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Baltimore MSA was 3.1 percent compared to the national unemployment rate of 3.7 percent.

Winchester MSA

The Winchester MSA has Winchester, Virginia as its principal city within the county of Frederick. Winchester is located in northern Virginia in the Shenandoah Valley. As of the 2020 Census, the city of Winchester had a population of 28,120. The area was known as the “Apple Capital”, surrounded by its vast orchards and constituting one of the largest apple export markets in the nation and the largest producing area in Virginia. The city hosts the annual spring Shenandoah Apple Blossom Festival, which draws crowds in excess of 250,000 each year. Major employers in the Winchester MSA include Valley Health, Rubbermaid Commercial Products, Winchester City Public Schools, Walmart, and Shenandoah University. Federal agencies with operations in Winchester included Federal Bureau of Investigation and United States Army Corps of Engineers. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Winchester MSA was 2.6 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Washington Multistate CSA. The organizations included one community development organization that helped to address the causes and conditions of poverty and one economic development organization that helped to attract and retain businesses in the area. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank’s needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing units
- Single-family affordable housing
- Rental assistance
- Rehabilitation of housing units/improvement of the quality of housing stock
- Workforce development
- Financial literacy

Opportunities for participation by financial institutions included the following:

- Home-ownership counseling
- Closing cost assistance
- Affordable home mortgage loans
- Working with the area’s community development corporation network.
- Various state and local government partnership opportunities.

Scope of Evaluation in the Washington Multistate CSA

During the evaluation period, the bank originated or purchased 145,305 home mortgage loans, small loans to businesses, and small loans to farms totaling \$37.5 billion in the Washington Multistate CSA. The bank’s primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within the AA, the OCC placed more weight on the bank’s lending products based on the number of loans that had the highest percentage of loans in

arriving at conclusions. The OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE WASHINGTON MULTISTATE CSA

LENDING TEST

The bank's performance under the Lending Test in the Washington Multistate CSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Washington CSA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Washington CSA	91,640	53,172	493	64	145,369	100.0	100.0
Total	91,640	53,172	493	64	145,369	100.0	100.0

Source: Bank Data; Due to rounding, totals may not equal 100.0%

Dollar Volume of Loans (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Washington CSA	35,873,866	1,614,233	11,637	424,212	37,923,948	100.0	100.0
Total	35,873,866	1,614,233	11,637	424,212	37,923,948	100.0	100.0

Source: Bank Data; Due to rounding, totals may not equal 100.0%

As of June 30, 2021, WFBNA had a deposit market share of 10 percent. The bank ranked fourth among 96 depository financial institutions placing it in the top 5 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 3.6 percent based on the number of home mortgage loans originated or purchased. The bank ranked fifth among 953 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. The top lenders in the AA based on market share were Rocket Mortgage (6.8 percent), Truist Bank (4.3 percent), and PennyMac Financial Loan Services, LLC (4 percent).

According to peer small business data for 2021, WFBNA had a market share of 6.1 percent based on the number of small loans to businesses originated or purchased. The bank ranked fifth out of 351 small business lenders, which placed it in the top 2 percent of lenders. The top lenders in the AA based on market share were American Express National Bank (20 percent), Bank of America, N.A. (13.4 percent), and JPMorgan Chase Bank, N.A. (9.4 percent).

According to peer small farm data for 2021, WFBNA had a market share of 14.2 percent based on the number of small loans to farms originated or purchased. The bank ranked third out of 44 small farm

lenders, which placed it in the top 7 percent of lenders. The other top lenders in the AA based on market share were John Deere Financial, F.S.B. (18.5 percent), JPMorgan Chase Bank, N.A. (18.5 percent), and U.S. Bank, N.A. (8.3 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O in the Washington Multistate CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was below the percentage of owner-occupied housing units in low-income geographies but it was equal to the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied housing units in moderate-income geographies but it was near to the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the Washington Multistate CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was below both the percentage of businesses in low-income geographies and the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was near to the percentage of businesses in moderate-income geographies and it approximated the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the Washington Multistate CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was excellent.

The bank's percentage of small loans to farms in low-income geographies was near to the percentage of farms in low-income geographies and it exceeded the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-income geographies exceeded both the percentage of farms in moderate-income geographies and the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the Washington Multistate CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but it approximated the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the Washington Multistate CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 30.1 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was well below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the Washington Multistate CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was poor.

The bank did not collect or consider the GAR in the underwriting of approximately 75.1 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was significantly below the percentage of farms in the AA with GAR of \$1 million or less and it was well below the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a neutral effect on the Lending Test conclusion as it further supported the bank's excellent lending performance.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

WFBNA made 64 CD loans totaling approximately \$424.2 million, which represented 7 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 93.6 percent of these loans funded affordable housing that provided 2,505 units of affordable housing, 0.5 percent funded economic development, 0.8 percent funded revitalization and stabilization efforts, and 5.1 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$2 million line of credit for an organization that provided services for low- and moderate-income individuals with developmental disabilities in the AA. The organization provided vocational and family services related to schooling and developmental issues for individuals from birth to aged 21.
- WFBNA made a \$48.2 million construction loan to finance an affordable housing development in Washington D.C. The development comprised 179 units reserved for seniors 55 and older with incomes at or below 30 percent of the AMI. Eighteen of the units were restricted to formerly homeless individuals or families and received supportive services. All units included energy-efficient lighting, fixtures, and appliances.
- WFBNA provided a \$2 million loan to a CDFI organization. The organization invested in underserved communities in the AA. According to the organization, 100 percent of its clients were low- and moderate-income individuals earning less than 80 percent of the AMI.

Product Innovation and Flexibility

WFBNA made extensive use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 10,947 loans under its flexible lending programs totaling \$727.3 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	689	212,900
Dream. Plan. Home.	341	88,000
PPP	9,917	426,400
Total	10,947	727,300

INVESTMENT TEST

The bank's performance under the Investment Test in the Washington Multistate CSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Washington CSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Washington CSA	165	367,801	744	507,750	909	100.0	875,551	100.0	42	138,971
Total	165	367,801	744	507,750	909	100.0	875,551	100.0	42	138,971
* '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 tracked and recorded by the institution's financial reporting system. Due to rounding, totals may not equal 100.0%										

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$875.2 million and represented 14.5 percent of the bank's tier 1 capital allocated to the AA. The investments also included 661 grants and donations totaling \$164.2 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 47.4 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 25.1 percent that focused on community services targeted to low- and moderate-income individuals, and 27.5 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 6,535 units of affordable housing in the AA.

The bank occasionally used innovative and complex investments to support CD initiatives. Approximately 41 percent of current period investment dollars were complex LIHTC and NMTC investments. The following are examples of CD investments made in this AA:

- WFBNA made investments in two MDIs located in the AA. The investment in one of the MDIs helped the MDI to upgrade its technology infrastructure and automate and digitize its loan process. The investment in the other MDI increased its capital and helped it focus on profitability. WFBNA engaged with the MDIs' leadership teams to provide technical assistance to evaluate lending and other new business opportunities. The investments were responsive to the need for access to capital.
- WFBNA made a \$13.6 million equity investment to finance an LIHTC affordable housing development in Washington D.C. This development comprised 93 units reserved for individuals and families with incomes at or below 60 percent of the AMI. The development was located in the Lincoln Heights neighborhood and was part of the District of Columbia's revitalization plan New Communities Initiative. The Initiative focused on demolishing distressed housing units and replacing them with mixed-income housing to end the concentration of low-income housing and poverty. The redevelopment plans also called for many community resources, including new schools, recreation centers, and retail. Nearby amenities included a bus stop, grocery store, library, community park, and recreation center. The site featured basketball courts, a playground, trails, and picnic areas. The property had security features, including entries with security cameras. This activity was complex due to the inherent nature of LIHTC transactions and multiple funding sources, including the city's Planning and Economic Development department and land acquisition through the Progressive National Baptist Convention. The bank also provided a \$19.7 million construction loan for this project. The investment was responsive to the identified need for affordable housing.

SERVICE TEST

The bank's performance under the Service Test in the Washington Multistate CSA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the Washington CSA was good.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Washington CSA	100.0	204	9.4	9.8	40.0	30.0	20.0	8.7	21.7	36.1	32.8
Total	100.0	204	9.4	9.8	40.0	30.0	20.0	8.7	21.7	36.1	32.8
Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Washington CSA	3	18	-1	-3	-5	-5
Total	3	18	-1	-3	-5	-5

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Washington CSA. WFBNA operated 204 branches in the AA, comprising 20 branches in low-income geographies, 39 branches in moderate-income geographies, 72 branches in middle-income geographies, 72 branches in upper-income geographies, and one branch in a geography without an income designation. The distribution of branches in low-income geographies exceeded the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies was near to the distribution of the population in moderate-income geographies. The distribution was augmented by five branches in middle- and upper-income geographies that were within close proximity to serve low-income geographies and 22 in middle- and upper-income geographies that were within close proximity to serve moderate-income geographies. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These adjacent middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations. Despite the closures, its service delivery systems remained readily accessible.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. All branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the 110 branches opened on Saturdays, 13 were located in low-income geographies and 26 were located in moderate-income geographies.

Community Development Services

WFBNA provided a limited level of CD services in the Washington Multistate CSA. During the exam period, the bank's qualifying activities performed were significantly impacted by COVID-19 pandemic. Bank records showed that employees provided their financial or job-specific expertise and/or technical assistance for 80 CD service activities to 26 organizations, logging a total of 297 qualified hours within this AA during the evaluation period. A majority (75 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The other CD services were targeted to affordable housing (16.3 percent) and economic development (8.8 percent). The following are examples of CD services provided in this AA:

- A WFBNA employee provided three hours of financial education to an organization that provided grants via a worldwide organization that delivered educational programming focused on financial education, work readiness, and entrepreneurship to 62 students from kindergarten through high school. Data provided during the grant application process showed a majority of the students were from low- and moderate-income families.
- A WFBNA employee provided 24 hours serving on the board for a global nonprofit housing organization, which served the affordable housing needs of low- and moderate-income individuals and families. One hundred percent of the organization's clients were low- and moderate-income individuals. This activity was responsive to the identified need for board service volunteers, along with affordable housing.

State Ratings

State of Alabama

CRA rating for the State of Alabama²³: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited an adequate geographic distribution of loans in its AAs.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank made a low level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.
- The bank had a significant level of qualified CD investments and grants, occasionally in a leadership position. The bank exhibited excellent responsiveness to credit and community economic development needs. The bank made significant use of innovative or complex investments to support CD initiatives.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's full-scope AAs.
- The bank provided an adequate level of CD services.

Description of Institution's Operations in the State of Alabama

The state of Alabama was WFBNA's 22nd largest rating area based on its total deposits in the state. As of June 30, 2021, the bank maintained approximately \$10.5 billion or 0.7 percent of its total domestic deposits in branches within the state. Of the 119 depository financial institutions operating in the bank's AAs within the state, WFBNA, with a deposit market share of 8.3 percent, was the third largest. Other top depository financial institutions in the bank's AAs within the state based on market share included Regions Bank (22.8 percent), BBVA USA (16.2 percent), ServisFirst Bank (6.6 percent), and Synovus Bank (4.9 percent). As of December 31, 2021, the bank operated 85 branches and 155 ATMs in the state. WFBNA delineated 23 AAs within the state; however, the OCC combined, analyzed, and presented those AAs at the CSA level where possible for purposes of this evaluation. This resulted in the following 10 AAs: Anniston-Oxford, AL MSA (Anniston MSA), Birmingham-Hoover-Talladega, AL CSA (Birmingham CSA), Dothan-Ozark, AL CSA (Dothan CSA), Florence-Muscle Shoals, AL MSA (Florence MSA), Gadsden, AL MSA (Gadsden MSA), Huntsville-Decatur, AL CSA (Huntsville CSA), Mobile-Daphne-Fairhope, AL CSA (Mobile CSA), Montgomery-Selma-Alexander City, AL CSA (Montgomery CSA), Tuscaloosa, AL MSA (Tuscaloosa MSA), and Alabama Combined Non-MSA. The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

23 This rating only reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Birmingham CSA

The following table provides a summary of the demographics, including housing and business information for the Birmingham CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Birmingham CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	304	10.5	23.0	39.1	26.6	0.7
Population by Geography	1,300,878	7.5	21.5	39.8	30.7	0.4
Housing Units by Geography	579,357	8.7	22.5	39.6	28.9	0.3
Owner-Occupied Units by Geography	349,044	4.3	18.7	42.6	34.4	0.0
Occupied Rental Units by Geography	151,791	15.9	28.4	33.5	21.5	0.8
Vacant Units by Geography	78,522	14.7	28.0	38.0	19.0	0.4
Businesses by Geography	93,606	6.3	20.5	33.8	38.3	1.1
Farms by Geography	2,375	2.5	18.0	41.0	38.1	0.4
Family Distribution by Income Level	337,739	23.7	16.1	18.8	41.3	0.0
Household Distribution by Income Level	500,835	25.5	15.6	16.3	42.5	0.0
Median Family Income MSA - 13820 Birmingham-Hoover, AL MSA		\$63,259	Median Housing Value			\$151,473
Median Family Income Non-MSAs - AL		\$45,454	Median Gross Rent			\$775
			Families Below Poverty Level			13.4%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$22,727 to \$31,630 and moderate-income families earned at least \$22,727 to \$31,630 and less than \$36,363 to \$50,607 in the AA, depending on the metropolitan or non-metropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$568 to \$791 for low-income borrowers and ranging from \$909 to \$1,265 for moderate-income borrowers in the AA. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$813. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Birmingham, AL MSA (Birmingham MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Birmingham MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Finance jobs in the Birmingham MSA's large financial services industry continued to slide until early 2021. Many other financial hubs rode a red-hot stock market, but the Birmingham MSA was less concentrated in the securities industry. On the plus side, there was improvement in insurance, another key driver. Blue Cross Blue Shield of Alabama operated its corporate headquarters in the metro area. The company covered 90 percent of the health insurance market in the state, lending stability to

financial services. The Birmingham MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Government, Education and Health Services, Professional and Business Services, Leisure and Hospitality Services, and Financial Activities. Major employers in the Birmingham MSA include University of Alabama Birmingham, Regions Financial Corp., Children's of Alabama, and AT&T. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Birmingham MSA was 2.2 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Birmingham CSA. The organizations included one community development organization that helped to address the causes and conditions of poverty and one economic development organization that helped to attract and retain businesses in the area. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing
- Affordable for-sale housing
- Affordable childcare for working parents
- Living wage employment
- Financial literacy/education
- Credit counseling

Opportunities for participation by financial institutions included the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Small business lending
- Supporting nonprofit health providers and prevention
- Working with the area's community development corporation network
- Various state and local government partnership opportunities

Mobile CSA

The following table provides a summary of the demographics, including housing and business information for the Mobile CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Mobile CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	152	12.5	21.7	40.8	23.0	2.0
Population by Geography	626,369	6.1	17.2	47.0	29.6	0.1
Housing Units by Geography	295,725	5.6	18.7	46.9	28.8	0.0
Owner-Occupied Units by Geography	160,752	3.6	14.5	49.2	32.7	0.0
Occupied Rental Units by Geography	73,673	9.2	23.6	42.2	25.0	0.0
Vacant Units by Geography	61,300	6.5	24.1	46.3	23.2	0.0
Businesses by Geography	48,805	4.3	19.6	43.2	32.9	0.1
Farms by Geography	1,280	1.9	14.3	54.4	29.5	0.0
Family Distribution by Income Level	158,325	22.8	16.2	19.7	41.3	0.0
Household Distribution by Income Level	234,425	25.6	15.3	16.8	42.3	0.0
Median Family Income MSA - 19300 Daphne-Fairhope-Foley, AL MSA		\$62,271	Median Housing Value			\$145,789
Median Family Income MSA - 33660 Mobile, AL MSA		\$54,139	Median Gross Rent			\$817
			Families Below Poverty Level			13.8%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$27,070 to \$31,136 and moderate-income families earned at least \$27,070 to \$31,136 and less than \$43,311 to \$49,817 in the AA, depending on the metropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$677 to \$778 for low-income borrowers and ranging from \$1,083 to \$1,245 for moderate-income borrowers in the AA. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$783. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Mobile, AL MSA (Mobile MSA)

The Mobile MSA is a shipbuilding hub, and Department of Defense contracts accounted for more than 5 percent of gross metro product, more than triple the national average. Information from Moody's Analytics indicated that at the end of the evaluation period, the Mobile MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Payrolls in private services and goods-producing industries have barely budged since the final quarter of 2020. As a result, total employment in the Mobile MSA was no longer closer to its pre-virus level than the U.S. average for the first time since the pandemic struck. Single-family house permitting was proceeding at a below-average pace, and house price appreciation was roughly half the U.S. rate. The Mobile MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Government, Professional and Business Services, Education and Health Services, and Manufacturing. Major

employers in the Mobile MSA include University of South Alabama and Medical Facilities, Infirmary Health System, Austal USA, and CPSI. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Mobile MSA was 3.1 percent compared to the national unemployment rate of 3.7 percent.

Daphne-Fairhope-Foley, AL MSA (Daphne MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Daphne MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Daphne MSA's economy gathered steam since early 2021, outpacing the recoveries of the state and nation. Private services have led the way while goods producers have struggled amid supply-chain disruptions. The jobless rate was nearing the prerecession low, despite a surging labor force, which expanded the fastest among all peers statewide. The Daphne MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Leisure and Hospitality Services, Retail Trade, Education and Health Services, Government, and Professional and Business Services. Major employers in the Daphne MSA include Walmart Inc., Infirmary Health, Collins Aerospace, and Columbia Southern University. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Daphne MSA was 2 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Mobile CSA. The organizations included one community development organization that helped to address the causes and conditions of poverty and one economic development organization that helped to attract and retain businesses in the area. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing
- Affordable for-sale housing
- Affordable childcare for working parents
- Living wage employment
- Financial literacy/education
- Credit counseling

Opportunities for participation by financial institutions included the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Small business lending
- Supporting nonprofit health providers and prevention
- Working with the area's community development corporation network
- Various state and local government partnership opportunities

Scope of Evaluation in the State of Alabama

The OCC selected the Birmingham CSA and Mobile CSA for full-scope reviews and based conclusions and ratings primarily on activity within these geographical areas. These AAs carried significant weight in determining the overall ratings for the state of Alabama because of the significance of the bank's presence in these AAs. More weight was given to the Birmingham CSA due to larger deposit base, lending, and branch presence.

During the evaluation period, the bank originated or purchased 38,601 home mortgage loans, small loans to businesses, and small loans to farms totaling \$5.2 billion within the state of Alabama. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within each AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. In each of the AAs, the OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF ALABAMA

LENDING TEST

The bank's performance under the Lending Test in the state of Alabama is rated High Satisfactory. Performance in the limited-scope areas had a neutral effect on the overall Lending Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in Birmingham CSA was good and the bank's performance in the Mobile CSA was adequate.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Birmingham CSA	7,908	5,271	173	11	13,363	34.6	47.1
Mobile CSA	3,606	3,261	50	7	6,924	17.9	13.3
Anniston MSA	313	218	13	0	544	1.4	3.2
Dothan CSA	1,158	839	112	0	2,109	5.5	5.3
Florence MSA	537	227	23	0	787	2.0	1.5
Gadsden MSA	361	266	18	0	645	1.7	2.0
Huntsville CSA	5,310	1,652	79	10	7,051	18.3	7.8
Montgomery CSA	1,763	1,408	42	1	3,214	8.3	10.8
Tuscaloosa MSA	1,399	625	65	0	2,089	5.4	3.0
Alabama Combined Non-MSA	1,056	751	97	1	1,905	4.9	6.0
Total	23,411	14,518	672	30	38,631	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Birmingham CSA	1,689,953	143,463	5,307	13,086	1,851,809	35.6	47.1
Mobile CSA	720,621	70,642	3,326	71	794,660	15.3	13.3
Anniston MSA	41,161	7,580	859	0	49,600	1.0	3.2
Dothan CSA	185,377	21,103	9,621	0	216,101	4.2	5.3
Florence MSA	98,632	10,102	427	0	109,161	2.1	1.5
Gadsden MSA	56,867	9,045	319	0	66,231	1.3	2.0
Huntsville CSA	1,158,856	44,013	1,954	11,998	1,216,821	23.4	7.8
Montgomery CSA	350,251	44,428	2,222	500	397,401	7.6	10.8
Tuscaloosa MSA	281,558	12,608	5,017	0	299,183	5.8	3.0
Alabama Combined Non-MSA	169,602	19,227	2,565	8,000	199,394	3.8	6.0
Total	4,752,878	382,211	31,617	33,655	5,200,361	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Birmingham CSA

As of June 30, 2021, WFBNA had a deposit market share of 8.4 percent. The bank ranked third among 56 depository financial institutions placing it in the top 6 percent of institutions.

In the Birmingham CSA, home mortgage lending received the most weight, which accounted for 59.2 percent of the bank's lending in the AA. Small loans to businesses and small loans to farms accounted for 39.5 percent and 1.3 percent of the bank's loan volume in the AA, respectively. In the Mobile CSA, home mortgage lending received the most weight, which accounted for 52.1 percent of the bank's lending in the AA. Small loans to businesses and small loans to farms accounted for 47.1 percent and 0.7 percent of the bank's loan volume in the AA, respectively.

According to peer mortgage data for 2021, WFBNA had a market share of 2.9 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked sixth among 570 home mortgage lenders in the AA, which placed it in the top 2 percent of lenders. The top lenders in this AA based on market share were Rocket Mortgage (7 percent), Regions Bank (6.8 percent), and Fairway Independent Mortgage Corporation (3.7 percent).

According to peer small business data for 2021, WFBNA had a market share of 5 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked sixth out of 160 small business lenders, which placed it in the top 4 percent of lenders. The top lenders in this AA based on market share were American Express National Bank (19.5 percent), Regions Bank (7.1 percent), and JPMorgan Chase Bank, N.A. (6.4 percent).

According to peer small farm data for 2021, WFBNA had a market share of 22.4 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked second out of 32 small farm lenders, which placed it in the top 7 percent of lenders. The other top three lenders in this AA based on market share were John Deere Financial, FSB (28.6 percent) and JPMorgan Chase Bank, N.A. (9.5 percent).

Mobile CSA

As of June 30, 2021, WFBNA had a deposit market share of 8.1 percent. The bank ranked fourth among 31 depository financial institutions placing it in the top 6 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 3 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked seventh among 639 home mortgage lenders in the AA, which placed it in the top 2 percent of lenders. The top lenders in this AA based on market share were Rocket Mortgage (7.1 percent), Trustmark National Bank (5.3 percent), and Regions Bank (5.3 percent).

According to peer small business data for 2021, WFBNA had a market share of 6 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked second out of 144 small business lenders, which placed it in the top 2 percent of lenders. The other top lenders in this AA based on market share were American Express National Bank (17 percent) and Hancock Whitney Bank (5 percent).

According to peer small farm data for 2021, WFBNA had a market share of 11.3 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked third out of 31 small farm lenders, which placed it in the top 10 percent of lenders. The other top lenders in this AA based on market share were Regions Bank (17 percent) and John Deere Financial, FSB (15.2 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AAs. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data. The bank's performance was adequate in the Birmingham CSA and good in the Mobile CSA.

Birmingham CSA

Home Mortgage Loans

Refer to Table O in the state of Alabama section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans in low-income geographies was significantly below the percentage of owner-occupied housing units in low-income geographies but it exceeded the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was well below the percentage of owner-occupied housing units in moderate-income geographies but it was near to the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Alabama section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies approximated both the percentage of businesses and the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses and the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Alabama section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

The bank did not originate or purchase any small loans to farms in low-income geographies. The bank's percentage of small loans to farms in moderate-income geographies exceeded the percentage of farms in moderate-income geographies but it was below the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Mobile CSA

Home Mortgage Loans

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was significantly below the percentage of owner-occupied housing units in low-income geographies but it was equal to the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied housing units in moderate-income geographies but it was near to the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Alabama section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was well below the percentage of businesses in low-income geographies and it was below the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was below the percentage of businesses in moderate-income geographies but it was near to the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Alabama section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

The bank did not originate or purchase any small loans to farms in low-income geographies. The bank's percentage of small loans to farms in moderate-income geographies was well below the percentage of farms in moderate-income geographies and it was significantly below the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies in the Birmingham CSA and the Mobile CSA. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AAs.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes. The bank's performance was good in the Birmingham CSA and adequate in the Mobile CSA.

Birmingham CSA

Home Mortgage Loans

Refer to Table P in the state of Alabama section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but it was near to the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was near to both the percentage of moderate-income families and the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Alabama section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 31.6 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the Alabama section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was very poor.

The bank did not collect or consider the GAR in the underwriting of approximately 92.5 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was significantly below both the percentage of farms in the AA

with GAR of \$1 million or less and the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Mobile CSA

Home Mortgage Loans

Refer to Table P in the state of Alabama section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but it exceeded the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was below both the percentage of moderate-income families and the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Alabama section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 26 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Alabama section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was poor.

The bank did not collect or consider the GAR in the underwriting of approximately 78 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was significantly below the percentage of farms in the AA with GAR of \$1 million or less and it was well below the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Community Development Lending

The bank made a low level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

Birmingham CSA

WFBNA made an adequate level of CD loans in the Birmingham CSA. WFBNA made 11 CD loans totaling approximately \$13.1 million, which represented 2 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing, revitalization and stabilization, and community services purposes. By dollar volume, 84.4 percent of these loans funded affordable housing that provided 173 units of affordable housing, 1 percent funded revitalization and stabilization efforts, and 14.6 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA renewed a \$300,000 working capital line of credit to an organization in Fairfield, Alabama. The organization worked with people in need to build affordable housing, which were financed at zero-percent interest. According to the organization, 100 percent of its clients were low- and moderate-income.
- WFBNA provided a \$10.6 million loan for a 173-unit multifamily housing development located in a low-income census tract in Birmingham, Alabama. The development provided one, two, and three-bedroom units affordable to low- and moderate-income tenants.

Mobile CSA

WFBNA made a low level of CD loans in the Mobile CSA. WFBNA made seven CD loans totaling approximately \$71,000, which represented less than 1 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing, revitalization/stabilization and community services purposes. By dollar volume, 42.9 percent of these loans funded affordable housing, 49.5 percent funded revitalization and stabilization efforts, and 7.6 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$20 million term loan to a nonprofit 501(c)(3) and CDFI of which approximately \$27,000 was allocated to the Mobile CSA. The nonprofit primarily made loans to charter schools and community health facilities and was dedicated to improving access to high-quality health and elder care, healthy foods, housing, and education for low-income communities across the country.
- WFBNA provided a \$10 million line of credit to a national certified CDFI of which \$13,000 was allocated to the Mobile CSA. The CDFI provided flexible capital to its affiliates which used it to provide affordable homes and strengthen communities.

Broader Statewide Area

WFBNA provided a \$4.9 million loan to an affordable housing developer in the broader statewide area that included one or more AAs. The borrower did not have a purpose, mandate, or function to serve an AA. The loan was given positive consideration and supported the bank's overall performance under the Lending Test in the state of Alabama.

Product Innovation and Flexibility

Birmingham CSA

WFBNA made extensive use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 1,010 loans under its flexible lending programs totaling \$51.3 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	128	27,200
Dream. Plan. Home.	23	3,400
PPP	859	20,700
Total	1,010	51,300

Mobile CSA

WFBNA used flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 556 loans under its flexible lending programs totaling \$23.4 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	63	10,900
Dream. Plan. Home.	9	1,300
PPP	484	11,200
Total	556	23,400

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Florence MSA was consistent with the bank's overall performance under the Lending Test in the full-scope areas. The bank's performance in the Huntsville CSA and Alabama Combined Non-MSA was stronger than the overall performance primarily due to stronger levels of CD lending that had a positive impact on conclusions for those AAs. The bank's performance in the Anniston MSA, Dothan CSA, Gadsden MSA, Montgomery CSA, and Tuscaloosa MSA was weaker than the bank's performance in the full-scope areas primarily due to weaker geographic and borrower income distributions and lower levels of CD lending.

Refer to Tables O through T in the state of Alabama section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Alabama is rated High Satisfactory. Performance in the limited-scope areas had a neutral effect on the overall Investment Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Birmingham CSA was good and the bank's performance in the Mobile CSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Birmingham CSA	19	11,677	169	17,452	188	35.9	29,130	24.0	1	1,065
Mobile CSA	3	28,925	84	2,096	87	16.6	31,021	25.6	1	37
Anniston MSA	0	0	22	109	22	4.207	109	0.0	0	0
Dothan CSA	0	0	26	177	26	5.0	177	0.1	0	0
Florence MSA	1	6	14	74	15	2.9	80	0.0	0	0
Gadsden MSA	0	0	13	58	13	2.5	58	0.0	0	0
Huntsville CSA	19	26,781	46	1,098	65	12.4	27,879	23.0	2	134
Montgomery CSA	3	46	60	473	63	12.0	519	0.4	0	0
Tuscaloosa MSA	0	0	23	131	23	4.4	131	0.1	0	0
Alabama Combined Non-MSA	0	0	11	3,847	11	2.1	3,847	3.2	0	0
Statewide***	5	35,772	5	55,687	10	1.9	91,459	49.6	2	6
Total	50	92,132	473	29,203	523	100.0	121,335	100.0	6	1,242
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. * '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 tracked and recorded by the institution's financial reporting system. *** Statewide means investments in statewide programs that have a purpose, mandate, or function to serve one or more of the bank's assessment areas within the state. Due to rounding, totals may not equal 100.0%										

Birmingham CSA

The bank had a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$29.1 million and represented 4.5 percent of the bank's tier 1 capital allocated to the AA. The investments also included 167 grants and donations totaling \$3.8 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited adequate responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately

23.4 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 57.4 percent that focused on community services targeted to low- and moderate-income individuals, and 19.2 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 102 units of affordable housing in the AA.

The bank made significant use of innovative or complex investments to support CD initiatives. Approximately 78.2 percent of current period investment dollars were complex NMTC investments. The following are examples of CD investments made in this AA:

- WFBNA provided a \$6.7 million NMTC investment to finance the installation of a rail-line spur and to purchase new equipment for a fertilizer coating business in Sylacauga, Alabama. The company's focus was to increase crop yields while reducing farmers' dependence on water. The COVID-19 pandemic drastically adversely impacted the company's operations, causing delays in distribution that affected the company's working capital. This investment allowed the company to continue to grow and add jobs. This project retained 50 direct full-time jobs and created 10 new permanent jobs.
- WFBNA provided four grants totaling \$145,000 to support new home construction and a new Housing Relief Fund that was established to help clients address short-term housing cost impacts due to the COVID-19 pandemic. The organization handled mortgage payment restructuring plans on a case-by-case basis for clients.
- WFBNA provided a \$7 million NMTC investment for an organization to finance the development of an educational urban farm, located in Birmingham, Alabama. The organization operated seven farms co-located at schools; this new facility allowed the organization to serve more schools by reaching students through fields trips. The organization partnered with the Birmingham City Schools with a student population that had a poverty rate of 50 percent. Their STEM-based education provided hands-on experience growing and selling food. In addition to learning about farming and the importance of healthy nutrition, students developed critical thinking and communication skills. The Woodlawn neighborhood that was served by the organization and housed one of the school farms, was a qualified USDA low-income and low-food access census tract and 100 percent of students qualified for the free and reduced lunch program. This investment was responsive to the identified need for neighborhood revitalization.

Mobile CSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$31 million and represented 17 percent of the bank's tier 1 capital allocated to the AA. The investments also included 82 grants and donations totaling \$572,000 to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 17.2 percent of the bank's investment dollars focused on affordable housing, a primary community

development need in the AA, 72.4 percent that focused on community services targeted to low- and moderate-income individuals, and 10.3 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 135 units of affordable housing in the AA.

The bank rarely used innovative and complex investments to support CD initiatives. None of the current period investments were complex. The following are examples of CD investments made in this AA:

- WFBNA provided four grants totaling \$18,000 to support a nonprofit organization's financial literacy and economic empowerment programs. The organization provided counseling and financial education, focused on improving credit scores and increasing personal assets.
- WFBNA provided five grants totaling \$55,000 to an organization to support its Bank On program and VITA program. Bank On was a Cities for Financial Empowerment Fund financial education program targeted at under and unbanked individuals. Additionally, the bank provided COVID-19 relief funding directed towards clients' housing and utility bills.
- WFBNA provided \$17,000 in grants to support an organization's teen leadership program, focused on academic success, career preparation and community service. The organization provided educational, health and wellness, and workforce readiness programs for young people enabling them to secure employment after graduation.

Broader Statewide Investments

WFBNA had 10 current and prior period investments totaling \$28.3 million with a purpose, mandate, or function to serve one or more AAs in the state. These CD investments were primarily grants that supported community services targeted to low- and moderate-income persons. These investments were given positive consideration and supported the bank's overall performance under the Investment Test in the state of Alabama.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Alabama Combined Non-MSA was consistent with the bank's overall performance under the Investment Test in the full-scope areas. Performance in the Huntsville CSA was stronger than the bank's overall performance under the Investment Test in the full-scope areas primarily due to higher levels of CD investments relative to the bank's presence in the AA. Performance in the Anniston MSA, Dothan CSA, Florence MSA, Gadsden MSA, Montgomery CSA, and Tuscaloosa MSA was weaker than the bank's overall performance under the Investment Test in the full-scope areas primarily due to lower levels of CD investments relative to the bank's presence and capacity to invest in those AAs.

SERVICE TEST

The bank's performance under the Service Test in the state of Alabama is rated Outstanding. Performance in the limited-scope areas had a neutral effect on the overall Service Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Birmingham CSA was excellent and the performance in the Mobile CSA was adequate.

Retail Banking Services

Service delivery systems were accessible to geographies and individuals of different income levels in the bank's full-scope AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Birmingham CSA	47.1	31	36.5	9.7	22.6	35.5	29.0	7.5	21.5	39.8	30.7
Mobile CSA	13.3	14	16.5	0.0	14.3	42.9	42.9	6.1	17.2	47.0	29.6
Anniston MSA	3.2	3	3.5	0.0	66.7	33.3	0.0	5.1	17.5	63.8	10.3
Dothan CSA	5.3	7	8.2	0.0	14.3	57.1	28.6	2.4	12.9	50.2	34.5
Florence MSA	1.5	2	2.4	50.0	50.0	0.0	0.0	3.5	15.6	62.5	18.4
Gadsden MSA	2.0	2	2.4	0.0	0.0	100.0	0.0	6.4	23.0	43.5	27.1
Huntsville CSA	7.8	6	10.6	16.7	33.3	33.3	16.7	7.8	22.4	39.5	30.3
Montgomery CSA	10.8	9	10.6	0.0	33.3	44.4	11.1	9.1	21.7	39.4	29.6
Tuscaloosa MSA	3.0	3	3.5	0.0	66.7	0.0	33.3	3.5	25.8	37.9	28.8
Alabama Combined Non-MSA	6.0	8	9.4	0.0	37.5	37.5	25.0	0.0	13.8	53.0	33.2
Total	100.0	85	100.0	5.9	27.1	38.8	25.9	6.3	20.0	43.7	29.5
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Birmingham CSA	0	5	0	-2	-1	-2
Mobile CSA	0	4	0	-2	-1	-1
Anniston MSA	0	1	0	-1	0	0
Dothan CSA	0	1	0	0	0	-1
Florence MSA	0	0	0	0	0	0
Gadsden MSA	0	1	0	-1	0	0
Huntsville CSA	0	3	-1	0	-1	-1
Montgomery CSA	0	3	0	0	-2	-1
Tuscaloosa MSA	0	1	0	0	0	-1
Alabama Combined Non-MSA	0	5	0	-1	-2	-2
Total	0	24	-1	-7	-7	-9
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.						

Birmingham CSA

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Birmingham CSA. WFBNA operated 31 branches in the AA, comprising three branches in low-income geographies, seven branches in moderate-income geographies, 11 branches in middle-income geographies, nine branches in upper-income geographies, and one branch in a geography without an income designation. The distributions of branches in low- and moderate-income geographies exceeded the distributions of the population in low- and moderate-income geographies. The distribution was augmented by two branches in middle- and upper-income geographies that were within close proximity to serve low-income areas and four branches in middle- and upper-income geographies that were within close proximity to and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations. Despite the closures, its service delivery systems remained readily accessible.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the 16 branches opened on Saturdays, four were located in low- and moderate-income geographies.

Mobile CSA

WFBNA's service delivery systems were reasonably accessible to geographies and individuals of different income levels in the Mobile CSA. WFBNA operated 14 branches in the AA, comprising two branches in moderate-income geographies, six branches in middle-income geographies, and six branches in upper-income geographies. The distribution of branches in low-income geographies was significantly below the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies was near to the distribution of the population in moderate-income geographies. The distribution was augmented by three branches in middle- and upper-income geographies that were within close proximity to serve moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches had adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the four branches opened on Saturdays, two were located in moderate-income geographies.

Community Development Services

WFBNA provided an adequate level of CD services.

Birmingham CSA

WFBNA provided an adequate level of CD services in the Birmingham CSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 27 CD service activities during the evaluation period. A majority (59 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The other CD services were targeted to affordable housing, economic development, and revitalization and stabilization. Financial education comprised 52 percent of the CD service activities, and the remaining activities comprised of board membership. The bank's assistance provided was responsive to the identified needs in the AA. The following are examples of CD services provided in this AA:

- WFBNA employees provided 48 hours of board membership support to a nonprofit organization in Birmingham, Alabama. The organization supported local small business owners by creating business development plans and providing capital to fill vacant spaces in targeted low- and moderate-income geographies within the AA. The organization also helped businesses through mentorship to fuel commercial activities through proactive business recruitment and retention of jobs, and by encouraging private and public investments that support economic growth, including tourism

citywide. The CD service was responsive to the identified need for small business growth and neighborhood revitalization.

- WFNBA employees provided 19 hours of financial education to members of a nonprofit organization that utilized community-led solutions to identify and resolve community concerns with a primary focus on education, financial stability, and health. Management reported that 88 percent of the organization's clients were low- and moderate-income individuals and families.

Mobile CSA

WFBNA provided a poor level of CD services in the Mobile CSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 13 CD service activities during the evaluation period. All of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Anniston MSA, Florence MSA, Huntsville CSA, Tuscaloosa MSA, and Alabama Combined Non-MSA was consistent with the bank's overall performance under the Service Test in the full-scope areas. The bank's performance in the Dothan CSA, Gadsden MSA, and Montgomery CSA was weaker than the bank's overall performance under the Service Test in the full-scope areas. Performance was weaker primarily due to lower accessibility of retail banking services in low- and moderate-income areas.

State of Alaska

CRA rating for the State of Alaska²⁴: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected good responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AAs.
- The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank made an adequate level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.
- The bank had an adequate level of qualified CD investments and grants, occasionally in a leadership position. The bank exhibited adequate responsiveness to credit and community economic development needs. The bank rarely used innovative or complex investments to support CD initiatives.
- Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided an adequate level of CD services.

Description of Institution's Operations in the State of Alaska

The state of Alaska was WFBNA's 24th largest rating area based on its total deposits in the state. As of June 30, 2021, the bank maintained approximately \$7.5 billion or 0.5 percent of its total domestic deposits in branches within the state. Of the seven depository financial institutions operating in the bank's AAs within the state, WFBNA, with a deposit market share of 45.5 percent, was the largest. Other top depository financial institutions in the bank's AAs within the state based on market share included First National Bank Alaska (22.9 percent), Northrim Bank (13.2 percent), and Keybank, N.A. (8.8 percent). As of December 31, 2021, the bank operated 39 branches and 82 ATMs in the state. WFBNA delineated seven AAs within the state; however, the OCC combined, analyzed, and presented those AAs at the CSA level where possible for purposes of this evaluation. This resulted in the following three AAs: Anchorage, AK MSA (Anchorage MSA), Fairbanks, AK MSA (Fairbanks MSA), and Alaska Combined Non-MSA. The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

Alaska Combined Non-MSA

The following table provides a summary of the demographics, including housing and business information for the Alaska Combined Non-MSA.

24 This rating only reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Alaska Combined Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	57	3.5	15.8	52.6	21.1	7.0
Population by Geography	206,974	3.0	14.5	57.3	23.7	1.5
Housing Units by Geography	95,230	2.6	17.3	57.6	22.4	0.1
Owner-Occupied Units by Geography	45,920	2.3	13.9	57.3	26.5	0.0
Occupied Rental Units by Geography	24,211	2.5	8.7	64.9	23.9	0.0
Vacant Units by Geography	25,099	3.5	31.8	51.1	13.4	0.2
Businesses by Geography	19,202	0.7	6.3	65.7	27.1	0.2
Farms by Geography	658	0.0	4.6	66.0	29.5	0.0
Family Distribution by Income Level	46,865	20.9	16.2	21.2	41.7	0.0
Household Distribution by Income Level	70,131	24.0	14.9	18.8	42.3	0.0
Median Family Income Non-MSAs - AK		\$76,010	Median Housing Value			\$224,457
			Median Gross Rent			\$1,050
			Families Below Poverty Level			8.9%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$38,005 and moderate-income families earned at least \$38,005 and less than \$60,808 in the AA. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$950 for low-income borrowers and \$1,520 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$1,205. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Information from Moody's Analytics indicated that at the end of the evaluation period, the Alaska Combined Non-MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Alaska's recovery was lagging its national peers. The state had recovered fewer pandemic job losses than all but five other states. Employment in the key mining industry was stuck at a 15-year low. Also, tourism was still unstable from the pandemic and leisure/hospitality payrolls were about 20 percent below pre-pandemic levels, versus less than 10 percent nationally. The Alaska Combined Non-MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Government, Education and Health Services, and Retail Trade. Major employers in the state included Fort Richardson, Elmendorf Air Force Base, Fort Wainwright, and University of Alaska Fairbanks. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the counties that comprise the Alaska Combined Non-MSA ranged from a low of 3.6 percent (Juneau City and Borough) to a high of 13.7 percent (Skagway Municipality) compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided during a CRA listening session of a variety of nine community-based organizations representing non-metropolitan areas of Alaska that was conducted during the evaluation period. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing
- Affordable for-sale housing
- Basic infrastructure (water and sewage)
- High density housing
- Micro loans for small businesses
- Loans for specialized industries (e.g., fishing, seasonal businesses, and energy resource extraction)
- Small business support in hard-to-reach rural communities

Opportunities for participation by financial institutions included the following:

- Small loans for businesses, particularly in rural areas
- Flexible lending products, including loan products with lower interest rates and flexibility for small business.
- Participation in the HUD 184 and Title VI programs (HUD guarantees)
- Digital services due to lack of branches in rural Alaska villages
- Technical assistance for small businesses
- Support for rural broadband and connectivity

Anchorage MSA

The following table provides a summary of the demographics, including housing and business information for the Anchorage MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Anchorage MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	79	2.5	26.6	53.2	17.7	0.0
Population by Geography	395,285	3.0	23.6	51.5	21.8	0.0
Housing Units by Geography	155,394	2.6	25.7	51.6	20.1	0.0
Owner-Occupied Units by Geography	86,653	1.0	15.9	55.1	27.9	0.0
Occupied Rental Units by Geography	49,620	5.6	38.4	45.2	10.8	0.0
Vacant Units by Geography	19,121	1.9	36.9	52.3	8.9	0.0
Businesses by Geography	44,842	3.1	25.8	49.1	22.1	0.0
Farms by Geography	1,003	1.2	15.9	60.6	22.3	0.0

Family Distribution by Income Level	91,970	19.8	18.0	22.5	39.7	0.0
Household Distribution by Income Level	136,273	21.8	17.1	20.0	41.1	0.0
Median Family Income MSA - 11260 Anchorage, AK MSA		\$89,267	Median Housing Value			\$259,483
			Median Gross Rent			\$1,238
			Families Below Poverty Level			5.9%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$44,634 and moderate-income families earned at least \$44,634 and less than \$71,414 in the AA. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$1,116 for low-income borrowers and \$1,785 for moderate-income borrowers in the AA. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$1,393. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Information from Moody's Analytics indicated that at the end of the evaluation period, the Anchorage MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. During the evaluation period, the Anchorage MSA's economy slowed down. House prices were rising at their fastest pace since 2006, but price appreciation was the second slowest in the region. Nonfarm employment was contracting, and the Anchorage MSA's employment situation was the weakest in the West during 2021. Employment in the important mining industry contracted to its lowest point since 2004, despite higher prices for Alaskan oil. Although most drilling in Alaska occurred in the northern region of the state, the Anchorage MSA was highly dependent on the performance of oil. Many energy workers travel from Anchorage to work on oil fields, and the Anchorage MSA was home to many regional headquarters of large oil players and firms that provided support activities for mining. The Anchorage MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Government, Education and Health Services, Retail Trade, Professional and Business Services, and Leisure and Hospitality Services. Major employers in the Anchorage MSA include Fort Richardson, Elmendorf Air Force Base, and Providence Health & Services. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Anchorage MSA was 4.8 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by one local community development organization that was contacted during the evaluation period and served the Anchorage MSA. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of the community contact and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable housing
- Rental assistance

- Rehabilitation of housing units/improvement of the quality of the housing stock
- Micro loans for small businesses
- Bank branches in the banking deserts, which are primarily low- and moderate-income areas
- Small business support in hard-to-reach rural communities
- Financial education such as credit building counseling
- Low-cost, long-term capital loans
- Low-cost checking or savings accounts
- Emergency shelters for the homeless
- Transitional housing
- Job skills training

Opportunities for participation by financial institutions included the following:

- Small loans for businesses, particularly in rural areas
- Flexible lending products, including loan products with lower interest rates and flexibility for small businesses
- Funding to help administer grant programs like HomeStart
- Technical assistance for small businesses
- Long-term investments in nonprofits (multi-year grants)
- Low-interest capital for nonprofits

Scope of Evaluation in the State of Alaska

The OCC selected the Alaska Combined Non-MSA and Anchorage MSA for full-scope reviews and based conclusions and ratings primarily on activity within these geographical areas. These AAs carried significant weight in determining the overall ratings for the state of Alaska because of the significance of the bank's presence in these AAs. More weight was given to the Anchorage MSA due to the larger deposit base, lending, and branch presence.

During the evaluation period, the bank originated or purchased 16,263 home mortgage loans, small loans to businesses, and small loans to farms totaling \$2.8 billion within the state of Alaska. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within each AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. In the Anchorage MSA and Fairbanks MSA, the OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms. In the Alaska Combined Non-MSA, the OCC placed more weight based on the number of loans on small loans to businesses versus home mortgage loans and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF ALASKA

LENDING TEST

The bank's performance under the Lending Test in the state of Alaska is rated High Satisfactory. Performance in the limited-scope area had a neutral effect on the overall Lending Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Alaska Combined Non-MSA and Anchorage MSA was good.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Alaska Combined Non-MSA	1,723	2,569	71	7	4,370	26.8	33.3
Anchorage MSA	6,656	4,005	65	15	10,741	66.0	59.9
Fairbanks MSA	656	514	4	0	1,174	7.2	6.8
Total	9,035	7,088	140	22	16,285	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Alaska Combined Non-MSA	439,746	98,314	4,413	141	542,614	19.4	33.3
Anchorage MSA	1,899,824	164,989	1,831	22,711	2,089,355	74.7	59.9
Fairbanks MSA	148,850	16,451	110	0	165,411	5.9	6.8
Total	2,488,420	279,754	6,354	22,852	2,797,380	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Alaska Combined Non-MSA

As of June 30, 2021, WFBNA had a deposit market share of 47.3 percent. The bank ranked first among seven depository financial institutions placing it in the top 15 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 8.2 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked fourth among 147 home mortgage lenders in the AA, which placed it in the top 3 percent of lenders. The top lenders in this AA based on market share were Alaska USA Federal Credit Union (15.1 percent), Alaska USA Mortgage Company (13.7 percent), and Residential Mortgage (12 percent).

According to peer small business data for 2021, WFBNA had a market share of 14.8 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked fourth out of 77 small business lenders, which placed it in the top 6 percent of lenders. The top lenders in this AA based on market share were Bank of America, N.A. (27 percent), Northrim Bank (16.7 percent), and First National Bank Alaska (14.8 percent).

According to peer small farm data for 2021, WFBNA had a market share of 3.3 percent based on the number of small loans to farms originated or purchased. The bank ranked third out of 10 small farm lenders, which placed it in the top 30 percent of lenders. The other top lenders in this AA based on market share were First National Bank Alaska (67.7 percent) and Bank of America, N.A. (22.6 percent).

Anchorage MSA

As of June 30, 2021, WFBNA had a deposit market share of 48.1 percent. The bank ranked first among four depository financial institutions..

According to peer mortgage data for 2021, WFBNA had a market share of 7.3 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked fourth among 205 home mortgage lenders in the AA, which placed it in the top 2 percent of lenders. The top lenders in this AA based on market share were Alaska USA Federal Credit Union (10.6 percent), Residential Mortgage (10.5 percent), and Alaska USA Mortgage Company (9.8 percent).

According to peer small business data for 2021, WFBNA had a market share of 10.6 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked fifth out of 93 small business lenders, which placed it in the top 6 percent of lenders. The top lenders in this AA based on market share were Bank of America, N.A. (24.1 percent), Northrim Bank (15 percent), and First National Bank Alaska (11.1 percent).

According to peer small farm data for 2021, WFBNA had a market share of 10.9 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked third out of 11 small farm lenders, which placed it in the top 28 percent of lenders. The other top lenders in this AA based on market share were Bank of America, N.A. (40.1 percent) and First National Bank Alaska (34.7 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AAs. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data. The bank's performance was adequate in the Alaska Combined Non-MSA and excellent in the Anchorage MSA.

Alaska Combined Non-MSA

Home Mortgage Loans

Refer to Table O in the state of Alaska section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was poor.

The bank did not originate or purchase any home mortgage loans in low-income geographies. The bank's percentage of home mortgage loans in moderate-income geographies was significantly below the

percentage of owner-occupied housing units in moderate-income geographies and it was below the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Alaska section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was well below the percentage of businesses in low-income geographies but it exceeded the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was below the percentage of businesses in moderate-income geographies and it approximated the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Alaska section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was excellent.

The bank did not originate or purchase any loans to farms in low-income geographies. Consideration was given to the fact that there were no farms in these low-income geographies. The bank's percentage of small loans to farms in moderate-income geographies exceeded both the percentage of farms and the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Anchorage MSA

Home Mortgage Loans

Refer to Table O in the state of Alaska section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans in low-income geographies was equal to the percentage of owner-occupied housing units in low-income geographies and it exceeded the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied housing units in moderate-income geographies but it was near to the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Alaska section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was below both the percentage of businesses and the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was near to the percentage of businesses in moderate-income geographies and it exceeded the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Alaska section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

The bank did not originate or purchase any small loans to farms in low-income geographies. The bank's percentage of small loans to farms in moderate-income geographies approximated the percentage of farms in moderate-income geographies and it exceeded the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies in the Anchorage MSA and Alaska Combined Non-MSA. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AAs.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes. The bank's performance was good in the Alaska Combined Non-MSA and adequate in the Anchorage MSA.

Alaska Combined Non-MSA

Home Mortgage Loans

Refer to Table P in the state of Alaska section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but it was near to the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was below both the percentage of moderate-income families and the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Alaska section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 25.1 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Alaska section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was adequate.

The bank did not collect or consider the GAR in the underwriting of approximately 28.2 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was below both the percentage of farms in the AA with GAR of \$1 million or less and the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Anchorage MSA

Home Mortgage Loans

Refer to Table P in the state of Alaska section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and it was below the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was near to the percentage of moderate-income families and it was below the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Alaska section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 23.3 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Alaska section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was poor.

The bank did not collect or consider the GAR in the underwriting of approximately 56.9 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below both the percentage of farms in the AA with GAR of \$1 million or less and the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Community Development Lending

The bank made an adequate level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

Alaska Combined Non-MSA

WFBNA made a low level of CD loans in the Alaska Combined Non-MSA. WFBNA made seven CD loans totaling approximately \$141,000, which represented less than 1 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing, revitalization and stabilization, and

community services purposes. By dollar volume, 42.9 percent of these loans funded affordable housing, 49.5 percent funded revitalization and stabilization efforts, and 7.6 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$20 million term loan to a nonprofit 501(c)(3) and CDFI of which, \$53,547 was allocated to Alaska Combined Non-MSA. The organization was dedicated to improving access to high-quality health and elder care, healthy foods, housing, and education for low-income communities.
- WFBNA provided a \$10 million line of credit to a national certified CDFI of which approximately \$26,774 was allocated to the Alaska Combined Non-MSA. The CDFI provided flexible capital to its affiliates which use it to provide affordable housing and strengthen communities.

Anchorage MSA

WFBNA made an adequate level of CD loans in the Anchorage MSA. WFBNA made 15 CD loans totaling approximately \$22.7 million, which represented 3.9 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing, economic development, revitalization and stabilization purposes. By dollar volume, 1 percent of these loans funded affordable housing, less than 1 percent funded revitalization and stabilization efforts, and 16.5 percent funded economic development. The following are examples of CD loans made in this AA:

- WFBNA provided a \$3.8 million SBA 504 term loan that funded the expansion of a dental office located in Anchorage, Alaska. The bank worked with a CDC that supported economic growth and stability of small businesses.
- WFBNA provided an extension on \$100,000 loan in the form of patient debt for a certified CDFI. This CDFI provided affordable rental housing for seniors and the homeless; home ownership and home improvement opportunities for all community members; and neighborhood revitalization activities and community partnerships. The funding was responsive to the identified need for affordable multifamily housing and homeless services.

Product Innovation and Flexibility

Alaska Combined Non-MSA

WFBNA used flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 705 loans under its flexible lending programs totaling \$34.3 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	28	7,600
Dream. Plan. Home.	4	686
PPP	673	26,000
Total	705	34,286

Anchorage MSA

WFBNA made extensive use flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 1,004 loans under its flexible lending programs totaling \$91.9 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	153	45,600
Dream. Plan. Home.	21	4,100
PPP	830	42,200
Total	1,004	91,900

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Fairbanks MSA was weaker than the bank's overall performance under the Lending Test in the full-scope areas. Performance was weaker primarily due to weaker geographic distribution and poor level of CD lending.

Refer to Tables O through T in the state of Alaska section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Alaska is rated Low Satisfactory. Performance in the limited-scope area had a neutral effect on the overall Investment Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Alaska Combined Non-MSA was poor and the bank's performance in the Anchorage MSA was good

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Alaska Combined Non-MSA	6	251	59	582	65	26.5	833	1.7	0	0
Anchorage MSA	5	10,046	160	19,811	165	67.3	29,857	59.7	2	144
Fairbanks MSA	1	49	12	65	13	5.3	113	0.2	0	0
Statewide***	0	0	2	19,250	2	0.8	19,250	38.5	0	0
Total	12	10,346	233	39,708	245	100.0	50,053	100.0	2	144

The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.
 * '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 tracked and recorded by the institution's financial reporting system.
 *** Statewide means investments in statewide programs that have a purpose, mandate, or function to serve one or more of the bank's assessment areas within the state. Due to rounding, totals may not equal 100.0%

Alaska Combined Non-MSA

The bank had a poor level of qualified CD investments and grants, and not in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$833,000 and represented 0.3 percent of the bank's tier 1 capital allocated to the AA. The investments also included 59 grants and donations totaling \$581,900 to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited adequate responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 36.1 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, economic development (33.9 percent), community services targeted to low- and moderate-income individuals (29.2 percent), and revitalization/stabilization of low- and moderate-income geographies (0.7 percent). In total, the bank's investments helped create or retain seven units of affordable housing in the AA.

The bank did not use any innovative or complex investments to support CD initiatives. The following are examples of CD investments made in this AA:

- WFBNA provided a \$250,000 grant to a CDFI through the Open for Business program. The CDFI provided micro and small business loans throughout southeast Alaska communities. The organization also provided technical assistance to entrepreneurs through business basics workshops. The bank's funding enabled the organization to pivot during the COVID-19 pandemic to provide workshops virtually online to continue serving the ongoing needs of small businesses.
- WFBNA provided two grants totaling \$10,000 that went toward general operating support for a food bank including, fuel, facilities, insurance as well as the food needed to meet the needs of those struggling with food insecurity.

- WFBNA provided a \$25,000 grant to a community garden program. The mission of the organization was to end long term homelessness and stabilize lives and communities through collaborative and public private partnerships using housing first philosophy, specifically, to provide safe, affordable, permanent supportive housing.

Anchorage MSA

The bank had a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$29.9 million and represented 5.1 percent of the bank's tier 1 capital allocated to the AA. The investments also included 159 grants and donations totaling \$4 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited good responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 87.1 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, economic development (4.8 percent), community services targeted to low- and moderate-income individuals (4.5 percent), and revitalization/stabilization of low- and moderate-income geographies (3.7 percent). In total, the bank's investments helped create or retain 604 units of affordable housing in the AA.

The bank rarely used innovative and complex investments to support CD initiatives. None of the current period investments were complex. The following are examples of CD investments made in this AA:

- WFBNA provided a \$1 million grant through its Open for Business Fund CDFI program. The grant funds exclusively served small businesses throughout Anchorage, Alaska. The funds responded to the citywide strategy for small business relief in Anchorage and prioritized low- and moderate-income small business owners with 40 percent of the funding set aside for those businesses.
- WFBNA provided a \$350,000 grant to an organization's Set Up Shop program as part of the bank's Open for Business Technical Assistance Strategy program. The Set-Up Shop program specifically served low- and moderate-income entrepreneurs in Anchorage's lowest-income neighborhoods that have the highest unemployment rates in Alaska.

Broader Statewide Investments

WFBNA had two investments totaling \$19.2 million with a purpose, mandate, or function to serve one or more AAs in the state. One investment was a NMTC used to finance a broadband project that involved the construction of communities of telecommunications equipment located in rural Aleutians Island to serve the communities of Chignik, SandPoint, King Cove, and Akutan. The project created approximately 211 construction jobs and 27 permanent jobs. The other investment was a \$3 million grant to an organization to support the Neighborhood LIFT program for down payment assistance throughout the state of Alaska. These investments were given positive consideration and supported the bank's overall performance under the Investment Test in the state of Alaska.

Conclusions for Area Receiving a Limited-Scope Review

Based on limited-scope review, the bank's performance under the Investment Test in the Fairbanks MSA was weaker than the bank's overall performance under the Investment Test in the full-scope area. Performance was weaker primarily due to lower levels of CD investments relative to the bank's presence and capacity to invest in the AA.

SERVICE TEST

The bank's performance under the Service Test in the state of Alaska is rated High Satisfactory. Performance in the limited-scope areas had a neutral effect on the overall Service Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Alaska Combined Non-MSA was adequate and the bank's performance in the Anchorage MSA was good.

Retail Banking Services

Service delivery systems were accessible to geographies and individuals of different income levels in the bank's full-scope AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Alaska Combined Non-MSA	33.3	23	59.0	0.0	4.3	78.3	17.4	3.0	14.5	57.3	23.7
Anchorage MSA	59.9	13	33.3	0.0	38.5	53.8	7.7	3.0	23.6	51.5	21.8
Fairbanks MSA	6.8	3	7.7	0.0	0.0	66.7	33.3	0.0	20.9	54.7	24.4
Total	100.0	39	100.0	0.0	15.4	69.2	15.4	2.6	20.5	53.7	22.7
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Alaska Combined Non-MSA	0	1	0	0	-1	0
Anchorage MSA	0	3	0	-2	-1	0
Fairbanks MSA	0	1	0	-1	0	0
Total	0	5	0	-3	-2	0
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.						

Alaska Combined Non-MSA

WFBNA's service delivery systems were reasonably accessible to geographies and individuals of different income levels in the Alaska Combined Non-MSA. WFBNA operated 23 branches in the AA, comprising one branch in a moderate-income geography, 18 branches in middle-income geographies, and four branches in upper-income geographies. The distribution of branches in low-income geographies was significantly below the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies was well below the distribution of the population in moderate-income geographies. The distribution was augmented by one branch in middle- and upper-income geographies that was within close proximity to serve low-income areas and five branches in middle- and upper-income geographies that were within close proximity to and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed the branch primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the four branches opened on Saturdays, all were located in middle-income geographies.

Anchorage MSA

WFBNA's service delivery systems were accessible to geographies and individuals of different income levels in the Anchorage MSA. WFBNA operated 13 branches in the AA, comprising five branches in moderate-income geographies, seven branches in middle-income geographies, and one branch in an upper-income geography. The distribution of branches in low-income geographies was significantly below the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies. The distribution was augmented by two branches in middle- and upper-income geographies that were within close proximity to serve low-income areas and one branch in middle- and upper-income geographies that was within close proximity to and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches had generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were generally opened for business 9:00 a.m. to 6:00 p.m. Monday through Friday. Of the five branches opened on Saturdays, two were located in moderate-income geographies.

Community Development Services

WFBNA provided an adequate level of CD services.

Alaska Combined Non-MSA

WFBNA provided an adequate level of CD services in the Alaska Combined Non-MSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 25 CD service activities during the evaluation period. A majority (76 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The other CD services were targeted to economic development (24 percent). Financial education comprised 44 percent of the CD service activities, and Ongoing outreach in terms of offering financial expertise to low- and moderate-income organizations comprised 32 percent. The bank's assistance provided was responsive to the identified needs in the AA. The following is an example of CD services provided in this AA:

- WFNBA employees provided 29 hours of financial expertise on a CDFI's loan committee. The bank also provided grant funding to the organization to support its programs. This activity helped to alleviate the strain on small businesses throughout rural Alaska, which was severely impacted by the COVID-19 pandemic. The CD service was responsive to the identified need for small business access to capital and technical assistance.

Anchorage MSA

WFBNA provided an adequate level of CD services in the Anchorage MSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 49 CD service activities to 11 organizations, logging a total of 146 hours during the evaluation period. A majority (76 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families, and the remaining activities were targeted to economic development. Board membership comprised 63 percent and financial education comprised 20 percent of the CD service activities. The remaining activities provided outreach and technical assistance to these organizations. The bank's assistance provided was responsive to the identified needs in the AA. The following are examples of CD services provided in this AA:

- WFBNA employees provided 31 hours of CD services by serving on the board and finance committee of a nonprofit organization located in Anchorage, Alaska that offered homeless services. The organization was the largest privately funded charity in America providing transitional housing, crisis counseling services, and essential services to homeless, abandoned, abused, trafficked, and

exploited youth throughout Alaska. The CD service was responsive to the identified need for affordable housing.

- A WFBNA employee provided 30 hours of board membership services to an organization that served small business growth and stability within the AA. The organization had a commitment to improve the quality of life in three low-income Anchorage neighborhoods by acquiring, developing, and planning for the land and projects necessary to bring about sustainable neighborhood revitalization and economic development.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Fairbanks MSA AA was weaker than the bank's overall performance under the Service Test in the full-scope areas. Performance was weaker primarily due to the limited access to retail banking services, particularly in low- and moderate-income geographies.

State of Arizona

CRA rating for the State of Arizona²⁵: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AAs.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.
- The bank had a significant level of qualified CD investments that demonstrated good responsiveness to credit and economic development needs, although occasionally in a leadership position. The bank occasionally used innovative and complex investments to support CD initiatives.
- Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided a significant level of CD services.

Description of Institution's Operations in the State of Arizona

The state of Arizona was WFBNA's ninth largest rating area based on its total deposits in the state. As of June 30, 2021, the bank maintained approximately \$45.3 billion or 3.1 percent of its total domestic deposits in branches within Arizona. Of the 63 depository financial institutions operating in the bank's AAs within the state, WFBNA, with a deposit market share of 20.5 percent, was the second largest. Other top depository financial institutions in the bank's AAs within the state included JPMorgan Chase Bank, N.A. (26.3 percent), Bank of America, N.A. (17 percent), and Western Alliance Bank (9.4 percent). As of December 31, 2021, the bank operated 181 branches and 515 ATMs in Arizona. WFBNA delineated 13 AAs within the state; however, the OCC combined, analyzed, and presented those AAs at the CSA level where possible for purposes of this evaluation. This resulted in the following eight AAs: Flagstaff, AZ MSA (Flagstaff MSA), Lake Havasu City-Kingman, AZ MSA (Lake Havasu MSA), Phoenix-Mesa, AZ CSA (Phoenix CSA), Prescott Valley-Prescott, AZ MSA (Prescott Valley MSA), Sierra Vista-Douglas, AZ MSA (Sierra Vista MSA), Tucson-Nogales, AZ CSA (Tucson CSA), Yuma, AZ MSA (Yuma MSA), and Arizona Combined Non-MSA. The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AA, including type of review and description of AA boundaries.

Phoenix CSA

The following table provides a summary of the demographics, including housing and business information for the Phoenix CSA.

²⁵ This rating only reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Phoenix CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,007	10.9	23.1	33.5	31.2	1.3
Population by Geography	4,461,080	10.5	23.4	34.1	31.7	0.3
Housing Units by Geography	1,864,997	9.2	23.6	36.1	31.0	0.1
Owner-Occupied Units by Geography	982,687	4.4	19.4	37.7	38.5	0.0
Occupied Rental Units by Geography	608,339	16.5	29.5	32.9	20.8	0.2
Vacant Units by Geography	273,971	10.2	25.4	37.4	26.9	0.1
Businesses by Geography	830,004	6.8	15.4	31.2	46.1	0.5
Farms by Geography	13,970	7.0	19.4	31.8	41.6	0.3
Family Distribution by Income Level	1,050,219	21.9	17.3	19.5	41.3	0.0
Household Distribution by Income Level	1,591,026	23.4	16.5	17.9	42.2	0.0
Median Family Income MSA - 38060 Phoenix-Mesa-Chandler, AZ MSA		\$63,686	Median Housing Value			\$196,678
Median Family Income Non-MSAs - AZ		\$44,368	Median Gross Rent			\$988
			Families Below Poverty Level			12.5%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$22,184 to \$31,843 and moderate-income families earned at least \$22,184 to \$31,843 and less than \$35,494 to \$50,949, depending on the metropolitan or non-metropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$555 to \$796 for low-income borrowers and \$887 to \$1,274 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$1,056. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA. Moderate-income borrowers would also be challenged to afford a mortgage loan in the non-metropolitan areas.

Phoenix-Mesa-Chandler, AZ MSA (Phoenix MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Phoenix MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Phoenix MSA's economic strengths included it had a robust population growth and immigration, served as a hub for expansion and relocation of banks, insurance companies, and business services firms, and had lower business costs than in California. Economy weaknesses included average wages well below those of the West and high cyclicalities due to dependence on investment and population inflows. The Phoenix MSA cultivated large investments in data centers to support its rapidly expanding tech and financial technology industries. Facebook, Expedient and NTT Data were a few

examples of major technology firms that broke ground on data centers during the evaluation period. Reasonable costs, a high quality of life, an abundant labor pool and friendly business climate make the area a destination for workers and firms. The Phoenix MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Professional and Business Services, Education and Health Services, Government, Retail Trade, Financial Activities, and Leisure and Hospitality Services. Major employers in the Phoenix MSA include Banner Health System, Walmart, Inc., Fry's Food Stores, Wells Fargo, and Arizona State University. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Phoenix MSA was 2.8 percent compared to the national unemployment rate of 3.7 percent.

Payson, AZ Micro Area (Gila County)

In 2021, Payson, AZ had a population of 53,000 people with a median age of 50.3 and a median household income of \$51,406. In 2021, the median property value in Payson, AZ was \$190,700, and the homeownership rate was 76.4 percent. The economy of Payson, AZ employed 18,800 people. The largest industries in Payson, AZ were Health Care & Social Assistance, Educational Services, and Retail Trade. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for Nogales, AZ was 3.4 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Phoenix CSA. The organizations included one affordable housing organization and one economic development organization that helped to attract new businesses to the area. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing
- Affordable for-sale housing
- Affordable health care or health care facilities
- Rental assistance
- Homeless services
- Neighborhood revitalization
- Financial literacy/education

Opportunities for participation by financial institutions included the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Supporting community development services such as financial literacy
- Providing greater access to financial services

Tucson CSA

The following table provides a summary of the demographics, including housing and business information for the Tucson CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Tucson CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	251	7.6	28.7	32.3	30.7	0.8
Population by Geography	1,045,610	8.7	27.5	32.4	30.9	0.5
Housing Units by Geography	464,874	8.5	27.3	32.5	31.6	0.1
Owner-Occupied Units by Geography	248,466	4.5	21.6	34.1	39.7	0.0
Occupied Rental Units by Geography	156,551	14.4	35.9	29.8	19.7	0.3
Vacant Units by Geography	59,857	9.5	28.6	32.9	28.9	0.1
Businesses by Geography	130,524	5.8	22.8	29.3	41.1	1.0
Farms by Geography	2,706	5.6	21.3	33.6	39.2	0.3
Family Distribution by Income Level	251,540	22.2	17.4	19.1	41.3	0.0
Household Distribution by Income Level	405,017	24.7	16.1	16.8	42.5	0.0
Median Family Income MSA - 46060 Tucson, AZ MSA		\$57,457	Median Housing Value			\$172,424
Median Family Income Non-MSAs - AZ		\$44,368	Median Gross Rent			\$838
			Families Below Poverty Level			13.6%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$22,184 to \$28,729 and moderate-income families earned at least \$22,184 to \$28,729 and less than \$35,494 to \$45,966, depending on the metropolitan or non-metropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$555 to \$718 for low-income borrowers and \$887 to \$1,149 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$926. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA. Moderate-income borrowers would also be challenged to afford a mortgage in the non-metropolitan areas.

Tucson, AZ MSA (Tucson MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Tucson MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Economic strengths in the Tucson MSA included low-cost alternative to Southern California, highly educated workforce due to the presence of University of Arizona, and its exposure to military employment and aerospace presence. Weaknesses included below-average incomes, small working-age

population, and above-average employment volatility. The Tucson MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Government, Education and Health Services, Professional and Business Services, Retail Trade, and Leisure and Hospitality Services. Major employers in the Tucson MSA include Raytheon Missile Systems, University of Arizona, and Davis-Monthan Air Force Base. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Tucson MSA was 3.2 percent compared to the national unemployment rate of 3.7 percent.

Nogales, AZ Micro Area (Santa Cruz County)

Nogales, AZ had a population of 19,766. Between 2016 to 2020, 51.9 percent of housing was owner occupied, which was lower than the national average of 64.4 percent. The largest percent of population was persons 18 years and under at 26.3 percent of the total population. In the civilian labor force, total percent of population age 65 years and above was 18.2 percent. The most common employment sectors for those who lived in Nogales, AZ, were Trade, Transportation, and Utilities, Education and Health Services, and Leisure and Hospitality. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for Nogales, AZ was 5.9 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by four local organizations that were contacted during the evaluation period and served the Tucson CSA. The organizations included two affordable housing organizations and two economic development organizations that helped to attract new businesses to the area. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable housing
- Access to affordable health care or health care facilities
- Rental assistance
- Homeless services
- Neighborhood revitalization
- Financial literacy/education
- Small business financing
- Workforce development

Opportunities for participation by financial institutions included the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Small business lending, including micro loans
- Supporting community development services such as programs that promote financial education and economic inclusion
- Providing greater access to financial services

Scope of Evaluation in the State of Arizona

The OCC selected the Phoenix CSA and Tucson CSA for full-scope reviews and based conclusions and ratings primarily on activity within these geographical areas. These AAs carried significant weight in determining the overall ratings for the state of Arizona because of the significance of the bank's presence in these AAs. More weight was given to the Phoenix CSA due to the larger deposit base, lending, and branch presence.

During the evaluation period, the bank originated or purchased 38,601 home mortgage loans, small loans to businesses, and small loans to farms totaling \$5.2 billion within the state of Arizona. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within each AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. In the Tucson CSA, Lake Havasu City MSA, and Arizona Combined Non-MSA, the OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms. In the remaining AAs, the OCC placed more weight based on the number of loans on small loans to businesses versus home mortgage loans and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF ARIZONA

LENDING TEST

The bank's performance under the Lending Test in the state of Arizona is rated Outstanding. Performance in the limited-scope areas had a neutral effect on the overall Lending Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Phoenix CSA and Tucson CSA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Phoenix CSA	46,147	47,085	507	73	93,812	72.5	76.0
Tucson CSA	10,056	8,996	110	30	19,192	14.8	12.9
Flagstaff	1,092	1,286	16	2	2,396	1.9	2.0
Lake Havasu City MSA	2,032	1,729	63	2	3,826	3.0	2.6
Prescott Valley MSA	1,960	2,316	88	4	4,368	3.4	2.6
Sierra Vista MSA	977	817	186	3	1,983	1.5	1.0
Yuma MSA	1,168	1,123	64	5	2,360	1.8	1.8
Arizona Combined Non-MSA	795	609	70	2	1,476	1.1	1.0
Total	64,227	63,961	1,104	121	129,413	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Phoenix CSA	13,234,994	1,385,184	15,283	219,158	14,854,619	75.9	76.0
Tucson CSA	2,354,344	275,832	2,630	146,339	2,779,145	14.2	12.9
Flagstaff	332,757	39,539	508	58	372,862	1.9	2.0
Lake Havasu City MSA	392,797	35,963	1,245	77	430,082	2.2	2.6
Prescott Valley MSA	482,113	46,577	1,468	3,081	533,239	2.7	2.6
Sierra Vista MSA	158,623	19,751	5,296	1,482	185,152	0.9	1.0
Yuma MSA	206,831	31,366	6,362	1,782	246,341	1.3	1.8
Arizona Combined Non-MSA	159,748	15,607	2,358	28	177,741	0.9	1.0
Total	17,322,207	1,849,819	35,150	372,005	19,579,181	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Phoenix CSA

As of June 30, 2021, WFBNA had a deposit market share of 21.3 percent. The bank ranked second among 58 depository financial institutions placing it in the top 4 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 2.8 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked sixth among 1,012 home mortgage lenders in this AA, which placed it in the top 1 percent of lenders. The top lenders in this AA based on market share were United Wholesale Mortgage (7.7 percent), Rocket Mortgage (7.6 percent), and Fairway Independent Mortgage (3.7percent).

According to peer small business data for 2021, WFBNA had a market share of 10.8 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked third out of 307 small business lenders, which placed it in the top 1 percent of lenders. The other top lenders in this AA based on market share were JPMorgan Chase Bank, N.A. (18.7 percent) and American Express National Bank (16.3 percent).

According to peer small farm data for 2021, WFBNA had a market share of 33.4 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked first out of 41 small farm lenders, which placed it in the top 3 percent of lenders. The other top lenders in this AA based on market share were JPMorgan Chase Bank, N.A. (26.3 percent) and John Deere Financial, FSB (7.3 percent).

Tucson CSA

As of June 30, 2021, WFBNA had a deposit market share of 27.1 percent. The bank ranked first among 21 depository financial institutions placing it in the top 5 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 4.1 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked third among 654 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. The other top lenders in this AA based on market share were Nova Home Loans (10.3 percent) and Rocket Mortgage (6.2 percent).

According to peer small business data for 2021, WFBNA had a market share of 12.9 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked third out of 143 small business lenders, which placed it in the top 3 percent of lenders. The other top lenders in this AA based on market share were JPMorgan Chase Bank, N.A. (16.7 percent) and American Express National Bank (14.8 percent).

According to peer small farm data for 2021, WFBNA had a market share of 40.9 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked first out of 13 small farm lenders, which placed it in the top 8 percent of lenders. The other top lenders in this AA based on market share were JPMorgan Chase Bank, N.A. (22.6 percent) and U.S. Bank, N.A. (7 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited good geographic distribution of loans in its AAs. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data. The bank's performance in the Phoenix CSA and Tucson CSA was good.

Phoenix CSA

Home Mortgage Loans

Refer to Table O in the state of Arizona section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was below the percentage of owner-occupied housing units in low-income geographies but it was near to the aggregate distribution of

home mortgage loans by all lenders. Similarly, the bank's percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied housing units in moderate-income geographies but it was near to the aggregate distribution of home mortgage loans by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Arizona section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income was below both the percentage of businesses in low-income geographies and the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was near to both the percentage of businesses in moderate-income geographies and the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Arizona section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was good.

The bank's percentage of small loans to farms in low-income geographies was significantly below the percentage of farms in low-income geographies and it was well below the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-income geographies exceeded the percentage of farms in moderate-income geographies and it approximated the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Tucson CSA

Home Mortgage Loans

Refer to Table O in the state of Arizona section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was well below the percentage of owner-occupied housing units in low-income geographies but it was near to the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied

housing units in moderate-income geographies and it approximated the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Arizona section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies exceeded the percentage of businesses in low-income geographies and it was equal to the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies exceeded the percentage of businesses in moderate-income geographies and it was near to the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Arizona section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

The bank's percentage of small loans to farms in low-income geographies was significantly below the percentage of farms in low-income geographies but it exceeded the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-income geographies was also significantly below the percentage of farms in moderate-income geographies but it was near to the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies in the Phoenix CSA and the Tucson CSA. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AAs.

Distribution of Loans by Income Level of the Borrower

The bank exhibited good distribution of loans among individuals of different income levels and businesses and farms of different sizes. The bank's performance was good in the Phoenix CSA and excellent in the Tucson CSA.

Phoenix CSA

Home Mortgage Loans

Refer to Table P in the state of Arizona section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but it exceeded the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Arizona section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 21.7 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Arizona section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was adequate.

The bank did not collect or consider the GAR in the underwriting of approximately 49.5 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below the percentage of farms in the AA with GAR of \$1 million or less and it was below the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Tucson CSA

Home Mortgage Loans

Refer to Table P in the state of Arizona section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but it exceeded the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Arizona section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 20.8 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Arizona section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was poor.

The bank did not collect or consider the GAR in the underwriting of approximately 66.4 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below both the percentage of farms in the AA with GAR of \$1 million or less and the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Community Development Lending

WFBNA was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

Phoenix CSA

WFBNA made a relatively high level of CD loans in the Phoenix CSA. WFBNA made 73 CD loans totaling approximately \$219.2 million, which represented 4.9 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing, revitalization and stabilization and community service purposes. By dollar volume, 77.5 percent of these loans funded affordable housing that provided 1,304 units of affordable housing, 1.3 percent funded economic development, 1.7 percent funded revitalization and stabilization efforts, and 19.5 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$14.9 million construction loan to finance an LIHTC development located in Phoenix, Arizona. The housing development included 78 units that were restricted to seniors aged 62 and older with incomes at or below 60 percent of the AMI.
- WFBNA provided a \$59.4 million loan for a multifamily housing development located in a moderate-income census tract in Phoenix, Arizona. The development comprised 160 one-bedroom units, 316 two-bedroom units, and 52 three-bedroom units with 90.7 percent of the actual rent rates below the 2019 Fair Market Rent for the area and 98.7 percent of the units affordable to tenants earning below 80 percent of the MFI.
- WFBNA provided a \$300,000 working capital line of credit to a nonprofit organization whose purpose was to provide housing, case management, and supportive services to the homeless and impoverished families. All its clients earned less than 80 percent of the area MFI.

Tucson CSA

WFBNA was a leader in making CD loans in the Tucson CSA. WFBNA made 30 CD loans totaling approximately \$146.3 million, which represented 19.1 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing, revitalization and stabilization and community service purposes. By dollar volume, 83.9 percent of these loans funded affordable housing that provided 1,141 units of affordable housing, less than 1 percent funded revitalization and stabilization efforts, and 15.8 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$3.5 million term loan that helped the nonprofit organization expand its food bank facility. In addition, for two years of the exam period, the bank renewed a \$1 million working capital line of credit to the organization.
- WFBNA provided a \$15 million line of credit to a national Tax Credit Investment Fund. Of that total, \$424,015 was allocated to an affordable housing development located in Tucson, Arizona. This development contained 100 rent restricted units. Thirteen of the housing units, which equals 13.4 percent of the total number of low- and moderate-income units, reflected WFBNA's percentage of the fund's investment.

- WFBNA provided a \$12.8 million loan for a multifamily housing development located in a low-income census tract in Tucson, Arizona. The development comprised 96 one-bedroom units, 96 two-bedroom units, and 28 four-bedroom units with 95.5 percent of the actual rent rates below the 2019 Fair Market Rent for the area and 100 percent of the units affordable to tenants earning below 80 percent of the MFI.

Product Innovation and Flexibility

Phoenix CSA

WFBNA made extensive use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 8,414 loans under its flexible lending programs totaling \$502.3 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	585	154,100
Dream. Plan. Home.	132	24,300
PPP	7,697	323,900
Total	8,414	502,300

Tucson CSA

WFBNA made extensive use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 1,673 loans under its flexible lending programs totaling \$81.4 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	53	11,600
Dream. Plan. Home.	19	2,700
PPP	1,601	67,100
Total	1,673	81,400

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Prescott Valley MSA was consistent with the bank's overall performance under the Lending Test in the full-scope areas. The bank's performance in the Flagstaff MSA, Lake Havasu City MSA, Sierra Vista MSA, Yuma MSA, and Arizona Combined Non-MSA was weaker than the bank's overall performance. Performance was weaker primarily due to lower levels of CD lending relative to the credit needs and the bank's capacity to make CD loans in those AAs.

Refer to Tables O through T in the state of Arizona section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Arizona is rated High Satisfactory. Performance in the limited-scope areas had a neutral effect on the overall Investment Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Phoenix CSA was good and the bank's performance in the Tucson CSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Phoenix CSA	166	18,384	292	199,134	458	71.3	217,518	74.2	16	65,451
Tucson CSA	18	38,672	94	33,915	112	17.4	72,586	24.8	2	605
Flagstaff MSA	0	0	32	969	32	5.0	969	0.3	0	0
Lake Havasu City MSA	1	83	3	9	4	0.6	92	0.0	1	1
Prescott Valley MSA	0	0	19	715	19	3.0	715	0.2	0	0
Sierra Vista MSA	1	456	2	4	3	0.5	459	0.2	1	22
Yuma MSA	0	0	5	53	5	0.8	53	0.0	0	0
Arizona Combined Non-MSA	1	370	8	210	9	1.4	581	0.2	1	32
Statewide***	0	0	0	0	0	0.0	0	0.0	0	0
Total	187	57,965	455	235,009	642	100.0	292,973	100.0	21	66,111
<p>The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.</p> <p>* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.</p> <p>** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.</p> <p>*** Statewide means investments in statewide programs that have a purpose, mandate, or function to serve one or more of the bank's assessment areas within the state. Due to rounding, totals may not equal 100.0%</p>										

Phoenix CSA

The bank had a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$217.5 million and represented 4.8 percent of the bank's tier 1 capital allocated to the AA. The investments also included 275 grants and donations totaling \$19.9 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited good responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 46.5 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 40.4 percent that focused on community services targeted to low- and

moderate-income individuals, and 13.1 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 2353 units of affordable housing in the AA.

The bank occasionally used innovative and complex investments to support CD initiatives. Approximately 52.1 percent of current period investment dollars were complex LIHTC investments. The following are examples of CD investments made in this AA:

- WFBNA provided an equity investment of \$14.6 million to finance an LIHTC development located in Phoenix. The 78 units were restricted to seniors (62+) with incomes at or below 60 percent of the AMI.
- WFBNA provided a \$75,000 grant to support a redevelopment project in the South Phoenix Village Neighborhood Initiative Area. The grant allowed the organization to provide up to \$7,500 in down payment assistance (DPA) to households earning less than 80 percent of the AMI.
- WFBNA provided four investments through a multi-year effort totaling \$7.8 million. Of the total invested, the bank provided a \$1.3 million grant to the organization for the Implementation of Growing Diverse Housing Developers, an initiative to increase the supply of homes that were affordable and to support the sustained growth and financial independence of experienced Black, Indigenous or other People of Color (BIPOC) led housing developers. Of the total invested, \$3.5 million, was part of the Open for Business CDFI strategy and went directly to the organization's Covid-19 Hope Fund (Fund), created to respond to the immediate need for capital that small businesses experienced during the height of the pandemic. The Fund exclusively served low- and moderate-income individuals, minorities, and small business owners, with a special focus on Latino and women-owned businesses.

Tucson CSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$72.6 million and represented 9.5 percent of the bank's tier 1 capital allocated to the AA. The investments also included 90 grants and donations totaling \$1.1 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 27.7 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 58.9 percent that focused on community services targeted to low- and moderate-income individuals, and 13.4 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 586 units of affordable housing in the AA.

The bank occasionally used innovative and complex investments to support CD initiatives. Approximately 34.7 percent of current period investment dollars were complex NMTC investments. The following are examples of CD investments made in this AA:

- WFBNA provided 90 grants to a variety of organizations, totaling more than \$1.1 million that primarily supported affordable housing, community service and economic development, including grants addressing immediate community needs due to COVID-19. The bank made a complex investment into a NMTC project in addition to investments into two NMTC projects a few months before the current exam period that had a significant impact in the CAA during the exam period.
- WFBNA provided a \$11.8 million NMTC investment in a health care center, located in a severely distressed census tract in Tucson, Arizona. The center improved the health of its community through comprehensive, accessible, affordable, quality, and compassionate care. The NMTC investment transformed the former WFBNA branch into a state-of-the-art family health and medical clinic, expanding the number of health care centers serving underserved communities in the Tucson area.
- WFBNA provided three grants totaling \$57,500 to a nonprofit, community-based organization in Pima County, Arizona. The organization provided permanent affordable housing for low- and moderate-income individuals and promoted community revitalization in the neighborhoods in which it operated. The funding provided general operating support for the organization and responded to the amplified demand for emergency rental and mortgage support during the pandemic.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Flagstaff MSA, Lake Havasu City MSA, Prescott Valley MSA, Sierra Vista MSA, Yuma MSA, and Arizona Combined Non-MSA was weaker than the bank's overall performance under the Investment Test in the full-scope areas, primarily due to lower levels of CD investments relative to the bank's presence and capacity to invest in those AAs.

SERVICE TEST

The bank's performance under the Service Test in the state of Arizona is rated High Satisfactory. Performance in the limited-scope areas had a neutral effect on the overall Service Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Phoenix CSA and Tucson CSA was good.

Retail Banking Services

Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Phoenix CSA	76.0	114	63.0	7.0	15.8	36.8	40.4	10.5	23.4	34.1	31.7
Tucson CSA	12.9	34	18.8	0.0	35.3	23.5	38.2	8.7	27.5	32.4	30.9
Flagstaff MSA	2.0	3	1.7	0.0	33.3	33.3	0.0	3.2	26.0	29.0	34.5
Lake Havasu City MSA	2.6	6	3.3	0.0	0.0	100.0	0.0	0.0	10.3	71.9	17.7
Prescott Valley MSA	2.6	7	3.9	0.0	42.9	28.6	28.6	0.0	24.4	57.2	18.4
Sierra Vista MSA	1.0	3	1.7	0.0	66.7	0.0	33.3	2.9	25.5	48.5	23.1
Yuma MSA	1.8	5	2.8	0.0	40.0	40.0	20.0	0.0	32.9	42.0	24.8
Arizona Combined Non-MSA	1.0	9	5.0	0.0	33.3	44.4	22.2	1.1	44.7	30.5	23.7
Total	100.0	181	100.0	4.4	22.7	35.9	35.9	8.6	24.8	36.0	30.1
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Phoenix CSA	0	32	-2	-4	-14	-12
Tucson CSA	0	6	0	-3	-3	0
Flagstaff MSA	0	2	0	0	-1	-1
Lake Havasu City MSA	0	2	0	-1	-1	0
Prescott Valley MSA	0	2	0	-2	0	0
Sierra Vista MSA	0	1	0	-1	0	0
Yuma MSA	0	1	0	0	-1	0
Arizona Combined Non-MSA	0	0	0	0	0	0
Total	0	46	-2	-11	-20	-13
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.						

Phoenix CSA

WFBNA's service delivery systems were accessible to geographies and individuals of different income levels in the Phoenix CSA. WFBNA operated 114 branches in the AA, comprising eight branches in low-income geographies, 18 branches in moderate-income geographies, 42 branches in middle-income geographies, and 46 branches in upper-income geographies. The distributions of branches in low- and moderate-income geographies were below the distributions of the populations in low- and moderate-income geographies. The distribution was augmented by two branches in middle- and upper-income geographies that were within close proximity to serve low-income areas and 21 branches in middle- and upper-income geographies that were within close proximity and served moderate-income geographies. Internal customer data for these branches demonstrated a reasonable level of service to customers in

low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches had adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the 59 branches opened on Saturdays, 13 were located in low- and moderate-income geographies.

Tucson CSA

WFBNA's service delivery systems were accessible to geographies and individuals of different income levels in the Tucson CSA. WFBNA operated 34 branches in the AA, comprising 12 branches in moderate-income geographies, eight branches in middle-income geographies, 13 branches in upper-income geographies, and one branch in geographies without an income designation. The distribution of branches in low-income geographies was significantly below the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies. The distribution was augmented by one branch in middle- and upper-income geographies that was within close proximity and served low-income areas and five branches in middle- and upper-income geographies that were within close proximity to and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These adjacent branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches had adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations. Despite the closures, its service delivery systems remained readily accessible.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the 15 branches opened on Saturdays, six were located in moderate-income geographies.

Community Development Services

WFBNA provided a relatively high level of CD services.

Phoenix CSA

WFBNA provided a relatively high level of CD services in the Phoenix CSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 169 CD service activities during the evaluation period. A majority (88 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The other CD services were targeted to economic development (7 percent) and affordable housing (6 percent). Financial education comprised 64 percent and serving on the board of directors in organizations focused on community development comprised 22 percent of the CD service activities. The remainder of activities focused on ongoing and ad hoc outreach that provided financial technical expertise to organizations serving low- and moderate-income communities. The bank's assistance provided was responsive to the identified needs in the AA. The following are examples of CD services provided in this AA:

- WFBNA employees provided 72 hours of financial education to 231 members of a nonprofit organization that provided low- and moderate-income individuals with tools to achieve economic and social equality such as child development, college preparation, job readiness, housing, and small business support. This organization reported that 90 percent of its clients were low- and moderate-income individuals and families. This activity was responsive to community development services.
- WFBNA employees provided 27 hours of board service for a nonprofit CDFI organization that is certified by the U.S. Department of Treasury to provide alternative financing programs anywhere in the state of Arizona. The organization also provided the means for a collaborative partnership between private and public sectors such as city municipalities, businesses, neighbors, and developers to address the local community reinvestment needs. This activity was responsive to economic development services and supported businesses to build capacity to address local community development needs.
- WFBNA employees provided 16 hours of board service for a CDFI organization that was dedicated to helping community residents transform distressed neighborhoods that face systematic challenges. The organization's purpose covered four pillars of community development, including affordable housing, economic development, financial stability, and health.

Tucson CSA

WFBNA provided a relatively high level of CD services in the Tucson CSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 61 CD service activities during the evaluation period. A majority (95 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The remaining CD services were targeted to affordable housing and economic development. Financial education comprised 93 percent of the CD service activities. The bank's assistance provided was responsive to the identified needs in the AA. The following is an example of CD services provided in this AA:

- WFBNA employees provided 149 hours of financial education to 422 students at an elementary school in the AA. The NCES data indicated that 90 percent of the students in this school qualified

for the free or reduced lunch program. This activity was responsive to the community services needs identified in the AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Flagstaff MSA, Prescott Valley MSA, Sierra Vista MSA, and Yuma MSA was stronger than the bank's overall performance under the Service Test in the full-scope areas. Performance was stronger primarily due to greater accessibility of retail banking services in low- and moderate-income areas. The bank's performance in the Lake Havasu City MSA and Arizona Combined non-MSA areas was weaker than the bank's overall performance under the Service Test in the full-scope areas. Performance was weaker primarily due to lower accessibility of retail banking services in low- and moderate-income areas.

State of California

CRA rating for the State of California²⁶: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AAs.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments that demonstrated excellent responsiveness to credit and economic development needs, often in a leadership position. The bank made significant use of innovative and complex investments to support CD initiatives.
- Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided a significant level of CD services.

Description of Institution's Operations in the State of California

The state of California was WFBNA's largest rating area based on its total deposits in the state. As of June 30, 2021, the bank maintained approximately \$335.1 billion or 22.9 percent of its total domestic deposits in branches within the state. Of the 186 depository financial institutions operating in the bank's AAs within the state, WFBNA, with a deposit market share of 15.8percent, was the second largest. Other top depository financial institutions in the bank's AAs within the state based on market share included Bank of America, N.A. (21.2 percent), JPMorgan Chase Bank, N.A. (12.1 percent), and Silicon Valley Bank (6.4 percent). As of December 31, 2021, the bank operated 914 branches and 3,707 ATMs in the state. WFBNA delineated 41 AAs within the state; however, the OCC combined, analyzed, and presented those AAs at the CSA level where possible for purposes of this evaluation. This resulted in the following 14 AAs: Bakersfield, CA MSA (Bakersfield MSA), Chico, CA MSA (Chico MSA), El Centro, CA MSA (El Centro MSA), Fresno-Madera-Hanford, CA CSA (Fresno CSA), Los Angeles-Long Beach, CA CSA (Los Angeles CSA), Redding-Red Bluff, CA CSA (Redding CSA), Sacramento-Roseville, CA CSA (Sacramento CSA), Salinas, CA MSA (Salinas MSA), San Diego-Chula Vista-Carlsbad, CA MSA (San Diego MSA), San Jose-San Francisco-Oakland, CA CSA (San Jose CSA), San Luis Obispo-Paso Robles, CA MSA (San Luis Obispo MSA), Santa Maria-Santa Barbara, CSA MSA (Santa Maria MSA), Visalia, CA MSA (Visalia MSA), and California Combined Non-MSA. The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries

²⁶ This rating only reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Fresno CSA

The following table provides a summary of the demographics, including housing and business information for the Fresno CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Fresno CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	249	7.6	32.9	23.3	34.5	1.6
Population by Geography	1,260,934	6.8	32.9	24.0	34.5	1.8
Housing Units by Geography	416,287	6.2	31.0	24.2	38.5	0.1
Owner-Occupied Units by Geography	204,112	2.6	22.7	23.8	50.9	0.0
Occupied Rental Units by Geography	176,906	10.2	41.1	24.7	23.8	0.3
Vacant Units by Geography	35,269	7.2	28.4	24.1	40.0	0.2
Businesses by Geography	76,771	5.3	26.7	22.3	44.6	1.1
Farms by Geography	4,870	3.1	23.2	30.2	43.3	0.1
Family Distribution by Income Level	281,170	24.7	16.2	16.8	42.3	0.0
Household Distribution by Income Level	381,018	24.8	16.2	16.3	42.7	0.0
Median Family Income MSA - 23420 Fresno, CA MSA		\$49,999	Median Housing Value			\$184,643
Median Family Income MSA - 25260 Hanford-Corcoran, CA MSA		\$49,735	Median Gross Rent			\$919
Median Family Income MSA - 31460 Madera, CA MSA		\$49,272	Families Below Poverty Level			21.2%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$24,636 to \$25,000 and moderate-income families earned at least \$24,636 to \$25,000 and less than \$39,418 to \$39,999 in the AA, depending on the metropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$616 to \$625 for low-income borrowers and ranging from \$985 to \$1,000 for moderate-income borrowers in the AA. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$991. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Fresno, CA MSA (Fresno MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Fresno MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Fresno MSA experienced solid population growth and improved migration trends. Housing prices were growing at an above average rate. The area benefited from its central location that attracted distribution, transportation, and warehousing firms. Fresno is easily accessible to other areas in the state

given its location and proximity to major interstates making it a well-suited transportation and warehousing distribution hub. The e-commerce boom led to a number of nationwide retailers investing in area distribution centers as the demand for materials handling, storage, and shipping increased. The area economy was recovering at a measured pace, led by the leisure and hospitality industry. The MSA was a major producer of almonds. The Fresno MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Government, Education and Health Services, Retail Trade, and Professional and Business Services. Major employers in the Fresno MSA include Community Medical Center, Ruiz Food Products Inc., Kaiser Permanente, Saint Agnes Medical Center, and California State University-Fresno. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Fresno MSA was 7 percent compared to the national unemployment rate of 3.7 percent.

Hanford-Corcoran, CA MSA (Hanford MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Hanford MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Hanford MSA's economic recovery lagged other metro areas in California and the nation overall. While the area lost a lower percentage of jobs due to the pandemic, it had since only recovered one in five of jobs lost. Economic weakness was broad based, though manufacturing and education/healthcare were particularly hard hit. Hanford benefitted from below-average living costs and the presence of the Naval Air Station (NAS) Lemoore, which is the area's largest employer. Hanford relies heavily on the agriculture industry, and its major commodity is milk production. The MSA is a major producer of almonds. The Hanford MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Government, Education and Health Services, Manufacturing, and Retail Trade. Major employers in the Hanford MSA include NAS Lemoore, Tachi Hotel and Casino, Del Monte Food, California State Prison-Corcoran and Hanford Medical Center. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Hanford MSA was 7.7 percent compared to the national unemployment rate of 3.7 percent.

Madera, CA MSA (Madera MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Madera MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Madera MSA's economic recovery lagged the state of California and national overall. Similar to the Hanford MSA, Madera lost fewer jobs at the onset of the pandemic but had since only recovered about half of the jobs lost which was fewer than that of the state and nation. The area suffered from high economic volatility due to a very narrow industrial structure and low educational attainment which skewed investment towards low-value-added activities. The primary economic drivers in the MSA were agriculture, manufacturing, and medical centers. Like Fresno and Hanford, the MSA was a major producer of almonds. The industry was hurting from severe drought conditions and tighter border restrictions limited the availability of migrant workers that the farmers rely on. The Madera MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Government, Education and Health Services, and Retail Trade. Major employers in the AA include Valley State Prison, Valley Children's Hospital, Mission Bell Winery, and Walmart Inc. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Hanford MSA was 6.7 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by three local organizations that were contacted during the evaluation period and served the Fresno CSA. The organizations included one CDFI supporting small businesses and two organizations that provided services to low- and moderate-income individuals. The regulatory agencies also held a listening session that comprised six local community-based organizations that supported affordable housing, economic development, revitalization/stabilization efforts, and services targeted to low- and moderate-income individuals. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing
- Affordable for-sale housing
- Affordable health care or health care facilities
- Rental assistance
- Services for homeless population
- Neighborhood revitalization
- Financial literacy/education

Opportunities for participation by financial institutions included the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Supporting community development services such as financial literacy
- Providing greater access to financial services

Los Angeles CSA

The following table provides a summary of the demographics, including housing and business information for the Los Angeles CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Los Angeles CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	3,925	8.1	28.5	28.6	33.2	1.6
Population by Geography	18,388,091	7.6	28.6	29.4	33.8	0.5
Housing Units by Geography	6,346,543	6.7	26.2	29.2	37.5	0.4
Owner-Occupied Units by Geography	3,074,292	2.6	18.6	30.8	47.9	0.1
Occupied Rental Units by Geography	2,780,656	11.3	34.6	27.1	26.4	0.6
Vacant Units by Geography	491,595	6.4	26.1	31.5	35.3	0.7
Businesses by Geography	1,937,113	4.8	20.2	26.9	46.6	1.5
Farms by Geography	23,826	3.8	20.4	31.1	44.0	0.6
Family Distribution by Income Level	4,090,774	23.9	16.5	17.6	42.0	0.0
Household Distribution by Income Level	5,854,948	25.3	15.6	16.5	42.6	0.0
Median Family Income MSA - 11244 Anaheim-Santa Ana-Irvine, CA		\$86,003	Median Housing Value			\$449,452
Median Family Income MSA - 31084 Los Angeles-Long Beach-Glendale, CA		\$62,703	Median Gross Rent			\$1,330
Median Family Income MSA - 37100 Oxnard-Thousand Oaks-Ventura, CA MSA		\$86,766	Families Below Poverty Level			13.1%
Median Family Income MSA - 40140 Riverside-San Bernardino-Ontario, CA MSA		\$61,507				
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$30,754 to \$43,383 and moderate-income families earned at least \$30,754 to \$43,383 and less than \$49,206 to \$69,413 in the AA, depending on the metropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$769 to \$1,085 for low-income borrowers and ranging from \$1,230 to \$1,735 for moderate-income borrowers in the AA. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$2,413. Low- and moderate-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Los Angeles-Long Beach-Glendale, CA MD (Los Angeles MD)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Los Angeles MD was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Los Angeles MD's recovery was well behind the U.S. average. While employment growth in the industry was outpacing the economy overall, less than half of the entertainment jobs lost during the pandemic have been recovered. Further, the entertainment industry has been losing ground to other states where production costs were lower such as Georgia and Louisiana. The Los Angeles MD

has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Professional and Business Services, Government, Leisure and Hospitality Services, and Retail Trade. Major employers in the Los Angeles MD include Cedars-Sinai Medical Center, Los Angeles International Airport (LAX), University of California Los Angeles, VXi Global Solutions, The Walt Disney Co., Northrop Grumman Corp., and Kaiser Permanente. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Los Angeles MD was 6 percent compared to the national unemployment rate of 3.7 percent.

Anaheim-Santa Ana-Irvine, CA MD (Anaheim MD)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Anaheim MD was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Anaheim MD's recovery was among the strongest in the state, though it lagged the nation overall. The area gained back approximately 70 percent of jobs lost during 2020 driven by technology and the leisure/hospitality sector. The MD benefitted from a highly trained and well-educated workforce. In addition, the area was a research and development hub leading to a healthy demand for office space. Housing affordability was low and deteriorated as housing prices have appreciated faster than the U.S. overall and the inventory of homes for sale was at a historic low. The Anaheim MD has a well-diversified economy. Key sectors of the economy by percentage of employment include Professional and Business Services, Education and Health Services, Leisure and Hospitality Services, Government, and Retail Trade. Major employers in the Anaheim MD include Disney Resorts, University of California, Irvine, St. Joseph Health, Kaiser Permanente, Target Brands Inc, and Walmart Inc. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Anaheim MD was 3.8 percent compared to the national unemployment rate of 3.7 percent.

Oxnard-Thousand Oaks-Ventura, CA MSA (Oxnard MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Oxnard MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Oxnard MSA's economy was recovering at an average pace; however, nonfarm payrolls were still nearly 6 percent below pre-pandemic levels, compared with 2 percent lower nationwide. The healthcare industry which had been a key driver was recovering on par with the industry's overall nationwide recovery, yet still lagged other industries in the MSA. Economic drivers in the Oxnard MSA included high tech and defense. The area benefitted from a large military presence from the Ventura Naval Base and the Channel Islands Air National Guard Station, both of which provided economic stability to the MSA. The Oxnard MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Government, Professional and Business Services, Retail Trade, and Manufacturing. Major employers in the Oxnard MSA include Ventura Naval Base, Amgen Inc., Bank of America, WellPoint Health Networks Inc., Community Memorial Hospital of San Buenaventura, and Dignity Health. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Oxnard MSA was 4.4 percent compared to the national unemployment rate of 3.7 percent.

Riverside-San Bernardino-Ontario, CA MSA (Riverside MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Riverside MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Riverside's economic recovery was faring well and ahead of the state and U.S. overall. Area

economic drivers included logistics and defense. Riverside had a comparative advantage in transportation, distribution, and warehousing. The areas' competitive business costs and proximity to major population centers, major highways, and the ports of Los Angeles and Long Beach made it an ideal logistical hub. The Riverside MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Government, Transportation/Utilities, and Leisure and Hospitality Services. Major employers in the Riverside MSA include Stater Brothers Markets, Arrowhead Regional Medical Center, U.S. Marine Corps. Air Ground Combat Center, Fort Irwin, Walmart Inc, and U.C. Riverside. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Riverside MSA was 4.9 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by five local organizations that were contacted during the evaluation period and serve the Los Angeles CSA. The organizations included three affordable housing organizations and two community development organization that helped to address the causes and conditions of poverty. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following are identified needs within the community:

- Affordable rental housing
- Affordable for-sale housing
- Down payment assistance
- Living wage employment
- Job advancement training
- Small business micro-financing
- Credit counseling

Opportunities for participation by financial institutions include the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Mobile home improvement loans to stay up to code to stay within RV parks
- Working with the area's community development corporation network
- Various state and local government partnership opportunities

San Diego MSA

The following table provides a summary of the demographics, including housing and business information for the San Diego MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: San Diego MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	628	9.7	22.6	32.5	34.1	1.1
Population by Geography	3,223,096	8.9	23.6	32.5	34.7	0.3
Housing Units by Geography	1,180,806	7.7	21.7	34.2	36.5	0.0
Owner-Occupied Units by Geography	579,079	2.8	15.1	35.5	46.6	0.0
Occupied Rental Units by Geography	515,078	13.1	28.8	32.8	25.2	0.0
Vacant Units by Geography	86,649	7.6	22.8	33.8	35.8	0.0
Businesses by Geography	345,784	5.6	14.7	34.7	44.9	0.1
Farms by Geography	6,598	4.1	17.2	37.6	41.1	0.0
Family Distribution by Income Level	731,328	23.6	16.9	17.8	41.7	0.0
Household Distribution by Income Level	1,094,157	24.8	15.7	17.1	42.4	0.0
Median Family Income MSA - 41740 San Diego-Chula Vista-Carlsbad, CA MSA		\$75,179	Median Housing Value			\$458,248
			Median Gross Rent			\$1,404
			Families Below Poverty Level			10.6%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$37,590 and moderate-income families earned at least \$37,590 and less than \$60,143. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$940 for low-income borrowers and \$1,504 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$2,460. Low- and moderate-income borrowers would be challenged to afford a mortgage loan in this AA.

Information from Moody's Analytics indicated that at the end of the evaluation period, the San Diego MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. San Diego's economy was improving but still lagged the nationwide recovery. Through late 2021, the MSA had recovered less than two-thirds of jobs lost during the pandemic led by job gains in professional services and leisure/hospitality. The economy was driven by high tech and defense. San Diego is home to several military installations and is a top recipient of defense contracts. The San Diego MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Professional and Business Services, Government, Education and Health, Leisure and Hospitality Services, and Retail Trade. Major employers in the San Diego MSA include University of California, 32nd St. Naval Station, Marine Corps Recruit Depot, Kaiser Permanente, UC San Diego Health, and San Diego Community College. According to the Bureau of Labor Statistics, the December 2021 non-

seasonally adjusted unemployment rate for the San Diego MSA was 4.2 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by four local organizations that were contacted during the evaluation period and served the San Diego MSA. The organizations included three affordable housing organizations and one community development organization that helped to address the causes and conditions of poverty. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following are identified needs within the community:

- Affordable rental housing
- Affordable for-sale housing
- Down payment assistance programs
- Living wage employment
- Job advancement training
- Small business micro-financing
- Credit counseling

Opportunities for participation by financial institutions include the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Mobile home improvement loans to stay up to code to stay within RV parks
- Working with the area's community development corporation network
- Various state and local government partnership opportunities

San Jose CSA

The following table provides a summary of the demographics, including housing and business information for the San Jose CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: San Jose CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,934	9.4	23.0	34.7	31.7	1.2
Population by Geography	9,284,810	8.7	22.9	36.2	31.8	0.4
Housing Units by Geography	3,449,378	8.5	21.7	36.3	33.2	0.3
Owner-Occupied Units by Geography	1,795,915	3.7	17.2	37.6	41.4	0.1
Occupied Rental Units by Geography	1,444,618	13.9	27.1	34.7	23.7	0.6
Vacant Units by Geography	208,845	11.3	23.0	36.1	29.0	0.6
Businesses by Geography	896,324	8.5	19.1	32.9	39.1	0.5
Farms by Geography	20,485	4.4	17.6	39.9	38.0	0.1
Family Distribution by Income Level	2,170,973	23.8	16.3	18.4	41.5	0.0
Household Distribution by Income Level	3,240,533	25.6	15.2	16.7	42.5	0.0
Median Family Income MSA - 32900 Merced, CA MSA		\$46,793	Median Housing Value			\$568,144
Median Family Income MSA - 33700 Modesto, CA MSA		\$55,611	Median Gross Rent			\$1,469
Median Family Income MSA - 34900 Napa, CA MSA		\$80,921	Families Below Poverty Level			8.8%
Median Family Income MSA - 36084 Oakland-Berkeley-Livermore, CA		\$93,822				
Median Family Income MSA - 41884 San Francisco-San Mateo-Redwood City, CA		\$103,742				
Median Family Income MSA - 41940 San Jose-Sunnyvale-Santa Clara, CA MSA		\$107,126				
Median Family Income MSA - 42034 San Rafael, CA		\$121,130				
Median Family Income MSA - 42100 Santa Cruz-Watsonville, CA MSA		\$81,912				
Median Family Income MSA - 42220 Santa Rosa-Petaluma, CA MSA		\$77,587				
Median Family Income MSA - 44700 Stockton, CA MSA		\$59,946				
Median Family Income MSA - 46700 Vallejo, CA MSA		\$77,061				
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$23,397 to \$60,565 and moderate-income families earned at least \$23,397 to \$60,565 and less than \$37,434 to \$96,904 in the AA, depending on the metropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$585 to \$1,514 for low-income

borrowers and ranging from \$936 to \$2,423 for moderate-income borrowers in the AA. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$3,050. Low- and moderate-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

San Francisco-Oakland-Berkeley, CA MSA (San Francisco MSA)

San Francisco-San Mateo-Redwood City, CA MD (San Francisco MD)

Information from Moody's Analytics indicated that at the end of the evaluation period, the San Francisco MD was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. San Francisco's recovery lagged the state and nation overall. The area is home to a robust cluster of internet and other tech service companies. As such, San Francisco benefits from a highly educated and skilled workforce and very high incomes. The tech sector was expanding with tech employment on the rise; however, downstream consumer industries were struggling. This may be partly attributed to the rise of remote work arrangements, and the fact that these tech workers may not actually live in and support the local economy in San Francisco. The San Francisco MD has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Professional and Business Services, Education and Health Services, Government, Information, and Leisure and Hospitality Services. Major employers in the San Francisco MD include University of California San Francisco, Salesforce.com Inc., Wells Fargo, Kaiser Permanente, United Airlines, Sutter Health, and Uber Technologies Inc. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the San Francisco MD was 3 percent compared to the national unemployment rate of 3.7 percent.

Oakland-Berkeley-Livermore, CA MD (Oakland MD)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Oakland MD was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Oakland's economic recovery was weak having recouped only half of the pandemic related job losses, which is well below the national average. Oakland benefits from its proximity to the tech capital of the world and its world-class universities and laboratories. Technology, including manufacturing, remained a key economic driver for Oakland with computer/electronics production accounting for approximately 20 percent of manufacturing employment, which was more than twice the U.S. average. The Oakland MD has a well-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Professional and Business Services, Government, Retail Trade, and Manufacturing. Major employers in the Oakland MD include University of California, Western Digital, Chevron Corp., Grifols, Lawrence Livermore National Laboratory, Lawrence Berkeley National Laboratory, John Muir Health, and Kaiser Permanente. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Oakland MD was 4.1 percent compared to the national unemployment rate of 3.7 percent.

San Rafael, CA MD (San Rafael MD)

Information from Moody's Analytics indicated that at the end of the evaluation period, the San Rafael MD was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. San Rafael benefits from its proximity to San Francisco enabling it to take advantage of

spillover growth. Like its Bay Area neighbors to the south, San Rafael benefits from high educational attainment and a core of jobs in tech and other knowledge-based industries. San Rafael had among the highest wages and per capita income in the country. The San Rafael MD has a well-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Professional and Business Services, Government, Retail Trade, and Leisure and Hospitality Services. Major employers in the San Rafael MD include Kaiser Permanente, Marin General, BioMarin Pharmaceutical, Fireman's Fund Insurance, Bay Equity, and College of Marin. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the San Rafael MD was 3 percent compared to the national unemployment rate of 3.7 percent.

San Jose-Sunnyvale-Santa Clara, CA MSA (San Jose MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the San Jose MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. San Jose's recovery was ahead of other Bay Area neighbors, but still lagged the state and nation overall. The economy is driven by high tech manufacturing which was leading job gains. San Jose had by far the largest concentration of jobs in computer/electronics manufacturing than elsewhere in the country. The area benefits from a highly skilled workforce and access to substantial venture capital given its record of entrepreneurial success. The San Jose MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Professional and Business Services, Education and Health Services, Information, and Government. Major employers in the San Jose MSA include Cisco Systems Inc., Alphabet Inc., eBay Inc., Lockheed Martin Corp., Intel Corp., and Applied Materials Inc. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the San Jose MSA was 3.2 percent compared to the national unemployment rate of 3.7 percent.

Merced, CA MSA (Merced MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Merced MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Merced MSA's recovery accelerated led by the area's large public sector and the hospitality industry. Merced recovered more than 90 percent of jobs lost during the pandemic compared to approximately 75 percent nationwide. The area is a college town, home to the University of California Merced (UC Merced), which helped drive the economy and contributed to a favorable age structure. The agriculture industry is also an economic driver for the MSA. The industry was hard hit by low crop prices and drought conditions in 2021. The Merced MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Government, Education and Health Services, Manufacturing, and Retail Trade. Major employers in the Merced MSA include Mercy Medical Center Merced, Foster Farms AG Inc., UC Merced, Quad Graphics Merced, and Hilmar Cheese Co. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Merced MSA was 8.4 percent compared to the national unemployment rate of 3.7 percent.

Modesto, CA MSA (Modesto MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Modesto MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Modesto's recovery had been slow but steady. While growth had been slower to recover in the public sector and healthcare industry the leisure/hospitality industry was nearing its prior peak.

Overall, the metro recovered a smaller percentage of jobs than the U.S. overall but fared better than most of California. Economic drivers in Modesto include agriculture, logistics and medical centers. The Modesto MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Government, Retail Trade, and Manufacturing. Major employers in the Modesto MSA include E. & J. Gallo Winery, Doctors Medical Center, Memorial Medical Center, Foster Farms, Del Monte Foods Inc., and Stanislaus Food Products. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Modesto MSA was 6.1 percent compared to the national unemployment rate of 3.7 percent.

Napa, CA MSA (Napa MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Napa MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Napa's economy is dominated by its world-renowned wine and tourism industries. The area experienced larger than average job losses during the pandemic due to its reliance on tourism and therefore had more ground to make up than other metro areas. With the return of tourists, the leisure/hospitality industry picked up, but winemaking remained stagnant. On the housing front, Napa housing prices were rising but not as fast as the nation overall partly because home prices were already well above average in the area. The Napa MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Manufacturing, Education and Health Services, Government, Leisure and Hospitality Services, and Professional and Business Services. Major employers in the Napa MSA include Napa State Hospital, Veteran's Home, St. Helena Hospital, Napa Valley College, and Silverado Resort and Spa. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Napa MSA was 4.3 percent compared to the national unemployment rate of 3.7 percent.

Santa Cruz-Watsonville, CA MSA (Santa Cruz MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Santa Cruz MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Santa Cruz's economy was recovering with mixed results as weaknesses in the crucial public sector were weighing down any modest improvements in consumer services. Santa Cruz is a tourist destination known for its enviable climate and high quality of life. The area is home to the University of California (UC) Santa Cruz which helped drive the demand for consumer industries and also provided a steady stream of talent to the workforce. On the housing front, the area's housing market was outperforming much of the state with housing prices increasing at nearly 22 percent in 2021 and permit issuances were back to pre-pandemic levels. The Santa Cruz MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Government, Education and Health Services, Retail Trade, Professional and Business Services, and Leisure and Hospitality Services. Major employers in the Santa Cruz MSA include Dominican Hospital, UC Santa Cruz, Source Naturals, Sesnon House, Monterey Mushroom Inc., and Santa Cruz Health Center. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Santa Cruz MSA was 5.6 percent compared to the national unemployment rate of 3.7 percent.

Santa Rosa-Petaluma, CA MSA (Santa Rosa MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Santa Rosa MSA was still recovering from the impacts of the economic shutdown related to the COVID-19

pandemic. Santa Rosa's economy was performing well with job growth outperforming the state and national averages. The area is a tourist destination known for its world class wineries and craft breweries. The tourism industry had rebounded swiftly as the effects of the pandemic wore off and people were willing to travel, particularly by car, as most visitors to Santa Rosa came from neighboring metros. The Santa Rosa MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Government, Retail Trade, Professional and Business Services, Manufacturing, and Leisure and Hospitality Services. Major employers in the Santa Rosa MSA include Kaiser Permanente, Graton Resort & Casino, St. Joseph Health System, Keysight Technologies, Safeway Inc., and Sutter Santa Rosa Regional Hospital. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Santa Rosa MSA was 3.7 percent which was on par with the national unemployment rate of 3.7 percent.

Stockton, CA MSA (Stockton MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Stockton MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Stockton's economy had recently stalled. While job recovery in the metro area was further along than the state overall, job growth had slowed. Stockton is a bedroom community to the Bay Area and benefitted from a large and growing commuter workforce. The area had a comparative advantage in logistics given its competitive business costs, an inland seaport, and proximity to large population centers and major highway systems. The Stockton MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Government, Education and Health Services, Transportation/Utilities, and Retail Trade. Major employers in the Stockton MSA include St. Joseph Medical Center, Amazon, Safeway Inc., Dameron Hospital, Pacific Gas and Electric, and Kaiser Permanente. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Stockton MSA was 6.2 percent compared to the national unemployment rate of 3.7 percent.

Vallejo, CA MSA (Vallejo MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Vallejo MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Vallejo's economic recovery was losing ground and the MSA was well behind the nationwide recovery in terms of payroll growth and unemployment. The area suffered from below-average per capita income and a lack of high-wage jobs. The presence of Travis Air Force base provides a stabilizing force to the economy in terms of federal defense spending and downstream consumer services. The Vallejo MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Government, and Retail Trade. Major employers in the Vallejo MSA include Travis Air Force Base, Kaiser Permanente, NorthBay Health System, Six Flags, Kaiser Foundation Hospital and Rehab Center and California Medical Facility. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Vallejo MSA was 5.1 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by 10 local organizations that were contacted during the evaluation period and served the San Jose CSA. The organizations included four affordable housing

organizations, three community development organization that helped to address the causes and conditions of poverty, and three economic development organizations that helped to attract and retain businesses. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following are identified needs within the community:

- Affordable rental housing
- Affordable for-sale housing
- Down payment assistance programs
- Living wage employment
- Job advancement training
- Small business micro-financing
- Credit counseling

Opportunities for participation by financial institutions include the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Working with the area's community development corporation network
- Various state and local government partnership opportunities

Scope of Evaluation in the State of California

The OCC selected the Fresno CSA, Los Angeles CSA, San Diego MSA and San Jose CSA for full-scope reviews and based conclusions and ratings primarily on activity within these geographical areas. These AAs carried significant weight in determining the overall ratings for the state of California because of the significance of the bank's presence in these AAs. More weight was given to the Los Angeles CSA and San Jose CSA due to the larger deposit base, lending, and branch presence.

During the evaluation period, the bank originated or purchased 742,870 home mortgage loans, small loans to businesses, and small loans to farms totaling \$197.8 billion in the state of California. The bank's primary loan products in the rating area were small loans to businesses and home mortgage loans. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within each AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. In the San Luis Obispo MSA, Visalia MSA, and California Combined Non-MSA, the OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms. In all other AAs, the OCC placed more weight based on the number of loans on small loans to businesses versus home mortgage loans and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF CALIFORNIA

LENDING TEST

The bank's performance under the Lending Test in the state of California is rated Outstanding. Performance in the limited-scope areas had a positive effect on the overall Lending Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Fresno CSA, Los Angeles, San Diego MSA, and San Jose CSA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Fresno CSA	7,897	9,082	517	26	17,522	2.4	1.6
Los Angeles CSA	111,060	214,832	728	285	326,905	44.0	38.1
San Diego MSA	24,749	39,180	220	66	64,215	8.6	7.8
San Jose CSA	111,117	120,049	1,158	250	232,574	31.3	42.4
Bakersfield MSA	4,153	6,421	235	11	10,820	1.5	0.8
Chico MSA	1,001	1,368	169	3	2,541	0.3	0.3
El Centro MSA	773	1,029	50	5	1,857	0.2	0.2
Redding CSA	1,135	1,173	134	3	2,445	0.3	0.2
Sacramento CSA	22,560	29,622	626	55	52,863	7.1	5.5
Salinas MSA	3,304	4,091	179	8	7,582	1.0	0.9
San Luis Obispo MSA	3,282	2,530	127	9	5,948	0.8	0.4
Santa Maria MSA	3,412	3,398	114	9	6,933	0.9	0.9
Visalia MSA	2,621	2,251	278	8	5,158	0.7	0.4
California Combined Non-MSA	3,109	2,916	220	6	6,251	0.8	0.5
Total	300,173	437,942	4,755	744	743,614	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Fresno CSA	2,023,721	389,838	23,666	323,484	2,760,709	1.4	1.6
Los Angeles CSA	64,641,377	6,477,044	19,575	1,645,703	72,783,699	35.9	38.1
San Diego MSA	16,774,121	1,229,942	4,039	436,661	18,444,763	9.1	7.8
San Jose CSA	83,685,429	4,276,449	40,164	2,143,020	90,145,062	44.4	42.4
Bakersfield MSA	875,567	208,773	15,901	7,531	1,107,772	0.5	0.8
Chico MSA	252,950	41,477	4,414	42,863	341,704	0.2	0.3
El Centro MSA	135,097	38,445	5,378	28,457	207,377	0.1	0.2
Redding CSA	260,373	33,061	4,112	891	298,437	0.1	0.2
Sacramento CSA	8,276,637	877,744	17,244	345,433	9,517,058	4.7	5.5
Salinas MSA	1,755,980	109,702	12,287	37,339	1,915,308	0.9	0.9
San Luis Obispo MSA	1,464,672	69,186	2,956	8,389	1,545,203	0.8	0.4
Santa Maria MSA	1,995,343	101,450	5,547	43,374	2,145,714	1.1	0.9
Visalia MSA	558,572	102,631	18,613	33,280	713,096	0.4	0.4
California Combined Non-MSA	919,996	84,864	10,259	12,757	1,027,876	0.5	0.5
Total	183,619,835	14,040,606	184,155	5,109,182	202,953,778	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Fresno CSA

As of June 30, 2021, WFBNA had a deposit market share of 22.8 percent. The bank ranked first among 23 depository financial institutions placing it in the top 5 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 3.6 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked fifth among 578 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. The top three lenders in this AA based on market share were United Wholesale Mortgage (8.9 percent), Rocket Mortgage (8.8 percent), and Freedom Mortgage Corporation (3.6 percent).

According to peer small business data for 2021, WFBNA had a market share of 9.9 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked third out of 145 small business lenders, which placed it in the top 3 percent of lenders. The other top lenders in this AA based on market share were American Express National Bank (13.8 percent) and Bank of America, N.A. (10.8 percent).

According to peer small farm data for 2021, WFBNA had a market share of 18.1 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked first out of 28 small farm lenders, which placed it in the top 4 percent of lenders. The other top lenders in this AA based on market share were Bank of America, N.A. (17.4 percent) and JPMorgan Chase Bank, N.A. (17 percent).

Los Angeles CSA

As of June 30, 2021, WFBNA had a deposit market share of 14.7 percent. The bank ranked third among 127 depository financial institutions placing it in the top 3 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 2.8 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked sixth among 1,015 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. The top three lenders in this AA based on market share were United Wholesale Mortgage (9.3 percent), Rocket Mortgage (9 percent), and loanDepot.com (3.9 percent).

According to peer small business data for 2021, WFBNA had a market share of 8.9 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked fourth out of 379 small business lenders, which placed it in the top 2 percent of lenders. The top three lenders in this AA based on market share were American Express National Bank (20.2 percent), JPMorgan Chase Bank, N.A. (15.2 percent), and Bank of America, N.A. (13.9 percent).

According to peer small farm data for 2021, WFBNA had a market share of 21.1 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked second out of 47 small farm lenders, which placed it in the top 5 percent of lenders. The other top lenders in this AA based on market share were JPMorgan Chase Bank, N.A. (30.4 percent) and Bank of America, N.A. (15.5 percent).

San Diego MSA

As of June 30, 2021, WFBNA had a deposit market share of 19.1 percent. The bank is the top ranked depository financial institution in the AA.

According to peer mortgage data for 2021, WFBNA had a market share of 3 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked sixth among 807 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. The top three lenders in this AA based on market share were United Whole Mortgage (10.6 percent), Rocket Mortgage (9.4 percent), and loanDepot.com (3.5 percent).

According to peer small business data for 2021, WFBNA had a market share of 10.1 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked fourth out of 255 small business lenders, which placed it in the top 2 percent of lenders. The top three lenders in this AA based on market share were American Express National Bank (17.8 percent), JPMorgan Chase Bank, N.A. (17.2 percent), and Bank of America, N.A. (10.3 percent).

According to peer small farm data for 2021, WFBNA had a market share of 20.7 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked second out of 17 small farm lenders, which placed it in the top 12 percent of lenders. The other top in this AA based on market share were JPMorgan Chase Bank, N.A. (36.5 percent) and U.S. Bank, N.A. (15.9 percent).

San Jose CSA

As of June 30, 2021, WFBNA had a deposit market share of 15.8 percent. The bank ranked second among 89 depository financial institutions placing it in the top 3 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 5.5 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked third among 880

home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. The other top lenders in this AA based on market share were Rocket Mortgage (10.9 percent) and United Wholesale Mortgage (5.9 percent).

According to peer small business data for 2021, WFBNA had a market share of 11.3 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked fourth out of 307 small business lenders, which placed it in the top 2 percent of lenders. The top three lenders in this AA based on market share were American Express National Bank (16.2 percent), JPMorgan Chase Bank, N.A. (16.1 percent), and Bank of America, N.A. (13.9 percent).

According to peer small farm data for 2021, WFBNA had a market share of 16.7 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked second out of 47 small farm lenders, which placed it in the top 5 percent of lenders. The other top lenders in this AA based on market share were JPMorgan Chase Bank, N.A. (20.7 percent) and U.S. Bank, N.A. (11.2 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AAs. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data. The bank's performance in the Fresno CSA, Los Angeles CSA, San Diego MSA and San Jose CSA was good.

Fresno CSA

Home Mortgage Loans

Refer to Table O in the state of California section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was below the percentage of owner-occupied housing units in low-income geographies but it was equal to the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied housing units in moderate-income geographies but it approximated the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of California section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was below the percentage of businesses in low-income geographies but it was equal to the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was below the percentage of businesses in moderate-income geographies but it was near to the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of California section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was good.

The bank's percentage of small loans to farms in low-income geographies was below the percentage of farms in low-income geographies but it exceeded the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-income geographies was below the percentage of farms in moderate-income geographies but it was near to the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Los Angeles CSA

Home Mortgage Loans

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans in low-income geographies was well below the percentage of owner-occupied housing units in low-income geographies and it was below the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was below both the percentage of owner-occupied housing units in moderate-income geographies and the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of California section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies was below the percentage of businesses in low-income geographies but it was near to the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies approximated the percentage of businesses in

moderate-income geographies and it was near to the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of California section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was excellent.

The bank's percentage of small loans to farms in low-income geographies was below the percentage of farms in low-income geographies and it was near to the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-income geographies approximated the percentage of farms in moderate-income geographies but it exceeded the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

San Diego MSA

Home Mortgage Loans

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

The bank's percentages of home mortgage loans in low- and moderate-income geographies were below both the percentages of owner-occupied housing units in low- and moderate-income geographies and the aggregate distributions of home mortgage loans in geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of California section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies was near to the percentage of businesses in low-income geographies and it approximated the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies approximated both the percentage of businesses in moderate-income geographies and the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of California section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was excellent.

The bank's percentage of small loans to farms in low-income geographies was well below the percentage of farms in low-income geographies but it exceeded the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-income geographies approximated the percentage of farms in moderate-income geographies and it exceeded the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

San Jose CSA

Home Mortgage Loans

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

The bank's percentages of home mortgage loans in low- and moderate-income geographies were below both the percentages of owner-occupied housing units in low- and moderate-income geographies and the aggregate distributions of home mortgage loans in low- and moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of California section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentages of small loans to businesses in low- and moderate-income geographies were near to the percentages of businesses in low- and moderate-income geographies and the aggregate distributions of small loans to businesses in low-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of California section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was excellent.

The bank's percentage of small loans to farms in low-income geographies was well below the percentage of farms in low-income geographies but it exceeded the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-income geographies exceeded both the percentage of farms in moderate-income geographies and the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies in the Fresno CSA, Los Angeles CSA, San Diego MSA, and San Jose CSA. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AAs.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes. The bank's performance was good in the Fresno CSA, Los Angeles CSA, and San Jose CSA, and adequate in the San Diego MSA.

Fresno CSA

Home Mortgage Loans

Refer to Table P in the state of California section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but it approximated the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was well below the percentage of moderate-income families but it was equal to the aggregate distribution of home mortgage loans to moderate-income families by all lenders. Consideration was given to homeownership affordability challenges especially for low-income borrowers. The OCC placed more weight on the bank's performance against aggregate lenders in lending to low-income borrowers.

Small Loans to Businesses

Refer to Table R in the state of California section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 22.6 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of California section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

The bank did not collect or consider the GAR in the underwriting of approximately 29.8 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below the percentage of farms in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Los Angeles CSA

Home Mortgage Loans

Refer to Table P in the state of California section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and it was below the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was significantly below the percentage of moderate-income families but it was near to the aggregate distribution of home mortgage loans to moderate-income families by all lenders. Consideration was given to homeownership affordability challenges especially for moderate-income borrowers. The OCC placed more weight on the bank's performance against aggregate lenders in lending to moderate-income borrowers.

Small Loans to Businesses

Refer to Table R in the state of California section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 21.6 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of California section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

The bank did not collect or consider the GAR in the underwriting of approximately 28.3 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below the percentage of farms in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

San Diego MSA***Home Mortgage Loans***

Refer to Table P in the state of California section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and it was below the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was significantly below the percentage of moderate-income families but it was near to the aggregate distribution of home mortgage loans to moderate-income families by all lenders. Consideration was given to homeownership affordability challenges especially for low- and moderate-income borrowers. The OCC placed more weight on the bank's performance against aggregate lenders in lending to low- and moderate-income borrowers.

Small Loans to Businesses

Refer to Table R in the state of California section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 22.1 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of California section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was adequate.

The bank did not collect or consider the GAR in the underwriting of approximately 27.3 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below the percentage of farms in the AA with GAR of \$1 million or less but it was near to the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

San Jose CSA***Home Mortgage Loans***

Refer to Table P in the state of California section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and it was below the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was well below the percentage of moderate-income families and it was below the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of California section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 21.1 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of California section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

The bank did not collect or consider the GAR in the underwriting of approximately 23 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below the percentage of farms in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

Fresno CSA

WFBNA was a leader in making CD loans in the Fresno CSA. WFBNA made 26 CD loans totaling approximately \$323.5 million, which represented 46.8 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing, revitalization and stabilization, and community services purposes. By dollar volume, 43.3 percent of these loans funded affordable housing that provided 771 units of affordable housing, less than 1 percent funded revitalization and stabilization efforts, and 56.5 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA renewed a \$40 million line of credit to a medical center located in a medically underserved area due to the area's lack of primary care providers and high poverty population. The bank renewed this facility three times during the evaluation period.
- WFBNA renewed a \$30 million line of credit to a medical center that primarily provides comprehensive healthcare services to children, regardless of the family's ability to pay. The facility receives approximately 77 percent of its funding from the state's Medi-Cal program, which covers low-income adults, low-income families with children, seniors, persons with disabilities, and children in foster care.
- WFBNA provided a \$21.1 million construction loan for an LIHTC development located in Clovis, California. This development consisted of 60 units targeted to families with income at or below 80 percent of the AMI. Forty-three units were set aside at or below 60 percent of the AMI. Twenty-three of those units were subsidized through Rental Assistance Demonstration Housing Assistance Payment Contract (RAD-HAP). This loan was complex due to the involvement of multiple funding sources, including a local housing authority and local financial institution.

Los Angeles CSA

WFBNA was a leader in making CD loans in the Los Angeles CSA. WFBNA made 285 CD loans totaling approximately \$1.6 billion, which represented 9.9 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing, economic development, revitalization and stabilization, and community services purposes. By dollar volume, 81.4 percent of these loans funded affordable housing that provided 5,785 units of affordable housing, 14.1 percent funded economic development, 1.1 percent funded revitalization and stabilization efforts, and 3.4 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$22.9 million construction loan for an 83-unit LIHTC development located in Compton, California that targeted low-income families and homeless households. Fifty-three units provided housing for chronically homeless and formerly homeless tenants with incomes up to 30 percent of the AMI and were subsidized with project-based subsidy from the Housing Authority of Los Angeles County. Thirty units were targeted to low-income families with incomes of 60 percent of the AMI. This loan was complex due to the involvement of multiple funding sources, including local, state, and county government.
- WFBNA provided a \$13.7 million construction loan for an LIHTC development in Los Angeles, California. This 42-unit LIHTC development was restricted to senior households earning at or below 30 percent of the AMI. The units were subsidized with Section 8 rental assistance. This transaction was complex due to the involvement of multiple funding sources, including \$11 million in capital investments provided by the city and county of Los Angeles. This project increased the stock of affordable housing in a high-cost area and provided housing opportunities for homeless seniors and seniors with special needs.
- WFBNA provided a \$25.8 million construction loan for an LIHTC development in Indio, California. This 99-unit development was the third and final phase of the redevelopment of the dilapidated 58-acre migrant housing center. The USDA and Riverside County planned the three-phase revitalization of the disadvantaged community and provided replacement housing for current residents. This transaction was complex due to involvement of multiple funding sources including USDA 514, California Department of Housing and Community Development, Housing Authority of the county of Riverside, and the county of Riverside HOME funds.

San Diego MSA

WFBNA was a leader in making CD loans in the San Diego MSA. WFBNA made 66 CD loans totaling approximately \$436.6 million, which represented 12.7 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing, economic development, revitalization and stabilization, and community service purposes. By dollar volume, 89.4 percent of these loans funded affordable housing that provided 1,588 units of affordable housing, 8.4 percent funded economic development, 1 percent funded revitalization and stabilization efforts, and 1.1 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$19.5 million construction loan for a 54-unit LIHTC development in Poway, California. The project provided housing for low-income adults with developmental disabilities who

had incomes at or below 60 percent of the AMI. All housing units were subsidized with Housing Assistance Payments (HAP) subsidy.

- WFBNA provided a \$16.4 million construction loan for an LIHTC development located in Vista, California. The developer provided affordable housing for working families, seniors, and people with disabilities. Of the 60-units, 98.3 percent were restricted to tenants earning at or below 59 percent of the AMI. The units were provided to veterans, artists, and residents of San Diego County.
- WFBNA provided a \$21.8 million construction loan for an LIHTC development in San Diego, California. The 74-unit development was reserved for the homeless, formerly homeless, or seniors diagnosed with chronic illness, developmental, or mental health disabilities. All residents had incomes that are at or below 30 percent of the AMI. Funding for this development provided affordable housing opportunities and services for homeless, and special needs seniors.

San Jose CSA

WFBNA was a leader in making CD loans in the San Jose CSA. WFBNA made 250 CD loans totaling approximately \$2.1 billion, which represented 11.6 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing, economic development, revitalization and stabilization, and community service purposes. By dollar volume, 85.5 percent of these loans funded affordable housing that provided 6,217 units of affordable housing, 4.8 percent funded economic development, 6.4 percent funded revitalization and stabilization efforts, and 3.3 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$19.9 million construction loan for an LIHTC development located in Sonoma, California. The 48-unit development was targeted to families with incomes at or below 80 percent of the AMI. Ten units served formerly homeless veterans and receive a Veteran Affairs Supportive Housing subsidy, and 11 units received a project-based subsidy. This project increased the stock of affordable housing in a high-cost market and provides housing opportunities for homeless veterans and low- and moderate-income families.
- WFBNA provided a \$28 million construction loan for an LIHTC development in Mountain View, California. The 70-unit new development targeted low-income families at or below 70 percent of the AMI. Forty of the units were for households with incomes at or below 50 percent of the AMI. Fifteen units were for functional needs households with developmental disabilities.
- WFBNA provided a \$32.9 million construction loan for an LIHTC development in Alameda, California. The 70-unit development was reserved for tenants with income at or below 60 percent of the AMI. Twenty-one units were targeted to functional needs individuals, chronically homeless individuals, and families. The developer was focused on meeting the affordable housing needs of very low-, low-, and moderate-income families, seniors, disabled individuals, and the formerly homeless.

Broader Statewide Area

WFBNA provided a \$187,500 loan to a nonprofit organization that provided affordable housing services in the broader statewide area that included one or more AAs. The organization had a purpose, mandate,

or function to serve an AA. The loan was given positive consideration and supported the bank's overall performance under the Lending Test in the state of California.

Product Innovation and Flexibility

Fresno CSA

WFBNA made extensive use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 2,052 loans under its flexible lending programs totaling \$173.2 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	341	74,700
Dream. Plan. Home.	3	\$460
PPP	1,708	98,000
Total	2,052	173,160

Los Angeles CSA

WFBNA made extensive use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 41,219 loans under its flexible lending programs totaling \$2.1 billion. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	504	156,000
Dream. Plan. Home.	135	29,200
Neighborhood LIFT down payment grants	300	7,500
PPP	40,280	1,900,000
Total	41,219	2,092,700

San Diego MSA

WFBNA made extensive use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 7,344 loans under its flexible lending programs totaling \$343.3 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	62	22,100
Dream. Plan. Home.	47	9,500
PPP	7,235	341,700
Total	7,344	343,300

San Jose CSA

WFBNA made extensive use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 23,585 loans under its flexible lending programs totaling \$241 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	506	159,700
Dream. Plan. Home.	232	74,900
Neighborhood LIFT down payment grants	204	5,100
PPP	22,643	1,300
Total	23,585	241,00

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Chico MSA, El Centro MSA, Sacramento CSA, Salinas MSA, Santa Maria MSA and the Visalia MSA was consistent with the bank's overall performance under the Lending Test in the full-scope areas. The bank's performance in the remaining limited-scope areas was weaker than the bank's performance in the full-scope areas. The bank's performance in these limited-scope areas was weaker primarily due to adequate geographic and borrower distribution and lower levels of CD lending relative the needs and opportunities in these areas.

Refer to Tables O through T in the state of California section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of California is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Fresno CSA, Los Angeles CSA, San Diego MSA, and San Jose CSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Fresno CSA	7	48,384	114	84,225	121	3.2	132,608	3.0	8	52,693
Los Angeles CSA	174	559,606	1,115	839,076	1,289	33.6	1,398,683	32.1	115	348,276
San Diego MSA	34	126,210	281	336,327	315	8.2	462,537	10.6	22	110,059
San Jose CSA	158	890,247	1,421	1,173,104	1,579	41.1	2,063,352	47.3	117	667,870
Bakersfield MSA	5	9,163	39	656	44	1.1	9,819	0.2	2	131
Chico MSA	4	1,141	24	3,675	28	0.7	4,816	0.1	2	78
El Centro MSA	1	64	13	9,823	14	0.4	9,887	0.2	2	307
Redding CSA	1	676	6	257	7	0.2	932	0.0	1	518
Sacramento CSA	21	77,478	265	71,269	286	7.4	148,747	3.4	12	33,477
Salinas MSA	7	22,782	32	1,446	39	1.0	24,228	0.6	6	1,665
San Luis Obispo MSA	6	10,294	35	7,728	41	1.1	18,022	0.4	8	3,845
Santa Maria MSA	3	14,861	28	19,456	31	0.8	34,317	0.8	4	19,646
Visalia MSA	2	3,799	19	28,628	21	0.5	32,427	0.7	4	11,399
California Combined Non-MSA	5	17,310	18	425	23	0.6	17,735	0.4	5	976
Statewide***	1	1,479	0	0	1	0.0	1,479	0.0	1	105
Total	429	1,783,494	3,410	2,576,095	3,839	100.0	4,359,589	100.0	309	1,251,045
<p>The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.</p> <p>* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.</p> <p>** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.</p> <p>*** Statewide means investments in statewide programs that have a purpose, mandate, or function to serve one or more of the bank's assessment areas within the state. Due to rounding, totals may not equal 100.0%</p>										

Fresno CSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$132.6 million and represented 19.2 percent of the bank's tier 1 capital allocated to the AA. The investments also included 106 grants and donations totaling \$5.5 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 19 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 50.4 percent that focused on community services targeted to low- and moderate-income individuals, and 30.6 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 707 units of affordable housing in the AA.

The bank made extensive use of innovative or complex investments to support CD initiatives. Approximately 88.8 percent of current period investment dollars were complex LIHTC and NMTC investments. The following are examples of CD investments made in this AA:

- WFBNA provided an equity investment of \$7.7 million to finance an LIHTC development located in Fresno, California. The development consists of 40 total units. Thirty-nine of these units were restricted to senior households with incomes at or below 60 percent of the AMI. This investment was complex due to the inherent nature of LIHTC transactions and the involvement of multiple funding sources, including the city of Fresno, HOME Funds, and Fresno RDA Successor Boomerang funds. Financing this project increased the market's stock of needed affordable housing for senior households, which was in short supply.
- WFBNA provided a \$10 million NMTC investment to expand an educational facility in Madera, California for the school district. The school district strives to align its education with the needs of local industries, agriculture, health care and manufacturing. The expanded facility included two career education buildings located in a moderate-income census tract, with a 39.6 percent poverty rate and a 9.7 percent unemployment rate. More than 88 percent of students in the district received free or reduced lunch.
- WFBNA provided an Open for Business \$500,000 grant to an organization that supported small businesses within Central California. The funding supported technical assistance that helped small minority-owned businesses pivot their business models to adapt to new market conditions created by COVID-19. Grant funding served Central San Joaquin Valley including its rural communities.

Los Angeles CSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$1.4 billion and represented 8.4 percent of the bank's tier 1 capital allocated to the AA. The investments also included 1,051 grants and donations totaling \$80 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 29 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 50.7 percent that focused on community services targeted to low- and moderate-income individuals, and 20.3 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 11,528 units of affordable housing in the AA.

The bank made significant use of innovative or complex investments to support CD initiatives. Approximately 56.2 percent of current period investment dollars were complex LIHTC and NMTC investments. The following are examples of CD investments made in this AA:

- WFBNA provided a \$23 million NMTC investment for the construction of a new state-of-the-art 20,000 square foot community facility in the Watts neighborhood of Los Angeles, California. The organization supported low-income children and families healing from traumatic experiences. It provided opportunities through the organization's programs and services. The facility was located in a Health Resources and Services Administration (HRSA)-designated Medically Underserved Area, a United States Department of Agriculture (USDA)-designated Food Desert, and a U.S. Treasury-designated Opportunity Zone. The community impact of the development provided 15 full time jobs and 44 construction jobs.
- WFBNA provided a \$27 million NMTC investment to a nonprofit organization for the construction of transitional housing development in Los Angeles, California. WFBNA provided an additional \$10 million NMTC investment to complete construction, for a total investment of \$37 million. The organization served men, women, and children experiencing homelessness by providing comprehensive emergency and long-term services to help reduce long-term homelessness. The nonprofit provided transitional housing to formerly homeless single adults and two-parent families. Along with the NMTC investments, the bank provided six grants totaling \$280,000 to this organization's programs.
- WFBNA provided a \$15.8 million equity investment for an LIHTC development located Inglewood, California. This 42-unit development was restricted to families earning 60 percent of the AMI. Thirty-one units included project-based rental assistance, allocated by the Housing Authority of the city of Inglewood. The developer offered free supportive services, including educational classes (health, wellness, and skills building) and service coordination. Financing for this project increased the stock of affordable housing in a high-cost market and provided housing opportunities for families.

San Diego MSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$462.5 million and represented 13.5 percent of the bank's tier 1 capital allocated to the AA. The investments also included 265 grants and donations totaling \$11 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 25.4 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 51.7 percent that focused on community services targeted to low- and moderate-income individuals, and 22.9 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 1,947 units of affordable housing in the AA.

The bank made significant use of innovative or complex investments to support CD initiatives. Approximately 41.9 percent of current period investment dollars were complex LIHTC investments. The following are examples of CD investments made in this AA:

- WFBNA provided a \$17.3 million equity investment for an LIHTC development in San Diego, California. This 53-unit development provided housing for the homeless or formerly homeless, senior households, or seniors diagnosed with chronic illness, developmental, or mental health disabilities. The San Diego Housing Commission subsidized the development with a project-based subsidy. This investment was complex due to the inherent nature of LIHTC transactions and the involvement of multiple funding sources including support from state and local agencies.
- WFBNA provided a \$19.2 million equity investment for an LIHTC development in San Marcos, California. This 85-unit development was restricted to families earning at or below 60 percent of the AMI. Eight of those units were set aside for homeless and formerly homeless individuals. This activity was complex due to the inherent nature of LIHTC transactions and the involvement of multiple funding sources including the City of San Marcos, County of San Diego, and County of San Diego.
- WFBNA provided four grants totaling nearly \$1.4 million to an organization located in Chula Vista, California that served traditionally underserved people and communities by providing the resources and assistance to start and grow their business. The funds were distributed to small businesses to respond to their immediate needs for capital due to the COVID-19 pandemic.

San Jose CSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$2.1 billion and represented 11.1 percent of the bank's tier 1 capital allocated to the AA. The investments also included 1,366 grants and donations totaling \$88.5 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 23.7 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 54.1 percent that focused on community services targeted to low- and moderate-income individuals, and 22.1 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 12,296 units of affordable housing in the AA.

The bank made significant use of innovative or complex investments to support CD initiatives. Approximately 66.7 percent of current period investment dollars were complex LIHTC and NMTC investments. The following are examples of CD investments made in this AA:

- WFBNA provided a \$58.6 million equity investment for an LIHTC development. This LIHTC was part of a multiphase redevelopment of 16 dilapidated two-story public housing structures located in a low-income urban neighborhood of San Francisco that had experienced disinvestment. The redevelopment was part of the city of San Francisco's HOPE SF program, a major initiative to transform the city's aging public housing structures, which were modeled from the Federal HOPE

VI program. This activity was complex due to the inherent nature of LIHTC transactions and the involvement of multiple funding sources including the city and county of San Francisco.

- WFBNA provided a \$51 million equity investment for this LIHTC development. This development was along the Oakland Estuary that separated downtown Oakland from the island city of Alameda, known as Brooklyn Basin, that was redeveloped as part of a master-planned community with public parks, trails, and waterfront access. This 130-unit LIHTC development was located in Oakland, California, with its units restricted to tenants with income at or below 60 percent of the AMI. Twenty-six of the 130 units provided housing for the homeless, chronically homeless, formerly homeless, or those diagnosed with a mental health disability under the state of California's No Place Like Home program.
- WFBNA provided a \$9.5 million NMTC investment in Alameda County. The investment financed an early learning center in Cherryland for low-income children and families who needed access to high quality childcare and family support resources. The Cherryland neighborhood in Hayward had one of the highest needs for early learning. However, it was the least served neighborhood per capita in Alameda County. The facility provided year-round, full-day care and education for up to 100 children from birth to age five and offered programs to address the distinct education gaps in this community.

Broader Statewide Investments

WFBNA had one prior period investment totaling \$1.5 million with a purpose, mandate, or function to serve one or more AAs in the state. This LIHTC investment supported the creation or preservation of affordable housing in the state. This investment was given positive consideration and supported the bank's overall performance under the Investment Test in the state of California.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Bakersfield, MSA, Chico MSA, El Centro MSA, Redding CSA, Sacramento CSA, Salinas MSA, San Luis Obispo-Paso Robles MSA, Santa Maria MSA, Visalia MSA, California Combined Non-MSA was consistent with the bank's overall performance under the Investment Test in the full-scope areas.

SERVICE TEST

The bank's performance under the Service Test in the state of California is rated High Satisfactory. Performance in the limited-scope areas had a neutral effect on the overall Service Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Fresno CSA was adequate, the performance in the Los Angeles CSA and San Diego MSA was good, and the performance in the San Jose CSA was excellent.

Retail Banking Services

Service delivery systems were accessible to geographies and individuals of different income levels in the bank's full-scope AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Fresno CSA	1.6	19	2.1	0.0	26.3	21.1	47.4	6.8	32.9	24.0	34.5
Los Angeles CSA	38.1	414	45.3	3.6	22.7	29.5	43.2	7.6	28.6	29.4	33.8
San Diego MSA	7.8	80	8.8	6.3	13.8	40.0	40.0	8.9	23.6	32.5	34.7
San Jose CSA	42.4	263	28.8	7.2	25.9	28.5	37.6	8.7	22.9	36.2	31.8
Bakersfield MSA	0.8	12	1.3	16.7	8.3	33.3	41.7	9.7	23.3	31.8	33.0
Chico MSA	0.3	6	0.7	0.0	16.7	83.3	0.0	3.9	26.2	46.6	23.3
El Centro MSA	0.2	4	0.4	0.0	100.0	0.0	0.0	0.0	41.5	26.4	29.7
Redding CSA	0.2	3	0.3	0.0	66.7	33.3	0.0	0.0	26.4	56.1	17.5
Sacramento CSA	5.5	16	1.8	7.8	26.6	39.1	26.6	8.6	23.0	32.9	35.4
Salinas MSA	0.9	16	1.8	0.0	18.8	31.3	50.0	3.1	26.0	36.0	32.1
San Luis Obispo MSA	0.4	6	0.7	0.0	66.7	33.3	0.0	0.0	13.8	65.8	14.8
Santa Maria MSA	0.9	12	1.3	16.7	33.3	25.0	25.0	12.2	25.8	29.3	32.0
Visalia MSA	0.4	4	0.4	0.0	50.0	25.0	25.0	2.4	33.6	31.9	31.9
California Combined Non-MSA	0.5	11	1.2	0.0	54.5	36.4	9.1	2.1	19.9	53.0	24.4
Total	100.0	914	100.0	5.3	24.3	31.0	38.7	7.8	26.3	32.4	33.0
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Fresno CSA	0	1	0	-1	0	0
Los Angeles CSA	1	49	-1	-5	-14	-26
San Diego MSA	0	17	0	-2	-7	-8
San Jose CSA	1	28	0	-6	-7	-14
Bakersfield MSA	0	2	0	0	0	-2
Chico MSA	0	0	0	0	0	0
El Centro MSA	0	0	0	0	0	0
Redding CSA	0	0	0	0	0	0
Sacramento CSA	1	15	-1	1	-6	-8
Salinas MSA	0	0	0	0	0	0
San Luis Obispo MSA	0	1	0	0	0	-1
Santa Maria MSA	0	0	0	0	0	0
Visalia MSA	0	0	0	0	0	0
California Combined Non-MSA	0	2	0	0	-1	-1
Total	3	115	-2	-13	-35	-60
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.						

Fresno CSA

WFBNA's service delivery systems were accessible to geographies and individuals of different income levels in the Fresno CSA. WFBNA operated 19 branches in the AA, comprising five branches in moderate-income geographies, four branches in middle-income geographies, nine branches in upper-income geographies, and one branch in a geography without an income designation. The distribution of branches in low-income geographies was significantly below the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies was near to the distribution of the population in moderate-income geographies. The distribution was augmented by two branches in middle- and upper-income geographies that were within close proximity to serve low-income areas and two branches in middle- and upper-income geographies that were within close proximity to and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches had adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were

opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the 14 branches opened on Saturdays, five were located in moderate-income geographies.

Los Angeles CSA

WFBNA's service delivery systems were accessible to geographies and individuals of different income levels in the Los Angeles CSA. WFBNA operated 414 branches in the AA, comprising 15 branches in low-income geographies, 94 branches in moderate-income geographies, 122 branches in middle-income geographies, 179 branches in upper-income geographies, and four branches in geographies without an income designation. The distribution of branches in low-income geographies was well below the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies was near to the distribution of the population in moderate-income geographies. The distribution was augmented by seven branches in middle- and upper-income geographies that were within close proximity to serve low-income areas and 34 branches in middle- and upper-income geographies that were within close proximity to and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches had adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the 308 branches opened on Saturdays, 89 were located in low- and moderate-income geographies

San Diego MSA

WFBNA's service delivery systems were accessible to geographies and individuals of different income levels in the San Diego MSA. WFBNA operated 80 branches in the AA, comprising five branches in low-income geographies, 11 branches in moderate-income geographies, 32 branches in middle-income geographies, and 32 branches in upper-income geographies. The distribution of branches in low-income geographies was near to the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies was below the distribution of the population in moderate-income geographies. The distribution was augmented by eight branches in middle- and upper-income geographies that were within close proximity to and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches had generally not adversely affected the accessibility of its delivery systems, particularly in low- and

moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the 47 branches opened on Saturdays, 11 were located in low- and moderate-income geographies.

San Jose CSA

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the San Jose CSA. WFBNA operated 263 branches in the AA, comprising 19 branches in low-income geographies, 68 branches in moderate-income geographies, 75 branches in middle-income geographies, 99 branches in upper-income geographies, and two branches in geographies without an income designation. The distribution of branches in low-income geographies was near to the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies. The distribution was augmented by eight branches in middle- and upper-income geographies that were within close proximity to serve low-income areas and 16 branches in middle- and upper-income geographies that were within close proximity to and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations. Despite the closures, its service delivery systems remained readily accessible.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday and 150 of the 263 branches had Saturday hours, 122 branches from 9:00 a.m. to 12:00 p.m. Of the 150 branches opened on Saturdays, 56 were located in low- and moderate-income geographies.

Community Development Services

WFBNA provided a relatively high level of CD services.

Fresno CSA

WFBNA provided a limited level of CD services in the Fresno CSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 15 CD service activities during the evaluation period. All of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. Financial education comprised 60 percent of the CD service activities, and the remaining activities consisted of board membership in organizations that served the low- and moderate-income communities. The bank's assistance provided was responsive to the identified needs in the AA. The following is an example of CD services provided in this AA:

- WFNBA employees provided 14 hours of membership on the board of directors of a CDFI that was a microloan lender and provided affordable nontraditional small business capital to refugee farmers and nonprofit entities in Fresno. The CDFI also provided capital for housing projects, and business development ventures in economically distressed communities. This activity was responsive to the identified need for small business growth and stability by providing community development services focusing on economic development during the evaluation period.

Los Angeles CSA

WFBNA was a leader in making CD services in the Los Angeles CSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 638 CD service activities during the evaluation period. A majority (93 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The other CD services were targeted to affordable housing (6 percent), and the remaining activities aimed at economic development and revitalization and stabilization. Financial education comprised 58 percent of the CD service activities, and board membership in organizations that provide assistance to low- and moderate-income communities comprised 34 percent of CD activities. Other community development activities included ongoing outreach and tax preparation services. The bank's assistance provided was responsive to the identified needs in the AA. The following are examples of CD services provided in this AA:

- WFNBA team members provided 96 hours of board service for an organization in Orange County that advocated for mentoring and coaching of abandoned, abused, and neglected foster care children. The organization served over a thousand children who moved through Orange County's welfare system because of abuse or neglect. The organization assisted these children in navigating the complex child welfare system while balancing school and home life.
- WFBNA employees provided 60 hours of board membership to an organization in the Los Angeles County that served low- and moderate-income communities through financial education and counseling, affordable mortgage lending, construction project management services, and neighborhood revitalization. This organization reported that since 1984, it has developed and rehabilitated more than 27,000 housing and commercial units, placed 4.8 million families on the road to homeownership, created 255 block clubs, employed over 265 neighborhood youth, and reinvested more than \$8.5 billion back into some of Los Angeles County's low- and moderate-income neighborhoods.

- WFBNA employees provided 40 hours of board service and financial education for a nonprofit organization that provided the basic necessities of life, such as food and shelter, to people struggling with poverty, homelessness, and HIV/AIDS in Los Angeles County.

San Diego MSA

WFBNA provided a relatively high level of CD services in the San Diego MSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 87 CD service activities during the evaluation period. A majority (68 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The other CD services were targeted to affordable housing (32 percent). Board activity comprised 64 percent of CD service activities, and financial education comprised 30 percent of the CD service activities. The remaining activities provided outreach and technical expertise to nonprofit organizations that cater to low- and moderate-income communities. The bank's assistance provided was responsive to the identified needs in the AA. The following is an example of CD services provided in this AA:

- WFBNA employees responded to the need for affordable housing and provided 50 hours of board membership to an organization that created homeownership opportunities by developing, rehabilitating, preserving, and operating affordable apartment communities in San Diego and throughout California. The organization also connected low- and moderate-income communities to tools and resources to attain financial stability, improve their health and overall well-being, and set their children up for success in their education and in the community.

San Jose CSA

WFNBA was a leader in making CD services in San Jose CSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 373 CD service activities during the evaluation period. A majority (75 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The other CD services were targeted to affordable housing (21 percent), economic development (3 percent), and revitalization and stabilization (1 percent). Board membership comprised 44 percent, and financial education comprised 39 percent of the CD service activities. Other activities included ad hoc outreach and support to these organizations, and tax preparation assistance. The bank's assistance provided was responsive to the identified needs in the AA. The following are examples of CD services provided in this AA:

- WFBNA employees provided 51 hours of support serving on the board of a nonprofit organization that developed and managed affordable housing for the elderly that were nearly homeless or lived in substandard conditions due to limited income. As a result of their efforts, this organization had developed and managed 19 affordable housing properties with 671 apartments accommodating over 700 seniors with limited income, and several more properties in development. This activity was responsive to the identified need for affordable housing.
- WFBNA employees provided 50 hours of financial education to members of a nonprofit organization that was an affiliate of a worldwide program delivering educational programming focused on financial education, work readiness, and entrepreneurship to students from kindergarten through high school. According to the organization, a majority of its clients were low- and moderate-

income families. This activity was responsive to the identified need of community services within the AA.

- WFBNA employees provided 48 hours of board service for an organization that addressed the cause of homelessness by providing shelters and programs to equip their clients with the skills that lead to self-sufficiency. The programs offered to low- and moderate-income families included counseling, nutrition classes, education in basic life skills, parenting classes, help with resume, employment guidance, and homework assistance for children who resided in the shelters. According to the organization, 100 percent of its clients were low- and moderate-income families. This activity was responsive to the need for both community services and affordable housing.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance in the Bakersfield MSA and California Combined Non-MSA was consistent with the bank's overall performance under the Service Test in the full-scope areas. The bank's performance in the El Centro MSA, Redding CSA, Sacramento CSA, San Luis Obispo MSA, Santa Maria MSA, and Visalia MSA was stronger than the bank's overall performance under the Service Test in the full-scope areas. Performance was stronger primarily due to greater accessibility of retail banking services in low- and moderate-income areas. The bank's performance in the Chico MSA and Salinas MSA was weaker than the bank's overall performance under the Service Test in the full-scope areas. Performance was weaker primarily due to lower accessibility of retail banking services in low- and moderate-income areas.

State of Colorado

CRA rating for the State of Colorado²⁷: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AAs.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments that demonstrated excellent responsiveness to credit and economic development needs, often in a leadership position. The bank made significant use of innovative and complex investments to support CD initiatives.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided a relatively high level of CD services.

Description of Institution's Operations in the State of Colorado

The state of Colorado was WFBNA's eighth largest rating area based on its total deposits in the state. As of June 30, 2021, the bank maintained approximately \$40.9 billion or 2.8 percent of its total domestic deposits in branches within the state. Of the 111 depository financial institutions operating in the bank's AAs within the state, WFBNA, with a deposit market share of 21.5 percent, was the largest in the state. Other top depository financial institutions in the bank's AAs within the state based on market share included U.S. Bank, N.A. (12.7 percent), JPMorgan Chase Bank, N.A. (12.6 percent), and FirstBank (12 percent). As of December 31, 2021, the bank operated 135 branches and 333 ATMs in the state. WFBNA delineated 21 AAs within the state; however, the OCC combined, analyzed, and presented those AAs at the CSA level where possible for purposes of this evaluation. This resulted in the following six AAs: Colorado Springs, CO MSA (Colorado Springs MSA), Denver-Aurora, CO CSA (Denver CSA), Fort Collins, CO MSA (Fort Collins MSA), Grand Junction, CO MSA (Grand Junction MSA), Pueblo-Canon City, CO CSA (Pueblo CSA), and Colorado Combined Non-MSA. The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries

Denver CSA

The following table provides a summary of the demographics, including housing and business information for the Denver CSA.

27 This rating only reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Denver CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	766	8.2	23.5	34.1	33.0	1.2
Population by Geography	3,284,952	8.6	23.9	34.4	33.0	0.1
Housing Units by Geography	1,334,388	8.2	23.3	36.2	32.3	0.0
Owner-Occupied Units by Geography	800,469	4.3	18.7	36.0	40.9	0.0
Occupied Rental Units by Geography	458,444	14.7	31.2	35.6	18.4	0.0
Vacant Units by Geography	75,475	10.1	23.9	41.2	24.7	0.0
Businesses by Geography	616,981	6.4	19.7	33.2	40.5	0.3
Farms by Geography	13,090	6.3	19.1	36.4	37.9	0.2
Family Distribution by Income Level	799,082	21.3	17.5	20.5	40.7	0.0
Household Distribution by Income Level	1,258,913	23.7	16.4	18.0	41.9	0.0
Median Family Income MSA - 14500 Boulder, CO MSA		\$96,926	Median Housing Value			\$286,161
Median Family Income MSA - 19740 Denver-Aurora-Lakewood, CO MSA		\$80,820	Median Gross Rent			\$1,078
Median Family Income MSA - 24540 Greeley, CO MSA		\$70,457	Families Below Poverty Level			7.9%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$35,229 to \$48,463 and moderate-income families earned at least \$35,229 to \$48,463 and less than \$56,366 to \$77,541, depending on the MSA. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Depending on the MSA, this calculated to a maximum monthly mortgage payment between \$881 and \$1,212 for low-income borrowers and between \$1,409 and \$1,939 for moderate-income borrowers, depending on the MSA. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,536. Low-income borrowers would be challenged to afford a mortgage loan in this AA.

Denver-Aurora-Lakewood, CO MSA (Denver MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Denver MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Denver MSA area is an attractive tourist destination with proximity to the nearby Rocky Mountains. The area has a high concentration of dynamic, knowledge-based industries, a strong in-migration and population growth, skilled workforce, and high employment diversity. The area's weaknesses included elevated cost of living relative to other Mountain West metro areas and significantly overvalued housing market and low and falling affordability. The Denver MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Professional and Business Services, Government, Education and Health Services, Retail Trade, and Hospitality Services. Major employers in

the Denver MSA include HealthONE, UCHealth: University of Colorado Hospital, Lockheed Martin Corp., United Airlines, and Children’s Hospital Colorado. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Denver MSA was 5.5 percent compared to the national unemployment rate of 3.7 percent.

Boulder, CO MSA (Boulder MSA)

Information from Moody’s Analytics indicated that at the end of the evaluation period, the Boulder MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Boulder MSA has deep ties to technology across a broad range of industries, an extremely high educational attainment, and above-average per capita income and superior consumer credit quality. The weaknesses included high living costs relative to nearby areas, high employment volatility due to exposure to cyclical industries, and single-family housing was overvalued. The Boulder MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Professional and Business Services, Government, Education and Health Services, and Manufacturing. Major employers in the Boulder MSA include University of Colorado, Medtronic, Boulder Community Health, Ball Corp., and IBM Corp. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Boulder MSA was 4.4 percent compared to the national unemployment rate of 3.7 percent.

Greeley, CO MSA (Greeley MSA)

Information from Moody’s Analytics indicated that at the end of the evaluation period, the Greeley MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Greeley MSA has a strong factory base with exposure to noncyclical food manufacturing an exceptionally strong population growth, robust net migration and a large base of working age residents. The weaknesses included reliance on cyclical energy which creates high employment volatility, low educational attainment especially relative to the rest of Colorado. The Greeley MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Government, Manufacturing, Construction, Professional and Business Services, Retail Trade, and Education and Health Services. Major employers in the Greeley MSA include JBS meat wholesalers, Banner Health Systems, and Vestas. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Boulder MSA was 5.7 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Denver CSA. The organizations included one affordable housing organization and one small business development organization. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank’s needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing.
- Affordable for-sale housing.
- Small business lending to access capital needs.

- Homeless services.
- Financial literacy/education.
- Credit counseling.
- Technical Assistance to small businesses.

Opportunities for participation by financial institutions included the following:

- Lending and investment in affordable housing.
- Supporting community development services such as financial literacy.
- Working with the area's community development corporation network.
- Various state and local government partnership opportunities.

Scope of Evaluation in the State of Colorado

The OCC selected the Denver CSA for a full-scope review and based conclusions and ratings primarily on activity within this geographical area. This AA carried significant weight in determining the overall ratings for the state of Colorado because of the significance of the bank's presence in this AA.

During the evaluation period, the bank originated or purchased 117,166 home mortgage loans, small loans to businesses, and small loans to farms totaling \$19.8 billion in the state of Colorado. The bank's primary loan products in the rating area were small loans to businesses and home mortgage loans. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within each AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. In each of the AAs, the OCC placed more weight based on the number of loans on small loans to businesses versus home mortgage loans and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF COLORADO

LENDING TEST

The bank's performance under the Lending Test in the state of Colorado is rated Outstanding. Performance in the limited-scope areas had a positive effect on the overall Lending Test rating.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Denver CSA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Denver CSA	31,152	50,237	407	62	81,858	69.8	77.6
Colorado Springs MSA	5,346	5,799	60	11	11,216	9.6	6.9
Fort Collins MSA	2,943	3,848	78	6	6,875	5.9	3.9
Grand Junction MSA	1,741	1,736	63	4	3,544	3.0	2.1
Pueblo CSA	875	830	52	4	1,761	1.5	1.3
Colorado Combined Non-MSA	5,199	6,559	241	9	12,008	10.2	8.2
Total	47,256	69,009	901	96	117,262	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Denver CSA	12,271,910	1,357,580	9,050	332,029	13,970,569	68.8	77.6
Colorado Springs MSA	1,496,623	176,659	1,349	26,928	1,701,559	8.4	6.9
Fort Collins MSA	929,418	102,071	2,058	23,275	1,056,822	5.2	3.9
Grand Junction MSA	400,290	58,623	626	4,263	463,802	2.3	2.1
Pueblo CSA	162,263	26,491	952	15,233	204,939	1.0	1.3
Colorado Combined Non-MSA	2,648,255	187,346	13,750	46,485	2,895,836	14.3	8.2
Total	17,908,759	1,908,770	27,785	448,213	20,293,527	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

As of June 30, 2021, WFBNA had a deposit market share of 22.3 percent. The bank is the top ranked depository financial institution in the AA.

According to peer mortgage data for 2021, WFBNA had a market share of 2 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked ninth among 959 home mortgage lenders in this AA, which placed it in the top 1 percent of lenders. The top lenders in this AA based on market share were United Wholesale Mortgage (6.4 percent), Rocket Mortgage (5.3 percent), and JPMorgan Chase Bank, N.A. (4 percent).

According to peer small business data for 2021, WFBNA had a market share of 12.5 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked third out of 302 small business lenders, which placed it in the top 1 percent of lenders. The other top lenders in this AA based on market share were JPMorgan Chase Bank, N.A. (19.6 percent) and American Express National Bank (13.6 percent).

According to peer small farm data for 2021, WFBNA had a market share of 13.5 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked third out of 38 small farm lenders, which placed it in the top 8 percent of lenders. The other top lenders in this AA based on market share were Bank of Colorado (22.2 percent) and JPMorgan Chase Bank, N.A. (20.5 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AAs. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data. The bank's performance was good in the Denver CSA.

Home Mortgage Loans

Refer to Table O in the state of Colorado section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income was below both the percentage of owner-occupied housing units in low-income geographies and the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied housing units in moderate-income geographies but it was near to the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Colorado section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was near to the percentage of businesses in low-income geographies but it was below the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was near to both the percentage of businesses in moderate-income geographies and the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Colorado section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms adequate.

The bank's percentage of small loans to farms in low-income geographies was significantly below the percentage of farms in low-income geographies and it was below the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms

in moderate-income geographies was significantly below the percentage of farms in moderate-income geographies but it exceeded the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies in the Denver CSA. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes. The bank's performance was good in the Denver CSA.

Home Mortgage Loans

Refer to Table P in the state of Colorado section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but it was near to the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of home mortgage loans to moderate-income families by all lenders. Consideration was given to homeownership affordability challenges especially for low-income borrowers. The OCC placed more weight on the bank's performance against aggregate lenders in lending to low-income borrowers.

Small Loans to Businesses

Refer to Table R in the state of Colorado section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 29.8 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was well below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Colorado section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was adequate.

The bank did not collect or consider the GAR in the underwriting of approximately 42.5 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below the percentage of farms in the AA with GAR of \$1 million or less but it was near to the aggregate distribution of small loans to farms GAR of \$1 million or less by all lenders.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

WFBNA was a leader in making CD loans in the Denver CSA. WFBNA made 62 CD loans totaling approximately \$332 million, which represented 8 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 91 percent of these loans funded affordable housing that provided 1,922 units of affordable housing, 5.1 percent funded economic development, less than 1 percent funded revitalization and stabilization efforts, and 3.1 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$19.2 million construction loan to finance an LIHTC development in Denver, Colorado. All of the units were restricted to tenants earning less than 70 percent of the area MFI. The transaction was complex due to the involvement of multiple funding sources including the city of Denver, federal and state tax credits, and Mercy GAP fund.
- WFBNA provided a \$23 million construction loan that financed an LIHTC development located in Lafayette, Colorado. The complex provided 133 units targeted to seniors aged 55 and older and with income at or below 60 percent of the AMI.
- WFBNA renewed a \$600,000 working capital line of credit to support an organization that helped individuals find long-term stability and transition out of homelessness. The organization offered several specialized programs that provide additional services to families and refugees.

Product Innovation and Flexibility

WFBNA made extensive use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA made 8,211 loans under its flexible lending programs totaling \$388 million.

Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	216	74,700
Dream. Plan. Home.	71	16,600
PPP	7,924	296,700
Total	8,211	388,000

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Colorado MSA and Fort Collins MSA was consistent with the bank's overall performance under the Lending Test in the full-scope area. The bank's performance in the remaining limited-scope areas was weaker primarily due to adequate geographic and borrower distribution and lower levels of CD lending relative the needs and opportunities in these areas.

Refer to Tables O through T in the state of Colorado section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Colorado is rated Outstanding. Performance in the limited-scope areas had a positive effect on the overall Investment Test rating.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Denver CSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Denver CSA	122	188,314	224	267,345	346	72.1	455,659	71.0	40	141,904
Colorado Springs MSA	2	2,699	28	5,675	30	6.3	8,374	1.3	2	87
Fort Collins MSA	5	19,162	20	33,365	25	5.2	52,527	8.2	5	9,113
Grand Junction MSA	2	16,510	14	13,406	16	3.3	29,916	4.7	2	10,403
Pueblo CSA	2	7,558	9	138	11	2.3	7,695	1.2	2	525
Colorado Combined Non-MSA	5	23,241	35	36,821	40	8.3	60,062	9.4	3	269
Statewide***	3	5,659	9	21,990	12	2.5	27,650	4.3	3	881
Total	141	263,143	339	378,740	480	100.0	641,883	100.0	57	163,182
<p>The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.</p> <p>* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.</p> <p>** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.</p> <p>*** Statewide means investments in statewide programs that have a purpose, mandate, or function to serve one or more of the bank's assessment areas within the state. Due to rounding, totals may not equal 100.0%</p>										

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$455.6 million and represented 11 percent of the bank's tier 1 capital allocated to the AA. The investments also included 188 grants and donations totaling \$41.8 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 53.2 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 28.6 percent that focused on community services targeted to low- and moderate-income individuals, and 18.2 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 5,205 units of affordable housing in the AA.

The bank made significant use of innovative or complex investments to support CD initiatives. Approximately 68.4 percent of current period investment dollars were complex LIHTC and NMTC investments. The following are examples of CD investments made in this AA:

- WFBNA provided a \$11.6 million equity investment to finance an affordable housing development. The LIHTC development was located in Denver, Colorado, with all 82 units restricted to tenants earning less than 70 percent of the area median family income. The transaction is complex due to the inherent nature of LIHTC transactions and the involvement of multiple funding sources including the city of Denver, federal and state tax credits, and Mercy GAP fund.

- WFBNA provided a \$24.4 million equity investment to finance an LIHTC affordable housing development. The development was located in Commerce City, Colorado, with 223 units restricted to tenants earning less than 60 percent of the AMI. The site was near transit, a grocery store, and schools.
- WFBNA provided \$300,000 in grant funding to support an organization's transitional program that is designed to help individuals find long-term stability and transition out of homelessness. This innovative service provided homeless-but-working families secure, temporary housing as they worked through a rigorous one-year life skills methodology consisting of extensive mentoring, case management, financial education, housing-hunting and other services.

Broader Statewide Investments

WFBNA had 12 current and prior period investments totaling \$27.6 million with a purpose, mandate, or function to serve one or more AAs in the state. These investments were given positive consideration and supported the bank's overall performance under the Investment Test in the state of Colorado.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Fort Collins MSA, Grand Junction MSA, Pueblo CSA and the Colorado Combined Non-MSA was consistent with the bank's overall performance under the Investment Test in the full-scope areas. Performance in the Colorado Springs MSA was weaker than the bank's overall performance under the Investment Test in the full-scope areas primarily due to lower levels of CD investments relative to the bank's presence and capacity to invest in those AAs.

SERVICE TEST

The bank's performance under the Service Test in the state of Colorado is rated Outstanding. Performance in the limited-scope areas had a neutral effect on the overall Service Test rating.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Denver CSA was excellent.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's full-scope AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Denver CSA	77.6	87	64.4	5.7	24.1	44.8	24.1	8.6	23.9	34.4	33.0
Colorado Springs MSA	6.9	13	9.6	7.7	15.4	38.5	38.5	4.6	26.0	39.7	28.3
Fort Collins MSA	3.9	7	5.2	0.0	14.3	71.4	14.3	3.5	25.8	48.8	21.9
Grand Junction MSA	2.1	4	3.0	0.0	50.0	50.0	0.0	0.0	24.5	56.4	19.1
Pueblo CSA	1.3	4	3.0	0.0	25.0	75.0	0.0	4.0	32.0	31.5	27.0
Colorado Combined Non-MSA	8.2	20	14.8	0.0	5.0	50.0	45.0	0.0	8.2	45.7	46.1
Total	100.0	135	100.0	4.4	20.7	47.4	26.7	6.6	23.4	37.5	32.1
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Denver CSA	1	12	-1	-3	-5	-2
Colorado Springs MSA	0	4	-2	0	-1	-1
Fort Collins MSA	0	1	0	-1	0	0
Grand Junction MSA	0	0	0	0	0	0
Pueblo CSA	0	1	0	0	-1	0
Colorado Combined Non-MSA	0	3	0	-1	0	-2
Total	1	21	-3	-5	-7	-5
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.						

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Denver CSA. WFBNA operated 87 branches in the AA, comprising five branches in low-income geographies, 21 branches in moderate-income geographies, 39 branches in middle-income geographies, 21 branches in upper-income geographies, and one branch in a geography without an income designation. The distribution of branches in low-income geographies was below the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies. The distribution was augmented by two branches in middle- and upper-income geographies that were within close proximity to serve low-income areas and seven branches in middle- and upper-income geographies that were within close proximity to and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations. Despite the closures, its service delivery systems remained readily accessible.

Services, including, where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the 49 branches opened on Saturdays, five were located in low-income geographies and 13 were located in moderate-income geographies.

Community Development Services

WFBNA provided a relatively high level of CD services in the Denver CSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 149 CD service activities during the evaluation period. A majority (79 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The other CD services were targeted to affordable housing (17 percent), and the remaining were targeted to revitalization and stabilization and economic development. Board membership comprised 60 percent, and financial education comprised 31 percent of the CD service activities. The remaining activities provided ad hoc support and outreach for technical assistance to organizations that cater to low- and moderate-income communities, and tax preparation for these communities. The bank's assistance provided was responsive to the identified needs in the AA. The following are examples of CD services provided in this AA:

- WFBNA employees responded to the need for homeless services and served 48 hours on the board of an organization located in Denver, Colorado that assisted survivors of domestic violence and their children through an emergency shelter, a counseling center, and an extended stay program. All of the adults, children, and youth who went to this organization had access to a full range of individual counseling, group sessions, advocacy, and safety planning.
- WFBNA provided 31 hours of board membership and ad hoc technical assistance to a Community Development Corporation (CDC) that has served the Denver's underserved Community since 1973 with a focus on affordable housing, small businesses, and asset creation. This organization focused on deep-rooted economic disadvantages in low- and moderate-income communities by securing and coordinating resources for neighborhood revitalization, developing needed shopping areas and services, fostering minority and neighborhood business ownership, job creation and retention, increasing home ownership and affordable rental opportunities, neighborhood organizing and hosting cultural events and activities that showcase the underserved populations. This activity was responsive to all forms of community development initiatives, including community services, affordable housing, economic development, and revitalization and stabilization.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Grand Junction MSA and Pueblo CSA was consistent with the bank's performance under the Service Test in the full-scope area. The bank's performance in the Colorado Spring MSA, Fort Collins MSA, and Colorado Combined Non-MSA was weaker than the bank's overall performance under the Service Test in the full-scope area. Performance was weaker primarily due to lower accessibility of retail banking services in low- and moderate-income areas.

State of Connecticut

CRA rating for the State of Connecticut²⁸: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited an excellent geographic distribution of loans in its AAs.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank was a leader in making CD loans. CD lending had a neutral effect on the Lending Test conclusion as it further supported the bank's already excellent lending performance.
- The bank had an excellent level of qualified CD investments that demonstrated excellent responsiveness to credit and economic development needs, often in a leadership position. The bank rarely used innovative and complex investments to support CD initiatives.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.
- The bank provided a limited level of CD services.

Description of Institution's Operations in the State of Connecticut

The state of Connecticut was WFBNA's 43rd largest rating area based on its total deposits in the state. As of June 30, 2021, the bank maintained approximately \$1.1 billion or 0.1 percent of its total domestic deposits in branches within the state. Of the 27 depository financial institutions operating in the bank's AAs within the state, WFBNA, with a deposit market share of 1.8 percent, was the ninth largest. The top depository financial institutions in the bank's AAs within the state based on market share included Bank of America (47.5 percent), People's United Bank, N.A. (12.6 percent), Webster Bank, N.A. (8.6 percent), Liberty Bank (7.3 percent), and TD Bank, N.A. (7.3 percent). As of December 31, 2021, the bank operated seven branches and eight ATMs in the state. WFBNA delineated the Hartford-East Hartford-Middletown, CT MSA (Hartford MSA) as its only AA within the state. The AA met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

Hartford MSA

The following table provides a summary of the demographics, including housing and business information for the Hartford MSA.

²⁸ This rating only reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Hartford MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	290	15.9	14.8	36.6	30.7	2.1
Population by Geography	1,214,056	12.5	14.1	37.7	34.3	1.3
Housing Units by Geography	507,998	13.2	14.9	39.3	32.6	0.0
Owner-Occupied Units by Geography	313,532	3.7	10.9	42.5	42.8	0.0
Occupied Rental Units by Geography	153,414	29.5	22.5	33.3	14.7	0.1
Vacant Units by Geography	41,052	24.3	17.2	37.1	21.4	0.1
Businesses by Geography	141,476	10.7	12.9	39.8	36.2	0.3
Farms by Geography	4,188	3.9	8.9	41.1	46.1	0.0
Family Distribution by Income Level	306,718	22.3	16.5	20.7	40.5	0.0
Household Distribution by Income Level	466,946	25.7	14.8	17.3	42.2	0.0
Median Family Income MSA - 25540 Hartford-East Hartford-Middletown, CT MSA		\$88,016	Median Housing Value			\$238,867
			Median Gross Rent			\$1,005
			Families Below Poverty Level			7.7%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$44,008 and moderate-income families earned at least \$44,008 and less than \$70,413. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$1,100 for low-income borrowers and \$1,760 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,282. Low-income borrowers would find it challenging to afford a mortgage loan for a median-priced home in this AA.

Information from Moody's Analytics indicated that at the end of the evaluation period, the Hartford MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Hartford area has a well-educated workforce and above-average wages, lower living costs, and lower business costs than in Boston and New York, and housing was affordable. The Hartford MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Government, Professional and Business Services, Manufacturing, and Financial Activities. Major employers in the Hartford MSA include Pratt & Whitney/United Technologies and University of Connecticut. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Hartford MSA was 6.3 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by three local economic development organizations that were contacted during the evaluation period and served the AA. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of the contacts and bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing
- Affordable for-sale single family housing
- Program 8 rental assistance
- Financial literacy/education
- Tax preparation services
- Credit counseling
- Small business loans
- Technical assistance to small businesses

Opportunities for participation by financial institutions included the following:

- Lending and investment in affordable housing
- Supporting community development services such as financial literacy
- Providing products such as low-cost checking or savings accounts
- Various state and local government partnership opportunities

Scope of Evaluation in the State of Connecticut

The OCC selected the Hartford MSA for a full-scope review. The overall ratings for the state of Connecticut were based solely on performance in the Hartford MSA.

During the evaluation period, the bank originated or purchased 8,030 home mortgage loans, small loans to businesses, and small loans to farms totaling \$1.4 billion. The bank's primary loan products in the state of Connecticut were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within the AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. In the Hartford MSA, the OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF CONNECTICUT

LENDING TEST

The bank's performance under the Lending Test in Connecticut is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Hartford MSA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Hartford MSA	6,143	1,860	27	21	8,051	100.0	100.0
Total	6,143	1,860	27	21	8,051	100.0	100.0

*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.
Source: Bank Data; Due to rounding, totals may not equal 100.0%

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Hartford MSA	1,355,601	75,458	721	123,974	1,555,754	100.0	100.0
Total	1,355,601	75,458	721	123,974	1,555,754	100.0	100.0

*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.
Source: Bank Data; Due to rounding, totals may not equal 100.0%

As of June 30, 2021, WFBNA had a deposit market share of 1.8 percent. The bank ranked ninth among 27 depository financial institutions placing it in the top 34 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 3.1 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked fourth among 534 home mortgage lenders in this AA, which placed it in the top 1 percent of lenders. The top lenders in this AA based on market share were Rocket Mortgage (7.3 percent), Webster Bank, N.A. (3.2 percent), and CBNA (3.1 percent).

According to peer small business data for 2021, WFBNA had a market share of 1.6 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked 16th out of 181 small business lenders, which placed it in the top 9 percent of lenders. The top lenders in this AA based on market share were American Express National Bank (16.8 percent), Bank of America, N.A. (10.1 percent), and Webster Bank, N.A. (8 percent).

According to peer small farm data for 2021, WFBNA had a market share of 4.5 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked seventh out of 15 small farm lenders, which placed it in the bottom 47 percent of lenders. The top lenders in this AA based on market share were U.S. Bank, N.A. (29.3 percent), JPMorgan Chase Bank, N.A. (19.1 percent), and Bank of America, N.A. (14.7 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with

available demographic information. The OCC also considered any relevant performance context information and aggregate lending data. The bank's performance was ... in the Hartford MSA.

Home Mortgage Loans

Refer to Table O in the state of Connecticut section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans in low-income geographies exceeded the percentage of owner-occupied housing units in low-income geographies and it approximated the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was near to the percentage of owner-occupied housing units in moderate-income geographies but it exceeded the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Connecticut section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

The bank's percentage of small loans to businesses in low-income was well below both the percentage of businesses in low-income geographies and the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in moderate-income geographies and the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Connecticut section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was very poor.

The bank did not originate or purchase any small loans to farms in low- and moderate-income geographies.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies in the Hartford MSA. The OCC analyzed geographic lending patterns of home mortgage

loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the state of Connecticut section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and it was below the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families but it was below the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Connecticut section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was adequate.

The bank did not collect or consider the GAR in the underwriting of approximately 45.5 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was well below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Connecticut section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was very poor.

Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was significantly below both the percentage of farms in the AA with GAR of \$1 million or less and the aggregate distribution of small loans to farms GAR of \$1 million or less by all lenders.

Community Development Lending

WFBNA was a leader in making CD loans. CD lending had a neutral effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

WFBNA was a leader in making CD loans in the Hartford MSA. WFBNA made 21 CD loans totaling approximately \$124 million, which represented 90.1 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 97.3 percent of these loans funded affordable housing that provided 416 units of affordable housing, less than 1 percent funded economic development, 1 percent funded revitalization and stabilization efforts, and 1.5 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA renewed a \$100 million working capital line of credit to a housing finance authority that provided down payment assistance, homebuyer education, and counseling to low- and moderate-income individuals.
- WFBNA provided mortgage refinancing of \$7.7 million and \$8.35 million, respectively, for an affordable housing development in Bristol, Connecticut. The 173-unit development was restricted to seniors aged 62 and older and non-elderly disabled tenants earning up to 50 percent of the AMI.

Product Innovation and Flexibility

WFBNA made limited use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA made 309 loans under its flexible lending programs totaling \$26.6 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	39	10,000
Dream. Plan. Home.	28	4,800
PPP	242	11,800
Total	309	26,600

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Connecticut is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Hartford MSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Hartford MSA	3	8,998	67	8,132	70	93.3	17,129	50.5	3	305
Statewide***	1	16,310	4	488	5	6.7	16,799	49.5	1	1,364
Total	4	25,308	71	8,620	75	100.0	33,928	100.0	4	1,669
* '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 tracked and recorded by the institution's financial reporting system. *** Statewide means investments in statewide programs that have a purpose, mandate, or function to serve one or more of the bank's assessment areas within the state. Due to rounding, totals may not equal 100.0%										

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$17.1 million and represented 12.4 percent of the bank's tier 1 capital allocated to the AA. The investments also included 47 grants and donations totaling \$1.5 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 42.9 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 42.9 percent that focused on community services targeted to low- and moderate-income individuals, and 14.3 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 220 units of affordable housing in the AA.

The bank rarely used innovative and complex investments to support CD initiatives. None of the current period investments were complex. The following are examples of CD investments made in this AA:

- WFBNA provided a \$250,000 grant to a CDFI through the Open for Business Fund. The Hartford, Connecticut CDFI served small businesses throughout Connecticut with financial assistance, coaching, and education. The organization also used the funding to provide technical assistance to almost 100 small businesses, preserve more than 10 businesses, and create four new businesses, which in turn saved or created more than 120 jobs. The investment was responsive to the need for small business technical assistance.
- WFBNA provided two grants totaling \$30,000 to support a local organization's financial literacy programs. The nonprofit organization provided financial education to children from elementary through high school. During the grant application process, the organization estimated that 68 percent of its clients were low- and moderate-income.

Broader Statewide Investments

WFBNA had five current and prior period investments totaling \$16.8 million with a purpose, mandate, or function to serve one or more AAs in the state. These CD investments were primarily LIHTCs that supported the creation or preservation of affordable housing in the state. These investments were given positive consideration and supported the bank's overall performance under the Investment Test in the state of Connecticut.

SERVICE TEST

The bank's performance under the Service Test in the state of Connecticut is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Hartford MSA was good.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's full-scope AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Hartford MSA	100.0	7	100.0	14.3	14.3	57.1	14.3	12.5	14.1	37.7	34.3
Total	100.0	7	100.0	14.3	14.3	57.1	14.3	12.5	14.1	37.7	34.3
Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Hartford MSA	0	0	0	0	0	0
Total	0	0	0	0	0	0

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Hartford MSA. WFBNA operated seven branches in the AA, comprising one branch in low-income geographies, one branch in moderate-income geographies, four branches in middle-income geographies, and one branch in upper-income geographies. The distribution of branches in low-income geographies exceeded the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies.

WFBNA did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the six branches opened on Saturdays, one was located in a low-income geography and one was located in a moderate-income geography.

Community Development Services

WFBNA provided a limited level of CD services in the Hartford MSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 13 CD service activities during the evaluation period. A majority (77 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The other CD services were targeted to affordable housing, and revitalization and stabilization. Financial education comprised 62 percent of the CD service activities, and the remaining activities were focused on board membership, outreach and providing technical expertise, and tax preparation for low- and moderate-income communities. The bank's assistance provided was responsive to the identified needs in the AA.

State of Delaware

CRA rating for the State of Delaware²⁹: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a poor geographic distribution of loans in its AAs.
- The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments that demonstrated excellent responsiveness to credit and economic development needs, often in a leadership position. The bank made extensive use of innovative and complex investments to support CD initiatives.
- Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided few, if any, CD services.

Description of Institution's Operations in the State of Delaware

The state of Delaware was WFBNA's 49th largest rating area based on its total deposits in the state. As of June 30, 2021, the bank maintained approximately \$311.8 million or less than 1 percent of its total domestic deposits in branches within the state. Of the 18 depository financial institutions operating in the bank's AA within the state, WFBNA, with a deposit market share of 0.4 percent, was the seventh largest. The dominant depository financial institution in the bank's AA within the state based on market share was Discover Bank (93.1 percent). As of December 31, 2021, the bank operated two branches and three ATMs in the state. WFBNA delineated the Salisbury, DE MSA (Salisbury MSA) as its only AA within the state. The AA met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

Salisbury MSA

The following table provides a summary of the demographics, including housing and business information for the Salisbury MSA.

²⁹ This rating only reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Salisbury MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	54	0.0	9.3	64.8	24.1	1.9
Population by Geography	207,302	0.0	10.1	76.4	13.5	0.0
Housing Units by Geography	127,680	0.0	6.5	65.1	28.4	0.0
Owner-Occupied Units by Geography	62,989	0.0	6.5	77.0	16.4	0.0
Occupied Rental Units by Geography	18,194	0.0	16.2	69.1	14.7	0.0
Vacant Units by Geography	46,497	0.0	2.5	47.5	50.0	0.0
Businesses by Geography	17,572	0.0	8.4	71.0	20.6	0.0
Farms by Geography	918	0.0	7.3	82.6	10.1	0.0
Family Distribution by Income Level	55,052	20.1	18.2	21.2	40.4	0.0
Household Distribution by Income Level	81,183	22.0	16.8	18.7	42.4	0.0
Median Family Income MSA - 41540 Salisbury, MD-DE MSA		\$63,091	Median Housing Value			\$300,388
			Families Below Poverty Level			8.8%
			Median Gross Rent			\$971
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$31,546 and moderate-income families earned at least \$31,546 and less than \$50,473. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$789 for low-income borrowers and \$1,262 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,613. Low-income borrowers would find it challenging to afford a mortgage loan for a median-priced home in this AA.

Information from Moody's Analytics indicated that at the end of the evaluation period, the Salisbury MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Salisbury MSA has a business-friendly climate and attracted well-qualified workers from Pennsylvania, New Jersey and New York. The Salisbury MSA's recovery was nearly complete as about nine of every 10 jobs have been recouped, well ahead of the state and national recovery. Beach tourism continued to support jobs. At 19 percent of total employment, the Salisbury MSA has one of the highest concentrations of leisure/hospitality in the Northeast. The area's weaknesses included above average reliance on retail trade, low industrial diversity and high dependence on cyclical financial services. The Salisbury MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Leisure and Hospitality Services, Government, Retail Trade, Professional and Business Services, and Manufacturing. Major employers in the Salisbury MSA include Peninsula Regional Medical Center, Beebe Medical Center, Salisbury University, Perdue Farms Inc., Walmart Inc., and Harrison Group. The December 2021 non-seasonally adjusted

unemployment rate for the Salisbury MSA was 4.3 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local housing organizations and two local economic development organizations that were contacted during the evaluation period and served the AA. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of the contacts and bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing
- Affordable for-sale single family housing
- Rehabilitation of housing units
- Program 8 Rental Assistance
- Homeless services
- Mortgage payment assistance or deferrals
- Workforce development
- Financial literacy/education
- Small business lending in rural communities

Opportunities for participation by financial institutions included the following:

- Lending and investment in affordable housing
- Supporting community development services such as financial literacy
- Providing products such as affordable home loan products, down payment assistance and closing cost programs
- Sharing financial expertise in helping organizations to design programs that support small businesses

Scope of Evaluation in the State of Delaware

The OCC selected the Salisbury MSA for a full-scope review. The overall ratings for the state of Delaware were based solely on performance in the Salisbury MSA.

During the evaluation period, the bank originated or purchased 4,511 home mortgage loans, small loans to businesses, and small loans to farms totaling \$1.2 billion within the state of Delaware. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within the Salisbury MSA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. The OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF DELAWARE

LENDING TEST

The bank's performance under the Lending Test in the state of Delaware is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Salisbury MSA was good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Salisbury MSA	3,754	740	17	9	4,520	100.0	100.0
Total	3,754	740	17	9	4,520	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Salisbury MSA	1,161,361	22,289	287	8,262	1,192,199	100.0	100.0
Total	1,161,361	22,289	287	8,262	1,192,199	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

As of June 30, 2021, WFBNA had a deposit market share of less than 1 percent. The bank ranked seventh among 18 depository financial institutions placing it in the top 39 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 6.1 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked second among 445 home mortgage lenders in this AA, which placed it in the top 1 percent of lenders. The other top lenders in this AA based on market share were Rocket Mortgage (6.6 percent) and NVR Mortgage Finance, Inc. (3.2 percent).

According to peer small business data for 2021, WFBNA had a market share of 4.1 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked 10th out of 103 small business lenders, which placed it in the top 10 percent of lenders. The top lenders in this AA based on market share were American Express National Bank (17.2 percent), JPMorgan Chase Bank, N.A. (9.4 percent), and M&T Bank (8.7 percent).

According to peer small farm data for 2021, WFBNA had a market share of 3.2 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked ninth out of 19 small farm lenders, which placed it in the top 48 percent of lenders. The top lenders in this AA based on

market share were JPMorgan Chase Bank, N.A. (18.9 percent), U.S. Bank, N.A. (18.1 percent), and John Deere Financial, FSB (15.8 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited a poor geographic distribution of loans in its AA. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O in the state of Delaware section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was poor.

There were no low-income geographies. The bank's percentage of home mortgage loans in moderate-income geographies was significantly below the percentage of owner-occupied housing units in moderate-income geographies and it was well below the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Delaware section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was very poor.

There were no low-income geographies. The bank's percentage of small loans to businesses in moderate-income geographies was significantly below both the percentage of businesses in moderate-income geographies and the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies in the Salisbury MSA. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the state of Delaware section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and it was below the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was well below the percentage of moderate-income families and it was below the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Delaware section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 31.4 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

The bank was a leader in making CD loans in the Salisbury MSA. WFBNA made nine CD loans totaling approximately \$8.3 million, which represented 20.3 percent of the allocated tier 1 capital. CD loans were primarily made for affordable purposes. By dollar volume, 99.9 percent of these loans funded affordable housing that provided 50 units of affordable housing targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided an \$8.2 million construction loan to finance an affordable housing development. The 60-unit LIHTC development located in Millsboro, DE included 50 units restricted to households earning up to 60 percent of the AMI. This activity was complex due to the multiple funding sources, including the Delaware State Housing Authority's Housing Trust Funds, Housing Development Funds, and a COVID Gap Grant.

- WFBNA provided a \$20 million term loan to a nonprofit 501(c)(3) and CDFI of which, \$5,912 was allocated to the Salisbury MSA. The organization was dedicated to improving access to high-quality health and elder care, healthy foods, housing, and education for low-income communities across the country.

Product Innovation and Flexibility

WFBNA made limited use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA made 134 loans under its flexible lending programs totaling \$10.9 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	23	6,300
Dream. Plan. Home.	11	1,500
PPP	100	3,100
Total	134	10,900

INVESTMENT TEST

The bank's performance under the Investment Test in the state Delaware is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in Salisbury MSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Salisbury MSA	1	1,040	6	9,662	7	100.0	10,702	100.0	2	7,847
Total	1	1,040	6	9,662	7	100.0	10,702	100.0	2	7,847
* '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 tracked and recorded by the institution's financial reporting system. *** Statewide means investments in statewide programs that have a purpose, mandate, or function to serve one or more of the bank's assessment areas within the state. Due to rounding, totals may not equal 100.0%										

The bank had an excellent level of qualified CD investments and grants occasionally in a leadership position, particularly those that are not routinely provided by private.

The current and prior period qualified investments totaled \$10.7 million and represented 26.3 percent of the bank's tier 1 capital allocated to the AA. The investments also included five grants and donations totaling \$58,000 to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 100 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA. In total, the bank's investments helped create or retain 67 units of affordable housing in the AA.

The bank made extensive use of innovative or complex investments to support CD initiatives. Approximately 99.4 percent of current period investment dollars were complex LIHTC investments. The following are examples of CD investments made in this AA:

- WFBNA provided a \$9.6 million equity investment to finance an affordable housing development. This 60-unit LIHTC development located in Millsboro, Delaware included 50 units restricted to households earning up to 60 percent of the AMI. This activity was complex due to the inherent nature of LIHTC transactions and multiple funding sources, including the Delaware State Housing Authority's Housing Trust Funds, Housing Development Funds, and a COVID Gap Grant.
- WFBNA provided four grants totaling \$55,000 to a nonprofit organization in Milford, Delaware. The organization provided affordable housing and homebuyer education to low- and moderate-income people and emergency repairs for low-income homeowners throughout Delaware.
- WFBNA provided a \$10,000 grant to an organization whose mission was to provide decent, safe, and affordable housing solutions for people of modest means.

SERVICE TEST

The bank's performance under the Service Test in Delaware is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Salisbury MSA was adequate.

Retail Banking Services

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the bank's full-scope AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Salisbury MSA	100.0	2	100.0	0.0	0.0	0.0	100.0	0.0	10.1	76.4	13.5
Total	100.0	2	100.0	0.0	0.0	0.0	100.0	0.0	10.1	76.4	13.5
Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Salisbury MSA	0	0	0	0	0	0
Total	0	0	0	0	0	0
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.						

WFBNA's service delivery systems were reasonably accessible to geographies and individuals of different income levels in the Salisbury MSA. WFBNA's opportunities for providing retail banking services were limited as there were only two branches in the AA, neither of which was located in a low- and moderate-income geography. Additionally, there were no low-income geographies within the AA and only 10 percent of the population resided in moderate-income geographies.

WFBNA did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. The two branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. One branch in an upper-income geography was opened on Saturdays.

Community Development Services

WFBNA provided few, if any, CD services in the Salisbury MSA. Bank records showed that employees did not provide any CD service activities during the evaluation period.

State of Florida

CRA rating for the State of Florida³⁰: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited an excellent geographic distribution of loans in its AAs.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank made an adequate level of CD loans. CD lending had a neutral effect on the Lending Test conclusion as it further supported the bank's already excellent lending performance.
- The bank had an excellent level of qualified CD investments that demonstrated excellent responsiveness to credit and economic development needs, often in a leadership position. The bank made significant use of innovative and complex investments to support CD initiatives.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's full-scope AAs.
- The bank provided a relatively high level of CD services.

Description of Institution's Operations in the State of Florida

The state of Florida was WFBNA's third largest rating area based on its total deposits in the state. As of June 30, 2021, the bank maintained approximately \$104.4 billion or 7.1 percent of its total domestic deposits in branches within the state. Of the 185 depository financial institutions operating in the bank's AAs within the state, WFBNA, with a deposit market share of 13 percent, was the second largest. Other top depository financial institutions in the bank's AAs within the state based on market share included Bank of America, N.A. (20.5 percent), Truist Bank (10.4 percent), and JPMorgan Chase Bank, N.A. (7.8 percent). As of December 31, 2021, the bank operated 526 branches and 1,128 ATMs in the state. WFBNA delineated 28 AAs within the state; however, the OCC combined, analyzed, and presented those AAs at the CSA level where possible for purposes of this evaluation. This resulted in the following 16 AAs: Cape Coral-Fort Meyers-Naples, FL CSA (Cape Coral CSA), Crestview-Fort Walton Beach-Destin, FL MSA (Crestview MSA), Gainesville, FL MSA (Gainesville MSA), Homosassa Springs, FL MSA (Homosassa Springs MSA), Jacksonville, FL MSA (Jacksonville MSA), Miami-Port St. Lucie-Fort Lauderdale, FL CSA (Miami CSA), Ocala, FL MSA (Ocala MSA), Orlando-Lakeland-Deltona, FL CSA (Orlando CSA), North Port-Sarasota, FL CSA (North Port CSA), Palm Bay-Melbourne-Titusville, FL MSA (Palm Bay MSA), Panama City, FL MSA (Panama City MSA), Pensacola-Ferry Pass-Brent, FL MSA (Pensacola MSA), Sebring-Avon Park, FL MSA (Sebring MSA), Tallahassee, FL MSA (Tallahassee MSA), Tampa-St. Petersburg-Clearwater, FL MSA (Tampa MSA), and Florida Combined Non-MSA. The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries

³⁰ This rating only reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Jacksonville MSA

The following table provides a summary of the demographics, including housing and business information for the Jacksonville MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Jacksonville MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	262	7.6	26.3	37.8	26.7	1.5
Population by Geography	1,401,600	5.1	23.6	40.9	30.4	0.0
Housing Units by Geography	610,600	5.9	23.8	39.4	31.0	0.0
Owner-Occupied Units by Geography	339,445	3.4	19.7	41.3	35.6	0.0
Occupied Rental Units by Geography	183,261	8.3	30.5	38.4	22.8	0.0
Vacant Units by Geography	87,894	10.2	25.9	34.0	29.9	0.0
Businesses by Geography	252,282	4.3	21.8	34.9	39.0	0.0
Farms by Geography	6,387	3.4	21.2	44.2	31.2	0.0
Family Distribution by Income Level	343,061	21.8	17.4	20.0	40.9	0.0
Household Distribution by Income Level	522,706	23.7	16.5	17.7	42.2	0.0
Median Family Income MSA - 27260 Jacksonville, FL MSA		\$64,042	Median Housing Value			\$173,807
			Median Gross Rent			\$989
			Families Below Poverty Level			11.1%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$32,021 and moderate-income families earned at least \$32,021 and less than \$51,234 in the AA. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$801 for low-income borrowers and \$1,281 for moderate-income borrowers in the AA. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$933. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Information from Moody's Analytics indicated that at the end of the evaluation period, the Jacksonville MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Economic drivers in the MSA included logistics, financial services, and defense. Jacksonville benefits from being a low-cost center for financial services given its lower taxes and competitive office rents. The metro has an above average reliance on financial services and the industry had been a solid performer with hiring increasing at a rapid pace over the past year. The metro area is home to several naval stations which provided stability to the economy in terms of employment opportunities. The population growth, along with low interest rates and limited supply of housing had been driving up

housing prices at a faster pace than the nation on average. In turn, residential permitting had also picked up leading to local construction hiring. The Jacksonville MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Professional and Business Services, Retail Trade, Government, and Leisure and Hospitality Services. Major employers in the Jacksonville MSA include Naval Air Station Jacksonville, Baptist Health, Mayport Naval Station, Mayo Clinic, Florida Blue, and St. Vincent's Healthcare. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Jacksonville MSA was 2.9 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by four local organizations that were contacted during the evaluation period and served the Jacksonville MSA. The organizations included one affordable housing organization, one economic development organization that helped to attract and retain businesses in the area, and two community development organizations that help to address the causes and conditions of poverty. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Financial literacy/education
- Workforce development programs
- Affordable rental housing
- Affordable for-sale housing
- Credit counseling
- Banking and credit products

Opportunities for participation by financial institutions included the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Supporting community development services such as financial literacy
- Homebuyer education classes primarily for low- and moderate-income individuals
- Down payment assistance programs
- Flexible mortgage loans for low- and moderate-income individuals
- Board members for community organizations
- Low-cost checking accounts

Miami CSA

The following table provides a summary of the demographics, including housing and business information for the Miami CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Miami CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,362	5.9	26.9	30.2	34.0	2.9
Population by Geography	6,519,359	5.5	27.8	33.2	33.2	0.4
Housing Units by Geography	2,830,485	5.2	26.3	32.6	35.7	0.3
Owner-Occupied Units by Geography	1,434,256	2.4	21.7	35.1	40.6	0.1
Occupied Rental Units by Geography	869,371	9.8	35.6	30.9	23.2	0.4
Vacant Units by Geography	526,858	5.0	23.1	28.2	43.1	0.5
Businesses by Geography	1,798,011	4.1	21.7	29.4	43.7	1.1
Farms by Geography	25,530	4.7	24.8	32.2	38.0	0.4
Family Distribution by Income Level	1,494,049	22.7	17.1	17.9	42.3	0.0
Household Distribution by Income Level	2,303,627	24.9	15.7	16.7	42.8	0.0
Median Family Income MSA - 22744 Fort Lauderdale-Pompano Beach-Sunrise, FL		\$61,809	Median Housing Value			\$226,402
Median Family Income MSA - 33124 Miami-Miami Beach-Kendall, FL		\$49,264	Median Gross Rent			\$1,182
Median Family Income MSA - 38940 Port St. Lucie, FL MSA		\$56,570	Families Below Poverty Level			13.1%
Median Family Income MSA - 42680 Sebastian-Vero Beach, FL MSA		\$58,448				
Median Family Income MSA - 48424 West Palm Beach-Boca Raton-Boynton Beach, FL		\$65,914				
Median Family Income Non-MSAs - FL		\$46,899				
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$23,450 to \$32,957 and moderate-income families earned at least \$23,450 to \$32,957 and less than \$37,519 to \$52,731 in the AA, depending on the metropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$586 to \$824 for low-income borrowers and ranging from \$938 to \$1,318 for moderate-income borrowers in the AA. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$1,215. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA, while moderate-income borrowers would be challenged to afford a mortgage loan for a median-priced home in all metropolitan areas except the Fort Lauderdale-Pompano Beach-Sunrise, FL MD and West Palm Beach-Boca Raton-Boynton Beach, FL MSA.

Miami-Fort Lauderdale-Pompano Beach, FL MSA (Miami MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Miami MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic.

Miami-Miami Beach-Kendall, FL MD (Miami MD)

The Miami area is an attractive tourist destination and a convention destination. Miami maintains a luxury status which attracts international capital and is the world's busiest cruise port. The area's weaknesses include high household debt burden, congested roads and airport, and industrial structure that leaves economy susceptible to business cycle downturns. The Miami MD has a well-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Professional and Business Services, Government, and Retail Trade. Major employers in the Miami MD include Publix Super Markets, Baptist Health South Florida, American Airlines, Jackson Health System, and Florida International University. The December 2020 non-seasonally adjusted unemployment rate for the Miami MD was 3 percent compared to the national unemployment rate of 3.7 percent.

Fort Lauderdale-Pompano Beach-Sunrise, FL MD (Fort Lauderdale MD)

Fort Lauderdale is a metropolitan area on Florida's southeastern coast known for its beaches and boating canals. The Fort Lauderdale MD maintains strong ties to international trade via Latin America. The city also experiences spillover from Miami tourism and trade. The area's weaknesses include limited eastward expansion due to the Atlantic Ocean, limited westward expansion due to the Everglades, a weak housing market, and a highly volatile employment base. The Fort Lauderdale MD has a well-diversified economy. Key sectors of the economy by percentage of employment include Professional and Business Services, Education and Health Services, Government, Retail Trade, and Leisure and Hospitality Services. Major employers in the Fort Lauderdale MD include Nova Southeastern University, First Service Residential, HEICO, Spirit Airlines, and American Express. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Fort Lauderdale MD was 3.3 percent compared to the national unemployment rate of 3.7 percent.

West Palm Beach-Boca Raton-Boynton Beach, FL MD (West Palm Beach MD)

West Palm Beach's strengths include vibrant professional and business services, favorable migration patterns, well-positioned to expand logistics, international trade, and a very high per capita income. Its weaknesses include high cost of living primarily due to high house prices and employment volatility is very high. The local economy has rebounded from the COVID-19 recession. Jobs in professional services helped to insulate the area from the most damaging effects of the COVID-19 lockdowns because the metropolitan division emerged as Florida's hub for these jobs. The West Palm Beach MD has a well-diversified economy. Key sectors of the economy by percentage of employment include Professional and Business Services, Education and Health Services, Retail Trade, Leisure and Hospitality Services, and Government. Major employers in the West Palm Beach MD include Publix Super Markets, Tenet Healthcare, NextEra Energy/Florida Power & Light, and Comcast. The December 2020 non-seasonally adjusted unemployment rate for the West Palm Beach MD was 3 percent compared to the national unemployment rate of 3.7 percent.

Port St. Lucie, FL MSA (Port St. Lucie MSA)

Port St. Lucie has several strengths including desirable climate and quality of life, strong and improving migration, large port that can handle oceangoing vessels, and well above-average long-term growth prospects. Its weaknesses include the reliance on retirees, tourists magnify cyclical downturn, volatile employment, and below-average educational attainment. Key indicators were sending mixed signals about Port St. Lucie's recovery from the COVID-19 pandemic. Non-farm payrolls were 3 percent below their pre-pandemic level. Private services fared well, but goods industries and the public sector have lagged badly. Healthcare was among the top-performing industries because of the area's large and fast-growing senior population. The Port St. Lucie MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Professional and Business Services, Retail Trade, Government, and Leisure and Hospitality Services. Major employers in the Port St. Lucie MSA include Martin Health System, Indian River State College, and Walmart. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Port St. Lucie MSA was 3.3 percent compared to the national unemployment rate of 3.7 percent.

Sebastian-Vero Beach, FL MSA (Sebastian MSA)

The Sebastian MSA's strengths include high standard of living, premier health services, beaches that attract wealthy retirees, above-average population growth, and a high per capita income. Its weaknesses include high concentration of low-wage services, growth dependent on in-migration, and above-average employment volatility. The Sebastian MSA was leading Florida's recovery during the pandemic. The Sebastian MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Retail Trade, Leisure and Hospitality Services, Professional and Business Services, and Government. Major employers in the Sebastian MSA include Indian River Medical Center, Publix Super Markets, Piper Aircraft, and Walmart. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Sebastian MSA was 3.4 percent compared to the national unemployment rate of 3.7 percent.

Key West, FL Micropolitan Statistical Area (Monroe County)

Monroe County includes the islands of the Florida Keys and comprises the Key West Micropolitan Statistical Area. Over 99.9 percent of the county's population lives on the Florida Keys. The county seat is Key West, which is also Florida's southernmost point, lying roughly 90 miles north of Cuba. Famed for its pastel-hued, conch-style houses, it's a cruise-ship stop also accessible from the mainland via the Overseas Highway. Key West is known more for its coral reefs destinations for diving and snorkeling than for its beaches. The mainland, which is part of the Everglades, comprises 87 percent of the county's land area and is virtually uninhabited with only 17 people in total. Monroe County is the largest county in Florida by total area. More than 54 percent of the people in the county work in the tourist industry. Major employers in the AA include Historic Tours of America, Keys Energy Services, and Nesco Service Company. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for Monroe County was 2.1 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Miami CSA. The organizations included one CD organization that helped to address the causes and conditions of poverty and one economic development organization that helped to attract and retain businesses in the area. The bank also provided an assessment of community needs based on research it completed in its AA.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing
- Affordable for-sale housing
- Affordable childcare for working parents
- Living wage employment
- Financial literacy/education
- Credit counseling

Opportunities for participation by financial institutions included the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Small business lending
- Supporting nonprofit health providers
- Working with the area's CD corporation network
- Various state and local government partnership opportunities

Orlando CSA

The following table provides a summary of the demographics, including housing and business information for the Orlando CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Orlando CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	698	3.7	26.2	43.1	25.8	1.1
Population by Geography	3,617,495	2.4	25.2	45.1	27.2	0.3
Housing Units by Geography	1,612,382	2.4	24.7	47.0	25.9	0.0
Owner-Occupied Units by Geography	851,672	1.0	18.8	49.2	31.1	0.0
Occupied Rental Units by Geography	453,046	4.9	35.2	41.1	18.8	0.0
Vacant Units by Geography	307,664	2.4	25.5	49.9	22.1	0.0
Businesses by Geography	686,063	2.0	24.3	40.8	32.8	0.0
Farms by Geography	17,510	1.5	23.0	48.3	27.1	0.1
Family Distribution by Income Level	867,647	20.7	18.4	20.1	40.8	0.0
Household Distribution by Income Level	1,304,718	22.7	17.0	18.7	41.6	0.0
Median Family Income MSA - 19660 Deltona-Daytona Beach-Ormond Beach, FL MSA		\$52,220	Median Housing Value			\$151,243
Median Family Income MSA - 29460 Lakeland-Winter Haven, FL MSA		\$50,986	Median Gross Rent			\$1,012
Median Family Income MSA - 36740 Orlando-Kissimmee-Sanford, FL MSA		\$57,304	Families Below Poverty Level			12.2%
Median Family Income MSA - 45540 The Villages, FL MSA		\$60,099				
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$25,493 to \$30,050 and moderate-income families earned at least \$25,493 to \$30,050 and less than \$40,789 to \$48,079 in the AA, depending on the metropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$637 to \$751 for low-income borrowers and ranging from \$1,020 to \$1,202 for moderate-income borrowers in the AA. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$812. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Orlando-Kissimmee-Sanford, FL MSA (Orlando MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Orlando MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Orlando's strengths include natural and historic advantages for tourism, strong demographics due to in-migration, ample job opportunities in services, and plentiful land for development. Weaknesses include sensitivity to national and international economic conditions, abundance of low-wage jobs, and low employment diversity. The Orlando MSA was hit hard during the pandemic after suffering a severe drop in employment. Jobs in leisure/hospitality have been the hardest-hit and accounted for more than

three-quarters of the jobs yet to be recouped. The Orlando MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Professional and Business Services, Leisure and Hospitality Services, Education and Health Services, Retail Trade, and Government. Major employers in the Orlando MSA include Walt Disney World Resort, Advent Health, Universal Studios Florida, Orlando Health, Orlando International Airport, and Publix. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Orlando MSA was 3.4 percent compared to the national unemployment rate of 3.7 percent.

Deltona-Daytona Beach-Ormond Beach, FL MSA (Deltona MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Deltona MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic.

The Deltona MSA's strengths include above average population growth, large tourism industry, nearby colleges in Gainesville and Orlando, and strong demand for health services. Weaknesses include below average educational attainment, reliance on low wage positions, and sensitivity to national and international economic conditions. The Deltona MSA was making steady progress. About seven of every eight jobs lost during the pandemic have been recouped, nearly twice the share for the state and the region. The Deltona MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Leisure and Hospitality Services, Government, and Professional and Business Services. Major employers in the Deltona MSA include Halifax Medical Center, Publix Super Markets, Inc., Florida Hospital Ormond Memorial, and Wal-Mart Stores, Inc. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Deltona MSA was 3.4 percent compared to the national unemployment rate of 3.7 percent.

Lakeland-Winter Haven, FL MSA (Lakeland MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Lakeland MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Lakeland MSA's strengths include regional transportation and tourism hub with strong long-term growth prospects, proximity to fast-growing Tampa and Orlando economies, and high housing affordability in relation to coastal areas in Florida. Weaknesses include below-average per capita income few high-paying jobs and low educational attainment. The Lakeland MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Professional and Business Services, Retail Trade, Government, and Transportation/Utilities. Major employers in the Lakeland MSA include Publix Super Markets, Inc., Lakeland Regional Medical Center, and GEICO. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Lakeland MSA was 3.8 percent compared to the national unemployment rate of 3.7 percent.

The Villages, FL MSA (The Villages MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, The Villages MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Villages MSA's strengths include unrivaled long-term economic potential, proximity to several large metropolitan areas, above average population growth, and large senior population that

boosts employment in consumer industries. Weaknesses include high susceptibility cyclical fluctuations because of income's dependence on interest, dividends, and rent, and underperforming housing market. The Villages MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Government, Retail Trade, Leisure and Hospitality Services, and Construction. Major employers in The Villages MSA include Coleman Federal Prison, The Villages Regional Medical Center, and Publix Super Markets, Inc. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Villages MSA was 4.1 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by six local organizations that were contacted during the evaluation period and served the Orlando CSA. The organizations included four economic development organizations that helped to attract and retain businesses in the area and two affordable housing organizations. The bank also provided an assessment of community needs based on research it completed in its AA.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing
- Affordable for-sale housing
- Affordable childcare for working parents
- Living wage employment
- Financial literacy/education
- Credit counseling

Opportunities for participation by financial institutions included the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Small business lending
- Supporting nonprofit health providers
- Various state and local government partnership opportunities

Scope of Evaluation in the State of Florida

The OCC selected the Jacksonville MSA, Miami CSA, and Orlando CSA for full-scope reviews and based conclusions and ratings primarily on activity within these geographical areas. These AAs carried significant weight in determining the overall ratings for the state of Florida because of the significance of the bank's presence in these AAs. More weight was given to the Miami CSA due to the larger deposit base, lending, and branch presence.

During the evaluation period, the bank originated or purchased 340,298 home mortgage loans, small loans to businesses, and small loans to farms totaling \$47.1 billion in the state of Florida. The bank's primary loan products in the rating area were small loans to businesses and home mortgage loans. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within each AA, the OCC placed more weight based on the number of loans

on the bank's lending products that had the highest percentage of loans in arriving at conclusions. In the Jacksonville MSA, Miami CSA, Cape Coral CSA, Sebring MSA, Tampa MSA, and Florida Combined Non-MSA, the OCC placed more weight based on the number of loans on small loans to business versus home mortgage loans and small loans to farms. In the remaining AAs, the OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF FLORIDA

LENDING TEST

The bank's performance under the Lending Test in the state of Florida is rated Outstanding. Performance in the limited-scope areas had a neutral effect on the overall Lending Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Jacksonville MSA was good. The bank's performance in the Miami CSA and Orlando CSA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Jacksonville MSA	11,637	12,246	95	20	23,998	7.0	7.1
Miami CSA	39,485	95,429	431	38	135,383	39.8	46.7
Orlando CSA	29,549	29,642	242	16	59,449	17.5	14.9
Cape Coral CSA	10,336	11,522	50	2	21,910	6.4	5.4
Crestview MSA	3,741	1,839	13	1	5,594	1.6	0.5
Gainesville MSA	1,627	1,507	45	2	3,181	0.9	1.4
Homosassa Springs MSA	697	438	8	1	1,144	0.3	0.2
North Port CSA	8,788	8,564	77	5	17,434	5.1	4.6
Ocala MSA	2,218	2,088	66	1	4,373	1.3	0.9
Palm Bay MSA	5,122	4,213	31	5	9,371	2.8	2.1
Panama City MSA	1,197	971	7	3	2,178	0.6	0.4
Pensacola MSA	3,308	1,626	22	1	4,957	1.5	0.7
Sebring MSA	350	409	23	1	783	0.2	0.2
Tallahassee MSA	2,298	1,210	20	3	3,531	1.0	1.8
Tampa MSA	21,831	24,303	127	16	46,277	13.6	12.9
Florida Combined Non-MSA	250	519	81	1	851	0.2	0.3
Total	142,434	196,526	1,338	116	340,414	100.0	100.1
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Jacksonville MSA	3,815,939	370,275	3,044	21,119	4,120,377	8.7	7.1
Miami CSA	14,635,008	2,003,689	8,748	212,688	16,860,133	34.8	46.7
Orlando CSA	7,499,989	647,302	5,411	147,749	8,300,451	17.1	14.9
Cape Coral CSA	3,555,328	257,871	939	13,830	3,827,968	7.9	5.4
Crestview MSA	1,199,230	38,910	183	3	1,238,326	2.6	0.5
Gainesville MSA	351,124	34,638	1,849	38,508	426,119	0.9	1.4
Homosassa Springs MSA	119,552	8,163	102	1	127,818	0.3	0.2
North Port CSA	2,373,982	175,243	2,597	9,187	2,561,009	5.3	4.6
Ocala MSA	621,210	40,802	767	5	662,784	1.4	0.9
Palm Bay MSA	1,207,551	113,732	256	23,754	1,345,293	2.8	2.1
Panama City MSA	297,181	877,744	17,244	3,985	1,196,154	2.5	0.4
Pensacola MSA	718,099	17,602	601	4	736,306	1.5	0.7
Sebring MSA	52,085	8,237	1,232	1	61,555	0.1	0.2
Tallahassee MSA	486,344	23,549	1,301	6,768	517,962	1.1	1.8
Tampa MSA	5,790,007	528,651	2,493	51,709	6,372,860	13.1	12.9
Florida Combined Non-MSA	35,545	12,171	6,027	2	53,745	0.1	0.3
Total	42,758,174	5,158,579	52,794	529,313	48,498,860	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Jacksonville MSA

As of June 30, 2021, WFBNA had a deposit market share of 7.6 percent. The bank ranked third among 31 depository financial institutions placing it in the top 10 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 3.8 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked fourth among 938 home mortgage lenders in this AA, which placed it in the top 1 percent of lenders top lenders. The top lenders in this AA based on market share were Rocket Mortgage (7.5 percent), United Wholesale Mortgage (4.5 percent), and VyStar Credit Union (4.4 percent).

According to peer small business data for 2021, WFBNA had a market share of 8.2 percent based on the number of small loans to businesses originated or purchased in this AA. The bank's market share of small loans to businesses was stronger than its market share of deposits. The bank ranked fourth out of 206 small business lenders, which placed it in the top 2 percent of lenders. The top lenders in this AA based on market share were American Express National Bank (20.4 percent), Bank of America, N.A. (11.4 percent), and JPMorgan Chase Bank, N.A. (9.2 percent).

According to peer small farm data for 2021, WFBNA had a market share of 25.3 percent based on the number of small loans to farms originated or purchased in this AA. The bank was the top ranked lender of small loans to farms in the AA. The other top lenders in this AA based on market share were JPMorgan Chase Bank, N.A. (21.2 percent) and U.S. Bank, N.A. (13 percent).

Miami CSA

As of June 30, 2021, WFBNA had a deposit market share of 14.2 percent. The bank ranked second among 85 depository financial institutions placing it in the top 3 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 3.8 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked third among 1,253 home mortgage lenders in this AA, which placed it in the top 1 percent of lenders. The other top lenders in this AA based on market share were Rocket Mortgage (7.4 percent) and United Wholesale Mortgage (7.2 percent).

According to peer small business data for 2021, WFBNA had a market share of 7.6 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked fifth out of 385 small business lenders, which placed it in the top 2 percent of lenders. The top lenders in this AA based on market share were American Express National Bank (22 percent), Bank of America, N.A. (14.6 percent), and JPMorgan Chase Bank, N.A. (11.8 percent).

According to peer small farm data for 2021, WFBNA had a market share of 15.9 percent based on the number of small loans to farms originated or purchased in this AA. The bank's market share of small loans to farms was stronger than its market share of deposits. The bank ranked third out of 27 small farm lenders, which placed it in the top 12 percent of lenders. The other top lenders in this AA based on market share were JPMorgan Chase Bank, N.A. (31.2 percent) and Bank of America, N.A. (20.5 percent).

Orlando CSA

As of June 30, 2021, WFBNA had a deposit market share of 15.2 percent. The bank ranked third among 49 depository financial institutions placing it in the top 7 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 3.8 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked third among 1,266 home mortgage lenders in this AA, which placed it in the top 1 percent of lenders. The other top lenders in this AA based on market share were Rocket Mortgage (7.9 percent) and United Wholesale Mortgage (4.9 percent).

According to peer small business data for 2021, WFBNA had a market share of 7.1 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked fourth out of 296 small business lenders, which placed it in the top 2 percent of lenders. The top lenders in this AA based on market share were American Express National Bank (19.3 percent), JPMorgan Chase Bank, N.A. (12.1 percent), and Bank of America, N.A. (12 percent).

According to peer small farm data for 2021, WFBNA had a market share of 17.4 percent based on the number of small loans to farms originated or purchased in this AA. The bank's market share of small loans to farms was stronger than its market share of deposits. The bank ranked second out of 26 small farm lenders, which placed it in the top 8 percent of lenders. The other top lenders in this AA based on market share were JPMorgan Chase Bank, N.A. (31.2 percent) and Bank of America, N.A. (20.5 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AAs. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data. The bank's performance was good in the Jacksonville MSA and Miami CSA and was excellent in the Orlando CSA.

Home Mortgage Loans

Refer to Table O in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Jacksonville MSA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans in low-income geographies was significantly below the percentage of owner-occupied housing units in low-income geographies and it was below the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was well below the percentage of owner-occupied housing units in moderate-income geographies and it was below the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies exceeded both the percentage of businesses in low-income geographies and the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was near to the percentage of businesses in moderate-income geographies and it approximated the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

The bank's percentage of small loans to farms in low-income geographies was significantly below the percentage of farms in low-income geographies but it exceeded the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-income geographies was well below the percentage of farms in moderate-income geographies and it was significantly below the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Home Mortgage Loans

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

Miami CSA

The bank's percentage of home mortgage loans in low-income geographies was well below the percentage of owner-occupied housing units in low-income geographies and it was below the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied housing units in moderate-income geographies but it was near to the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies approximated the percentage of businesses in low-income geographies and it was near to the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies exceeded the percentage of businesses in moderate-income geographies and it approximated the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

The bank's percentage of small loans to farms in low-income geographies was significantly below the percentage of farms in low-income geographies and it was well below the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-income geographies was well below the percentage of farms in moderate-income

geographies but it exceeded the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Home Mortgage Loans

Refer to Table O in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Orlando CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was below the percentage of owner-occupied housing units in low-income geographies but it was equal to the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was below both the percentage of owner-occupied housing units in moderate-income geographies and the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies was near to both the percentage of businesses in low-income geographies and the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies approximated both the percentage of businesses in moderate-income geographies and the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was good.

The bank's percentage of small loans to farms in low-income geographies was well below the percentage of farms in low-income geographies but it exceeded the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-income geographies was below the percentage of farms in moderate-income geographies but it

exceeded the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies in the Jacksonville MSA, Miami CSA, and Orlando CSA. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AAs.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes. The bank's performance was good in the Jacksonville MSA, Miami CSA, and Orlando CSA.

Jacksonville MSA

Home Mortgage Loans

Refer to Table P in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but it approximated the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families but it exceeded the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 25.6 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was well below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

The bank did not collect or consider the GAR in the underwriting of approximately 35.8 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below the percentage of farms in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to farms GAR of \$1 million or less by all lenders.

Miami CSA***Home Mortgage Loans***

Refer to Table P in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but it approximated the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was well below the percentage of moderate-income families but it exceeded the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 22.7 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was adequate.

The bank did not collect or consider the GAR in the underwriting of approximately 26.9 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below the percentage of farms in the AA with GAR of \$1 million or less and it was near to the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Orlando CSA

Home Mortgage Loans

Refer to Table P in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but it approximated the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families but it was equal to the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 25.1 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was adequate.

The bank did not collect or consider the GAR in the underwriting of approximately 44.6 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below the percentage of farms in the AA with GAR of \$1 million or less and it was below the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Community Development Lending

The bank made an adequate level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

Jacksonville MSA

WFBNA made an adequate level of CD loans in the Jacksonville MSA. WFBNA made 20 CD loans totaling approximately \$21.1 million, which represented 2.2 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing, revitalization and stabilization, and community service purposes. By dollar volume, 79.5 percent of these loans funded affordable housing that provided 834 units of affordable housing, 5.9 percent funded revitalization and stabilization efforts, and 14.6 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$250,000 loan extension to a nonprofit organization in Jacksonville, Florida. The organization provided affordable housing and case management to individuals with a disability and/or those at risk of homelessness.
- WFBNA renewed a \$300,000 working capital line of credit for a private, nonprofit drug and alcohol rehabilitation agency. According to the organization, 85 percent of the clients were low- to moderate-income and earned less than 80 percent of the area MFI.
- WFBNA provided a \$3.9 million loan for two multifamily housing developments located in moderate-income census tracts in Jacksonville, Florida. Of the total loan, approximately \$2 million was allocated to a development that consisted of 60 units, with all units affordable to tenants earning below 40 percent of the area MFI. The second development was allocated approximately \$1.9 million. This development consisted of 56 units, with all units affordable to tenants earning below 75 percent of the area MFI.

Miami CSA

WFBNA made an adequate level of CD loans in the Miami CSA. WFBNA made 38 CD loans totaling approximately \$212.6 million, which represented 3.3 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing, economic development, and community service purposes. By dollar volume, 88.2 percent of these loans funded affordable housing that provided 1,307 units of affordable housing, 9.1 percent funded economic development, and 2 percent funded community

services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$20.8 million construction loan to finance a senior affordable housing development in Miami, Florida. The development was the third phase of a four-phase multifamily rental development with 600 total housing units. The 180-unit LIHTC development was restricted to tenants earning up to 60 percent of the AMI. WFBNA also participated as investor and construction lender in the two previous phases of this development.
- WFBNA provided a \$23.6 million construction loan to finance the redevelopment of an affordable housing development in Coral Springs, Florida. The 219-unit LIHTC development restricted the units to seniors earning up to 60 percent of the AMI.
- WFBNA provided a \$25 million construction loan for an LIHTC affordable housing development in Fort Lauderdale, Florida. The development was constructed through a partnership between the developer and Housing Enterprises of Florida, a subsidiary of the Housing Authority of the City of Fort Lauderdale. This development had 105 affordable housing units restricted to tenants earning up to 60 percent of the AMI. This transaction is complex due to the multiple funding sources, including Broward County and the Housing Authority of Fort Lauderdale.

Orlando CSA

WFBNA was a leader in making CD loans in the Orlando CSA. WFBNA made 16 CD loans totaling approximately \$147.7 million, which represented 7.3 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 99.7 percent of these loans funded affordable housing that provided 923 units of affordable housing, targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$10.5 million construction loan to finance an LIHTC senior, affordable housing development. The 68-unit LIHTC development in Sanford, Florida was restricted to tenants earning up to 60 percent of the AMI. Four units were set aside for special needs households that meet at least one of the following conditions: homeless, domestic violence survivor, a person with a disability, or a youth aging out of foster care.
- WFBNA provided a \$20.2 million construction loan to finance an LIHTC senior, affordable housing development in Orlando, Florida. WFBNA also provided an \$18.1 million loan to finance the second phase of the development. The 110-unit LIHTC development was restricted to tenants earning less than 60 percent of the AMI. Six units were set aside for special needs households that meet at least one of the following conditions: homeless, domestic violence survivor, a person with a disability, or a youth aging out of foster care.

Product Innovation and Flexibility

Jacksonville MSA

WFBNA made extensive use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA made 2,605 loans under its flexible lending programs totaling \$127.5

million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	162	32,300
Dream. Plan. Home.	26	3,900
PPP	2,417	91,300
Total	2,605	127,500

Miami CSA

WFBNA made extensive use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA made 18,628 loans under its flexible lending programs totaling \$716.8 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	413	115,300
Dream. Plan. Home.	78	11,100
PPP	18,137	590,400
Total	18,628	716,800

Orlando CSA

WFBNA made extensive use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA made 6,238 loans under its flexible lending programs totaling \$301.2 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	546	120,700
Dream. Plan. Home.	84	13,300
PPP	5,608	167,200
Total	6,238	301,200

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Cape Coral CSA, Homosassa Springs MSA, North Port CSA, Ocala MSA, Palm Bay MSA, Pensacola MSA, Sebring MSA, Tallahassee MSA, Tampa MSA, and Florida Combined Non-MSA was consistent with the bank's overall performance under the Lending Test in the full-scope areas. The bank's performance in the Gainesville MSA and Panama City MSA was stronger than the bank's performance in the full-scope areas due to CD lending having a positive impact in these AAs. Performance in the Crestview MSA was weaker than the bank's performance in the full-scope areas due to poor geographic distribution and lower levels of CD lending relative to the needs and opportunities for CD loans in the AA.

Refer to Tables O through T in the state of Florida section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Florida is rated Outstanding. Performance in the limited-scope areas had a neutral effect on the overall Investment Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Jacksonville MSA, Miami CSA, and Orlando CSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Jacksonville MSA	11	36,590	173	28,863	184	11.0	65,453	6.3	6	5,434
Miami CSA	93	296,999	487	304,105	580	34.8	601,104	58.3	37	146,744
Orlando CSA	20	63,279	216	127,977	236	14.1	191,256	18.5	10	73,526
Cape Coral CSA	3	8,008	85	18,515	88	5.3	26,523	2.6	3	13,525
Crestview MSA	1	4,285	13	221	14	0.8	4,506	0.4	1	12
Gainesville MSA	1	6,737	25	740	26	1.6	7,477	0.7	0	0
Homosassa Springs MSA	0	0	9	566	9	0.5	566	0.1	0	0
North Port CSA	1	4,547	69	2,220	70	4.2	6,768	0.7	0	0
Ocala MSA	0	0	20	402	20	1.2	402	0.0	0	0
Palm Bay MSA	0	0	33	7,234	33	2.0	7,234	0.7	1	164
Panama City MSA	1	7,814	13	384	14	0.8	8,198	0.8	1	41
Pensacola MSA	1	8,420	26	15,055	27	1.6	23,476	2.3	2	190
Sebring MSA	0	0	10	122	10	0.6	122	0.0	0	0
Tallahassee MSA	1	11,136	64	1,623	65	3.9	12,759	1.2	0	0
Tampa MSA	54	37,574	229	37,978	283	17.0	75,553	7.3	5	18,531
Florida Combined Non-MSA	0	0	9	171	9	0.5	171	0.0	0	0
Statewide***	0	0	0	0	0	0.0	0	0.0	0	0
Total	187	485,389	1,481	546,176	1,668	100.0	1,031,568	100.0	66	258,167

The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

* '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 tracked and recorded by the institution's financial reporting system.

*** Statewide means investments in statewide programs that have a purpose, mandate, or function to serve one or more of the bank's assessment areas within the state. Due to rounding, totals may not equal 100.0%

Jacksonville MSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$65.5 million and represented 6.8 percent of the bank's tier 1 capital allocated to the AA. The investments also included 166 grants and donations totaling \$2.3 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 20.1 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 65.8 percent that focused on community services targeted to low- and moderate-income individuals, and 14.2 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 791 units of affordable housing in the AA.

The bank made significant use of innovative or complex investments to support CD initiatives. Approximately 68.3 percent of current period investment dollars were complex LIHTC investments. The following are examples of CD investments made in this AA:

- WFBNA provided a \$9.7 million equity investment to finance an affordable housing development in Jacksonville, Florida. This 192-unit LIHTC development was restricted to tenants earning up to 60 percent of the AMI. The development provided free health screenings to tenants onsite and features a community building, exercise facility, and playground. The property was within one mile of a pharmacy and grocery store. This loan was complex due to the inherent nature of LIHTC transactions and the multiple funding sources, including the Jacksonville Housing Finance Agency and the City of Jacksonville HOME loan program.
- WFBNA provided providing a \$10 million equity investment to finance an affordable housing development in Jacksonville, Florida. This LIHTC development restricted all 127 units to tenants earning up to 60 percent of the AMI. The project involved demolishing 63 existing units and building 127 new units to increase occupancy. The property was within one mile of a pharmacy, grocery store, and bus stop. This investment was complex due to the inherent nature of LIHTC transactions and multiple funding sources, including Jax Urban Initiatives Development and the Jacksonville Housing Authority.
- WFBNA provided a \$100,000 grant to support the organization's program that addressed obstacles to graduating and focuses on increasing school attendance, achievement in math and English, and provides after-school programming. The bank's funding enabled the organization to provide services to more than 9,000 students in school districts, which included free lunch programs to a majority of the students.

Miami CSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$601.1 million and represented 9.5 percent of the bank's tier 1 capital allocated to the AA. The investments also included 468 grants and donations

totaling \$32.4 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 34 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 53.8 percent that focused on community services targeted to low- and moderate-income individuals, and 12.3 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 5,732 units of affordable housing in the AA.

The bank made significant use of innovative or complex investments to support CD initiatives. Approximately 77.3 percent of current period investment dollars were complex LIHTC investments. The following are examples of CD investments made in this AA:

- WFBNA provided a \$15.7 million equity investment to finance a senior (55+) affordable housing development. This 180-unit LIHTC development located in Miami, Florida, was restricted to tenants earning up to 60 percent of the AMI. The development was the third phase of a four-phase multifamily rental development with 600 total housing units.
- WFBNA provided a \$23.7 million equity investment to finance an LIHTC affordable housing development. This 120-unit LIHTC development located in Leisure City, Florida, was restricted to families earning up to 60 percent of the AMI. The development was constructed on a brownfield site, and included remediation, reducing blight, and addressing environmental health concerns in the community. Onsite amenities included a community room, and a fitness center. This investment was complex due to the inherent nature of LIHTC transactions and multiple funding sources, including a Miami-Dade County HOME loan.
- WFBNA provided a \$20 million grant to a nonprofit organization in Miami, Florida through the Open for Business Fund. The bank's funding was used to create small business grant programs and a revolving loan program for underserved small businesses. The organization provided grants, loans, and technical assistance to small businesses, supports civic leadership, and manages charitable investments.

Orlando CSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$191.3 million and represented 9.5 percent of the bank's tier 1 capital allocated to the AA. The investments also included 204 grants and donations totaling \$8 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately

26.3 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 53.4 percent that focused on community services targeted to low- and moderate-income individuals, and 20.4 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 1,163 units of affordable housing in the AA.

The bank made significant use of innovative or complex investments to support CD initiatives. Approximately 72.4 percent of current period investment dollars were complex LIHTC investments. The following are examples of CD investments made in this AA:

- WFBNA provided a providing a \$3 million grant to a CDFI through the Open for Business Fund that supported the CDFI's loan loss reserve and increased the organization's capital. WFBNA also provided \$500,000 to this organization through the Diverse Community Capital program which provided small businesses with capital and \$368,000 for general operating support during the COVID-19 pandemic.
- WFBNA provided a \$15,000 grant to support the construction of a home for a low-income family. The nonprofit organization was located in Winter Garden, Florida. The organization built affordable housing for low-income families and provided zero interest rate mortgages.
- WFBNA provided a \$22.5 million investment for an affordable housing development. This LIHTC development was located in Pine Hills, Florida, with 100 percent of the units restricted to tenants earning up to 60 percent of the AMI. The organization primarily focused on the development of affordable housing communities that leveraged LIHTCs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Crestview MSA, Panama City MSA, Pensacola MSA, was consistent with the bank's overall performance under the Investment Test in the full-scope areas. Performance in the Gainesville MSA, Cape Coral CSA, Homosassa Springs MSA, North Port CSA, Ocala MSA, Palm Bay MSA, Sebring MSA, Tallahassee, MSA, and Tampa MSA, and Florida Combined Non-MSA was weaker than the bank's overall performance under the Investment Test in the full-scope areas primarily due to lower levels of CD investments relative to the bank's presence and capacity to invest in those AAs.

SERVICE TEST

The bank's performance under the Service Test in the state of Florida is rated Outstanding. Performance in the limited-scope areas had a neutral effect on the overall Service Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Jacksonville MSA was good and the bank's performance in the Miami CSA and the Orlando CSA was excellent.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's full-scope AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Jacksonville MSA	7.1	42	8.0	2.4	19.0	33.3	45.2	5.1	23.6	40.9	30.4
Miami CSA	46.7	205	39.0	3.9	28.8	27.3	38.0	5.5	27.8	33.2	33.2
Orlando CSA	14.9	86	16.3	4.7	34.9	40.7	19.8	2.4	25.2	45.1	27.2
Cape Coral CSA	5.4	37	7.0	0.0	21.6	32.4	45.9	5.5	25.9	40.8	27.8
Crestview MSA	0.5	5	1.0	0.0	20.0	20.0	60.0	0.0	14.8	63.3	21.8
Gainesville MSA	1.4	8	1.5	12.5	25.0	37.5	25.0	7.7	30.3	33.6	26.2
Homosassa Springs MSA	0.2	2	0.4	0.0	0.0	0.0	100.0	0.0	21.9	59.8	18.3
North Port CSA	4.6	32	6.1	0.0	25.0	50.0	25.0	2.4	22.7	51.6	23.2
Ocala MSA	0.9	6	1.1	0.0	16.7	66.7	16.7	2.3	18.5	63.6	15.7
Palm Bay MSA	2.1	15	2.9	0.0	33.3	26.7	40.0	3.4	23.5	43.2	29.9
Panama City MSA	0.4	3	0.6	0.0	0.0	66.7	33.3	3.6	16.7	52.2	27.5
Pensacola MSA	0.7	6	1.1	16.7	50.0	16.7	16.7	2.5	18.6	54.8	24.1
Sebring MSA	0.2	2	0.4	0.0	0.0	100.0	0.0	0.0	9.0	75.6	15.4
Tallahassee MSA	1.8	6	1.1	16.7	50.0	33.3	0.0	14.1	22.3	35.9	24.0
Tampa MSA	12.9	67	12.7	6.0	19.4	35.8	38.8	4.5	24.4	38.0	32.7
Florida Combined Non-MSA	0.3	4	0.8	0.0	25.0	75.0	0.0	0.0	9.0	83.7	7.4
Total	100.0	526	100.0	3.8	27.0	34.0	34.4	4.4	25.0	40.7	29.5
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Jacksonville MSA	0	7	0	0	-2	-5
Miami CSA	1	17	-1	-5	-4	-5
Orlando CSA	0	10	-1	-3	-4	-2
Cape Coral CSA	0	7	0	-1	-2	-4
Crestview MSA	0	1	0	0	0	-1
Gainesville MSA	0	1	0	0	0	-1
Homosassa Springs MSA	0	0	0	0	0	0
North Port CSA	0	5	0	-2	-2	-1
Ocala MSA	0	3	0	-1	-1	-1
Palm Bay MSA	0	2	0	-1	0	-1
Panama City MSA	0	0	0	0	0	0
Pensacola MSA	0	1	0	-1	0	0
Sebring MSA	0	1	0	-1	0	0
Tallahassee MSA	0	0	0	0	0	0
Tampa MSA	0	10	0	-6	-1	-3
Florida Combined Non-MSA	0	0	0	0	0	0
Total	1	65	-2	-21	-16	-24
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.						

Jacksonville MSA

WFBNA's service delivery systems were accessible to geographies and individuals of different income levels in the Jacksonville MSA. WFBNA operated 42 branches in the AA, comprising one branch in low-income geographies, eight branches in moderate-income geographies, 14 branches in middle-income geographies, and 19 branches in upper-income geographies. The distribution of branches in low-income geographies was well below the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies was near to the distribution of the population in moderate-income geographies. The distribution was augmented by three branches in middle- and upper-income geographies that were within close proximity to serve low-income areas and six branches in middle- and upper-income geographies that were within close proximity to and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts,

deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the 24 branches opened on Saturdays, six were located in moderate-income geographies.

Miami CSA

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Miami CSA. WFBNA operated 205 branches in the AA, comprising eight branches in low-income geographies, 59 branches in moderate-income geographies, 56 branches in middle-income geographies, 78 branches in upper-income geographies, and four branches in geographies without an income designation. The distribution of branches in low-income geographies was near to the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies. The distribution was augmented by three branches in middle- and upper-income geographies that were within close proximity to serve low-income areas and 31 branches in middle- and upper-income geographies that were within close proximity to and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations. Despite the closures, its service delivery systems remained readily accessible.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the 114 branches opened on Saturdays, seven were located in low-income geographies and 42 were located in moderate-income geographies.

Orlando CSA

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Orlando CSA. WFBNA operated 86 branches in the AA, comprising four branches in low-income geographies, 30 branches in moderate-income geographies, 35 branches in middle-income geographies, and 17 branches in upper-income geographies. The distribution of branches in low-income geographies exceeded the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies. The distribution was augmented by 13 branches in middle- and upper-income geographies that were within close proximity to and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and

moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations. Despite the closures, its service delivery systems remained readily accessible.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the 42 branches opened on Saturdays, two were located in low-income geographies and 15 were located in moderate-income geographies.

Community Development Services

WFBNA provided a relatively high level of CD services.

Jacksonville MSA

WFBNA provided a relatively high level of CD services in the Jacksonville MSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 97 CD service activities during the evaluation period. A majority (72 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families, and the remaining provided support for affordable housing (20 percent), and economic development (5 percent). Board membership and ad hoc outreach to provide technical expertise comprised 75 percent, and financial education comprised 24 percent of the CD service activities. The remaining activities focused on tax preparation for low- and moderate-income families. The bank's assistance provided was responsive to the identified needs in the AA. The following are examples of CD services provided in this AA:

- WFBNA employees provided over 74 hours of ad hoc support and technical expertise to a nonprofit organization that aided low- and moderate-income families in terms of basic needs, financial well-being, and racial equity. This organization focused on economic mobility of low- and moderate-income communities by improving food access, housing stability, mental health, education attainment, workforce development, asset building knowledge, and leadership development. This activity was responsive to the community services and affordable housing needs identified within the AA.
- WFBNA employees provided over 31 hours of board service for a nonprofit organization that was a domestic violence center within the AA. This organization reported that their core services included an emergency shelter, an outreach center, a 24/7 Domestic Violence Hotline, education, and counseling for victims of domestic violence in low- and moderate-income communities within the AA. They answered more than 108,750 hotline calls and sheltered more than 47,000 victims of

domestic violence and their children. This activity was responsive to the identified need of community services within the AA.

Miami CSA

WFBNA provided a relatively high level of CD services in the Miami CSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 281 CD service activities during the evaluation period. A majority (94 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The other CD services were targeted to affordable housing, economic development, and revitalization and stabilization. Financial education comprised 77 percent of the CD service activities, and the remaining activities provided technical expertise in terms of board membership or outreach activities to organizations serving low- and moderate-income communities. The bank's assistance provided was responsive to the identified needs in the AA. The following are examples of CD services provided in this AA:

- WFBNA employees provided 47 hours of board activity and financial education to an organization, that provided support to the low- and moderate-income with HIV as a chronic condition. During the performance period, the organization served over 2,700 individuals to obtain food, medical nutrition therapy, wellness services, and finding care services for people who have fallen out of primary medical care. This activity responded to the identified need of community services within the AA.
- WFBNA employees provided 40 hours of board activity and ad hoc technical assistance to an organization that advocated and mobilized community resource to revitalize the AA through a network of organizations. This organization provided educational programs, housing programs, health programs, senior programs, youth programs, homelessness programs and other community services for the low- and moderate-income communities through its affiliate members. This activity was responsive to the identified need of revitalization and stabilization in the AA.
- WFBNA employees provided 25 hours of board membership to an organization that served nearly 14,000 individuals annually through community services. This organization's activities targeted low- and moderate-income communities' needs for education, entrepreneurship, jobs, community justice, housing, and health to provide stability and improve their social and economic mobility. This activity responded to the identified need of community services within the AA.

Orlando CSA

WFBNA provided a relatively high level of CD services in the Orlando CSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 115 CD service activities during the evaluation period. A majority (57 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The other CD services were targeted to affordable housing (43 percent). Board activities and technical assistance to organizations that served low- and moderate-income communities comprised 52 percent of the CD service activities, and financial education comprised 48 percent of the CD service activities. The bank's assistance provided was responsive to the identified needs in the AA. The following are examples of CD services provided in this AA:

- WFBNA employees provided 67 hours of financial education and board service to an organization that advocated for affordable housing. The organization partnered with people in the communities it served to help them build or improve a home with an affordable mortgage. This activity was responsive to the identified need of affordable housing within the area.
- WFBNA employees provided 61 hours of board service for a nonprofit organization that coordinated volunteers to preserve affordable homeownership by repairing the homes of low-income elderly and disabled individuals. According to the organization, 100 percent of its clients were low- and moderate-income families and individuals. This activity was responsive to the identified need of affordable housing within the area.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, The bank's performance under the Service Test in the Crestview MSA, Gainesville MSA, Pensacola MSA, Tallahassee MSA, and Florida Combined Non-MSA was consistent with the bank's overall performance under the Service Test in the full-scope areas. The bank's performance under the Service Test in the Cape Coral CSA, Homosassa Springs MSA, North Port CSA, Ocala MSA, Palm Bay MSA, Panama City MSA, Sebring MSA, and Tampa MSA was weaker than the bank's overall performance under the Service Test in the full-scope areas. Performance was weaker primarily due to lower accessibility of retail banking services in low- and moderate-income areas.

State of Georgia

CRA rating for the State of Georgia³¹: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: High Satisfactory

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited an adequate geographic distribution of loans in its AAs.
- The bank a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.
- The bank had a significant level of qualified CD investments that demonstrated good responsiveness to credit and economic development needs, occasionally in a leadership position. The bank occasionally used innovative and complex investments to support CD initiatives.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.
- The bank provided a relatively high level of CD services.

Description of Institution's Operations in the State of Georgia

The state of Georgia was WFBNA's seventh largest rating area based on its total deposits in the state. As of June 30, 2021, the bank maintained approximately \$47.4 billion or 3.2 percent of its total domestic deposits in branches within the state. Of the 143 depository financial institutions operating in the bank's AAs within the state, WFBNA, with a deposit market share of 16.6 percent, was the third largest. Other top depository financial institutions in the bank's AAs within the state based on market share included Truist Bank (23.8 percent) and Bank of America, N.A. (18.3 percent). As of December 31, 2021, the bank operated 189 branches and 613 ATMs in the state. WFBNA delineated 22 AAs within the state; however, the OCC combined, analyzed, and presented those AAs at the CSA level where possible for purposes of this evaluation. This resulted in the following six AAs: Atlanta-Athens Clarke County-Sandy Springs, GA CSA (Atlanta CSA), Brunswick, GA MSA (Brunswick MSA), Chattanooga-Cleveland-Dalton, GA CSA (Chattanooga CSA), Macon-Bibb County-Warner Robins, GA CSA (Macon CSA), Savannah-Hinesville-Statesboro, GA CSA (Savannah CSA), and Georgia Combined Non-MSA. The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

³¹ This rating only reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Atlanta CSA

The following table provides a summary of the demographics, including housing and business information for the Atlanta CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Atlanta CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,064	10.4	25.7	31.3	31.8	0.8
Population by Geography	6,079,567	7.4	25.4	34.7	32.2	0.4
Housing Units by Geography	2,418,439	8.2	25.9	33.7	32.1	0.1
Owner-Occupied Units by Geography	1,365,564	3.2	20.1	37.5	39.2	0.0
Occupied Rental Units by Geography	787,639	14.7	34.1	28.2	22.7	0.3
Vacant Units by Geography	265,236	15.3	31.5	30.0	23.1	0.2
Businesses by Geography	1,082,456	6.3	23.3	31.4	38.6	0.4
Farms by Geography	19,905	4.1	22.1	39.2	34.6	0.1
Family Distribution by Income Level	1,458,834	22.9	16.7	18.3	42.0	0.0
Household Distribution by Income Level	2,153,203	23.9	16.3	17.4	42.3	0.0
Median Family Income MSA - 12020 Athens-Clarke County, GA MSA		\$57,116	Median Housing Value			\$181,637
Median Family Income MSA - 12060 Atlanta-Sandy Springs-Alpharetta, GA MSA		\$67,322	Median Gross Rent			\$979
Median Family Income MSA - 23580 Gainesville, GA MSA		\$58,558	Families Below Poverty Level			12.3%
Median Family Income MSA - 40660 Rome, GA MSA		\$51,379				
Median Family Income Non-MSAs - GA		\$45,886				
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$22,943 to \$33,661 and moderate-income families earned at least \$22,943 to \$33,661 and less than \$36,709 to \$53,858 in the AA, depending on the metropolitan or non-metropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$574 to \$842 for low-income borrowers and ranging from \$918 to \$1,346 for moderate-income borrowers in the AA. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$975. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Atlanta-Sandy Springs-Alpharetta, GA MSA (Atlanta MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Atlanta MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Atlanta area has a diverse economy, is a distribution and cultural center, has a business-friendly environment, and has a large talent pool, healthy net migration. The area's weaknesses include a high rate of COVID-19 infections, heavy dependence on transportation raises cyclical volatility, strained infrastructure, and single-family housing is overvalued. The Atlanta MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Professional and Business Services, Education and Health Services, Government, Retail Trade, and Leisure and Hospitality Services. Major employers in the Atlanta MSA include Delta Air Lines Inc., Emory University and Emory Healthcare, The Home Depot Inc., Northside Hospital, and Piedmont Healthcare. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Atlanta MSA was 2.8 percent compared to the national unemployment rate of 3.7 percent.

Athens-Clarke County, GA MSA (Athens MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Athens MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Athens' economic strengths include its large university presence, low business and living costs, proximity to more expensive Atlanta, and highly educated workforce. The area's weaknesses include its difficulty in retaining University of Georgia (UGA) graduates and weak manufacturing industry. Athens-Clarke County's economic recovery was falling further behind the state's pace. Nonfarm payrolls moved sideways in 2021 after struggling to gain momentum in job gains. State and local government payrolls fell through the first half of 2021 due to budget cuts. While payrolls were on a positive trajectory, weakness in the outside public sector were weighing on the metro area's overall recovery. Consumer dependent industries have recovered about 70 percent of the pandemic-related job losses, while professional and business services have made nearly a full recovery. The Athens MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Government, Education and Health Services, Retail Trade, Leisure and Hospitality Services, and Professional and Business Services. Major employers in the Athens MSA include UGA, Piedmont Athens Regional, and St. Mary's Health Care System. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Athens MSA was 2.8 percent compared to the national unemployment rate of 2.8 percent.

Gainesville, GA MSA (Gainesville MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Gainesville MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Gainesville's economic strengths include it is a bedroom community for Atlanta, strong migration trends, large commuter workforce, below average cost of doing business, and strong housing market. The area's weaknesses include lack of high-wage jobs, low per capita income, and high employment volatility. Gainesville's recovery was moving forward in lockstep with the state. The labor market had almost fully recovered, better than in Georgia and nationwide. Goods producers inched ahead, as did private service providers, despite retailers giving back gains won in the spring. Local governments paved the way for public hiring, and the industry was in expansion, in the top quintile of performers in the South. The Gainesville MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Manufacturing, Education and Health Services,

Government, Professional and Business Services, and Retail Trade. Major employers in the Gainesville MSA include Northeast Georgia Health System, Fieldale Farms Corp., and Pilgrim's Pride Poultry. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Gainesville MSA was 2.3 percent compared to the national unemployment rate of 3.7 percent.

Rome, GA MSA (Rome MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Rome MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Rome economy was enjoying a stronger than average recovery, albeit slightly less strong than suggested by 2020's payroll employment estimates, which were significantly revised downward in 2021. Still, the unemployment rate had remained consistently below average throughout the recovery. This was largely because of the rapid recovery in goods-producing employment in 2020, combined with almost no pandemic-induced declines in public employment. Rome's economic strengths include it is a bedroom community for Atlanta, competitive tax burden, improving migration trends, and links to expanding regional automobile assembly industry. Weaknesses include a lack of high-paying service jobs, below -average educational attainment, and above-average employment volatility. The Rome MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Manufacturing, Government, Retail Trade, and Leisure and Hospitality Services. Major employers in the Rome MSA include Floyd Medical Center and Redmond Regional Medical Center. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Rome MSA was 2.9 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by four local organizations that were contacted during the evaluation period and served the Atlanta CSA. The organizations included one affordable housing organization and three economic development organization that helped to attract and retain businesses in the area. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing
- Rental assistance
- Affordable single-family housing
- Housing for persons with special needs
- Rehabilitation of housing units, improvement of the quality of the housing stock
- Financial literacy/education
- Workforce development programs
- Credit counseling
- Banking and credit products

Opportunities for participation by financial institutions included the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Supporting community development services such as financial literacy
- Homebuyer education classes primarily for low- and moderate-income individuals
- Down payment assistance programs
- Flexible mortgage loans for low- and moderate-income individuals
- Board members for community organizations
- Low-cost checking accounts
- Check cashing services that increase access to financial services
- Tax preparation services for low- and moderate-income individuals

Chattanooga CSA

The following table provides a summary of the demographics, including housing and business information for the Chattanooga CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Chattanooga CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	63	0.0	23.8	57.1	19.0	0.0
Population by Geography	348,851	0.0	23.2	55.6	21.2	0.0
Housing Units by Geography	141,863	0.0	24.5	55.1	20.4	0.0
Owner-Occupied Units by Geography	86,004	0.0	21.5	55.6	22.9	0.0
Occupied Rental Units by Geography	38,299	0.0	29.2	54.7	16.1	0.0
Vacant Units by Geography	17,560	0.0	28.8	53.4	17.8	0.0
Businesses by Geography	22,827	0.0	20.9	57.1	22.0	0.0
Farms by Geography	917	0.0	14.1	65.1	20.8	0.0
Family Distribution by Income Level	90,511	21.3	18.7	21.4	38.7	0.0
Household Distribution by Income Level	124,303	22.9	16.9	18.4	41.8	0.0
Median Family Income MSA - 16860 Chattanooga, TN-GA MSA		\$58,694	Median Housing Value			\$116,669
Median Family Income MSA - 19140 Dalton, GA MSA		\$47,062	Median Gross Rent			\$671
Median Family Income Non-MSAs - GA		\$45,886	Families Below Poverty Level			14.0%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$22,943 to \$29,347 and moderate-income families earned at least \$22,943 to \$29,347 and less than \$36,709 to \$46,955 in the AA, depending on the metropolitan or non-metropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of

the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$574 to \$734 for low-income borrowers and ranging from \$918 to \$1,174 for moderate-income borrowers in the AA. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$626. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in the Dalton, GA MSA and non-MSA.

Chattanooga, TN-GA MSA (Chattanooga MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Chattanooga MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Chattanooga's economic strengths include a favorable tax structure and its proximity to large southern markets, low business costs, publicly owned citywide high-speed internet, and it has less exposure to small businesses. Weaknesses include its below-average per capita income, low educational attainment of workforce, and its exposure to weaker tourism spending. Chattanooga's recovery had shifted into a higher gear. The public sector had been an important contributor in recent months, adding most of the net new jobs. Despite supply shortages, the key manufacturing sector was adding workers faster than elsewhere. The Chattanooga MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Government, Education and Health Services, Manufacturing, Professional and Business Services, Retail Trade, and Leisure and Hospitality Services. Major employers in the Chattanooga MSA include Erlanger Health System, Blue Cross Blue Shield of Tennessee, and Tennessee Valley Authority. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Chattanooga MSA was 2.6 percent compared to the national unemployment rate of 3.7 percent.

Dalton, GA MSA (Dalton MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Dalton MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Dalton's economic strengths include low living costs and its exposure to housing-related production. Weaknesses include well below-average per capita income and educational attainment, extremely low employment diversity, few high-paying industries outside of manufacturing and wholesale trade, and tepid population growth. Dalton is the nation's least industrially diverse metro area, which creates challenges. A heavy reliance on manufacturing limits the ability to draw creative talent. Manufacturing was the hardest-hit industry during the initial downturn in 2020, and its second-quarter contraction in 2020 was far worse than the national decline. Since then, Dalton had rebounded more rapidly. Dalton enjoys access to major highways and is close to many southeastern freight hubs; the importance of logistics is amplified by the area's proximity to major southern population centers, as Dalton sits between two large and growing cities, Atlanta, and Nashville. As online shopping resumed its slower but steady pre-pandemic growth path, the demand for transportation and warehousing on this key interstate grew. The Dalton MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Manufacturing, Government, Education and Health Services, Professional and Business Services, and Retail Trade. Major employers in the Dalton MSA include Shaw Industries, Mohawk Industries, Engineered Floors/J&J Industries, and Hamilton Medical Center. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Dalton MSA was 3.1 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local economic development organizations that were contacted during the evaluation period and serve the Chattanooga CSA. The organizations helped to attract and retain businesses, improve the quality of life, and increase wealth in the area. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing
- Rental assistance
- Affordable single-family housing
- Housing for persons with special needs
- Rehabilitation of housing units, improvement of the quality of the housing stock
- Financial literacy/education
- Workforce development programs
- Credit counseling
- Banking and credit products

Opportunities for participation by financial institutions included the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Supporting community development services such as financial literacy
- Homebuyer education classes primarily for low- and moderate-income individuals
- Down payment assistance programs
- Flexible mortgage loans for low- and moderate-income individuals
- Board members for community organizations
- Low-cost checking accounts
- Check cashing services that increase access to financial services
- Tax preparation services for low- and moderate-income individuals

Scope of Evaluation in the State of Georgia

The OCC selected the Atlanta CSA and Chattanooga CSA for full-scope reviews and based conclusions and ratings primarily on activity within these geographical areas. These AAs carried significant weight in determining the overall ratings for the state of Georgia because of the significance of the bank's presence in these AAs. More weight was given to the Atlanta CSA due to the larger deposit base, lending, and branch presence.

During the evaluation period, the bank originated or purchased 144,468 home mortgage loans, small loans to businesses, and small loans to farms totaling \$18.5 billion. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within each AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. In the Chattanooga

CSA, Brunswick MSA, Macon CSA, and Georgia Combined Non-MSA, the OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms. In the Atlanta CSA, the OCC placed more weight based on the number of loans on small loans to businesses versus home mortgage loans and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF GEORGIA

LENDING TEST

The bank's performance under the Lending Test in the state of Georgia is rated Outstanding. Performance in the limited-scope areas had a positive effect on the overall Lending Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Atlanta CSA was excellent and the bank's performance in the Chattanooga CSA was good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Atlanta CSA	54,980	73,917	572	49	129,518	89.6	92.7
Chattanooga CSA	1,525	938	177	1	2,641	1.8	1.6
Brunswick MSA	581	301	15	1	898	0.6	0.2
Macon CSA	1,886	974	47	8	2,915	2.0	0.9
Savannah CSA	3,496	3,541	56	14	7,107	4.9	3.7
Georgia Combined Non-MSA	735	678	49	2	1,464	1.0	0.9
Total	63,203	80,349	916	75	144,543	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Atlanta CSA	14,946,623	1,676,910	11,728	483,052	17,118,313	90.0	92.7
Chattanooga CSA	231,259	23,269	3,207	4	257,739	1.4	1.6
Brunswick MSA	155,250	8,032	671	1	163,954	0.9	0.2
Macon CSA	362,125	26,936	1,633	74,848	465,542	2.4	0.9
Savannah CSA	715,108	90,113	2,531	10,738	818,490	4.3	3.7
Georgia Combined Non-MSA	175,810	23,365	4,588	107	203,870	1.1	0.9
Total	16,586,175	1,848,625	24,358	568,750	19,027,908	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Atlanta CSA

As of June 30, 2021, WFBNA had a deposit market share of 17.5 percent. The bank ranked third among 89 depository financial institutions placing it in the top 4 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 3.3 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked fifth among 992 home mortgage lenders in this AA, which placed it in the top 1 percent of lenders. The top lenders in this AA based on market share were Rocket Mortgage (9.2 percent), PennyMac Loan Services (4.2 percent), and United Wholesale Mortgage (3.3 percent).

According to peer small business data for 2021, WFBNA had a market share of 9.4 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked third out of 312 small business lenders, which placed it in the top 1 percent of lenders. The other top lenders in this AA based on market share were American Express National Bank (22.2 percent) and Bank of America, N.A. (10.5 percent).

According to peer small farm data for 2021, WFBNA had a market share of 22.5 percent based on the number of small loans to farms originated or purchased in this AA. The bank was the top ranked lender of small loans to farms in the AA. The other top lenders in this AA based on market share were JPMorgan Chase Bank, N.A. (16.9 percent) and John Deere Financial, FSB (10.3 percent).

Chattanooga CSA

As of June 30, 2021, WFBNA had a deposit market share of 17.5 percent. The bank ranked second among 19 depository financial institutions placing it in the top 11 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 3.4 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked fourth among 377 home mortgage lenders in this AA, which placed it in the top 2 percent of lenders. The top lenders in this AA based on market share were Rocket Mortgage (8.7 percent), PennyMac Loan Services, LLC (4.7 percent), and Regions Bank (4 percent).

According to peer small business data for 2021, WFBNA had a market share of 7.2 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked third out of 96 small business lenders, which placed it in the top 4 percent of lenders. The other top lenders in this AA based on market share were American Express National Bank (20.1 percent) and Truist Bank (9.4 percent).

According to peer small farm data for 2021, WFBNA had a market share of 29.4 percent based on the number of small loans to farms originated or purchased in this AA. The bank was the top ranked lender of small loans to farms in the AA. The other top lenders in this AA based on market share were John Deere Financial, FSB (17.7 percent) and JPMorgan Chase Bank, N.A. (14 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AAs. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data. The bank's performance was adequate in Atlanta CSA and was good in the Chattanooga CSA.

Atlanta CSA

Home Mortgage Loans

Refer to Table O in the state of Georgia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was below the percentage of owner-occupied housing units in low-income geographies but it was near to the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied housing units in moderate-income geographies but it approximated the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Georgia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

The bank's percentages of small loans to businesses in low- and moderate-income geographies were below both the percentages of businesses in low- and moderate-income geographies and the aggregate distributions of small loans to businesses in low- and moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Georgia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

The bank's percentage of small loans to farms in low-income was significantly below both the percentage of farms in low-income geographies and the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-

income geographies approximated the percentage of farms in moderate-income geographies and it was near to the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Chattanooga CSA

Home Mortgage Loans

Refer to Table O in the state of Georgia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

There were no designated low-income census tracts in the AA. The bank's percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied housing units in moderate-income geographies but it was near to the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Georgia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

There were no designated low-income census tracts in the AA. The bank's percentage of small loans to businesses in moderate-income geographies was below the percentage of businesses in moderate-income geographies but it was near to the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Georgia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was excellent.

There were no designated low-income census tracts in the AA. The bank's percentage of small loans to farms in moderate-income geographies was equal to the percentage of farms in moderate-income geographies and it exceeded the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies in the Atlanta CSA and Chattanooga CSA. The OCC analyzed geographic lending patterns

of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AAs.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes. The bank's performance was good in the Atlanta CSA and Chattanooga CSA.

Atlanta CSA

Home Mortgage Loans

Refer to Table P in the state of Georgia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but it approximated the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers approximated both the percentage of moderate-income families and the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Georgia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 28.4 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was well below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Georgia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was poor.

The bank did not collect or consider the GAR in the underwriting of approximately 66.3 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was below both the percentage of farms in the AA with GAR of \$1 million or less and the aggregate distribution of small loans to farms GAR of \$1 million or less by all lenders.

Chattanooga CSA

Home Mortgage Loans

Refer to Table P in the state of Georgia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and was below the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and it was near to the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Georgia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 37 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was well below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Georgia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was poor.

The bank did not collect or consider the GAR in the underwriting of approximately 80.2 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was significantly below the percentage of farms in the AA with

GAR of \$1 million or less and it was well below the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

Atlanta CSA

WFBNA was a leader in making CD loans in the Atlanta CSA. WFBNA made 49 CD loans totaling approximately \$483 million, which represented 8.4 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing and community service purposes. By dollar volume, 57.8 percent of these loans funded affordable housing that provided 2,783 units of affordable housing, 1.5 percent funded economic development, less than 1 percent funded revitalization and stabilization efforts, and 40.1 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided two loans totaling \$35.7 million that financed the acquisition and rehabilitation of an affordable housing property. This LIHTC development located in Kennesaw, Georgia, restricted units to tenants earning up to 60 percent of the AMI.
- WFBNA renewed and increased a patient capital loan, from \$1.5 million to \$5 million to a CDFI in Atlanta, Georgia. The CDFI operated a small business community development loan fund that financed low-income minority-owned and women-owned small businesses in north Georgia, including the city of Atlanta.

Chattanooga CSA

WFBNA made few, if any, CD loans in the Chattanooga CSA. WFBNA made one CD loans totaling approximately \$4,154, which represented less than 1 percent of the allocated tier 1 capital. The CD loan was made for affordable housing purposes.

Product Innovation and Flexibility

Atlanta CSA

WFBNA made extensive use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA made 13,658 loans under its flexible lending programs totaling \$645.2 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	870	216,400

Dream. Plan. Home.	139	24,500
PPP	12,649	404,300
Total	13,658	645,200

Chattanooga CSA

WFBNA made limited use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA made 189 loans under its flexible lending programs totaling \$14.1 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	54	9,400
Dream. Plan. Home.	7	1,100
PPP	128	3,600
Total	189	14,100

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Macon CSA was consistent with the bank's overall performance under the Lending Test in the full-scope areas. The bank's performance in the Brunswick MSA, Savannah CSA, and Georgia Combined Non-MSA was weaker than performance in the full-scope areas. Performance was weaker primarily due to weaker borrower income distributions and lower levels of community development lending relative to the bank's presence in the limited-scope areas.

Refer to Tables O through T in the state of Georgia section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Georgia is rated High Satisfactory. Performance in the limited-scope areas had a neutral effect on the overall Investment Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Atlanta CSA was good and the bank's performance in the Chattanooga CSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Atlanta CSA	240	82,096	450	232,792	690	85.0	314,888	68.7	18	38,738
Chattanooga CSA	0	0	19	76,289	19	2.3	76,289	16.6	0	0
Brunswick MSA	1	990	5	35	6	0.7	1,025	0.2	1	31
Macon CSA	5	23,024	25	33,981	30	3.7	57,005	12.4	6	27,321
Savannah CSA	1	3,548	47	2,400	48	5.9	5,948	1.3	1	881
Georgia Combined Non-MSA	0	0	14	2,305	14	1.7	2,305	0.5	0	0
Statewide***	0	0	5	1,017	5	0.6	1,017	0.2	0	0
Total	247	109,658	565	348,819	812	100.0	458,477	100.0	26	66,971
<p>The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.</p> <p>* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.</p> <p>** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.</p> <p>*** Statewide means investments in statewide programs that have a purpose, mandate, or function to serve one or more of the bank's assessment areas within the state. Due to rounding, totals may not equal 100.0%</p>										

Atlanta CSA

The bank had a significant level of qualified CD investments and grants occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$315.2 million and represented 5.5 percent of the bank's tier 1 capital allocated to the AA. The investments also included 435 grants and donations totaling \$39.8 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited good responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 44 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 28.2 percent that focused on community services targeted to low- and moderate-income individuals, and 27.8 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 2,243 units of affordable housing in the AA.

The bank occasionally used innovative and complex investments to support CD initiatives. Approximately 32.4 percent of current period investment dollars were complex LIHTC and State Historic Tax Credit investments. The following are examples of CD investments made in this AA:

- WFBNA provided a \$17.8 million equity investment to finance the acquisition and rehabilitation of an affordable housing property. This LIHTC development located in Kennesaw, Georgia, restricted 258 units to tenants earning up to 60 percent of the AMI. The rehabilitation included essential upgrades such as new water heaters, and air conditioning. The development featured a central

laundry, a fitness center, a playground, and security surveillance. This activity was complex due to the inherent nature of LIHTC transactions and multiple funding sources including the Housing Authority of Cobb County.

- WFBNA invested in two bonds totaling more than \$53 million to finance the construction of a hospital in Atlanta, Georgia. The nonprofit healthcare organization was dedicated to caring for infants, children, teens, and young adults throughout Georgia. The bank financed a portion of the cost of the acquisition, and construction of a facility that included a hospital and medical office.
- WFBNA invested \$10 million in State Historic Tax Credits to finance the redevelopment of the historic Candler Building in Atlanta, Georgia. This project redeveloped the building into a hotel and created approximately 140 new low- and moderate-income jobs.

Chattanooga CSA

The bank had an excellent level of qualified CD investments and grants often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$78.5 million and represented 78.5 percent of the bank's tier 1 capital allocated to the AA. The investments also included 14 grants and donations totaling \$73,000 to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 31.6 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 36.8 percent that focused on community services targeted to low- and moderate-income individuals, and 31.6 percent that focused on revitalization/stabilization of low- and moderate-income individuals and geographies. The bank's investments did not help create or retain any units of affordable housing in the AA.

The bank made extensive use of innovative and complex investments to support CD initiatives. Approximately 99.6 percent of current period investment dollars were complex NMTC investments. The following are examples of CD investments made in this AA:

- WFBNA invested \$76 million in NMTCs to expand a prototype production facility in Calhoun, Georgia. The bank's funding supported the expansion of manufacturing capabilities. This project created an additional 240 quality full-time jobs. The business engaged a local employment agency to source full-time employees from the low-income community.
- WFBNA provided two grants totaling \$20,000 to a nonprofit organization in Dalton, Georgia. The organization built affordable housing for low-income families and provided zero-interest rate mortgages. One grant for \$15,000 supported the construction of a home and a \$5,000 grant supported homebuyer education for the organization's clients.
- WFBNA invested \$9.5 million in Single-Family Mortgage Bonds. The bonds qualified for CRA credit based on investments into new projects, used to finance, in whole or in part, newly originated

mortgage loans as whole loans or pooled into program securities, as well as down payment assistance loans, on single family residential housing units for eligible persons and low- and moderate-income families within the state.

Broader Statewide Investments

WFBNA had five current and prior period investments totaling \$1 million with a purpose, mandate, or function to serve one or more AAs in the state. These CD investments were primarily grants that supported community services targeted to low- and moderate-income persons. These investments were given positive consideration and supported the bank's overall performance under the Investment Test in the state of Georgia.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Brunswick MSA and Macon CSA was consistent with the bank's overall performance under the Investment Test in the full-scope areas. Performance in the Savannah CSA and Georgia Combined Non-MSA was weaker than the bank's overall performance under the Investment Test in the full-scope areas, primarily due to lower levels of CD investments relative to the bank's presence and capacity to invest in those AAs.

SERVICE TEST

The bank's performance under the Service Test in the state of Georgia is rated Outstanding. Performance in the limited-scope areas had a neutral effect on the overall Service Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Atlanta CSA was excellent and the bank's performance in the Chattanooga CSA was good.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's full-scope AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Atlanta CSA	92.7	158	83.6	7.0	26.6	27.2	38.0	7.4	25.4	34.7	32.2
Chattanooga CSA	1.6	5	2.6	0.0	40.0	60.0	0.0	0.0	23.2	55.6	21.2
Brunswick MSA	0.2	1	0.5	0.0	0.0	0.0	100.0	3.6	24.0	44.0	28.4
Macon CSA	0.9	4	2.1	0.0	0.0	25.0	75.0	11.6	20.8	36.2	31.3
Savannah CSA	3.7	14	7.4	0.0	28.6	50.0	21.4	8.2	19.8	42.8	29.2
Georgia Combined Non-MSA	0.9	7	3.7	0.0	14.3	71.4	14.3	1.7	23.2	59.8	15.3
Total	100.0	189	100.0	5.8	25.9	31.2	36.0	7.1	24.6	37.2	30.8
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Atlanta CSA	0	31	-4	-9	-7	-10
Chattanooga CSA	0	1	0	-1	0	0
Brunswick MSA	0	1	-1	0	0	0
Macon CSA	0	1	0	0	-1	0
Savannah CSA	0	1	0	-1	0	0
Georgia Combined Non-MSA	0	2	0	-2	0	0
Total	0	37	-5	-13	-8	-10
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.						

Atlanta CSA

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Atlanta CSA. WFBNA operated 158 branches in the AA, comprising 11 branches in low-income geographies, 42 branches in moderate-income geographies, 43 branches in middle-income geographies, 60 branches in upper-income geographies, and two branches in geographies without an income designation. The distribution of branches in low-income geographies approximated the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies. The distribution was augmented by three branches in middle- and upper-income geographies that were within close proximity to serve low-income areas and 14 branches in middle- and upper-income geographies that were within close proximity to and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income

geographies and/or to low- and moderate-income individuals. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations. Despite the closures, its service delivery systems remained readily accessible.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced, varied in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m., Monday through Friday. Of the 92 branches opened on Saturdays, seven were located in low-income geographies and 28 were located in moderate-income geographies.

Chattanooga CSA

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Chattanooga CSA. WFBNA operated five branches in the AA, comprising two branches in moderate-income geographies, and three branches in middle-income geographies. There were no low-income geographies within the AA, however, the distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies. The distribution was augmented by two branches in middle- and upper-income geographies that were within close proximity to and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations. Despite the closures, its service delivery systems remained readily accessible.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the three branches opened on Saturdays, one was located in a moderate-income geography.

Community Development Services

WFBNA provided an adequate level of CD services.

Atlanta CSA

WFBNA provided a relatively high level of CD services in the Atlanta CSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 235 CD service activities during the evaluation period. A majority (97 percent) of the bank's assistance was to

organizations providing community services targeted to low- and moderate-income individuals and families. The other CD services were targeted to economic development and affordable housing. Financial education comprised 70 percent of the CD service activities, and board membership and outreach to provide technical assistance to institutions serving low- and moderate-income communities comprised the remaining 30 percent of community development service activities. The bank's assistance provided was responsive to the identified needs in the AA. The following are examples of CD services provided in this AA:

- WFBNA employees provided 98 hours of financial education and board membership to an organization whose mission was higher education planning for low- and moderate-income high school and college students. The organization assisted these students to secure resources responsibly and proactively to pursue higher education.
- WFBNA employees provided 34 hours of board membership to an organization that supported affordable housing, homeless services, and care for low- and moderate-income families that were affected by HIV/AIDS. The organization provided a variety of housing options, healthcare resources, and supportive services. The housing programs also included case management, linkage to HIV care, employment services, mental health services, and legal services. This activity was responsive to the identified need for affordable housing and community services in the AA.
- WFBNA employees provided 18 hours of ongoing outreach to an organization that supported a variety of microbusinesses, minority-owned enterprises, women-owned enterprises, and agribusinesses. The organization also provided support to business development organizations, small business advisors, coaches, consultants, and small business loan, grant and funding providers. The organization's support assisted these businesses and organizations with entrepreneurial training for marketing, management, finance and accounting, legal and human resources. This activity was responsive to the identified need of economic development within the AA.

Chattanooga CSA

WFBNA provided a limited level of CD services in the Chattanooga CSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 20 CD service activities during the evaluation period. All of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. Board activity and technical assistance comprised 85 percent of CD services activities, and the remaining 15 percent were focused on financial education. The bank's assistance provided was responsive to the identified needs in the AA. The following is an example of a CD service provided in this AA:

- WFBNA employees provided 15 hours of board service for an organization that was committed to assist low- and moderate-income victims of violence, including children, by providing shelter, advocacy, and support to survivors while participating in community-wide educational programs to change beliefs and behaviors. This activity is responsive to the identified need of community services within the AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Brunswick MSA, Macon CSA, Savannah CSA, and Georgia Combined Non-MSA was weaker than the bank's overall

performance under the Service Test in the full-scope areas. Performance was weaker primarily due to lower accessibility of retail banking services in low- and moderate-income areas.

State of Idaho

CRA rating for the State of Idaho³²: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited an adequate geographic distribution of loans in its AAs.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank made a relatively high level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.
- The bank had an adequate level of qualified CD investments that demonstrated adequate responsiveness to credit and economic development needs, although occasionally in a leadership position. The bank made significant use of innovative and complex investments to support CD initiatives.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided an adequate level of CD services.

Description of Institution's Operations in the State of Idaho

The state of Idaho was WFBNA's 25th largest rating area based on its total deposits in the state. As of June 30, 2021, the bank maintained approximately \$7.4 billion or 0.5 percent of its total domestic deposits in branches within Idaho. Of the 28 depository financial institutions operating in the bank's AAs within the state, WFBNA with a deposit market share of 19.1 percent, was the largest in the state. Other top depository financial institutions in the bank's AAs within the state based on market share included U.S. Bank, N.A. (16.5 percent), Keybank, N.A. (6.9 percent), Bank of America, N.A. (6.8 percent), Glacier Bank (5.8 percent), D.L. Evans Bank (5.8 percent), and Zions Bancorporation, N.A. (5.2 percent). As of December 31, 2021, the bank operated 54 branches and 70 ATMs in Idaho. WFBNA delineated 18 AAs within the state; however, the OCC combined, analyzed, and presented those AAs at the CSA level where possible for purposes of this evaluation. This resulted in the following seven AAs: Boise City-Mountain Home, ID CSA (Boise City CSA), Coeur d'Alene, ID MSA (Coeur d'Alene MSA), Idaho Falls-Rexburg-Blackfoot, ID CSA (Idaho Falls CSA), Lewiston, ID MSA (Lewiston MSA), Pocatello, ID MSA (Pocatello MSA), Twin Falls, ID MSA (Twin Falls MSA), and Idaho Combined Non-MSA. The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries

³² This rating only reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Boise City CSA

The following table provides a summary of the demographics, including housing and business information for the Boise City CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Boise City CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	100	6.0	31.0	39.0	24.0	0.0
Population by Geography	677,577	3.2	28.1	45.8	22.9	0.0
Housing Units by Geography	265,117	3.7	27.9	45.8	22.5	0.0
Owner-Occupied Units by Geography	166,337	1.4	23.6	47.9	27.1	0.0
Occupied Rental Units by Geography	79,751	8.0	36.8	40.6	14.6	0.0
Vacant Units by Geography	19,029	6.3	28.8	49.5	15.4	0.0
Businesses by Geography	100,477	7.7	22.8	40.5	29.0	0.0
Farms by Geography	3,923	3.4	27.1	46.9	22.6	0.0
Family Distribution by Income Level	167,918	19.5	18.7	21.7	40.0	0.0
Household Distribution by Income Level	246,088	23.0	16.7	18.9	41.3	0.0
Median Family Income MSA - 14260 Boise City, ID MSA		\$61,722	Median Housing Value			\$170,903
Median Family Income Non-MSAs - ID		\$52,867	Median Gross Rent			\$832
			Families Below Poverty Level			10.3%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$26,434 to \$30,861 and moderate-income families earned at least \$26,434 to \$30,861 and less than \$42,294 to \$49,378, depending on the metropolitan or nonmetropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$661 to \$772 for low-income borrowers and \$1,057 to \$1,234 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$917. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Boise City, ID MSA (Boise City MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Boise City MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Boise City MSA has a robust population growth and favorable migration flows, cheaper living costs than in other large West Coast metro areas, and below average business costs. Economy weaknesses include above average volatility tied to cyclical semiconductor industry and lack of high wage jobs outside of technology and manufacturing. House price appreciation had slowed slightly from

the lofty gains realized earlier in 2021 but was still historically high and outpacing the national rate. Despite rising prices, builders have taken their foot off the accelerator as shortages of workers and materials made the previous pace of single-family permitting unsustainable. The Boise City MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Professional and Business Services, Education and Health Services, Government, Leisure and Hospitality Services, and Retail Trade. Major employers in the Boise City MSA include St. Luke's Health System, Micron Technology, and St. Alphonsus Regional Medical Center. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Boise City MSA was 3.5 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Boise City CSA. The organizations included one affordable housing organization and one economic development organization that helped to attract new businesses to the area. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing
- Affordable for-sale single family housing
- Rental assistance
- Homeless services
- Financial literacy/education
- Small business literacy/education and programs

Opportunities for participation by financial institutions included the following:

- Lending and investment in affordable housing
- Lending and investment in small businesses
- Supporting community development services such as financial literacy
- Providing greater access to financial services

Coeur d'Alene MSA

The following table provides a summary of the demographics, including housing and business information for the Coeur d'Alene MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Coeur d’Alene MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	25	0.0	20.0	64.0	16.0	0.0
Population by Geography	145,046	0.0	18.1	68.7	13.1	0.0
Housing Units by Geography	65,272	0.0	17.2	68.9	13.8	0.0
Owner-Occupied Units by Geography	39,582	0.0	12.8	72.0	15.3	0.0
Occupied Rental Units by Geography	16,839	0.0	30.3	61.6	8.1	0.0
Vacant Units by Geography	8,851	0.0	12.4	69.5	18.1	0.0
Businesses by Geography	23,471	0.0	20.7	65.8	13.5	0.0
Farms by Geography	746	0.0	16.5	69.7	13.8	0.0
Family Distribution by Income Level	38,705	18.0	20.3	22.7	39.0	0.0
Household Distribution by Income Level	56,421	21.8	17.7	19.8	40.7	0.0
Median Family Income MSA - 17660 Coeur d'Alene, ID MSA		\$58,966	Median Housing Value			\$203,695
			Families Below Poverty Level			9.4%
			Median Gross Rent			\$868
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$29,483 and moderate-income families earned at least \$29,483 and less than \$47,173. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant’s income. This calculated to a maximum monthly mortgage payment of \$737 for low-income borrowers and \$1,179 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner’s insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,093. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Information from Moody’s Analytics indicated that at the end of the evaluation period, the Coeur d’Alene MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Coeur d’Alene MSA has a robust population growth and in-migration, strong housing market, low business cost, equal distribution of rent and high quality of life. Economy weaknesses include retail and hospitality dependent on tourism, unfavorable age structure and above average employment volatility. The Coeur d’Alene MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Government, Leisure and Hospitality Services, Retail Trade, Education and Health Services, Professional and Business Services, and Construction. Major employers in the Coeur d’Alene MSA include Kootenai Health, Hagadone Hospitality Co., Qualfon, Inc., Willamette Dental Group, Coeur d’Alene Tribal Casino, and Northern Quest Resort and Casino. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Coeur d’Alene MSA was 4.3 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by three local organizations that were contacted during the evaluation period and served the Coeur d'Alene MSA. The organizations included one CDFI that focused on affordable housing and community facilities and two economic development organization that helped to attract and retain businesses in the area. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing
- Rental assistance
- Affordable single-family housing
- Housing for persons with special needs
- Rehabilitation of housing units, improvement of the quality of the housing stock
- Financial literacy/education
- Workforce development programs
- Credit counseling
- Banking and credit products

Opportunities for participation by financial institutions included the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Supporting community development services such as financial literacy
- Homebuyer education classes primarily for low- and moderate-income individuals
- Down payment assistance programs
- Flexible mortgage loans for low- and moderate-income individuals
- Board members for community organizations
- Low-cost checking accounts
- Check cashing services that increase access to financial services
- Tax preparation services for low- and moderate-income individuals

Scope of Evaluation in the State of Idaho

The OCC selected the Boise City CSA and Coeur d'Alene MSA for full-scope reviews and based conclusions and ratings primarily on activity within these geographical areas. These AAs carried significant weight in determining the overall ratings for the state of Idaho because of the significance of the bank's presence in these AAs. More weight was given to the Boise City CSA due to the larger deposit base, lending, and branch presence.

During the evaluation period, the bank originated or purchased 24,266 home mortgage loans, small loans to businesses, and small loans to farms totaling \$3.7 billion. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within each AA, the OCC placed more weight based on the number of loans on the bank's

lending products that had the highest percentage of loans in arriving at conclusions. In Coeur d'Alene MSA, Idaho Falls CSA, and Lewiston MSA, the OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms. In the Boise City CSA, Twin Falls MSA, and Idaho Combined Non-MSA, the OCC placed more weight based on the number of loans on small loans to businesses versus home mortgage loans and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF IDAHO

LENDING TEST

The bank's performance under the Lending Test in the state of Idaho is rated High Satisfactory. Performance in the limited-scope areas had a neutral effect on the overall Lending Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Boise City CSA and Coeur d'Alene MSA was good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Boise City CSA	5,247	5,737	175	20	11,179	46.0	55.8
Coeur d'Alene MSA	2,132	1,324	42	1	3,499	14.4	8.5
Idaho Falls CSA	1,694	1,110	156	4	2,964	12.2	8.2
Lewiston MSA	348	122	12	1	483	2.0	1.9
Pocatello MSA	294	263	37	3	597	2.5	3.5
Twin Falls MSA	280	520	59	1	860	3.5	4.9
Idaho Combined Non-MSA	2,014	2,344	356	8	4,722	19.4	17.2
Total	12,009	11,420	837	38	24,304	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Boise City CSA	1,498,920	176,371	11,090	28,459	1,714,840	45.8	55.8
Coeur d'Alene MSA	610,889	41,052	1,739	7	653,687	17.4	8.5
Idaho Falls CSA	390,370	38,368	6,819	606	436,163	11.6	8.2
Lewiston MSA	64,158	7,169	349	2	71,678	1.9	1.9
Pocatello MSA	57,417	13,056	933	1,002	72,408	1.9	3.5
Twin Falls MSA	51,074	17,348	2,525	4	70,951	1.9	4.9
Idaho Combined Non-MSA	618,953	83,894	24,277	77	727,201	19.4	17.2
Total	3,291,781	377,258	47,732	30,157	3,746,928	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Boise City CSA

As of June 30, 2021, WFBNA had a deposit market share of 23.2 percent. The bank ranked first among 22 depository financial institutions placing it in the top 5 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 2.2 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked ninth among 462 home mortgage lenders in this AA, which placed it in the top 2 percent of lenders. The top lenders in this AA based on market share were Idaho Central Credit Union (14.8 percent), Rocket Mortgage (6.6 percent), and Fairway Independent Mortgage Corp. (4.5 percent).

According to peer small business data for 2021, WFBNA had a market share of 10.9 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked fourth out of 128 small business lenders, which placed it in the top 4 percent of lenders. The top lenders in this AA based on market share were JPMorgan Chase Bank, N.A. (14.2 percent), American Express National Bank (13.5 percent), and U.S. Bank, N.A. (11.4 percent).

According to peer small farm data for 2021, WFBNA had a market share of 8.2 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked fifth out of 22 small farm lenders, which placed it in the top 23 percent of lenders. The top lenders in this AA based on market share were U.S. Bank, N.A. (18.5 percent), JPMorgan Chase Bank, N.A. (14.4 percent), and D.L. Evans Bank (14.2 percent).

Coeur d'Alene MSA

As of June 30, 2021, WFBNA had a deposit market share of 10.6 percent. The bank ranked third among 13 depository financial institutions placing it in the top 24 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 4.3 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked sixth among 344 home mortgage lenders in this AA, which placed it in the top 2 percent of lenders. The top lenders in this AA based on market share were Willamette Valley Bank (8.1 percent), Idaho Central Credit Union (7.1 percent), and Glacier Bank (6.1 percent).

According to peer small business data for 2021, WFBNA had a market share of 9.6 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked third out of 79 small business lenders, which placed it in the top 4 percent of lenders. The other top lenders in this AA based on market share were American Express National Bank (11.9 percent) and JPMorgan Chase Bank, N.A. (11.1 percent).

According to peer small farm data for 2021, WFBNA had a market share of 25 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked first out of 13 small farm lenders, which placed it in the top 8 percent of lenders. The other top lenders in this AA based on market share were U.S. Bank, N.A. (19.1 percent) and JPMorgan Chase Bank, N.A. (19.1 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AAs. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data. The bank's performance was adequate in the Boise City CSA and was excellent in the Coeur d'Alene MSA.

Boise City CSA

Home Mortgage Loans

Refer to Table O in the state of Idaho section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans in low-income geographies was well below both the percentage of owner-occupied housing units in low-income geographies and the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was well below the percentage of owner-occupied housing units in moderate-income geographies and it was below the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Idaho section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was near to the percentage of businesses in low-income geographies but it was below the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was near to both the percentage of businesses in moderate-

income geographies and the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Idaho section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

The bank's percentage of small loans to farms in low-income geographies was significantly below both the percentage of farms in low-income geographies and the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-income geographies was below the percentage of farms in moderate-income geographies and it was well below the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Coeur d'Alene MSA

Home Mortgage Loans

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

There were no designated low-income census tracts in the AA. The bank's percentage of home mortgage loans in moderate-income geographies exceeded both the percentage of owner-occupied housing units in moderate-income geographies and the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Idaho section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

There were no designated low-income census tracts in the AA. The bank's percentage of small loans to businesses in moderate-income geographies was below the percentage of businesses in moderate-income geographies but it was near to the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Idaho section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was good.

There were no designated low-income census tracts in the AA. The bank's percentage of small loans to farms in moderate-income geographies was well below the percentage of farms in moderate-income geographies but it approximated the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies in the Boise City CSA and Coeur d'Alene MSA. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AAs.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes. The bank's performance was good in the Boise City CSA and the Coeur d'Alene MSA.

Boise City CSA

Home Mortgage Loans

Refer to Table P in the state of Idaho section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but it approximated the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families but it approximated the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Idaho section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 24.9 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the

AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Idaho section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was adequate.

The bank did not collect or consider the GAR in the underwriting of approximately 41.1 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below the percentage of farms in the AA with GAR of \$1 million or less and it was below the aggregate distribution of small loans to farms GAR of \$1 million or less by all lenders.

Coeur d'Alene MSA

Home Mortgage Loans

Refer to Table P in the state of Idaho section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but it exceeded the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families but it exceeded the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Idaho section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 17.4 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Idaho section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was poor.

The bank did not collect or consider the GAR in the underwriting of approximately 59.5 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below both the percentage of farms in the AA with GAR of \$1 million or less and the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Community Development Lending

The bank made a relatively high level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

Boise City CSA

WFBNA made a relatively high level of CD loans in the Boise City CSA. WFBNA made 20 CD loans totaling approximately \$28.5 million, which represented 5.3 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing, economic development, and community service purposes. By dollar volume, 39.6 percent of these loans funded affordable housing that provided 144 units of affordable housing, 37.4 percent funded economic development, less than 1 percent funded revitalization and stabilization efforts, and 22.7 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$7.5 million loan that financed an LIHTC development located in Nampa, Idaho with 84 percent of its total units restricted to tenants with incomes up to 60 percent of the AMI.
- WFBNA renewed a \$2 million working capital line of credit to a nonprofit organization that provided residential treatment, group homes, adoption, and other services for troubled, disturbed, delinquent, or abused children and adolescents. According to the organization, 97 percent of its clients were considered low- or moderate-income.

Coeur d'Alene MSA

WFBNA made few, if any, CD loans in the Coeur d'Alene MSA. WFBNA made one CD loan totaling approximately \$6,585, which represented less than 1 percent of the allocated tier 1 capital. The CD loan was to a CDFI that funded economic development and affordable housing initiatives as well as financed

a broad range of community development projects crucial to assisting areas throughout the west affected by poverty. All the CDFI's clients earned less than 80 percent of the median family income.

Product Innovation and Flexibility

Boise City CSA

WFBNA made limited use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA made 674 loans under its flexible lending programs totaling 30.2 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	34	10,600
Dream. Plan. Home.	6	1,300
PPP	634	18,300
Total	674	30,200

Coeur d'Alene MSA

WFBNA made little use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA made 183 loans under its flexible lending programs totaling \$9.1 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	14	3,900
Dream. Plan. Home.	1	132
PPP	168	5,100
Total	183	9,132

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Idaho Falls CSA and Pocatello MSA was consistent with the bank's overall performance under the Lending Test in the full-scope areas. The bank's performance in the Lewiston MSA, Twin Falls MSA, and the Idaho Combined Non-MSA was weaker than the bank's overall performance. Performance in these limited-scope areas was weaker primarily due to adequate geographic and borrower distributions and lower levels of CD lending relative to the needs and opportunities in these areas.

Refer to Tables O through T in the state of Idaho section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Idaho is rated Low Satisfactory. Performance in the limited-scope areas had a neutral effect on the overall Investment Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Boise City CSA was adequate and the bank's performance in the Coeur d'Alene MSA was poor.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Boise City CSA	47	7,629	87	7,701	134	68.0	15,330	21.4	5	7,259
Coeur d'Alene MSA	4	1,340	5	33	9	4.6	1,372	1.9	3	42
Idaho Falls CSA	5	37,299	9	53	14	7.1	37,352	52.0	3	734
Lewiston MSA	0	0	4	12	4	2.0	12	0.0	0	0
Pocatello MSA	1	14,065	9	173	10	5.1	14,238	19.8	1	616
Twin Falls MSA	2	3,209	6	41	8	4.1	3,251	4.5	1	161
Idaho Combined Non-MSA	3	85	15	163	18	9.1	248	0.3	1	1
Statewide***	0	0	0	0	0	0.0	0	0.0	0	0
Total	62	63,628	135	8,175	197	100.0	71,803	100.0	14	8,813
<p>The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.</p> <p>* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.</p> <p>** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.</p> <p>*** Statewide means investments in statewide programs that have a purpose, mandate, or function to serve one or more of the bank's assessment areas within the state. Due to rounding, totals may not equal 100.0%</p>										

Boise City CSA

The bank had an adequate level of qualified CD investments and grants although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$15.3 million and represented 2.8 percent of the bank's tier 1 capital allocated to the AA. The investments also included 86 grants and donations totaling \$1.6 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited adequate responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 49.3 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 44.8 percent that focused on community services targeted to low- and moderate-income individuals, and 5.9 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 203 units of affordable housing in the AA.

The bank made significant use of innovative or complex investments to support CD initiatives. Approximately 79.2 percent of current period investment dollars were complex LIHTC investments. The following are examples of CD investments made in this AA:

- WFBNA invested \$21.6 million in an LIHTC fund that benefitted multiple AAs. Of this total investment, \$6.1 million supported an LIHTC development located in Caldwell, Idaho with 76 units restricted to tenants earning up to 60 percent of the AMI.
- WFBNA provided four grants totaling \$102,500 to a nonprofit organization that focused on comprehensive approaches to affordable housing and community development. Their mission was to create innovative housing solutions for underserved populations through strategic partnerships. One \$20,000 grant was used by the organization to assist its clients including refugee populations, with incomes in the 30 to 60 percent of the AMI range by covering basic, immediate needs during COVID-19 including food, shelter, and health care.
- WFBNA provided a \$345,000 Open for Business grant to an organization that provided health and human services to individuals, families, and communities in transition.

Coeur d'Alene MSA

The bank had a poor level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$1.4 million and represented 1.7 percent of the bank's tier 1 capital allocated to the AA. The investments also included five grants and donations totaling \$33,000 to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited poor responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 44.4 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 44.4 percent that focused on community services targeted to low- and moderate-income individuals, and 11.1 percent that focused on economic development of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 47 units of affordable housing in the AA.

The bank rarely used innovative and complex investments to support CD initiatives. None of the current period investments were complex. The following are examples of CD investments made in this AA:

- WFBNA provided two grants totaling \$7,500 to an organization that utilized community-led solutions to identify and resolve community concerns with a focus on education, financial stability, and health. The grants supported COVID-19 relief efforts and a training program targeted to home-based small business childcare providers who were often also low- and moderate-income.
- WFBNA provided a \$10,000 grant to an organization that provided safety, education, and empowerment to victims of violence and the community.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Idaho Falls CSA, Pocatello MSA, and Twin Falls MSA was stronger than the bank's overall performance under the Investment Test in the full-scope areas, primarily due to higher levels of CD investments relative to the bank's presence in the AA. Performance in the Lewiston MSA and Idaho Combined Non-MSA was weaker than the bank's overall performance under the Investment Test in the full-scope areas primarily due to lower levels of CD investments relative to the bank's presence and capacity to invest in those AAs.

SERVICE TEST

The bank's performance under the Service Test in the state of Idaho is rated Outstanding. Performance in the limited-scope areas had a neutral effect on the overall Service Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Boise City CSA was excellent and the bank's performance in the Coeur d'Alene MSA was good.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's full-scope AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Boise City CSA	55.8	21	38.9	9.5	42.9	33.3	14.3	3.2	28.1	45.8	22.9
Coeur d'Alene MSA	8.5	5	9.3	0.0	60.0	40.0	0.0	0.0	18.1	68.7	13.1
Idaho Falls CSA	8.2	7	13.0	14.3	14.3	42.9	28.6	8.9	9.6	63.0	18.4
Lewiston MSA	1.9	1	1.9	0.0	0.0	100.0	0.0	0.0	0.0	77.1	22.9
Pocatello MSA	3.5	2	3.7	0.0	0.0	100.0	0.0	2.8	16.5	56.3	24.4
Twin Falls MSA	4.9	3	5.6	0.0	0.0	66.7	33.3	0.0	3.6	88.6	7.7
Idaho Combined Non-MSA	17.2	15	27.8	0.0	6.7	80.0	13.3	0.0	6.4	78.3	15.3
Total	100.0	54	100.0	5.6	25.9	53.7	14.8	2.9	17.5	60.5	19.1
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Boise City CSA	0	2	-1	0	0	-1
Coeur d'Alene MSA	0	1	0	0	-1	0
Idaho Falls CSA	0	2	0	-2	0	0
Lewiston MSA	0	1	0	0	0	-1
Pocatello MSA	0	1	0	0	-1	0
Twin Falls MSA	0	0	0	0	0	0
Idaho Combined Non-MSA	0	9	0	-1	-6	-2
Total	0	16	-1	-3	-8	-4
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.						

Boise City CSA

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Boise City CSA. WFBNA operated 21 branches in the AA, comprising two branches in low-income geographies, nine branches in moderate-income geographies, seven branches in middle-income geographies, and three branches in upper-income geographies. The distribution of branches in low-income geographies exceeded the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies. The distribution was augmented by two branches in middle- and upper-income geographies that were within close proximity to serve low-income areas and two branches in middle- and upper-income geographies that were within close proximity to and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations. Despite the closures, its service delivery systems remained readily accessible.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the 14 branches opened on Saturdays, six were located in moderate-income geographies.

Coeur d'Alene MSA

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Coeur d'Alene MSA. WFBNA operated five branches in the AA, comprising three

branches in moderate-income geographies, and two branches in middle-income geographies. There are no low-income geographies, however. the distribution of the population in moderate-income geographies exceeded the distribution of the population in moderate-income geographies.

To the extent changes have been made, the bank's record of opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations. Despite the closures, its service delivery systems remained readily accessible.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the four branches opened on Saturdays, two were located in moderate-income geographies.

Community Development Services

WFBNA provided an adequate level of CD services.

Boise City CSA

WFBNA provided an adequate level of CD services in the Boise City CSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 41 CD service activities during the evaluation period. A majority (80 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families, and the remaining were targeted to affordable housing. Financial education comprised 73 percent of the CD service activities, and the remaining activities were bank employee board memberships at institutions that cater to low- and moderate-income communities. The bank's assistance provided was responsive to the identified needs in the AA. The following are examples of CD services provided in this AA:

- A WFBNA employee provided two hours of board service for an organization that helped to develop and preserve affordable housing throughout the state of Idaho.
- A WFBNA employee provided two hours of board service for a congressionally chartered nonprofit organization that focused on comprehensive approaches to affordable housing and community development.

Coeur d'Alene MSA

WFBNA provided a limited level of CD services in the Coeur d'Alene MSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for four CD service activities during the evaluation period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Idaho Combined Non-MSA was consistent with the bank's overall performance under the Service Test in the full-scope areas. The bank's performance under the Service Test in the Idaho Falls CSA, Lewiston MSA, Pocatello MSA, and Twin Falls MSA was weaker than the bank's overall performance under the Service Test in the full-scope areas. Performance was weaker primarily due to lower accessibility of retail banking services in low- and moderate-income areas.

State of Illinois

CRA rating for the State of Illinois³³: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Needs to Improve

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited an adequate geographic distribution of loans in its AAs.
- The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments that demonstrated excellent responsiveness to credit and economic development needs, often in a leadership position. The bank made extensive use of innovative and complex investments to support CD initiatives.
- Delivery systems were unreasonably inaccessible to portions of the AAs, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.
- The bank provided an adequate level of CD services.

Description of Institution's Operations in the State of Illinois

The state of Illinois was WFBNA's 20th largest rating area based on its total deposits in the state. As of June 30, 2021, the bank maintained approximately \$12.3 billion or 0.8 percent of its total domestic deposits in branches within the state. Of the 188 depository financial institutions operating in the bank's AAs within the state, WFBNA, with a deposit market share of 2.3 percent, was the 10th largest. The top depository financial institutions in the bank's AAs within the state based on market share included JPMorgan Chase Bank, N.A. (22.7 percent), BMO Harris Bank, N.A. (15.6 percent), Bank of America (8.7 percent), and The Northern Trust Company (7 percent). As of December 31, 2021, the bank operated 12 branches and 16 ATMs in the state. WFBNA delineated six AAs within the state; however, the OCC combined, analyzed, and presented those AAs at the CSA level where possible for purposes of this evaluation. This resulted in the following three AAs: Chicago-Naperville, IL CSA (Chicago CSA), Peoria, IL MSA (Peoria MSA), and Illinois Combined Non-MSA. The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

Chicago CSA

The following table provides a summary of the demographics, including housing and business information for the Chicago CSA.

³³ This rating only reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Chicago CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,862	14.4	24.1	28.9	31.7	0.8
Population by Geography	7,957,701	10.3	23.8	31.3	34.3	0.3
Housing Units by Geography	3,175,141	10.6	22.7	31.2	35.1	0.4
Owner-Occupied Units by Geography	1,820,873	4.5	18.0	35.2	42.2	0.1
Occupied Rental Units by Geography	1,060,056	17.7	29.5	26.1	26.1	0.7
Vacant Units by Geography	294,212	22.8	27.6	24.7	24.4	0.5
Businesses by Geography	699,086	6.4	17.2	28.5	47.4	0.5
Farms by Geography	10,403	3.7	15.2	40.5	40.5	0.1
Family Distribution by Income Level	1,872,887	23.6	16.3	18.6	41.5	0.0
Household Distribution by Income Level	2,880,929	25.6	15.2	17.0	42.2	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		\$75,024	Median Housing Value			\$243,549
Median Family Income MSA - 20994 Elgin, IL		\$80,899	Median Gross Rent			\$1,049
			Families Below Poverty Level			10.7%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$37,512 to \$40,450 and moderate-income families earned at least \$37,512 to \$40,450 and less than \$60,019 to \$64,719, depending on the MSA or MD. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$938 to \$1,011 for low-income borrowers and \$1,500 to \$1,618 for moderate-income borrowers, depending on the MSA. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,307. Low- and moderate-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Chicago-Naperville-Elgin, IL-IN-WI MSA (Chicago MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Chicago MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic.

Chicago-Naperville-Evanston, IL MD (Chicago MD)

The Chicago area is a major center for business, distribution, transportation, and finance. The area also has a huge talent pool and a strong roster of well-regarded educational institutions. In 2021, the pace of job growth in the Chicago area was stronger than in most Midwest states. Industries such as transportation/warehousing started their recoveries strong and have generally extended their leads.

Weaker parts of the economy, including office-using industries, continued to struggle, with the exception of the leisure/hospitality industry, as job creation improved markedly in 2021. The Chicago MD has a well-diversified economy. Key sectors of the economy by percentage of employment include Professional and Business Services, Education and Health Services, Government, Retail Trade, and Leisure and Hospitality Services. Major employers in the Chicago MD include Advocate Health Care System, Northwestern Memorial Healthcare, Amita Health, University of Chicago, JPMorgan Chase & Company, Amazon, and United Continental Holdings, Inc. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Chicago MD was 4 percent compared to the national unemployment rate of 3.7 percent.

Elgin, IL MD (Elgin MD)

The Elgin area is in close proximity to Chicago's businesses and large consumer base. It has a large commuter workforce and a low cost of doing business. The area's weaknesses include very few highly skilled workers, weak population growth, negative net migration, high employment volatility, and a low per capita income. The Elgin MD has a well-diversified economy. Key sectors of the economy by percentage of employment include Government, Manufacturing, Professional and Business Services, Education and Health Services, Retail Trade, and Leisure and Hospitality Services. Major employers in the Elgin MD include Northern Illinois University and J.P. Morgan Chase. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Elgin MD was 4.8 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by three local organizations that were contacted during the evaluation period and served the Chicago CSA. The organizations included two community development organizations that help to address the causes and conditions of poverty and one economic development organization that helped to attract and retain businesses in the area. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing
- Housing for persons with special needs
- Program 8 Rental Assistance
- Financial literacy/education
- Homeless services
- Small business capital funds

Opportunities for participation by financial institutions included the following:

- Lending and investment in economic development and workforce development
- Supporting community development services such as financial literacy
- Supporting small business needs

Scope of Evaluation in the State of Illinois

The OCC selected the Chicago CSA for a full-scope review and based conclusions and ratings primarily on activity within this geographical area. This AA carried significant weight in determining the overall ratings for the state of Illinois because of the significance of the bank's presence in this AA.

During the evaluation period, the bank originated or purchased 75,807 home mortgage loans, small loans to businesses, and small loans to farms totaling \$20.8 billion. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within each AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. In each of the AAs, the OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF ILLINOIS

LENDING TEST

The bank's performance under the Lending Test in the state of Illinois is rated High Satisfactory Performance in the limited-scope areas had a neutral effect on the overall Lending Test rating.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Chicago CSA was good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Chicago CSA	68,117	5,391	31	25	73,564	97.0	97.2
Peoria MSA	1,525	159	24	4	1,712	2.3	1.1
Illinois Combined Non-MSA	356	163	41	10	570	0.8	1.8
Total	69,998	5,713	96	39	75,846	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Chicago CSA	20,153,588	326,946	1,022	241,348	20,722,904	98.7	97.2
Peoria MSA	213,033	14,625	881	1,224	229,763	1.1	1.1
Illinois Combined Non-MSA	36,859	5,343	3,447	5,074	50,723	0.2	1.8
Total	20,403,480	346,914	5,350	247,646	21,003,390	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

As of June 30, 2021, WFBNA had a deposit market share of 2.3 percent. The bank ranked 10th among 148 depository financial institutions placing it in the top 7 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 4.1 percent based on the number of home mortgage loans originated or purchased. The bank ranked fourth among 919 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. The top three lenders in this AA based on market share were JPMorgan Chase Bank, N.A. (8.8 percent), Guaranteed Rate, Inc (6.9 percent), and Rocket Mortgage (4.4 percent).

According to peer small business data for 2021, WFBNA had a market share of 1 percent based on the number of small loans to businesses originated or purchased. The bank ranked 18th out of 330 small business lenders, which placed it in the top 6 percent of lenders. The top three lenders in this AA based on market share were JPMorgan Chase Bank, N.A. (20.5 percent), American Express National Bank (13.9 percent), and Cross River (10.3 percent).

According to peer small farm data for 2021, WFBNA had a market share of 0.8 percent based on the number of small loans to farms originated or purchased. The bank ranked 15th out of 44 small farm lenders, which placed it in the top 35 percent of lenders. The top three lenders in this AA based on market share were Heartland Bank and Trust Company (16.7 percent), First Midwest Bank (16.1 percent), and JPMorgan Chase Bank, N.A. (15.2 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited a poor geographic distribution of loans in its AA. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data. The bank's performance was poor in the Chicago CSA.

Home Mortgage Loans

Refer to Table O in the state of Illinois section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was poor.

The bank's percentage of home mortgage loans in low-income geographies was significantly below the percentage of owner-occupied housing units in low-income geographies and it was well below the

aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was well below the percentage of owner-occupied housing units in moderate-income geographies and it was below the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Illinois section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was below the percentage of businesses in low-income geographies and it was below the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was near to the percentage of businesses in moderate-income geographies but it was below the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Illinois section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

WFBNA did not originate or purchase any small loans to farms in low-income geographies during the evaluation period. The bank's percentage of small loans to farms in moderate-income geographies was significantly below the percentage of farms in moderate-income geographies but it exceeded the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies in the Chicago CSA. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes. The bank's performance was good in the Chicago CSA.

Home Mortgage Loans

Refer to Table P in the state of Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but it was near to the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was near to both the percentage of moderate-income families and the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was adequate.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 49.7 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with gross annual revenues of \$1 million or less was well below the percentage of businesses in the AA with gross annual revenues of \$1 million or less but it was near to the aggregate distribution of small loans to businesses with gross annual revenues of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was very poor.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 80.6 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with gross annual revenues of \$1 million or less was significantly below the percentage of farms in the AA with gross annual revenues of \$1 million or less and it was well below the aggregate distribution of small loans to farms with gross annual revenues of \$1 million or less by all lenders.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

WFBNA was a leader in making CD loans in the Chicago CSA. WFBNA made 25 CD loans totaling approximately \$241 million, which represented 15.4 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 97.6 percent of these loans funded affordable housing that provided 1,529 units of affordable housing, 0.1 percent funded economic development, 1.5 percent funded revitalization and stabilization efforts, and 0.8 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$2.5 million term loan to a CDFI. Of this total loan, \$277,778 was allocated to the AA. Funds were used to support continued growth in the CDFI's supportive affordable housing lending program. The financing for this development was responsive to the identified need for homeless services.
- WFBNA provided a \$7.8 million loan for an affordable housing development located in Chicago, Illinois. This development included 81 units, with 80 units encumbered by a Project-based Section 8 HAP contract. This activity was responsive to the identified need for affordable housing.
- WFBNA made a \$49 million loan for the acquisition and rehabilitation of an LIHTC development located in Chicago, Illinois. The development included 418 units restricted to tenants with incomes at or below 80 percent of the AMI with a waitlist preference for tenants who were veterans. The location included a fitness center, playground, grills, and picnic tables, basketball court and was pet friendly. The complex was located near transit, a child development center that provided childcare and head start services, a senior center that provided education classes and recreational opportunities. In addition to the loan, WFBNA made a \$62.2 million equity investment. These activities were complex due to the inherent nature of LIHTC transactions and the multiple funding sources including tax exempt bonds. WFBNA demonstrated active involvement, evidenced by its long-term working relationship with this sponsor, financing more than 40 other developments. This activity was responsive to the identified need for affordable housing.

Product Innovation and Flexibility

WFBNA made extensive use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 789 loans under its flexible lending programs totaling \$109.6 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	339	81,200
Dream. Plan. Home.	70	11,700
PPP	380	16,700
Total	789	109,600

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Peoria MSA and Illinois Combined Non-MSA was stronger than the bank's overall performance under the Lending Test in the full-scope area. Performance was stronger in the limited-scope areas due to strong geographic distributions.

Refer to Tables O through T in the state of Illinois section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Illinois is rated Outstanding. Performance in the limited-scope areas had a neutral effect on the overall Investment Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Chicago CSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Chicago CSA	35	103,290	177	204,581	212	70.0	307,870	72.7	22	80,018
Peoria MSA	1	108	27	281	28	9.2	389	0.0	1	1
Illinois Combined Non-MSA	3	112	7	14,648	10	3.3	14,760	3.5	2	10,941
Statewide***	3	7,087	50	93,344	53	17.5	100,431	23.7	3	1,421
Total	42	110,597	261	312,854	303	100.0	423,450	100.0	28	92,381
<p>The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.</p> <p>* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.</p> <p>** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.</p> <p>*** Statewide means investments in statewide programs that have a purpose, mandate, or function to serve one or more of the bank's assessment areas within the state. Due to rounding, totals may not equal 100.0%</p>										

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$307.9 million and represented 19.7 percent of the bank's tier 1 capital allocated to the AA. The investments also included 163 grants and donations totaling \$29.4 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 37.7 percent of the bank's investment dollars focused on affordable housing, a primary community

development need in the AA, 46.2 percent that focused on community services targeted to low- and moderate-income individuals, and 16 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 3,386 units of affordable housing in the AA.

The bank made extensive use of innovative or complex investments to support CD initiatives. Approximately 78.7 percent of current period investment dollars were complex LIHTC and NMTC investments. The following are examples of CD investments made in this AA:

- WFBNA provided a \$62.6 million equity investment to finance the acquisition and rehabilitation of an LIHTC development located in Chicago, Illinois. The development included 418 units restricted to tenants with incomes at or below 80 percent of the AMI with a waitlist preference for tenants who were veterans. These activities were complex due to the inherent nature of LIHTC transactions and the multiple funding sources including tax exempt bonds.
- WFBNA provided a \$21.7 million NMTC investment in a medical facility, located in a moderate-income census tract in Chicago, Illinois. The funds financed the acquisition and rehabilitation of a commercial building into a new medical clinic and administrative offices. The facility was in a federally designated medically underserved area and provided needed services, including pediatric care, women's health, dental, OBGYN, and mental and behavioral health. The funding sources included allocations from the following three Community Development Enterprises: Urban Development Fund, Southside Community Optimal Redevelopment Enterprise, and two leveraged loans.
- WFBNA provided four grants totaling nearly \$2.4 million to a certified CDFI that provided marginalized entrepreneurs with the tools they needed to achieve financial security, grow their businesses, create jobs, and revitalize their communities. Of the total grants, \$2 million was part of the bank's Open for Business CDFI strategy and went directly to the organization's efforts helping small business owners survive the pandemic and rebuild their businesses.

Broader Statewide Investments

WFBNA had 53 current and prior period investments totaling \$100.4 million with a purpose, mandate, or function to serve one or more AAs in the state. These CD investments were primarily LIHTCs that supported the creation or preservation of affordable housing in the state. These investments were given positive consideration and supported the bank's overall performance under the Investment Test in the state of Illinois.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Illinois Combined Non-MSA was consistent with the bank's overall performance under the Investment Test in the full-scope areas. Performance in the Peoria MSA was weaker than the bank's overall performance under the Investment Test in the full-scope areas primarily due to lower levels of CD investments relative to the bank's presence and capacity to invest in the AA.

SERVICE TEST

The bank's performance under the Service Test in the state of Illinois is rated Needs to Improve. Performance in the limited-scope areas had a neutral effect on the overall Service Test rating.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Chicago CSA was poor.

Retail Banking Services

Delivery systems were unreasonably inaccessible to portions of the bank's full-scope AA, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Chicago CSA	97.2	9	75.0	0.0	0.0	33.3	20.0	7.5	21.7	66.7	0.0
Peoria MSA	1.1	1	8.3	0.0	100.0	0.0	0.0	7.0	15.8	50.6	26.5
Illinois Combined Non-MSA	1.8	2	16.7	0.0	0.0	50.0	50.0	6.1	21.4	61.6	11.0
Total	100.0	12	100.0	0.0	8.3	33.3	58.3	10.1	23.4	32.7	33.5
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Chicago CSA	1	2	0	0	-1	0
Peoria MSA	0	0	0	0	0	0
Illinois Combined Non-MSA	0	2	-1	-1	0	0
Total	1	4	-1	-1	-1	0
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.						

WFBNA's service delivery systems were unreasonably accessible to geographies and individuals of different income levels in the Chicago CSA. WFBNA operated nine branches in the AA, three branches in middle-income geographies and six branches in upper-income geographies. The bank did not operate any branches in low- and moderate-income geographies where 29.2 percent of the population resided. The bank had one branch in a middle- or upper-income geography that served a moderate-income area. Internal customer data for this branch demonstrated a reasonable level of service to customers in the moderate-income area, which contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches had not adversely affected access to retail banking services, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the four branches opened on Saturdays, none were located in low- and moderate-income geographies.

Community Development Services

WFBNA provided an adequate level of CD services in the Chicago CSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 31 CD service activities during the evaluation period. A majority (77 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The remaining CD services were targeted to affordable housing. Financial education comprised 74 percent of the CD service activities, and the remaining activities consisted of providing technical expertise to organizations that cater to low- and moderate-income via board memberships and outreach activities. The bank's assistance provided was responsive to the identified needs in the AA. The following is an example of a CD service provided in this AA:

- A WFBNA employee served on the board of a nonprofit organization that preserved affordable homeownership by repairing the homes of low-income elderly and disabled individuals, providing them with a safe and healthy residence. This activity was responsive to the identified need for affordable housing.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Peoria MSA and Illinois Combined Non-MSA was stronger than the bank's overall performance under the Service Test in the full-scope area. Performance was stronger primarily due to greater accessibility of retail banking services in low- and moderate-income areas.

State of Iowa

CRA rating for the State of Iowa³⁴: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected good responsiveness to AA credit needs.
- The bank exhibited an adequate geographic distribution of loans in its AAs.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank made a low level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.
- The bank had a significant level of qualified CD investments that demonstrated good responsiveness to credit and economic development needs, although occasionally in a leadership position. The bank made significant use of innovative and complex investments to support CD initiatives.
- Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided an adequate level of CD services.

Description of Institution's Operations in the State of Iowa

The state of Iowa was WFBNA's 23rd largest rating area based on its total deposits in the state. As of June 30, 2021, the bank maintained approximately \$8.3 billion or 0.6 percent of its total domestic deposits in branches within the state. Of the 166 depository financial institutions operating in the bank's AAs within the state, WFBNA, with a deposit market share of 13.2 percent, was the largest. Other top depository financial institutions in the bank's AAs within the state based on market share included U.S. Bank N.A. (7.5 percent), Principal Bank (6.8 percent), and Bankers Trust Company (6.7 percent). As of December 31, 2021, the bank operated 45 branches and 75 ATMs in the state. WFBNA delineated 18 AAs within the state; however, the OCC combined, analyzed, and presented those AAs at the CSA level where possible for purposes of this evaluation. This resulted in the following five AAs: Cedar Rapids-Iowa City, IA CSA (Cedar Rapids CSA), Des Moines-Ames-West Des Moines, IA CSA (Des Moines CSA), Sioux City, IA MSA (Sioux City MSA), Waterloo-Cedar Falls, IA MSA (Waterloo MSA), and Iowa Combined Non-MSA. The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

Des Moines CSA

The following table provides a summary of the demographics, including housing and business information for the Des Moines CSA.

³⁴ This rating only reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Des Moines CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	175	6.3	21.7	50.9	20.0	1.1
Population by Geography	791,148	4.9	18.7	49.4	26.4	0.7
Housing Units by Geography	329,557	4.5	19.1	51.3	25.1	0.0
Owner-Occupied Units by Geography	210,400	2.1	16.9	51.9	29.1	0.0
Occupied Rental Units by Geography	97,065	9.0	22.9	49.4	18.7	0.0
Vacant Units by Geography	22,092	6.9	24.2	54.2	14.8	0.0
Businesses by Geography	88,167	3.8	13.5	52.1	30.4	0.2
Farms by Geography	4,909	1.2	9.4	64.7	24.7	0.0
Family Distribution by Income Level	199,083	19.6	17.5	22.5	40.4	0.0
Household Distribution by Income Level	307,465	23.3	15.9	19.0	41.8	0.0
Median Family Income MSA - 11180 Ames, IA MSA		\$74,380	Median Housing Value			\$158,768
Median Family Income MSA - 19780 Des Moines-West Des Moines, IA MSA		\$75,653	Median Gross Rent			\$797
Median Family Income Non-MSAs - IA		\$61,681	Families Below Poverty Level			7.6%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$30,841 to \$37,827 and moderate-income families earned at least \$30,841 to \$37,827 and less than \$49,345 to \$60,522, depending on the metropolitan or nonmetropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$771 to \$946 for low-income borrowers and ranging from \$1,234 to \$1,513 for moderate-income borrowers, depending on the metropolitan or nonmetropolitan area. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$852. Low-income families in the nonmetropolitan counties would be challenged to afford a mortgage loan for a median-priced home in this AA.

Des Moines-West Des Moines, IA MSA (Des Moines MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Des Moines MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Mild job losses from early in the pandemic provided a cushion, and more recently in late 2021, the metro area began to regain momentum. Housing starts on a per capita basis consistently ranked among the highest in the Midwest, keeping builders active but forestalling the shortages seen elsewhere. As a result, house price appreciation had been strong but far below the national trend. The Des Moines MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Financial Activities, Education and Health Services, Professional and Business Services, Government, Retail Trade, and Leisure and Hospitality Services. Major employers in the Des

Moines MSA include Wells Fargo & Co., UnityPoint Health, Principal Financial Group, and Hy-Vee, Inc. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Des Moines MSA was 2.6 percent compared to the national unemployment rate of 3.7 percent.

Ames, IA MSA (Ames MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Ames MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Ames MSA's recovery had been bumpy, and the labor market had made little progress since the middle of 2021. State government employment, anchored by Iowa State University, had been stable but was relatively far below pre-pandemic levels. A preponderance of college students makes the Ames MSA one of the most multifamily-dependent small metro areas in the nation. The Ames MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Government, Retail Trade, Manufacturing, Leisure and Hospitality Services, Professional and Business Services, and Education and Health Services. Major employers in the Ames MSA include Iowa State University, Iowa Department of Transportation, and Mary Greeley Medical Center. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Ames MSA was 1.9 percent compared to the national unemployment rate.

Pella, IA Micro Area

According to the U.S. Census Bureau QuickFacts, Pella City, IA has a population of 10,554. As of July 2021, the area has 3,914 households with 2.27 persons per household. Between 2016 to 2020, 65.2 percent of housing was owner occupied, which is on par with the national average of 64.4 percent. The largest percent of population is persons under 18 years at 20 percent of the total population. In the civilian labor force, total percent of population age 16 years and above is 68.1 percent. The mean travel time to work for workers aged 16 years and above is 11.9 minutes. According to Pella, Iowa website, the top employers in Pella City, IA are Pella Corporation, Vermeer Corporation, Pella Regional Health Center, Central College, and Pella Community Schools. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for Pella, IA was 2 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Des Moines CSA. The organizations included one community development organization that helped to address the causes and conditions of poverty and one economic development organization that helped to attract and retain businesses in the area. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing units
- Single-family affordable housing
- Rental assistance
- Rehabilitation of housing units/improvement of the quality of housing stock

- Workforce development
- Financial literacy

Opportunities for participation by financial institutions included the following:

- Home-ownership counseling
- Closing cost assistance
- Affordable home mortgage loans

Iowa Combined Non-MSA

The following table provides a summary of the demographics, including housing and business information for the Iowa Combined Non-MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Iowa Combined Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	82	0.0	20.7	70.7	8.5	0.0
Population by Geography	266,070	0.0	20.4	69.9	9.6	0.0
Housing Units by Geography	123,220	0.0	20.1	70.2	9.7	0.0
Owner-Occupied Units by Geography	79,165	0.0	15.7	74.2	10.1	0.0
Occupied Rental Units by Geography	30,220	0.0	31.6	60.8	7.5	0.0
Vacant Units by Geography	13,835	0.0	20.2	67.9	11.9	0.0
Businesses by Geography	23,200	0.0	22.1	69.1	8.8	0.0
Farms by Geography	3,556	0.0	4.4	86.7	8.9	0.0
Family Distribution by Income Level	69,977	20.9	19.9	22.8	36.4	0.0
Household Distribution by Income Level	109,385	25.4	16.7	19.2	38.6	0.0
Median Family Income Non-MSAs - IA		\$61,681	Median Housing Value			\$99,330
			Families Below Poverty Level			9.7%
			Median Gross Rent			\$598
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$30,841 and moderate-income families earned less than \$49,345. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$771 for low-income borrowers and \$1,234 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$533. Low- and moderate-income families would be able to afford a mortgage loan for a median-priced home in this AA.

The statewide economic drivers include agriculture, manufacturing, and finance. The area's strengths include the appeal to younger, more highly skilled workers, high share of employment in financial services, large middle class, and low poverty rate. Weaknesses include exposure to woes in agriculture and manufacturing, slow rate of new business formation, and below-average population growth.

Iowa's recovery trailed the national rebound. Finance fully recovered pandemic-induced losses earlier in 2021 but has lost ground over the last few months of the year. Healthcare gains slowed, and state government employment was backpedaling again, offsetting gains in manufacturing. The unemployment rate has edged higher since the start of the year, but this is partly because of an expanding labor force. House prices were accelerating, but the pace paled in comparison to the heady U.S. average. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rates for the counties within the Iowa Combined Non-MSA ranged from 2.2 percent (Greene and Palo Alto counties) to 5.3 percent (Marshall County) compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by 12 local organizations that were contacted during the evaluation period and served the Iowa Combined Non-MSA. The organizations included one affordable housing organization, five community development organization that helped to address the causes and conditions of poverty, and six economic development organizations that help to attract and retain businesses in the area. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing
- Affordable for-sale single family housing
- Rental assistance
- Homeless services
- Financial literacy/education
- Small business literacy/education and programs

Opportunities for participation by financial institutions included the following:

- Lending and investment in affordable housing
- Lending and investment in small businesses
- Supporting community development services such as financial literacy
- Providing greater access to financial services

Scope of Evaluation in the State of Iowa

The OCC selected the Des Moines CSA and Iowa Combined Non-MSA for full-scope reviews and based conclusions and ratings primarily on activity within these geographical areas. These AAs carried significant weight in determining the overall ratings for the state of Iowa because of the significance of the bank's presence in these AAs. More weight was given to the Des Moines CSA due to the larger deposit base, lending, and branch presence.

During the evaluation period, the bank originated or purchased 21,050 home mortgage loans, small loans to businesses, and small loans to farms totaling \$2.6 billion. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within each AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. In each of the AAs except for the Waterloo MSA, the OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF IOWA

LENDING TEST

The bank's performance under the Lending Test in the state of Iowa is rated High Satisfactory. Performance in the limited-scope areas had a neutral effect on the overall Lending Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Des Moines CSA and Iowa Combined Non-MSA was good.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Des Moines CSA	9,257	5,021	171	11	14,460	68.6	53.9
Iowa Combined Non-MSA	1,439	710	194	6	2,349	11.1	24.5
Cedar Rapids CSA	1,392	1,100	42	11	2,545	12.0	12.9
Sioux City MSA	740	397	20	4	1,161	5.5	5.3
Waterloo MSA	251	297	19	4	571	2.7	3.4
Total	13,079	7,525	446	36	21,086	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Des Moines CSA	1,793,866	144,162	11,671	9,148	1,958,847	73.8	53.9
Iowa Combined Non-MSA	175,369	25,175	23,295	1,585	225,424	8.5	24.5
Cedar Rapids CSA	236,191	51,924	3,801	8,269	300,185	11.3	12.9
Sioux City MSA	98,453	11,508	3,116	7,620	120,697	4.5	5.3
Waterloo MSA	33,722	11,743	1,147	2,075	48,687	1.8	3.4
Total	2,337,601	244,512	43,030	28,697	2,653,840	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Des Moines CSA

As of June 30, 2021, WFBNA had a deposit market share of 14.1 percent. The bank ranked first among 66 depository financial institutions placing it in the top 2 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 5.4 percent based on the number of home mortgage loans originated or purchased. The bank ranked third among 451 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. The other top lenders in this AA based on market share were GreenState Credit Union (4.4 percent), Veridian Credit Union (5.8 percent), and Iowa Bankers Mortgage Corporation. (5.3 percent).

According to peer small business data for 2021, WFBNA had a market share of 10.2 percent based on the number of small loans to businesses originated or purchased. The bank ranked third out of 147 small business lenders, which placed it in the top 2 percent of lenders. The other top lenders in this AA based on market share were American Express National Bank (14.3 percent), U.S. Bank, N.A. (10.6 percent), and JPMorgan Chase Bank, N.A. (9.9 percent).

According to peer small farm data for 2021, WFBNA had a market share of 3.8 percent based on the number of small loans to farms originated or purchased. The bank ranked 10th out of 30 small farm lenders, which placed it in the top 34 percent of lenders. The top lenders in this AA based on market share were Bank Iowa (24.8 percent), John Deere Financial, FSB (22.5 percent), and U.S. Bank, N.A. (8.7 percent).

Iowa Combined Non-MSA

As of June 30, 2021, WFBNA had a deposit market share of 21.3 percent. The bank was the top ranked depository financial institution in the AA.

According to peer mortgage data for 2021, WFBNA had a market share of 7 percent based on the number of home mortgage loans originated or purchased. The bank ranked fourth among 260 home mortgage lenders in the AA, which placed it in the top 2 percent of lenders. The top lenders in this AA based on market share were GreenState Credit Union (11 percent), Iowa Bankers Mortgage Corporation (7.6 percent), and Rocket Mortgage (7.2 percent).

According to peer small business data for 2021, WFBNA had a market share of 6 percent based on the number of small loans to businesses originated or purchased. The bank ranked eighth out of 88 small

business lenders, which placed it in the top 10 percent of lenders. The top lenders in this AA based on market share were United Bank of Iowa (17.14 percent), American Express National Bank (9.5 percent), and U.S. Bank, N.A. (8.1 percent).

According to peer small farm data for 2021, WFBNA had a market share of 1.8 percent based on the number of small loans to farms originated or purchased. The bank ranked 11th out of 27 small farm lenders, which placed it in the top 41 percent of lenders. The top lenders in this AA based on market share were Bank Iowa (24.6 percent), United Bank of Iowa (21.6 percent), and John Deere Financial FSB (20.7 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AAs. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data. The bank's performance was adequate in the Des Moines CSA and good in the Iowa Combined Non-MSA.

Des Moines CSA

Home Mortgage Loans

Refer to Table O in the state of Iowa section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans in low-income geographies was significantly below the percentage of owner-occupied housing units in low-income geographies and it was below the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied housing units in moderate-income geographies but it was near to the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Iowa section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was below both the percentage of businesses in low-income geographies and the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was near to the percentage of businesses in moderate-income

geographies but it exceeded the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Iowa section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

The bank's percentage of small loans to farms in low-income geographies was well below the percentage of farms in low-income geographies but it exceeded the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-income geographies was significantly below both the percentage of farms and the aggregate distribution of small loans to farms by all lenders in moderate-income geographies.

Iowa Combined Non-MSA

Home Mortgage Loans

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

There were no low-income geographies. The bank's percentage of home mortgage loans in moderate-income geographies was below both the percentage of owner-occupied housing units in moderate-income geographies and the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Iowa section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

There were no low-income geographies. The bank's percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses in moderate-income geographies and the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Iowa section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was good.

There were no low-income geographies. The bank's percentage of small loans to farms in moderate-income geographies was below the percentage of farms in moderate-income geographies but it exceeded the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies in the Des Moines CSA and Iowa Combined Non-MSA. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AAs.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes. The bank's performance was good in the Des Moines CSA and excellent in the Iowa Combined Non-MSA.

Des Moines CSA

Home Mortgage Loans

Refer to Table P in the state of Iowa section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but it approximated the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers approximated the percentage of moderate-income families and it was near to the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Iowa section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 26 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with gross annual revenues of \$1 million or less was below the percentage of businesses in the AA with gross annual revenues of \$1 million or less but it exceeded the

aggregate distribution of small loans to businesses with gross annual revenues of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Iowa section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was adequate.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 36.3 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with gross annual revenues of \$1 million or less was well below the percentage of farms in the AA with gross annual revenues of \$1 million or less but it was near to the aggregate distribution of small loans to farms with gross annual revenues of \$1 million or less by all lenders.

Iowa Combined Non-MSA

Home Mortgage Loans

Refer to Table P in the state of Iowa section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but it approximated the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers approximated the percentage of moderate-income families but it was near to the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Iowa section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 29.7 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with gross annual revenues of \$1 million or less was below the percentage of businesses in the AA with gross annual revenues of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with gross annual revenues of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Iowa section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was adequate.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 29.9 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with gross annual revenues of \$1 million or less was well below the percentage of farms in the AA with gross annual revenues of \$1 million or less but it was near to the aggregate distribution of small loans to farms with gross annual revenues of \$1 million or less by all lenders.

Community Development Lending

The bank made a low level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

Des Moines CSA

WFBNA made a low level of CD loans in the Des Moines CSA. WFBNA made 11 CD loans totaling approximately \$9.1 million which represented 1.6 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 88.3 percent of these loans funded affordable housing that provided 64 units of affordable housing, 11.5 percent funded revitalization and stabilization efforts, and 0.2 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided an extension on a \$7.9 million construction loan for an affordable housing development located in Des Moines, Iowa. This LIHTC development included 72 units, of which 64 units were restricted to households earning up to 60 percent of the AMI. This activity was responsive to the identified need for affordable housing. WFBNA demonstrated multi-faceted support by providing both the construction loan and equity investment to support this affordable housing development.
- WFBNA provided a \$10 million term loan to a community development organization, of which \$43,172 was allocated to this AA. The organization was dedicated to creating pathways of opportunity for low-income people and communities. The organization helped to foster healthy communities by providing a bridge between private capital markets and low-income neighborhoods. By investing capital and providing technical assistance for affordable housing, childcare, education and other community development organizations, the organization spurred economic advancement

for the very poor. According to the organization, 100 percent of its clients were low- to moderate-income as they earned less than 80 percent of the area median family income.

- WFBNA made a \$4 million loan to a regional CDFI, of which \$268,543 was allocated to the AA. The organization promoted community development by creating opportunities for low-income communities and people with disabilities.

Iowa Combined Non-MSA

WFBNA made a low level of CD loans in the Iowa Combined Non-MSA. WFBNA made six CD loans totaling approximately \$1.6 million, which represented 0.6 percent of the allocated tier 1 capital. CD loans were primarily made for community services purposes. By dollar volume, 2.1 percent of these loans funded affordable housing that provided no units of affordable housing, 15.9 percent funded revitalization and stabilization efforts, and 82 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA renewed a \$500,000 working capital line of credit for a community development organization. The organization's mission was to provide opportunities for growth and achievement for persons with disabilities who faced barriers to independence and integration in employment and daily living. The organization offered vocational, residential and community support services to individuals with mental, physical or development disabilities. According to the organization's Executive Director, an estimated 98 percent of their clients were considered to be low or moderate income as they earned less than 80 percent of the median family income.
- WFBNA renewed a \$300,000 working capital line of credit to a local housing agency. The agency identified the unique needs of the poverty population within their communities and designed programs to meet those needs. The organization implemented a range of programs designed to provide advocacy, access to supportive services, and service coordination. In addition to the loan, WFBNA provided grant support. The funding was responsive to the identified needs for affordable housing and education.
- WFBNA provided a \$10 million line of credit to a CDFI, of which \$180,262 benefitted the AA. The CDFI promoted community development by creating opportunities for low-income communities and people with disabilities.

Product Innovation and Flexibility

Des Moines CSA

WFBNA made extensive use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 1,084 loans under its flexible lending programs totaling \$100.1 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	313	62,000
Dream. Plan. Home.	98	16,000
PPP	673	22,100
Total	1,084	100,100

Iowa Combined Non-MSA

WFBNA made limited use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 252 loans under its flexible lending programs totaling \$21.5 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	154	17,800
Dream. Plan. Home.	17	1,700
PPP	81	2,000
Total	252	21,500

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Cedar Rapids CSA, Sioux City MSA, and Waterloo MSA was consistent with the bank's overall performance under the Lending Test in the full-scope areas.

Refer to Tables O through T in the state of Iowa section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Iowa is rated High Satisfactory. Performance in the limited-scope areas had neutral effect on the overall Investment Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Des Moines CSA was excellent and the bank's performance in the Iowa Combined Non-MSA was poor.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Des Moines CSA	33	35,502	199	21,743	232	59.8	57,245	47.4	14	4,561
Iowa Combined Non-MSA	3	1,471	26	1,044	29	7.5	2,515	2.1	1	129
Cedar Rapids CSA	10	10,829	59	15,908	69	17.8	26,737	22.1	5	7,336
Sioux City MSA	5	9,639	19	499	24	6.2	10,138	8.4	3	1,027
Waterloo MSA	3	3,514	22	375	25	6.4	3,888	3.2	2	223
Statewide***	5	5,301	4	14,974	9	2.3	20,275	16.8	6	7,062
Total	59	66,256	329	54,543	388	100.0	120,798	100.0	31	20,338
<p>The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.</p> <p>* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.</p> <p>** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.</p> <p>*** Statewide means investments in statewide programs that have a purpose, mandate, or function to serve one or more of the bank's assessment areas within the state. Due to rounding, totals may not equal 100.0%</p>										

Des Moines CSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$57.2 million and represented 9.8 percent of the bank's tier 1 capital allocated to the AA. The investments also included 195 grants and donations totaling \$6.9 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 23.7 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 65.5 percent that focused on community services targeted to low- and moderate-income individuals, and 10.8 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 1,314 units of affordable housing in the AA.

The bank made significant use of innovative or complex investments to support CD initiatives. Approximately 53.5 percent of current period investment dollars were complex LIHTC investments. The following are examples of CD investments made in this AA:

- WFBNA provided a \$7.8 million equity investment to fund the development of an LIHTC multifamily complex located in Norwalk, Iowa. Nearly 90 percent of the units targeted seniors with income earning 60 percent of the AMI. This activity was complex due to the inherent nature of LIHTC transactions, and the financing included funding from the city.

- WFBNA invested \$20 million in an LIHTC fund that benefitted multiple AAs. Of the total amount, \$3.6 million supported an LIHTC development located in Pleasant Hill, Iowa with 32 units restricted to tenants earning up to 60 percent of the AMI. The syndicator of the fund promoted the development and sustainability of quality affordable housing.
- WFBNA invested \$3.2 million in a single-family mortgage bond. The investment was allocated to the AA to finance first lien single family mortgage loans, down payment assistance loans, and grants to provide affordable housing for low and moderate-income first-time homebuyers and offer a variety of programs that address a continuum of housing needs, from homeless assistance to multifamily rental to single-family homeownership.

Iowa Combined Non-MSA

The bank had a poor level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$2.5 million and represented 0.9 percent of the bank's tier 1 capital allocated to the AA. The investments also included 25 grants and donations totaling \$183,000 to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited poor responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 41.4 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 58.6 percent that focused on community services targeted to low- and moderate-income individuals. In total, the bank's investments helped create or retain 81 units of affordable housing in the AA.

The bank rarely used innovative and complex investments to support CD initiatives. None of the current period investments were complex. The following are examples of CD investments made in this AA:

- WFBNA invested \$860,660 in a single-family mortgage bond. Funds were used to finance first lien single family mortgage loans, down payment assistance loans and grants to provide affordable housing for low and moderate-income first-time homebuyers.
- WFBNA provided a \$2,500 grant to support programming for Head Start students and their families and to provide funding for furnace/water heater replacement not covered by the organization's weatherization program. The agency identified the unique needs of the poverty population within their communities and designed programs to meet those needs. The organization implemented a range of programs designed to provide advocacy, access to supportive services, and service coordination.
- WFBNA provided two grants totaling \$10,000 to an organization that utilized community-led solutions to identify and resolve community concerns with a primary focus on education, financial stability, and health.

Broader Statewide Investments

WFBNA had nine current and prior period investments totaling \$20.3 million with a purpose, mandate, or function to serve one or more AAs in the state. These CD investments were primarily LIHTCs that supported the creation or preservation of affordable housing in the state. These investments were given positive consideration and supported the bank's overall performance under the Investment Test in the state of Iowa.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Cedar Rapids CSA, Sioux City MSA, and the Waterloo MSA was consistent with the bank's overall performance under the Investment Test in the full-scope areas.

SERVICE TEST

The bank's performance under the Service Test in the state of Iowa is rated High Satisfactory. Performance in the limited-scope areas had a neutral effect on the overall Service Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Des Moines CSA and Iowa Combined Non-MSA was good.

Retail Banking Services

Service delivery systems were accessible to geographies and individuals of different income levels in the bank's full-scope AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Des Moines CSA	53.9	20	44.4	0.0	15.0	65.0	20.0	4.9	18.7	49.4	26.4
Iowa Combined Non-MSA	24.5	11	24.4	0.0	45.5	54.5	0.0	0.0	20.4	69.9	9.6
Cedar Rapids CSA	12.9	8	17.8	12.5	37.5	25.0	12.5	1.8	21.5	56.7	19.2
Sioux City MSA	5.3	3	6.7	33.3	0.0	0.0	66.7	5.0	23.5	33.9	37.6
Waterloo MSA	3.4	3	6.7	33.3	0.0	33.3	33.3	4.2	14.9	51.5	26.3
Total	100.0	45	100.0	6.7	24.4	48.9	17.8	3.3	19.5	53.6	22.8
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Des Moines CSA	2	1	0	0	1	0
Iowa Combined Non-MSA	0	3	0	-1	-1	-1
Cedar Rapids CSA	0	3	0	-1	-2	0
Sioux City MSA	0	1	0	0	-1	0
Waterloo MSA	0	0	0	0	0	0
Total	2	8	0	-2	-3	-1
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.						

Des Moines CSA

WFBNA's branches were accessible to geographies and individuals of different income levels in the Des Moines CSA. WFBNA operated 20 branches in the AA, comprising three branches in moderate-income geographies, 13 branches in middle-income geographies, and four branches in upper-income geographies. The distribution of branches in low-income geographies was significantly below the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies was near to the distribution of the population in moderate-income geographies. The distribution was augmented by one branch in middle- and upper-income geographies that was within close proximity to serve low-income areas and three branches in middle- and upper-income geographies that were within close proximity to and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the 16 branches opened on Saturdays, two were located in moderate-income geographies.

Iowa Combined Non-MSA

WFBNA's branches were readily accessible to geographies and individuals of different income levels in the Iowa Combined Non-MSA. WFBNA operated 11 branches in the AA, comprising five branches in moderate-income geographies, and six branches in middle-income geographies. There were no low-income geographies within the AA. The distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies. The distribution was

further augmented by one branch in a middle- or upper-income geography that served a moderate-income area. Internal customer data for this branch demonstrated a reasonable level of service to customers in moderate-income areas. This middle- or upper-income branch contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations. Despite the closures, its service delivery systems remained readily accessible.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. and 5:30 p.m. Monday through Friday. Of the seven branches opened on Saturdays, two were located in moderate-income geographies.

Community Development Services

WFBNA provided an adequate level of CD services.

Des Moines CSA

WFBNA provided an adequate level of CD services in the Des Moines CSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 109 CD service activities during the evaluation period. A majority (95 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The remaining CD services were targeted to affordable housing. The community service activities were a mix of financial education, tax preparation, board activity, and outreach to provide financial and technical assistance to low- and moderate-income communities. Financial education comprised 37 percent, and tax preparation was 28 percent of the CD service activities. The remaining activities comprised of board membership and outreach to provide technical assistance to organizations that cater to low- and moderate-income communities. The bank's assistance provided was responsive to the identified needs in the AA. The following is an example of CD services provided in this AA:

- WFBNA employees provided 107 hours of tax preparation via a free and reliable volunteer tax assistance program that served low- and moderate-income individuals and families, elderly, and the disabled.

Iowa Combined Non-MSA

WFBNA provided a limited level of CD services in the Iowa Combined Non-MSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 13 CD service activities during the evaluation period that were a mix of community services, affordable housing, and revitalization and stabilization. The bank's assistance provided was responsive to the identified needs in the AA. The following is an example of CD services provided in this AA:

- WFBNA employees provided 33 hours of board service to a nonprofit affordable housing organization that constructed quality, affordable housing. The houses were sold at no profit and no interest charged.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Cedar Rapids CSA, Sioux City MSA, and Waterloo MSA was stronger than the bank's overall performance under the Service Test in the full-scope areas. Performance was stronger primarily due to higher accessibility of retail banking services in low- and moderate-income areas.

State of Kansas

CRA rating for the State of Kansas³⁵: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited an adequate geographic distribution of loans in its AAs.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank made a low level of CD loans. CD lending had a negative effect on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments that demonstrated excellent responsiveness to credit and economic development needs, although occasionally in a leadership position. The bank made significant use of innovative and complex investments to support CD initiatives.
- Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided a limited level of CD services.

Description of Institution's Operations in the State of Kansas

The state of Kansas was WFBNA's 40th largest rating area based on its total deposits in the state. As of June 30, 2021, the bank maintained approximately \$1.3 billion or 0.1 percent of its total domestic deposits in branches within the state. Of the 111 depository financial institutions operating in the bank's AAs within the state, WFBNA, with a deposit market share of 2.4 percent, was the 12th largest. The top depository financial institutions in the bank's AAs within the state based on market share included Bank of America, N.A. (11.6 percent), Intrust Bank, N.A. (10.3 percent), Commerce Bank (6.9 percent), and Capitol Federal Savings Bank (6.8 percent). As of December 31, 2021, the bank operated nine branches and 10 ATMs in the state. WFBNA delineated three AAs within the state; however, the OCC combined, analyzed, and presented those AAs at the CSA level where possible for purposes of this evaluation. This resulted in the following two AAs: Kansas City-Overland Park, KS CSA (Kansas City CSA) and Wichita, KS MSA (Wichita MSA). The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

Kansas City CSA

The following table provides a summary of the demographics, including housing and business information for the Kansas City CSA.

³⁵ This rating only reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Kansas City CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	230	13.0	16.1	31.3	34.8	4.8
Population by Geography	864,696	7.3	14.3	34.7	43.5	0.1
Housing Units by Geography	352,818	8.3	14.8	36.2	40.4	0.2
Owner-Occupied Units by Geography	222,431	4.4	11.1	35.5	48.8	0.1
Occupied Rental Units by Geography	105,696	14.0	20.8	37.9	27.1	0.2
Vacant Units by Geography	24,691	19.4	23.0	34.7	21.7	1.2
Businesses by Geography	79,742	5.2	10.1	29.2	52.3	3.2
Farms by Geography	2,395	3.1	11.1	40.0	45.2	0.6
Family Distribution by Income Level	221,575	17.4	15.7	19.8	47.2	0.0
Household Distribution by Income Level	328,127	19.8	14.9	17.4	47.8	0.0
Median Family Income MSA - 28140 Kansas City, MO-KS MSA		\$72,623	Median Housing Value			\$189,256
Median Family Income Non-MSAs - KS		\$57,229	Median Gross Rent			\$913
			Families Below Poverty Level			7.2%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$28,615 to \$36,312 and moderate-income families earned at least \$28,615 to \$36,312 and less than \$45,783 to \$58,098, depending on the metropolitan or nonmetropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$715 to \$908 for low-income borrowers and ranging from \$1,145 to \$1,452 for moderate-income borrowers, depending on the metropolitan or nonmetropolitan area. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$1,016. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Kansas City, KS MSA (Kansas City MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Kansas City MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Kansas City's employment remained below its pre-pandemic level. However, the recovery reaccelerated in late 2021. As manufacturing and farming, which are pillars of the economy, continued to recover, a nexus of office-using services and logistics also contributed to economic growth in Kansas. Prior to the pandemic, single-family house prices had been growing at an above-average pace, a gap that has widened since the onset of the crisis. Recent gains have been impressive; 2021 year-over-year price appreciation was among the strongest in the Midwest. The Kansas City MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Professional and Business Services, Education and Health Services, Government, Retail Trade, Leisure and Hospitality Services

Financial Activities, and Manufacturing. Major employers in the Kansas City MSA include Children's Mercy Hospital, Cerner Corp., Honeywell, and Truman Medical Centers. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Kansas City MSA was 2.8 percent compared to the national unemployment rate of 3.7 percent.

Atchison, KS Micro Area

According to the U.S. Census Bureau QuickFacts: Atchison City, KS has a population of 10,694. As of July 2021, the area has 3,746 households with 2.4 persons per household. Between 2016 to 2020, 63.6 percent of housing was owner occupied, which is on par with the national average of 64.4 percent. The largest percent of population is persons under 18 years at 23.9 percent of the total population. In the civilian labor force, total percent of population age 16 years and above is 61.3 percent. The mean travel time to work for workers aged 16 years and above is 17.4 minutes. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for Atchison, KS was 2.4 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Kansas City CSA. The organizations included one community development organization that helped to address the causes and conditions of poverty and one economic development organization that helped to attract and retain businesses in the area. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Construction of affordable rental housing
- Development of single-family affordable for-sale housing
- Affordable housing for persons with special needs
- Rehabilitation and quality improvement of housing units
- Rental assistance
- Homeless services such as basic necessities, emergency shelters and transitional housing, health services, and job skills training
- Revitalization and stabilization of neighborhoods such as demolition or rehabilitation of abandoned properties, development / improvement of public facilities, infrastructure needs, and redevelopment of commercial properties

Opportunities for participation by financial institutions included the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Supporting nonprofit affordable housing, shelters, and health providers and prevention
- Working with the area's community development corporation network
- Various state and local government partnership opportunities

Wichita MSA

The following table provides a summary of the demographics, including housing and business information for the Wichita MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Wichita MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	149	10.1	26.2	34.2	29.5	0.0
Population by Geography	631,094	7.5	21.7	36.3	34.5	0.0
Housing Units by Geography	265,486	8.4	23.3	37.2	31.1	0.0
Owner-Occupied Units by Geography	157,925	4.5	16.6	37.7	41.2	0.0
Occupied Rental Units by Geography	81,981	13.6	33.1	37.0	16.3	0.0
Vacant Units by Geography	25,580	15.1	33.2	34.9	16.7	0.0
Businesses by Geography	44,131	4.9	24.1	32.6	38.5	0.0
Farms by Geography	1,900	2.4	9.8	43.0	44.8	0.0
Family Distribution by Income Level	157,478	20.5	17.9	21.4	40.2	0.0
Household Distribution by Income Level	239,906	23.7	16.6	18.4	41.4	0.0
Median Family Income MSA - 48620 Wichita, KS MSA		\$64,331	Median Housing Value			\$122,324
			Families Below Poverty Level			10.3%
			Median Gross Rent			\$742
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$32,166 and moderate-income families earned at least \$32,166 and less than \$51,465. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$804 for low-income borrowers and ranging from \$1,287 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$657. Low- and moderate-income individuals could afford a mortgage loan for a median-priced home in this AA.

Information from Moody's Analytics indicated that at the end of the evaluation period, the Wichita MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Wichita's recovery was finally picking up some steam, as job growth outpaced that of both Kansas and the U.S. over the last three months of 2021.

The Wichita MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Manufacturing, Government, Professional and Business Services, Retail Trade, and Leisure and Hospitality Services. Major employers in the Wichita MSA include Spirit AeroSystems, Textron Aviation, Ascension Via Christi, McConnell Air Force Base, and Koch Industries. According to the Bureau of Labor Statistics, the December 2021 non-seasonally

adjusted unemployment rate for the Wichita MSA was 2.6 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by nine local organizations that were contacted during the evaluation period and served the Wichita MSA. The organizations included one affordable housing organization, six community development organizations that help to address the causes and conditions of poverty, and two economic development organizations that help to attract and retain businesses in the area. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following are identified needs within the community:

- Affordable rental housing
- Affordable for-sale housing
- Living wage employment
- Financial literacy/education
- Start-up business capital financing

Opportunities for participation by financial institutions include the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Down payment assistance programs
- Working with the area's community development corporation network
- Various state and local government partnership opportunities

Scope of Evaluation in the State of Kansas

The OCC selected the Kansas City CSA and Wichita MSA for full-scope reviews and based conclusions and ratings primarily on activity within these geographical areas. These were the bank's only assessment areas in the state of Kansas. More weight was given to the Kansas City CSA due to the larger deposit base, lending, and branch presence.

During the evaluation period, the bank originated or purchased 13,925 home mortgage loans, small loans to businesses, and small loans to farms totaling \$3 billion. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within each AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. In each of the AAs, the OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF KANSAS

LENDING TEST

The bank's performance under the Lending Test in the state of Kansas is rated Low Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Kansas City CSA and Wichita MSA was adequate.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Kansas City CSA	9,585	1,055	42	9	10,691	76.7	83.7
Wichita MSA	2,683	537	23	3	3,246	23.3	16.3
Total	12,268	1,592	65	12	13,937	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Kansas City CSA	2,435,830	47,060	2,775	390	2,486,055	83.9	83.7
Wichita MSA	443,911	30,396	633	517	475,457	16.1	16.3
Total	2,879,741	77,456	3,408	907	2,961,512	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Kansas City CSA

As of June 30, 2021, WFBNA had a deposit market share of 3.3 percent. The bank ranked ninth among 80 depository financial institutions placing it in the top 12 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 4.8 percent based on the number of home mortgage loans originated or purchased. The bank ranked third among 540 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. Other top three lenders in this AA based on market share were Rocket Mortgage (5.4 percent), Community America Credit Union (5.4 percent), and Fairway Independent Mortgage Corporation (4.5 percent).

According to peer small business data for 2021, WFBNA had a market share of 1.5 percent based on the number of small loans to businesses originated or purchased. The bank ranked 15th out of 165 small business lenders, which placed it in the top 10 percent of lenders. The top lenders in this AA based on

market share were American Express National Bank (16.2 percent), JPMorgan Chase Bank, N.A. (12.3 percent), and U.S. Bank, N.A. (9.4 percent).

According to peer small farm data for 2021, WFBNA had a market share of 5 percent based on the number of small loans to farms originated or purchased. The bank ranked seventh out of 30 small farm lenders, which placed it in the top 24 percent of lenders. The top lenders in this AA based on market share were John Deere Financial, FSB (18.6 percent), JPMorgan Chase Bank, N.A. (14.9 percent), and Commerce Bank (8.5 percent).

Wichita MSA

As of June 30, 2021, WFBNA had a deposit market share of 1 percent. The bank ranked 14th among 48 depository financial institutions placing it in the top 30 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 2.9 percent based on the number of home mortgage loans originated or purchased. The bank ranked eighth among 378 home mortgage lenders in the AA, which placed it in the top 3 percent of lenders. The top lenders in this AA based on market share were Rocket Mortgage (5.6 percent), Members Mortgage Services, LLC (4.9 percent), and Meritrust Federal Credit Union (4.3 percent).

According to peer small business data for 2021, WFBNA had a market share of 1.6 percent based on the number of small loans to businesses originated or purchased. The bank ranked 16th out of 120 small business lenders, which placed it in the top 14 percent of lenders. The top lenders in this AA based on market share were American Express National Bank (14.5 percent), Intrust Bank, N.A. (13.5 percent), and JPMorgan Chase Bank, N.A. (7.2 percent).

According to peer small farm data for 2021, WFBNA had a market share of 1 percent based on the number of small loans to farms originated or purchased. The bank ranked 12th out of 20 small farm lenders, which placed it in the bottom 60 percent of lenders. The top lenders in this AA based on market share were John Deer FNCL FSB (27.5 percent), RCB Bank (15.7 percent), and Intrust Bank, N.A. (15.6 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AAs. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data. The bank's performance was adequate in the Kansas City CSA and Wichita MSA.

Kansas City CSA

Home Mortgage Loans

Refer to Table O in the state of Kansas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans in low-income geographies was significantly below the percentage of owner-occupied housing units in low-income geographies and it was below the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was well below the percentage of owner-occupied housing units in moderate-income geographies and it was below the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Kansas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was below both the percentage of businesses in low-income geographies and the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses in moderate-income geographies and the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Kansas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was excellent.

The bank's percentage of small loans to farms in low-income geographies was below the percentage of farms in low-income geographies but it exceeded the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-income geographies exceeded both the percentage of farms in moderate-income geographies and the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Wichita MSA

Home Mortgage Loans

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans in low-income geographies was well below the percentage of owner-occupied housing units in low-income geographies but it was equal to the

aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied housing units in moderate-income geographies but it was near to the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Kansas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies was near to both the percentage of businesses in low-income geographies and the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses in moderate-income geographies and the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Kansas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

The bank's percentage of small loans to farms in low-income geographies exceeded both the percentage of farms in low-income geographies and the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank did not originate or purchase any small loans to farms in moderate-income geographies.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies in the Kansas City CSA and Wichita MSA. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AAs.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes. The bank's performance was good in the Kansas City CSA and adequate in the Wichita MSA.

Kansas City CSA***Home Mortgage Loans***

Refer to Table P in the state of Kansas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but it was near to the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was near to the percentage of moderate-income families and it approximated the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Kansas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was adequate.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 44.6 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with gross annual revenues of \$1 million or less was well below the percentage of businesses in the AA with gross annual revenues of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with gross annual revenues of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Kansas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was very poor.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 85.7 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with gross annual revenues of \$1 million or less was significantly below both the percentage of farms in the AA with gross annual revenues of \$1 million or less and the aggregate distribution of small loans to farms with gross annual revenues of \$1 million or less by all lenders.

Wichita MSA***Home Mortgage Loans***

Refer to Table P in the state of Kansas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but it was near to the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was below both the percentage of moderate-income families and the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Kansas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was poor.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 51.2 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with gross annual revenues of \$1 million or less was well below the percentage of businesses in the AA with gross annual revenues of \$1 million or less and it was below the aggregate distribution of small loans to businesses with gross annual revenues of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Kansas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was very poor.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 78.3 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with gross annual revenues of \$1 million or less was significantly below the percentage of farms in the AA with gross annual revenues of \$1 million or less and it was well below the aggregate distribution of small loans to farms with gross annual revenues of \$1 million or less by all lenders.

Community Development Lending

The bank made a low level of CD loans. CD lending had a negative effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

Kansas City CSA

WFBNA made a low level of CD loans in the Kansas City CSA. WFBNA made nine CD loans totaling approximately \$390,138, which represented 0.3 percent of the allocated tier 1 capital. CD loans were primarily made for revitalization/stabilization purposes. By dollar volume, 8.3 percent of these loans funded affordable housing that provided zero units of affordable housing, 90.2 percent funded revitalization and stabilization efforts, and 1.5 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA made a \$10 million loan to an organization, of which \$14,438 benefitted the AA. The organization invested capital and provided technical assistance to community development organizations for affordable housing, childcare, and education for low- and moderate-income families.
- WFBNA made a \$20 million loan to a CDFI, of which \$28,877 benefitted the AA. The CDFI provided funding to improve access to high-quality health and elder care, healthy foods, housing, and education for low-income communities.
- WFBNA provided a \$10 million line of credit to a CDFI, of which \$14,438 benefitted the AA. The organization provided flexible capital for development of affordable housing.
- WFBNA made a \$5 million loan to an organization, of which \$7,219 benefitted the AA. The organization primarily supported smaller and medium sized CDFIs that had difficulty efficiently accessing sufficient capital for larger transactions. Allowable uses were restricted to acquisition, construction, and mini-permanent loans for affordable housing and community facilities supporting low- to moderate-income communities.

Wichita MSA

WFBNA made an adequate level of CD loans in the Wichita MSA. WFBNA made three CD loans totaling approximately \$516,617, which represented 1.9 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 91.4 percent of these loans funded affordable housing that provided three units of affordable housing and 8.6 percent funded revitalization and stabilization efforts. The following are examples of CD loans made in this AA:

- WFBNA provided a \$15 million line of credit to a tax credit investment fund, of which \$472,454 was allocated to an affordable housing development for the elderly within the AA. This development contained 24 rent-restricted low-income housing tax credit units.

- WFBNA made a \$4 million loan to a CDFI, of which \$12,618 benefitted organizations within the AA. The CDFI provided funding to organizations that provided opportunities to low-income communities and people with disabilities.

Product Innovation and Flexibility

Kansas City CSA

WFBNA made little use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 192 loans under its flexible lending programs totaling \$16.1 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	52	11,100
Dream. Plan. Home.	5	725
PPP	135	4,300
Total	192	16,125

Wichita MSA

WFBNA made little use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 106 loans under its flexible lending programs totaling \$11 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	47	8,100
Dream. Plan. Home.	8	1,000
PPP	51	1,900
Total	106	11,000

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Kansas is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Kansas City CSA and Wichita MSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Kansas City CSA	14	8,049	10	8,517	24	34.3	16,566	15.9	11	2,280
Wichita MSA	10	15,614	12	548	22	31.4	16,162	15.5	8	856
Statewide***	16	13,344	8	58,041	24	34.3	71,385	68.6	4	29
Total	40	37,007	30	67,106	70	100.0	104,113	100.0	23	3,165
<p>The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.</p> <p>* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.</p> <p>** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.</p> <p>*** Statewide means investments in statewide programs that have a purpose, mandate, or function to serve one or more of the bank's assessment areas within the state. Due to rounding, totals may not equal 100.0%</p>										

Kansas City CSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$16.6 million and represented 12 percent of the bank's tier 1 capital allocated to the AA. The investments also included eight grants and donations totaling \$168,000 to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 66.7 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 25 percent that focused on community services targeted to low- and moderate-income individuals, and 8.4 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 294 units of affordable housing in the AA.

The bank made significant use of innovative or complex investments to support CD initiatives. Approximately 70.5 percent of current period investment dollars were complex NMTC investments. The following are examples of CD investments made in this AA:

- WFBNA provided a \$6 million NMTC investment for an educational facility and administrative offices. The organization previously operated out of disconnected classrooms throughout the metro area and its staff worked in a separate office space. The new facility brought the offices and programming together at a highly visible, centrally located facility.
- WFBNA provided two grants totaling \$32,500 to an organization that served the urban core of Kansas City, Kansas. One of the grants supported the organization's homebuyer and financial education services, which included group and individual pre-purchase and post-purchase homebuyer education, foreclosure avoidance, financial literacy classes and community engagement services in English, Spanish and other languages as required. The largest of the grants went to increase the

organization's financial management capacity and its plans to invest in its financial management software, processes, and technical operating systems.

- WFBNA provided a \$25,000 grant to the organization for its Asset Development, Financial Capability Program. The mission of the organization was to provide unconditional love and necessary help to people of all faiths by stabilizing and strengthening individuals and families in need across northeast Kansas.

Wichita MSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$16.2 million and represented 60.2 percent of the bank's tier 1 capital allocated to the AA. The investments also included 11 grants and donations totaling \$168,000 to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 54.5 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 45.5 percent that focused on community services targeted to low- and moderate-income individuals. In total, the bank's investments helped create or retain 233 units of affordable housing in the AA.

The bank made significant use of innovative or complex investments to support CD initiatives. Approximately 69.5 percent of current period investment dollars were complex LIHTC investments. The following are examples of CD investments made in this AA:

- WFBNA invested \$40 million in an LIHTC fund that benefitted multiple AAs. Of this total investment, \$380,770 supported an LIHTC development located in Valley Center, Kansas, with 40 housing units restricted to tenants earning less than 60 percent of the AMI.
- WFBNA provided a \$15,000 grant to a nonprofit housing organization that built affordable housing for low-income families and provided zero-interest rate mortgages.
- WFBNA provided a \$25,000 grant to an organization to prevent child abuse, strengthen families and empower parents and youth.

Broader Statewide Investments

WFBNA had 24 current and prior period investments totaling \$71.4 million with a purpose, mandate, or function to serve one or more AAs in the state. These CD investments were primarily LIHTCs that supported the creation or preservation of affordable housing in the state. These investments were given positive consideration and supported the bank's overall performance under the Investment Test in the state of Kansas.

SERVICE TEST

The bank's performance under the Service Test in the state of Kansas is rated Low Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Kansas City CSA was adequate and the bank's performance in the Wichita MSA was excellent.

Retail Banking Services

Service delivery systems were accessible to geographies and individuals of different income levels in the bank's full-scope AAs.

Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Kansas City CSA	83.7	7	77.8	0.0	14.3	42.9	42.9	7.3	14.3	34.7	43.5
Wichita MSA	16.3	2	22.2	0.0	50.0	0.0	50.0	7.5	21.7	36.3	34.5
Total	100.0	9	100.0	0.0	22.2	33.3	44.4	7.4	17.4	35.4	39.7
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Kansas City CSA	0	0	0	0	0	0
Wichita MSA	0	0	0	0	0	0
Total	0	0	0	0	0	0
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.						

Kansas City CSA

WFBNA's service delivery systems were reasonably accessible to geographies and individuals of different income levels in the Kansas City CSA. WFBNA operated seven branches in the AA, comprising one branch in a moderate-income geography, three branches in middle-income geographies, and three branches in upper-income geographies. The distribution of branches in low-income geographies was significantly below the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies was equal to the distribution of the population in moderate-income geographies. The distribution was augmented by two branches in middle- and upper-income geographies that were within close proximity to and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

WFBNA did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the five branches opened on Saturdays, one was located in a moderate-income geography.

Wichita MSA

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Wichita MSA. WFBNA operated two branches in the AA, comprising one branch in a moderate-income geography and one branch in an upper-income geography. Considering the bank's limited number of branches and 50 percent of the branches were located in low- and moderate-income geographies, service delivery systems were readily accessible.

WFBNA did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. The two branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the two branches opened on Saturdays, one was located in a moderate-income geography.

Community Development Services

WFBNA provided a limited level of CD services.

Kansas City CSA

WFBNA provided a limited level of CD services in the Kansas City CSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for seven CD service activities during the evaluation period. All of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families focusing on financial education. The bank's assistance provided was responsive to the identified needs in the AA.

Wichita MSA

WFBNA provided no CD services in the Wichita MSA.

State of Minnesota

CRA rating for the State of Minnesota³⁶: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected good responsiveness to AA credit needs.
- The bank exhibited an excellent geographic distribution of loans in its AAs.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank made an adequate level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments that demonstrated excellent responsiveness to credit and economic development needs, often in a leadership position. The bank occasionally used innovative and complex investments to support CD initiatives.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided a limited level of CD services.

Description of Institution's Operations in the State of Minnesota

The state of Minnesota was WFBNA's 27th largest rating area based on its total deposits in the state. As of June 30, 2021, the bank maintained approximately \$5.6 billion or 0.4 percent of its total domestic deposits in branches within the state. Of the 160 depository financial institutions operating in the bank's AAs within the state, WFBNA, with a deposit market share of 15.7 percent, was the largest. Other top depository financial institutions in the bank's AAs within the state based on market share included Bremer Bank N.A. (8.9 percent), U.S. Bank N.A. (7 percent), and Think Mutual Bank (4.3 percent). As of December 31, 2021, the bank operated 34 branches and 84 ATMs in the state. WFBNA delineated 21 AAs within the state; however, the OCC combined, analyzed, and presented those AAs at the CSA level where possible for purposes of this evaluation. This resulted in the following four AAs: Duluth, MN MSA (Duluth MSA), Mankato-New Ulm, MN CSA (Mankato CSA), Rochester-Austin, MN CSA (Rochester CSA), and Minnesota Combined Non-MSA. The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

Minnesota Combined Non-MSA

The following table provides a summary of the demographics, including housing and business information for the Minnesota Combined Non-MSA.

³⁶ This rating only reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Minnesota Combined Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	164	0.0	16.5	75.0	8.5	0.0
Population by Geography	598,330	0.0	17.8	73.5	8.7	0.0
Housing Units by Geography	323,687	0.0	16.7	75.5	7.8	0.0
Owner-Occupied Units by Geography	183,251	0.0	14.3	76.0	9.6	0.0
Occupied Rental Units by Geography	59,020	0.0	27.1	68.3	4.6	0.0
Vacant Units by Geography	81,416	0.0	14.5	79.5	6.0	0.0
Businesses by Geography	52,730	0.0	17.8	74.1	8.1	0.0
Farms by Geography	4,965	0.0	8.1	78.7	13.2	0.0
Family Distribution by Income Level	159,741	19.6	18.9	23.5	38.0	0.0
Household Distribution by Income Level	242,271	24.2	16.4	19.3	40.2	0.0
Median Family Income Non-MSAs – MN		\$63,045	Median Housing Value			\$161,704
			Families Below Poverty Level			8.4%
			Median Gross Rent			\$653
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$31,523 and moderate-income families earned at least \$31,523 to \$50,436. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$788 for low-income borrowers and \$1,261 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$868. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Minnesota's recovery was proceeding in step with the national pace. Most industries have been contributing to job gains, with leisure/hospitality a standout performer. However, the outside healthcare sector had slowed in 2021 due to rising resignations amid worker burnout. Minnesota recovered a slightly lower share of pandemic job losses than the Midwest and the U.S. Statewide, Minnesota has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Government, Professional and Business Services, Manufacturing, and Retail Trade. Major employers in the state of Minnesota include Mayo Clinic, Fairview Health System, Allina Health System, Target Corp., University of Minnesota, and HealthPartners. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rates for the counties within the Minnesota Combined Non-MSA ranged from 2.2 percent to 5.4 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Minnesota Combined Non-MSA. The organizations included one community development organization that helped to address the causes and conditions of poverty and one economic development organization that helped to attract and retain businesses in the area. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Construction of affordable rental housing
- Rehabilitation of housing units / improvement of the quality of the housing stock
- Rental assistance
- Homeless services such as emergency shelters and transitional housing
- Small business growth
- Workforce development

Opportunities for participation by financial institutions included the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Small business lending
- Supporting nonprofit organization that support the needs of the community
- Working with the area's community development corporation network
- Various state and local government partnership opportunities

Rochester CSA

The following table provides a summary of the demographics, including housing and business information for the Rochester CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Rochester CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	61	0.0	24.6	52.5	23.0	0.0
Population by Geography	250,477	0.0	23.8	48.6	27.6	0.0
Housing Units by Geography	106,281	0.0	25.6	49.1	25.4	0.0
Owner-Occupied Units by Geography	74,019	0.0	19.8	50.6	29.6	0.0
Occupied Rental Units by Geography	24,345	0.0	41.1	43.7	15.2	0.0
Vacant Units by Geography	7,917	0.0	31.7	50.9	17.4	0.0
Businesses by Geography	20,584	0.0	24.2	48.2	27.5	0.0
Farms by Geography	1,842	0.0	16.8	62.5	20.7	0.0
Family Distribution by Income Level	66,028	18.9	18.7	23.4	39.0	0.0
Household Distribution by Income Level	98,364	23.6	16.2	18.7	41.4	0.0
Median Family Income MSA – 40340 Rochester, MN MSA		\$81,036	Median Housing Value			\$168,162
Median Family Income Non-MSAs – MN		\$63,045	Median Gross Rent			\$796
			Families Below Poverty Level			5.9%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$31,523 to \$40,518 and moderate-income families earned at least \$31,523 to \$40,518 and less than \$50,436 to \$64,829, depending on the metropolitan or nonmetropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$788 to \$1,013 for low-income borrowers and ranging from \$1,261 to \$1,621 for moderate-income borrowers, depending on the metropolitan or nonmetropolitan area. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$903. Low-income borrowers in the nonmetropolitan counties would be challenged to afford a mortgage loan for a median-priced home in this AA.

Rochester, MN MSA (Rochester MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Rochester MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Rochester's recovery gained momentum in 2021, and the economy rallied at an above-average rate. The metro area's key healthcare sector had already recouped all pandemic job losses, while its outsize tech sector continued to shed payrolls. Overall, Rochester had recovered more than 80 percent of jobs lost during the pandemic, above Minnesota's 70 percent. House prices were rising at the fastest pace in nearly two decades, but growth remained below the state and national averages. The Rochester MSA has a moderately-diversified economy. Healthcare accounts for a whopping 40 percent of local employment, the highest share in the country. Key sectors of the economy by percentage of employment

include Education and Health Services, Government, Retail Trade, Manufacturing, and Leisure and Hospitality Services. The major employer in the Rochester MSA is Mayo Clinic. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Rochester CSA was 2.5 percent compared to the national unemployment rate of 3.7 percent.

Austin, MN Micro Area

According to the U.S. Census Bureau QuickFacts, Austin, MN has a population of 26,225. As of July 2021, the area has 10,097 households with 2.4 persons per household. Between 2016 to 2020, 65.4 percent of housing was owner occupied, which is on par with the national average of 64.4 percent. The largest percent of population is persons under 18 years at 25.1 percent of the total population. The most common employment sectors for those who live in Austin, MN, are Manufacturing (3,438 people), Health Care & Social Assistance (1,855 people), and Retail Trade (1,017 people)

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Rochester CSA. The organizations included one community development organization that helped to address the causes and conditions of poverty and one economic development organization that helped to attract and retain businesses in the area. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Construction of affordable rental housing
- Rehabilitation of housing units / improvement of the quality of the housing stock
- Rental assistance
- Homeless services such as emergency shelters and transitional housing
- Small business growth
- Workforce development

Opportunities for participation by financial institutions included the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Small business lending
- Supporting nonprofit organizations that support the needs of the community
- Working with the area's community development corporation network
- Various state and local government partnership opportunities

Scope of Evaluation in the State of Minnesota

The OCC selected the Minnesota Combined Non-MSA and Rochester CSA for full-scope reviews and based conclusions and ratings primarily on activity within these geographical areas. These AAs carried significant weight in determining the overall ratings for the state of Minnesota because of the

significance of the bank's presence in these AAs. More weight was given to the Minnesota Combined Non-MSA due to the larger deposit base, lending, and branch presence.

During the evaluation period, the bank originated or purchased 16,301 home mortgage loans, small loans to businesses, and small loans to farms totaling \$2 billion. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within each AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. In each of the AAs, the OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF MINNESOTA

LENDING TEST

The bank's performance under the Lending Test in the state of Minnesota is rated High Satisfactory. Performance in the limited-scope areas had a neutral effect on the overall Lending Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Minnesota Combined Non-MSA was good and the bank's performance in the Rochester CSA was excellent.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Minnesota Combined Non-MSA	4,143	2,564	318	14	7,039	43.1	34.1
Rochester CSA	2,281	1,264	85	5	3,635	22.2	23.7
Duluth MSA	1,946	1,604	39	13	3,602	22.0	26.0
Mankato CSA	1,364	674	19	7	2,064	12.6	16.1
Total	9,734	6,106	461	39	16,340	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Minnesota Combined Non-MSA	777,325	74,615	28,950	3,050	883,940	43.2	34.1
Rochester CSA	436,098	39,445	7,682	20,109	503,334	24.6	23.7
Duluth MSA	330,250	38,954	460	3,638	373,302	18.2	26.0
Mankato CSA	252,006	21,725	1,504	11,164	286,399	14.0	16.1
Total	1,795,679	174,739	38,596	37,961	2,046,975	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Minnesota Combined Non-MSA

As of June 30, 2021, WFBNA had a deposit market share of 10.4 percent. The bank ranked second among 102 depository financial institutions placing it in the top 2 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 5.2 percent based on the number of home mortgage loans originated or purchased. The bank ranked third among 489 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. Other top lenders in this AA based on market share were U.S. Bank, N.A. (6.9 percent), Rocket Mortgage (5.5 percent), and Bremer Bank, N.A. (4.4 percent).

According to peer small business data for 2021, WFBNA had a market share of 8.2 percent based on the number of small loans to businesses originated or purchased. The bank ranked fifth out of 103 small business lenders, which placed it in the top 5 percent of lenders. The top lenders in this AA based on market share were U.S. Bank, N.A. (13 percent), American Express National Bank (10.9 percent), and Bremer Bank, N.A. (10.9 percent).

According to peer small farm data for 2021, WFBNA had a market share of 3.3 percent based on the number of small loans to farms originated or purchased. The bank ranked ninth out of 27 small farm lenders, which placed it in the top 34 percent of lenders. The top lenders in this AA based on market share were Minnwest Bank (28.8 percent), Bremer Bank, N.A. (18.7 percent), and John Deere Financial, FSB (16.3 percent).

Rochester CSA

As of June 30, 2021, WFBNA had a deposit market share of 16.6 percent. The bank ranked second among 38 depository financial institutions placing it in the top 6 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 5.4 percent based on the number of home mortgage loans originated or purchased. The bank ranked third among 338 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. Other top lenders in this AA based on market share were Think Mutual Bank (8.3 percent), U.S. Bank, N.A. (7.7 percent), and Home Federal Savings Bank (5.2 percent).

According to peer small business data for 2021, WFBNA had a market share of 8.8 percent based on the number of small loans to businesses originated or purchased. The bank ranked fourth out of 76 small business lenders, which placed it in the top 6 percent of lenders. The top lenders in this AA based on

market share were American Express National Bank (14.5 percent), U.S. Bank, N.A. (13 percent), and Think Mutual Bank (10.2 percent).

According to peer small farm data for 2021, WFBNA had a market share of 1.9 percent based on the number of small loans to farms originated or purchased. The bank ranked eighth out of 17 small farm lenders, which placed it in the top 48 percent of lenders. The top lenders in this AA based on market share were Bremer Bank, N.A. (31.2 percent), Merchants Bank, N.A. (20.3 percent), and Minnwest Bank (17.4 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AAs. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data. The bank's performance was excellent in the Minnesota Combined Non-MSA and good in the Rochester CSA.

Minnesota Combined Non-MSA

Home Mortgage Loans

Refer to Table O in the state of Minnesota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in moderate-income geographies was near to the percentage of owner-occupied housing units in moderate-income geographies but it exceeded the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Minnesota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in moderate-income geographies was near to the percentage of businesses in moderate-income geographies and it approximated the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Minnesota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

The bank's percentage of small loans to farms in moderate-income geographies was well below the percentage of farms in moderate-income geographies but it was near to the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Home Mortgage Loans

Rochester CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans in moderate-income geographies approximated the percentage of owner-occupied housing units in moderate-income geographies and it exceeded the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Minnesota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

The bank's percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in moderate-income geographies and the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Minnesota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

The bank's percentage of small loans to farms in moderate-income geographies was well below the percentage of farms in moderate-income geographies and it was significantly below the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies in the Rochester CSA and Minnesota Combined Non-MSA. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AAs.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes. The bank's performance was good in the Minnesota Combined Non-MSA and excellent in the Rochester CSA.

Minnesota Combined Non-MSA

Home Mortgage Loans

Refer to Table P in the state of Minnesota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the affordability for low-income individuals discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was near to the percentage of low-income families and it approximated the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and it was near to the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Minnesota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 30.6 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with gross annual revenues of \$1 million or less was below the percentage of businesses in the AA with gross annual revenues of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with gross annual revenues of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Minnesota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was poor.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 37.1 percent of its small loans to farms. Based on those farms with known revenues, the bank's

percentage of small loans to farms with gross annual revenues of \$1 million or less was well below the percentage of farms in the AA with gross annual revenues of \$1 million or less and it was below the aggregate distribution of small loans to farms with gross annual revenues of \$1 million or less by all lenders.

Rochester CSA

Home Mortgage Loans

Refer to Table P in the state of Minnesota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was near to the percentage of low-income families and it approximated the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and it was near to the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Minnesota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 25.9 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with gross annual revenues of \$1 million or less was below the percentage of businesses in the AA with gross annual revenues of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with gross annual revenues of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Minnesota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was poor.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 38.8 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with gross annual revenues of \$1 million or less was well below the percentage of farms in the AA with gross annual revenues of \$1 million or less and it was below the

aggregate distribution of small loans to farms with gross annual revenues of \$1 million or less by all lenders.

Community Development Lending

The bank made a relatively high level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

Minnesota Combined Non-MSA

WFBNA has made a low level of CD loans in the Minnesota Combined Non-MSA. WFBNA made 14 CD loans totaling approximately \$3.1 million, which represented 1.2 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 40.5 percent of these loans funded affordable housing that provided 62 units of affordable housing, 16.4 percent funded economic development, 18.2 percent funded revitalization and stabilization efforts, and 24.8 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided an extension for a \$500,000 loan to a CDFI to capitalize a revolving commercial loan fund. The fund provided business capital for start-up and expansion of micro-enterprises owned by low- and moderate-income families in rural Minnesota.
- WFBNA provided a \$1.1 million loan for Section 8 housing developments located in Walker, Minnesota and Park Rapids, Minnesota. All of the 62 units were restricted to tenants earning between 50 percent and 60 percent of the areas' MFI.
- WFBNA made a \$20 million loan to a CDFI, of which \$37,427 benefitted the AA. The CDFI provided funding to improve access to high-quality health and elder care, healthy foods, housing, and education for low-income communities.

Rochester CSA

WFBNA was a leader in making CD loans in the Rochester CSA. WFBNA made five CD loans totaling approximately \$20.1 million, which represented 11.6 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 98.5 percent of these loans funded affordable housing that provided 114 units of affordable housing and 1.5 percent funded revitalization and stabilization efforts. The following are examples of CD loans made in this AA:

- WFBNA provided a \$13.5 million construction loan for a 76-unit LIHTC development located in Rochester, Minnesota. The units were restricted to tenants earning up to 60 percent of the AMI with four units set aside for people with disabilities and four units set aside for formerly homeless individuals. This loan was complex due to the multiple funding sources including tax increment financing.

- WFBNA provided a modification on a \$6.2 million construction loan for an affordable housing development located in Austin, Minnesota. The 38 units were restricted to households with incomes up to 60 percent of the AMI. Four of the units were reserved for families with children who were experiencing long-term homelessness, with supportive services provided.

Product Innovation and Flexibility

Minnesota Combined Non-MSA

WFBNA made extensive use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 468 loans under its flexible lending programs totaling \$42.8 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	209	33,700
Dream. Plan. Home.	28	3,900
PPP	231	5,200
Total	468	42,800

Rochester CSA

WFBNA used flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 289 loans under its flexible lending programs totaling \$29.5 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	103	19,700
Dream. Plan. Home.	32	6,400
PPP	154	3,400
Total	289	29,500

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Duluth MSA was consistent with the bank's overall performance under the Lending Test in the full-scope areas. The bank's performance in the Mankato CSA was stronger than the bank's overall performance under the Lending Test in the full-scope areas. Performance was stronger primarily due to stronger geographic distributions of loans in low- and moderate-income areas and stronger responsiveness to area credit needs.

Refer to Tables O through T in the state of Minnesota section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Minnesota is rated Outstanding. Performance in the limited-scope areas had a positive effect on the overall Investment Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Minnesota Combined Non-MSA was good and Rochester CSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Minnesota Combined Non-MSA	6	13,304	45	1,320	51	37.2	14,625	16.9	3	117
Rochester CSA	9	27,271	12	11,320	21	15.3	38,591	44.7	2	205
Duluth MSA	9	4,403	37	10,603	46	33.6	15,006	17.4	2	8,317
Mankato CSA	4	10,778	9	420	13	9.5	11,198	13.0	3	859
Statewide***	4	6,467	2	508	6	4.4	6,975	8.1	1	100
Total	32	62,224	105	24,171	137	100.0	86,395	100.0	11	9,598

The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.
 * '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 tracked and recorded by the institution's financial reporting system.
 *** Statewide means investments in statewide programs that have a purpose, mandate, or function to serve one or more of the bank's assessment areas within the state. Due to rounding, totals may not equal 100.0%

Minnesota Combined Non-MSA

The bank had a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$14.6 million and represented 5.9 percent of the bank's tier 1 capital allocated to the AA. The investments also included 40 grants and donations totaling \$320,000 to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 33.3 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 54.9 percent that focused on community services targeted to low- and moderate-income individuals, and 11.7 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 131 units of affordable housing in the AA.

The bank rarely used innovative and complex investments to support CD initiatives. None of the current period investments were complex. The following are examples of CD investments made in this AA:

- WFBNA provided five investments totaling over \$1 million to an organization that provided access to safe, decent, and affordable housing. The organization used the funds to purchase pools of mortgage loans provided to low- and moderate-income families to finance the purchase of homes in Minnesota.
- WFBNA provided five grants totaling \$76,000 to an organization to support its IDA (Individual Development Account) program. The organization promoted economic well-being and community development for the Leech Lake Reservation community by providing affordable financial products, training, and services.
- WFBNA provided a \$20,000 grant to an organization whose mission was to improve west central Minnesota through funding, programs, and technical assistance. According to the organization, 100 percent of its clients were small businesses.

Rochester CSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$38.6 million and represented 22.3 percent of the bank's tier 1 capital allocated to the AA. The investments also included six grants and donations totaling \$43,000 to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 76.2 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 23.8 percent that focused on community services targeted to low- and moderate-income individuals. In total, the bank's investments helped create or retain 453 units of affordable housing in the AA.

The bank made extensive use of innovative or complex investments to support CD initiatives. Approximately 93.3 percent of current period investment dollars were complex LIHTC investments. The following are examples of CD investments made in this AA:

- WFBNA invested \$10.5 million in an equity investment for a 76-unit LIHTC development located in Rochester, Minnesota. The units were restricted to tenants earning up to 60 percent of the AMI with four units set aside for people with disabilities and four units set aside for formerly homeless individuals. This investment was complex due to the inherent nature of LIHTC transactions and multiple funding sources including Tax Increment Financing.
- WFBNA provided a \$10,000 grant to an organization for its rental assistance program. The organization has provided for the basic needs of those less fortunate for 125 years, serving the homeless, working poor, elderly, and at-risk youth while providing services through five pillars of

programming: emergency social services, housing, the Good Samaritan Health Clinic, Caring Partners Adult Day Program, and youth programs/ministry outreach.

- WFBNA invested a total of \$19.8 million in five residential housing finance bonds, of which \$714,274 was allocated to the Rochester CSA. Funds were used to purchase pools of mortgage loans that lending institutions have made to qualified persons or families of low- and moderate-income to finance the purchase of single-family residences in Minnesota.

Broader Statewide Investments

WFBNA had six current and prior period investments totaling \$7 million with a purpose, mandate, or function to serve one or more AAs in the state. These CD investments were primarily LIHTCs that supported the creation or preservation of affordable housing in the state. These investments were given positive consideration and supported the bank's overall performance under the Investment Test in the state of Minnesota.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in Duluth MSA and Mankato CSA was stronger than the bank's overall performance under the Investment Test in the full-scope areas, particularly relative to the Minnesota Combined Non-MSA. Performance was stronger due to higher levels of CD investments relative to the bank's capacity to make investments in those AAs.

SERVICE TEST

The bank's performance under the Service Test in the state of Minnesota is rated High Satisfactory. Performance in the limited-scope AAs had a neutral effect on the overall Service Test rating.

Conclusions for Minnesota Receiving a Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Minnesota Combined Non-MSA and Rochester CSA was good.

Retail Banking Services

Service delivery systems were accessible to geographies and individuals of different income levels in the bank's full-scope AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Minnesota Combined Non-MSA	34.1	16	47.1	0.0	37.5	62.5	0.0	0.0	17.8	73.5	8.7
Rochester CSA	23.7	6	17.6	0.0	16.7	33.3	50.0	0.0	23.8	48.6	27.6
Duluth MSA	26.0	9	26.5	0.0	44.4	44.4	11.1	4.9	16.0	54.5	24.6
Mankato CSA	16.1	3	8.8	0.0	33.3	66.7	0.0	0.0	11.9	81.3	6.8
Total	100.0	34	100.0	0.0	35.3	52.9	11.8	1.0	18.1	65.4	15.6
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Minnesota Combined Non-MSA	0	4	0	0	-4	0
Rochester CSA	0	1	0	0	-1	0
Duluth MSA	0	1	0	0	-1	0
Mankato CSA	0	2	0	-1	-1	0
Total	0	8	0	-1	-7	0
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.						

Minnesota Combined Non-MSA

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Minnesota Combined Non-MSA. WFBNA operated 16 branches in the AA, comprising six branches in moderate-income geographies and 10 branches in middle-income geographies. There were no low-income tracts in the AA. The distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies. The distribution was augmented by two branches in middle- and upper-income geographies that were within close proximity to serve moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in moderate-income geographies and/or to low- and moderate-income individuals. WFBNA did not open or close any branches in and moderate-income geographies.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Generally, branches were opened

Monday through Friday from 9:00 a.m. to 5:00 p.m. The two branches opened on Saturdays were located in middle-income geographies.

Rochester CSA

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Rochester CSA after consideration of... WFBNA operated six branches in the AA, comprising one branch in a moderate-income geography, two branches in middle-income geographies, and three branches in upper-income geographies. There were no low-income tracts in the AA. The distribution of branches in moderate-income geographies was near to the distribution of the population in moderate-income geographies. The distribution was augmented by three branches in middle- and upper-income geographies that were within close proximity to serve moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in moderate areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches has not adversely affected access to retail banking services. WFBNA did not open or close any branches in moderate-income geographies.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Generally, branches were opened Monday through Friday from 9:00 a.m. to 5:00 p.m. Of the four branches opened on Saturdays, one was located in a moderate-income geography.

Community Development Services

The bank provided a limited level of CD services.

Minnesota Combined Non-MSA

WFBNA provided a limited level of CD services in the Minnesota Combined Non-MSA. During the exam period, the bank's qualifying activities performed were significantly impacted by COVID-19 pandemic. Bank records showed that the employees provided their financial or job-specific expertise and/or technical assistance for 17 CD service activities to five organizations during the evaluation period, logging a total 28 qualified hours within this AA. All of the bank's assistance were to organizations that provided community services to low- and moderate-income individuals and families. The following is an example of CD services provided in this AA:

- Bank members provided 13 hours of financial education at schools located in the AA, where the majority of the students qualified for free/reduced lunches.

Rochester CSA

WFBNA provided few, if any, CD services in the Rochester CSA. During the exam period, the bank's qualifying activities performed were significantly impacted by COVID-19 pandemic. WFBNA provided no CD services.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Duluth MSA and Mankato CSA was consistent with the bank's overall performance under the Service Test in the full-scope areas.

State of Mississippi

CRA rating for the State of Mississippi³⁷: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited an adequate geographic distribution of loans in its AAs.
- The bank exhibited a poor distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments that demonstrated excellent responsiveness to credit and economic development needs, although occasionally in a leadership position. The bank rarely used innovative and complex investments to support CD initiatives.
- Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided a limited level of CD services.

Description of Institution's Operations in the State of Mississippi

The state of Mississippi was WFBNA's 44th largest rating area based on its total deposits in the state. As of June 30, 2021, the bank maintained approximately \$939 million or 0.1 percent of its total domestic deposits in branches within the state. Of the 44 depository financial institutions operating in the bank's AAs within the state, WFBNA, with a deposit market share of 6.1 percent, was the sixth largest. The top depository financial institutions in the bank's AAs within the state based on market share included Trustmark National Bank (20.1 percent), Regions Bank (15.3 percent), Hancock Whitney Bank (12 percent), BancorpSouth Bank (8.9 percent), and BankPlus (8.5 percent). As of December 31, 2021, the bank operated 10 branches and 15 ATMs in the state. WFBNA delineated the following three AAs within the state: Gulfport-Biloxi, MS MSA (Gulfport MSA), Hattiesburg, MS MSA (Hattiesburg MSA), and Jackson, MS MSA (Jackson MSA). The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

Gulfport MSA

The following table provides a summary of the demographics, including housing and business information for the Gulfport MSA.

37 This rating only reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Gulfport MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	86	8.1	16.3	51.2	18.6	5.8
Population by Geography	400,549	5.6	14.1	56.5	23.8	0.1
Housing Units by Geography	180,122	6.1	15.0	57.1	21.6	0.1
Owner-Occupied Units by Geography	96,703	3.4	10.9	59.5	26.1	0.0
Occupied Rental Units by Geography	53,776	10.3	19.7	54.5	15.3	0.3
Vacant Units by Geography	29,643	7.6	20.0	53.9	18.5	0.0
Businesses by Geography	29,803	7.2	14.0	55.9	22.6	0.3
Farms by Geography	664	2.9	7.4	62.5	27.3	0.0
Family Distribution by Income Level	101,074	22.7	16.3	19.6	41.5	0.0
Household Distribution by Income Level	150,479	24.2	15.7	17.7	42.4	0.0
Median Family Income MSA - 25060 Gulfport-Biloxi, MS MSA		\$52,608	Median Housing Value			\$130,353
			Median Gross Rent			\$832
			Families Below Poverty Level			15.3%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$26,304 and moderate-income families earned at least \$26,304 and less than \$42,086. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$658 for low-income borrowers and \$1,052 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$700. Low-income borrowers would find it challenging to afford a mortgage for a median-priced home in the AA.

Information from Moody's Analytics indicated that at the end of the evaluation period, the Gulfport MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Gulfport's economy caught up with the nation toward the end of 2021. Stronger growth in nonfarm employment was largely due to tourism. The reopening of the U.S. border with Canada provided support to the economy, as Canadians accounted for a large share of international travelers to the state. The Gulfport MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Government, Leisure and Hospitality Services, Manufacturing, Retail Trade, Professional and Business Services, and Education and Health Services. Major employers in the Gulfport MSA include Huntington Ingalls Industries, Inc., Keesler Air Force Base, Naval Construction Battalion Center, and NASA Stennis Space Center. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Gulfport MSA was 3.6 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considers an assessment of community needs completed by the bank through its contacts with community leaders and information provided through HUD Consolidated Plans during the evaluation period.

A review of the bank's needs assessment indicated that the following were identified needs within the community:

- Construction of affordable rental housing units
- Development of single-family affordable housing
- Housing for persons with special needs
- Rehabilitation of housing units/improvement of the quality of housing stock
- Rental assistance
- Homeless services
- Small business growth
- Financial health services
- Tax preparation services for low- and moderate-income (VITA)
- Job creation and retention

Opportunities for participation by financial institutions included the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Small business lending
- Supporting nonprofit health providers and prevention
- Working with the area's community development corporation network
- Various state and local government partnership opportunities

Jackson MSA

The following table provides a summary of the demographics, including housing and business information for the Jackson MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Jackson MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	134	15.7	31.3	24.6	27.6	0.7
Population by Geography	595,842	11.6	26.4	29.2	32.1	0.8
Housing Units by Geography	244,703	11.8	27.5	29.5	31.3	0.0
Owner-Occupied Units by Geography	143,816	6.8	23.0	30.3	40.0	0.0
Occupied Rental Units by Geography	70,334	18.4	31.9	30.7	19.1	0.0
Vacant Units by Geography	30,553	20.6	38.4	22.7	18.3	0.1
Businesses by Geography	57,352	7.6	22.4	29.2	40.8	0.1
Farms by Geography	1,904	4.5	18.5	32.1	44.9	0.1
Family Distribution by Income Level	147,525	24.1	17.1	17.6	41.3	0.0
Household Distribution by Income Level	214,150	26.1	15.4	16.3	42.3	0.0
Median Family Income MSA - 27140 Jackson, MS MSA		\$55,459	Median Housing Value			\$126,167
			Median Gross Rent			\$785
			Families Below Poverty Level			15.7%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$27,730 and moderate-income families earned at least \$27,730 and less than \$44,367. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$693 for low-income borrowers and \$1,109 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$677. Low- and moderate-income borrowers should be able to afford a mortgage for a median-priced home in this AA.

Information from Moody's Analytics indicated that at the end of the evaluation period, the Jackson MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Mirroring the rest of Mississippi, the Jackson MSA experienced a strong initial rebound, and though it remained ahead of the U.S. in its recovery, employment had been flat over during 2021. The public sector performed worst while professional/ business services and logistics have moved higher. The rebound in housing had been quite weak. Price appreciation lagged the state, national, and even its own pre-pandemic trends, while housing starts were down in the first quarter of 2021 compared with 2020. The Jackson MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Government, Education and Health Services, Professional and Business Services, Retail Trade, and Leisure and Hospitality Services. Major employers in the Jackson MSA include University of Mississippi Medical Center, Merit Health, and Nissan. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Jackson MSA was 3.2 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by four local economic development organizations that were contacted during the evaluation period and served the Jackson MSA. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Construction of affordable rental housing units
- Development of single-family affordable housing
- Housing for persons with special needs
- Rehabilitation of housing units
- Rental assistance
- Homeless services
- Small business growth
- Financial health services
- Tax preparation services for low- and moderate-income (VITA)
- Job creation and retention

Opportunities for participation by financial institutions included the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Small business lending
- Supporting nonprofit health providers and prevention
- Working with the area's community development corporation network
- Various state and local government partnership opportunities

Scope of Evaluation in the State of Mississippi

The OCC selected the Gulfport MSA and Jackson MSA for full-scope reviews and based conclusions and ratings primarily on activity within these geographical areas. These AAs carried significant weight in determining the overall ratings for the state of Mississippi because of the significance of the bank's presence in these AAs. More weight was given to the Jackson MSA due to the larger deposit base, lending, and branch presence.

During the evaluation period, the bank originated or purchased 8,472 home mortgage loans, small loans to businesses, and small loans to farms totaling \$1.3 billion. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within each AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. In each of the AAs, the OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF MISSISSIPPI

LENDING TEST

The bank's performance under the Lending Test in the state of Mississippi is rated High Satisfactory. Performance in the limited-scope area had a neutral effect on the overall Lending Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Gulfport MSA was excellent and the bank's performance in the Jackson MSA was adequate.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Gulfport MSA	1,529	842	22	8	2,401	28.3	33.0
Jackson MSA	3,740	1,051	93	10	4,894	57.6	54.8
Hattiesburg MSA	795	354	46	0	1,195	14.1	12.2
Total	6,064	2,247	161	18	8,490	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Gulfport MSA	258,156	21,471	1,288	9,017	289,932	21.8	33.0
Jackson MSA	819,827	32,601	3,168	6,916	862,512	64.8	54.8
Hattiesburg MSA	164,919	9,904	3,160	0	177,983	13.4	12.2
Total	1,242,902	63,976	7,616	15,933	1,330,427	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Gulfport MSA

As of June 30, 2021, WFBNA had a deposit market share of 4.2 percent. The bank ranked eighth among 16 depository financial institutions placing it in the top 50 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 2.6 percent based on the number of home mortgage loans originated or purchased. The bank ranked 10th among 364 home mortgage lenders in the AA, which placed it in the top 3 percent of lenders. The top lenders in this AA based on market share were Rocket Mortgage (7.8 percent), CMG Mortgage Inc. (4.7 percent), and Cadence Bank (4.6 percent).

According to peer small business data for 2021, WFBNA had a market share of 3 percent based on the number of small loans to businesses originated or purchased. The bank ranked ninth out of 107 small business lenders, which placed it in the top 9 percent of lenders. The top lenders in this AA based on market share were American Express National Bank (14.5 percent), Hancock Whitney Bank (13.6 percent), and Community Bank of Mississippi (11.2 percent).

According to peer small farm data for 2021, WFBNA had a market share of 3.7 percent based on the number of small loans to farms originated or purchased. The bank ranked fourth out of 17 small farm lenders, which placed it in the top 24 percent of lenders. The top lenders in this AA based on market share were Cadence Bank (65.8 percent), The Citizens Bank of Philadelphia (5.3 percent), and Trustmark National Bank (4.7 percent).

Jackson MSA

As of June 30, 2021, WFBNA had a deposit market share of 2.8 percent. The bank ranked seventh among 31 depository financial institutions placing it in the top 23 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 3.5 percent based on the number of home mortgage loans originated or purchased. The bank ranked sixth among 366 home mortgage lenders in the AA, which placed it in the top 2 percent of lenders. The top lenders in this AA based on market share were Trustmark National Bank (12.8 percent), BankPlus (6.7 percent), and Cadence Bank (6.5 percent).

According to peer small business data for 2021, WFBNA had a market share of 2 percent based on the number of small loans to businesses originated or purchased. The bank ranked 13th out of 117 small business lenders, which placed it in the top 12 percent of lenders. The top lenders in this AA based on market share were American Express National Bank (15.9 percent), Trustmark National Bank (12.3 percent), and BankPlus (10.5 percent).

According to peer small farm data for 2021, WFBNA had a market share of 4.5 percent based on the number of small loans to farms originated or purchased. The bank ranked fourth out of 29 small farm lenders, which placed it in the top 14 percent of lenders. The top lenders in this AA based on market share were BankPlus (37.6 percent), Trustmark National Bank (25.5 percent), and John Deere Financial, FSB (12.3 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AAs. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data. The bank's performance was good in the Gulfport MSA and poor in the Jackson MSA.

Gulfport MSA***Home Mortgage Loans***

Refer to Table O in the state of Mississippi section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was significantly below the percentage of owner-occupied housing units in low-income geographies and it was below the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was near to the percentage of owner-occupied housing units in moderate-income geographies and it exceeded the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Mississippi section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies was near to the percentage of businesses in low-income geographies but it approximated the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies approximated the percentage of businesses in moderate-income geographies and it exceeded the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Jackson MSA***Home Mortgage Loans***

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was poor.

The bank's percentage of home mortgage loans in low-income geographies was significantly below the percentage of owner-occupied housing units in low-income geographies and it was well below the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was significantly below the percentage of owner-occupied housing units in moderate-income geographies and it was below the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Mississippi section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies approximated the percentage of businesses in low-income geographies and it exceeded the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in moderate-income geographies and the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Mississippi section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was good.

The bank's percentage of small loans to farms in low-income geographies was below the percentage of farms in low-income geographies and it was significantly below the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-income geographies exceeded both the percentage of farms in moderate-income geographies and the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies in the Jackson MSA and Gulfport MSA. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AAs.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes. The bank's performance was adequate in the Gulfport MSA and poor in the Jackson MSA.

Gulfport MSA

Home Mortgage Loans

Refer to Table P in the state of Mississippi section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was poor.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but it approximated the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was significantly below the percentage of moderate-income families and it was well below the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Mississippi section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 18.9 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with gross annual revenues of \$1 million or less was below the percentage of businesses in the AA with gross annual revenues of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with gross annual revenues of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Mississippi section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was very poor.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 81.8 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with gross annual revenues of \$1 million or less was significantly below the percentage of farms in the AA with gross annual revenues of \$1 million or less and it was well below the aggregate distribution of small loans to farms with gross annual revenues of \$1 million or less by all lenders.

Jackson MSA

Home Mortgage Loans

Refer to Table P in the state of Mississippi section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was poor.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and it was below the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was significantly below both the percentage of moderate-income families and the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Mississippi section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was adequate.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 35.2 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with gross annual revenues of \$1 million or less was well below the percentage of businesses in the AA with gross annual revenues of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with gross annual revenues of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Mississippi section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was very poor.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 96.8 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with gross annual revenues of \$1 million or less was significantly below both the percentage of farms in the AA with gross annual revenues of \$1 million or less and the aggregate distribution of small loans to farms with gross annual revenues of \$1 million or less by all lenders.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

Gulfport MSA

WFBNA was a leader in making CD loans in the Gulfport MSA. WFBNA made eight CD loans totaling approximately \$9 million, which represented 22.3 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 99.9 percent of these loans funded affordable housing that provided 62 units of affordable housing. The following are examples of CD loans made in this AA:

- WFBNA provided a \$9 million loan to finance an affordable housing development in Gulfport, Mississippi. The 80-unit LIHTC development of single-family homes was restricted to tenants earning 60 percent of the AMI. The development replaced a public housing community built in 1959. This activity was complex due to the multiple funding sources, including the Mississippi Regional Housing Authority and the National Equity Fund.
- WFBNA provided a \$20 million Term Loan for this nonprofit 501(c)(3) and CDFI, of which \$6,316 was allocated to Gulfport MSA. The CDFI was dedicated to improving access to high-quality health and elder care, healthy foods, housing, and education for low-income communities across the country.
- WFBNA made a \$10 million loan to an organization, of which nearly \$3,158 benefitted the AA. The organization invested capital and provided technical assistance to community development organizations for affordable housing, childcare, and education for low- and moderate-income families.

Jackson MSA

WFBNA was a leader in making CD loans in the Jackson MSA. WFBNA made 10 CD loans totaling approximately \$6.9 million, which represented 10.3 percent of the allocated tier 1 capital. CD loans were primarily made for community services purposes. By dollar volume, 99.6 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$5 million loan to CDFI in Jackson, Mississippi to support its credit union. The CDFI and its credit union worked to strengthen communities, build assets, and improve lives in economically distressed areas of the Deep South.
- WFBNA provided a \$35 million line of credit to an organization, of which, \$945,900 was allocated to the Jackson MSA. The organization worked toward excellent and equitable education by finding and nurturing leaders who commit to expanding opportunities for low-income students, beginning with at least two years teaching in a public school.

Product Innovation and Flexibility

Gulfport MSA

WFBNA used flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 126 loans under its flexible lending programs totaling \$6.5 million.

Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	19	2,800
Dream. Plan. Home.	3	380
PPP	104	3,300
Total	126	6,480

Jackson MSA

WFBNA made extensive use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 185 loans under its flexible lending programs totaling \$9.6 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	33	6,900
Dream. Plan. Home.	3	471
PPP	149	2,200
Total	185	9,571

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Hattiesburg MSA was consistent with the bank's overall performance under the Lending Test in the full-scope areas.

Refer to Tables O through T in the state of Mississippi section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Mississippi is rated Outstanding. Performance in the limited-scope areas had a positive effect on the overall Investment Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Gulfport MSA was good and the bank's performance in the Jackson MSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Gulfport MSA	5	1,462	38	442	43	35.5	1,904	2.7	1	289
Jackson MSA	6	3,587	47	6,180	53	43.8	9,767	13.7	4	409
Hattiesburg MSA	4	8,854	14	176	18	14.9	9,029	12.7	3	21
Statewide***	6	35,496	1	15,000	7	5.8	50,496	70.9	1	15
Total	21	49,399	100	21,798	121	100.0	71,196	100.0	9	734
<p>The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.</p> <p>* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.</p> <p>** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.</p> <p>*** Statewide means investments in statewide programs that have a purpose, mandate, or function to serve one or more of the bank's assessment areas within the state. Due to rounding, totals may not equal 100.0%</p>										

Gulfport MSA

The bank had a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$1.9 million and represented 4.7 percent of the bank's tier 1 capital allocated to the AA. The investments also included 38 grants and donations totaling \$442,000 to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited good responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 23.3 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 60.5 percent that focused on community services targeted to low- and moderate-income individuals, and 16.3 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 225 units of affordable housing in the AA.

The bank rarely used innovative and complex investments to support CD initiatives. None of the current period investments were complex. The following are examples of CD investments made in this AA:

- WFBNA provided three grants totaling \$35,000 to an organization that provided educational, health and wellness, and workforce readiness programs to young people.
- WFBNA provided a \$35,000 grant to an organization for its Small Business Micro Loan program. The organization provided support through financial assistance and development services which facilitated the development of communities that provide safe, quality housing for the residents of Mississippi and create economic opportunities that add and retain jobs in the community.

- WFBNA provided a \$10,000 grant to an organization for its women in construction program operations. The organization improved the economic standing of the neighborhoods of East Biloxi, Mississippi.

Jackson MSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$9.8 million and represented 14.6 percent of the bank's tier 1 capital allocated to the AA. The investments also included 47 grants and donations totaling \$6.2 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 34 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 58.5 percent that focused on community services targeted to low- and moderate-income individuals, and 7.6 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 136 units of affordable housing in the AA.

The bank rarely used innovative and complex investments to support CD initiatives. None of the current period investments were complex. The following are examples of CD investments made in this AA:

- WFBNA provided a \$3.5 million grant through the Open for Business Fund. The organization used these funds to provide loans to more than 230 small businesses and provided technical assistance to more than 350 small businesses, preserving, or creating an estimated 860 jobs. WFBNA provided additional grants totaling \$2.3 million during the evaluation period, that allowed the organization to provide low interest loans to clients and support businesses impacted by COVID-19.
- WFBNA provided a \$15,000 grant to an organization for its financial education support. The mission of the organization was to increase economic and financial literacy in Mississippi by providing resources and training to public and private K-12 schoolteachers, empowering students to create a more prosperous future for themselves and Mississippi.
- WFBNA provided a \$5,000 grant to an organization for its homeownership counseling grant program. The organization's mission was to keep the public aware of current Fair Housing and Fair Lending laws and issues. The goal was to educate Mississippians about their rights under the Fair Housing Act. The organization made sure that female heads of households, families with children, and people with disabilities can identify an illegal act of discrimination.

Broader Statewide Investments

WFBNA had seven current and prior period investments totaling \$50.5 million with a purpose, mandate, or function to serve one or more AAs in the state. These CD investments were primarily LIHTCs that supported the creation or preservation of affordable housing in the state. These investments were given

positive consideration and supported the bank's overall performance under the Investment Test in the state of Mississippi.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review the bank's performance under the Investment Test in the Hattiesburg, MSA was consistent with the bank's overall performance under the Investment Test in the full-scope areas.

SERVICE TEST

The bank's performance under the Service Test in the state of Mississippi is rated High Satisfactory. Performance in the limited-scope AA had a neutral effect on the overall Service Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Gulfport MSA was adequate and the bank's performance in the Jackson MSA was good.

Retail Banking Services

Service delivery systems were accessible to geographies and individuals of different income levels in the bank's full-scope AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Gulfport MSA	33.0	4	40.0	0.0	0.0	75.0	25.0	5.6	14.1	56.5	23.8
Jackson MSA	54.8	4	40.0	0.0	25.0	50.0	25.0	11.6	26.4	29.2	32.1
Hattiesburg MSA	12.2	2	20.0	50.0	0.0	50.0	0.0	10.3	18.2	44.5	26.9
Total	100.0	10	100.0	10.0	10.0	60.0	20.0	9.3	21.0	40.8	28.5
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Gulfport MSA	0	1	0	-1	0	0
Jackson MSA	0	0	0	0	0	0
Hattiesburg MSA	0	0	0	0	0	0
Total	0	1	0	-1	0	0
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.						

Gulfport MSA

WFBNA's service delivery systems were reasonably accessible to geographies and individuals of different income levels in the Gulfport MSA. WFBNA operated four branches in the AA, comprising of three branches in middle-income geographies and one branch in an upper-income geography. The distribution was augmented by one branch in a middle- or upper-income geography that was within close proximity that served a low-income area and one branch in a middle- or upper-income geography that served a moderate-income area. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. The middle- or upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, its record of opening and closing branches, generally has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed one branch in a moderate-income area primarily due to low customer traffic, poor operating performance, or to reduce redundancy in branching locations.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Generally, branches were opened for business Monday through Friday from 9:00 a.m. to 5:00 p.m. Of the two branches opened on Saturdays, neither was located in a low-or moderate-income geography.

Jackson MSA

WFBNA's service delivery systems were accessible to geographies and individuals of different income levels in the Jackson MSA. WFBNA operated four branches in the AA, comprising of one branch in a moderate-income geography, two branches in middle-income geographies, and one branch in upper-income geography. The distribution was augmented by one branch in a middle- or upper-income geography that was within close proximity that served a moderate-income area. Internal customer data for this branch demonstrated a reasonable level of service to customers in low- and moderate-income areas. This middle- or upper-income branch contributed positively to the service delivery systems conclusion.

WFBNA did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Generally, branches were opened Monday through Friday from 9:00 a.m. to 5:00 p.m. The bank had one branch in a middle-income geography opened on Saturdays.

Community Development Services

The bank provided a limited level of CD services.

Gulfport MSA

WFBNA provided a limited level of CD services in the Gulfport MSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for five CD service activities to four organizations and 11 CD service hours during the evaluation period. All of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The following are examples of CD services provided in this AA:

- A WFBNA employee provided four hours of financial education to an elementary school, where majority of the student's population qualifies for free/reduced lunches. This activity was responsive to the identified need for financial health.
- A WFBNA employee provided one hour of financial education to an organization that provided after school programs for young people. The organization's data showed that 100 percent of its clients were low- and moderate-income individuals. This activity was responsive to the identified need for financial health.

Jackson MSA

WFBNA provided a limited level of CD services in the Jackson MSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for five CD service activities to two organizations and 10 CD service hours during the evaluation period. All of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The following are examples of CD services provided in this AA:

- Two WFBNA employees provided a total of four hours of financial education to a high school on two separate occasions, where majority of the student's population qualified for free/reduced lunches. This activity was responsive to the identified need for financial health.
- Three WFBNA employees provided a total of six hours of financial education to an organization on three separate occasions. The organization's mission was to increase economic and financial literacy in the AA by providing resources and training to public and private K-12 schoolteachers, empowering students to create a more prosperous future for themselves and the AA. The organization's data showed that over 75 percent of its clients were low- and moderate-income individuals. This activity was responsive to the identified need for financial health.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited scope review the bank's performance under the Service Test in the Hattiesburg MSA was stronger than the bank's overall performance under the Service Test in the full-scope areas due to a stronger performance in branch distribution in low- and moderate-income geographies.

State of Montana

CRA rating for the State of Montana³⁸: Satisfactory

The Lending Test is rated: Outstanding

The Investment Test is rated: Needs to Improve

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited an excellent geographic distribution of loans in its AAs.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank made an adequate level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.
- The bank had a low level of qualified CD investments that demonstrated poor responsiveness to credit and economic development needs, rarely in a leadership position. The bank rarely used innovative and complex investments to support CD initiatives.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided a limited level of CD services.

Description of Institution's Operations in the State of Montana

The state of Montana was WFBNA's 32nd largest rating area based on its total deposits in the state. As of June 30, 2021, the bank maintained approximately \$3.4 billion or 0.2 percent of its total domestic deposits in branches within the state. Of the 39 depository financial institutions operating in the bank's AAs within the state, WFBNA, with a deposit market share of 10.5 percent, was the fifth largest. The top depository financial institutions in the bank's AAs within the state based on market share included Glacier Bank (21.8 percent), First Interstate Bank (19.3 percent), Stockman Bank of Montana (11.8 percent), and U.S. Bank, N.A. (10.7 percent). As of December 31, 2021, the bank operated 15 branches and 47 ATMs in the state. WFBNA delineated 14 AAs within the state; however, the OCC combined, analyzed, and presented those AAs at the CSA level where possible for purposes of this evaluation. This resulted in the following four AAs: Billings, MT MSA (Billings MSA), Great Falls, MT MSA (Great Falls MSA), Missoula, MT MSA (Missoula MSA), and Montana Combined Non-MSA. The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

Missoula MSA

The following table provides a summary of the demographics, including housing and business information for the Missoula MSA.

³⁸ This rating only reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Missoula MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	20	5.0	15.0	65.0	15.0	0.0
Population by Geography	111,966	1.9	17.6	63.0	17.5	0.0
Housing Units by Geography	51,056	2.9	18.8	62.6	15.7	0.0
Owner-Occupied Units by Geography	27,228	0.5	12.6	67.3	19.5	0.0
Occupied Rental Units by Geography	19,396	5.9	29.7	51.8	12.6	0.0
Vacant Units by Geography	4,432	4.2	9.4	80.6	5.8	0.0
Businesses by Geography	16,292	9.8	18.2	55.8	16.3	0.0
Farms by Geography	490	2.7	13.5	68.6	15.3	0.0
Family Distribution by Income Level	26,664	21.0	18.2	20.8	39.9	0.0
Household Distribution by Income Level	46,624	24.3	16.2	17.0	42.5	0.0
Median Family Income MSA - 33540 Missoula, MT MSA		\$65,463	Median Housing Value			\$239,884
			Families Below Poverty Level			8.7%
			Median Gross Rent			\$774
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$32,732 and moderate-income families earned at least \$32,737 and less than \$52,370. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$818 for low-income borrowers and \$1,309 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,288. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Information from Moody's Analytics indicated that at the end of the evaluation period, the Missoula MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Missoula's recovery was chugging along but remained a step behind Montana's recovery. Nonfarm employment growth picked back up in 2021, bringing the overall share of jobs regained since early 2020 closer to that of Montana. Declining enrollment at the University of Montana (UM) remained a source of trouble for Missoula's top employer. Missoula's house prices continued to rise at an above-average clip, but the increase was starting to slow a bit now that construction had picked up causing well above-average growth in housing starts. The Missoula MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Government, Retail Trade, Leisure and Hospitality Services, and Professional and Business Services. Major employers in the Missoula MSA include University of Montana, St. Patrick's Hospital, and Montana Rail Link. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Missoula MSA was 2.8 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by one local economic development organization that were contacted during the evaluation period and served the Missoula MSA. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable housing
- Homeless services
- Small business growth
- Services for low- and moderate-income
- Neighborhood revitalization / stabilization

Opportunities for participation by financial institutions included the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Small business lending
- Supporting nonprofit health providers and prevention
- Working with the area's community development corporation network
- Various state and local government partnership opportunities

Montana Combined Non-MSA

The following table provides a summary of the demographics, including housing and business information for the Montana Combined Non-MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Montana Combined Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	117	2.6	12.8	59.0	23.1	2.6
Population by Geography	458,546	3.4	12.2	57.7	26.6	0.1
Housing Units by Geography	221,328	2.7	13.1	60.1	24.1	0.0
Owner-Occupied Units by Geography	124,671	1.5	10.3	59.8	28.4	0.0
Occupied Rental Units by Geography	59,806	5.5	17.9	56.3	20.3	0.0
Vacant Units by Geography	36,851	2.2	15.1	67.2	15.4	0.1
Businesses by Geography	67,515	1.8	10.7	56.4	31.1	0.0
Farms by Geography	4,388	0.2	6.8	70.2	22.8	0.0
Family Distribution by Income Level	114,936	18.6	17.8	21.7	41.9	0.0
Household Distribution by Income Level	184,477	22.7	15.9	17.4	44.0	0.0
Median Family Income Non-MSAs - MT		\$59,777	Median Housing Value			\$213,569
			Median Gross Rent			\$749
			Families Below Poverty Level			9.7%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$29,889 and moderate-income families earned at least \$29,889 and less than \$47,822. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$747 for low-income borrowers and \$1,196 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$1,146. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Montana's economic strengths include year-round tourist attractions, including national parks, relatively low cost of doing business, and strong migration trends. Weaknesses include distance from major markets, below average incomes, and the vulnerability of the agriculture and tourism industries to weather. Tourism remained a key driver. Leisure and hospitality payrolls were faring better in the state than in most of the nation, but growth had slowed in 2021. The state of Montana continued to easily outperform the nation. Despite slower growth in late 2021, the state remained ahead of the Mountain West, which was the nation's fastest-growing division. House price appreciation was easing but still ranked in the top 10 nationally, with both permitting and starts. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the counties within the Montana Combined Non-MSA ranged from 1.9 percent (Gallatin County) to 4.8 percent (Glacier County) compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by eight local organizations that were contacted during the evaluation period and served the Montana Combined Non-MSA. The organizations included six economic development organizations that helped to attract and retain businesses in the area, one organization focused on providing affordable housing, and one organization focused on providing services to low- and moderate-income individuals. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable housing
- Homeless services
- Small business growth
- Services to low- and moderate-income individuals
- Neighborhood revitalization / stabilization

Opportunities for participation by financial institutions included the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Small business lending
- Supporting nonprofit health providers and prevention
- Working with the area's community development corporation network
- Various state and local government partnership opportunities

Scope of Evaluation in the State of Montana

The OCC selected the Missoula MSA and Montana Combined Non-MSA for full-scope reviews and based conclusions and ratings primarily on activity within these geographical areas. These AAs carried significant weight in determining the overall ratings for the state of Montana because of the significance of the bank's presence in these AAs. More weight was given to the Montana Combined Non-MSA due to the larger deposit base, lending, and branch presence.

During the evaluation period, the bank originated or purchased 14,113 home mortgage loans, small loans to businesses, and small loans to farms totaling \$2.4 billion. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within each AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. In the Missoula MSA, Montana Combined Non-MSA, and Billings MSA, the OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms. In the Great Falls MSA, the OCC placed more weight based on the number of loans on small loans to businesses versus home mortgage loans and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF MONTANA

LENDING TEST

The bank's performance under the Lending Test in the state of Montana is rated Outstanding. Performance in the limited-scope areas had a neutral effect on the overall Lending Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Missoula MSA was good and Montana Combined Non-MSA was excellent.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Missoula MSA	791	645	29	1	1,466	10.4	10.8
Montana Combined Non-MSA	4,861	3,816	339	9	9,025	63.9	52.5
Billings MSA	1,537	1,053	43	8	2,641	18.7	26.2
Great Falls MSA	461	506	32	1	1,000	7.1	10.5
Total	7,650	6,020	443	19	14,132	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Missoula MSA	210,103	11,376	738	3	222,220	9.4	10.8
Montana Combined Non-MSA	1,534,200	105,638	23,553	5,271	1,668,662	70.5	52.5
Billings MSA	349,530	28,951	2,860	54	381,395	16.1	26.2
Great Falls MSA	81,349	11,555	699	3	93,606	4.0	10.5
Total	2,175,182	157,520	27,850	5331	2,365,883	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Missoula MSA

As of June 30, 2021, WFBNA had a deposit market share of 10.2 percent. The bank ranked fourth among 11 depository financial institutions placing it in the top 37 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 3.2 percent based on the number of home mortgage loans originated or purchased. The bank ranked ninth among 213 home mortgage lenders in the AA, which placed it in the top 5 percent of lenders. The top lenders in this AA

based on market share were Mann Mortgage LLC (8.8 percent), Glacier Bank (8.8 percent), and Opportunity Bank of Montana (8.3 percent).

According to peer small business data for 2021, WFBNA had a market share of 5.9 percent based on the number of small loans to businesses originated or purchased. The bank ranked seventh out of 81 small business lenders, which placed it in the top 9 percent of lenders. The top lenders in this AA based on market share were Glacier Bank (24.6 percent), American Express National Bank (13.3 percent), Citibank, N.A. (7.5 percent), and JPMorgan Chase Bank, N.A. (7.3 percent).

According to peer small farm data for 2021, WFBNA had a market share of 24.5 percent based on the number of small loans to farms originated or purchased. The bank ranked first out of 10 small farm lenders, which placed it in the top 10 percent of lenders. The other top three lenders in this AA based on market share were JPMorgan Chase Bank, N.A. (22.5 percent), Glacier Bank (20.4 percent), and Bank of America, N.A. (10.2 percent).

Montana Combined Non-MSA

As of June 30, 2021, WFBNA had a deposit market share of 10.9 percent. The bank ranked third among 32 depository financial institutions placing it in the top 10 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 5.3 percent based on the number of home mortgage loans originated or purchased. The bank ranked fifth among 443 home mortgage lenders in the AA, which placed it in the top 2 percent of lenders. The top lenders in this AA based on market share were Glacier Bank (9 percent), Rocket Mortgage (6.4 percent), and Opportunity Bank of Montana (5.8 percent).

According to peer small business data for 2021, WFBNA had a market share of 7.8 percent based on the number of small loans to businesses originated or purchased. The bank ranked fifth out of 138 small business lenders, which placed it in the top 4 percent of lenders. The top lenders in this AA based on market share were American Express National Bank (16.1 percent), Glacier Bank (15.6 percent), Stockman Bank (8.8 percent), and JPMorgan Chase Bank, N.A. (8.8 percent).

According to peer small farm data for 2021, WFBNA had a market share of 4.6 percent based on the number of small loans to farms originated or purchased. The bank ranked fourth out of 29 small farm lenders, which placed it in the top 14 percent of lenders. The top lenders in this AA based on market share were Glacier Bank (36.2 percent), Stockman Bank (27.7 percent), and John Deere Financial FSB (10.4 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AAs. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data. The bank's performance was excellent in the Missoula MSA and good in the Montana Combined Non-MSA.

Missoula MSA***Home Mortgage Loans***

Refer to Table O in the state of Montana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

The bank's percentages of home mortgage loans in low- and moderate-income geographies exceeded both the percentages of owner-occupied housing units in low- and moderate-income geographies and the aggregate distributions of home mortgage loans by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Montana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was below the percentage of businesses in low-income geographies and it was well below the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies exceeded the percentage of businesses in moderate-income geographies and it approximated the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Montana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

The bank's percentage of small loans to farms in low-income geographies exceeded both the percentage of farms in low-income geographies and the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank did not originate or purchase any small loans to farms located in moderate-income geographies.

Montana Combined Non-MSA***Home Mortgage Loans***

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans in low-income geographies was well below the percentage of owner-occupied housing units in low-income geographies but it exceeded the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was near to the percentage of owner-occupied housing units in moderate-income geographies and it exceeded the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Montana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was below the percentage of businesses in low-income geographies but it exceeded the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in moderate-income geographies and the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Montana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was excellent.

The bank's percentage of small loans to farms in low-income geographies exceeded both the percentage of farms in low-income geographies and the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-income geographies was well below the percentage of farms in moderate-income geographies but it exceeded the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies in the Missoula MSA and Montana Combined Non-MSA. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AAs.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes. The bank's performance was good in the Missoula MSA and good in the Montana Combined Non-MSA.

Missoula MSA

Home Mortgage Loans

Refer to Table P in the state of Montana section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but it exceeded the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was near to the percentage of moderate-income families and it exceeded the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Montana section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 31.5 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with gross annual revenues of \$1 million or less was below the percentage of businesses in the AA with gross annual revenues of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with gross annual revenues of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Montana section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was very poor.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 89.7 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with gross annual revenues of \$1 million or less was significantly

below both the percentage of farms in the AA with gross annual revenues of \$1 million or less and the aggregate distribution of small loans to farms with gross annual revenues of \$1 million or less by all lenders.

Montana Combined Non-MSA

Home Mortgage Loans

Refer to Table P in the state of Montana section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but it approximated the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families but it exceeded the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Montana section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 37.9 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with gross annual revenues of \$1 million or less was well below the percentage of businesses in the AA with gross annual revenues of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with gross annual revenues of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Montana section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was poor.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 47.2 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with gross annual revenues of \$1 million or less was well below both the percentage of farms in the AA with gross annual revenues of \$1 million or less and the aggregate distribution of small loans to farms with gross annual revenues of \$1 million or less by all lenders.

Community Development Lending

The bank made an adequate level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

Missoula MSA

WFBNA made few, if any, CD loans in the Missoula MSA. WFBNA made one CD loan for \$1.5 million, of which \$3,466 benefitted the AA.

Montana Combined Non-MSA

WFBNA made an adequate level of CD loans in the Montana Combined Non-MSA. WFBNA made nine CD loans totaling approximately \$5.3 million, which represented 2.3 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 99 percent of these loans funded affordable housing that provided 27 units of affordable housing, 0.9 percent funded revitalization and stabilization efforts, and 0.1 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA made a \$5 million loan to a CDFI, of which \$9,106 benefitted the AA. Allowable uses were restricted to acquisition, construction, and mini-permanent loans for affordable housing and community facilities supporting low- and moderate-income communities.
- WFBNA provided a \$4 million line of credit to an organization, of which \$7,285 benefitted the AA. The organization provided scholarships and a range of ancillary programs for low- and moderate-income candidates, scholars, and their families.
- WFBNA provided a \$10 million line of credit to a CDFI, of which \$18,212 benefitted the AA. The organization provided flexible capital for development of affordable housing.

Product Innovation and Flexibility

Missoula MSA

WFBNA made little use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 103 loans under its flexible lending programs totaling \$6.6 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	16	4,500
Dream. Plan. Home.	3	598
PPP	84	1,500
Total	103	6,598

Montana Combined Non-MSA

WFBNA made extensive use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 571 loans under its flexible lending programs totaling \$52.7 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	162	39,600
Dream. Plan. Home.	11	2,100
PPP	398	11,000
Total	571	52,700

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Billings MSA and Great Falls MSA was weaker than the bank's overall performance under the Lending Test in the full-scope areas. Performance was weaker primarily due to poorer geographic distributions.

Refer to Tables O through T in the state of Montana section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Montana is rated Needs to Improve. Performance in the limited-scope areas had a neutral effect on the overall Investment Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Missoula MSA was excellent and the bank's performance in the Montana Combined Non-MSA was poor.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Missoula MSA	0	0	48	3,074	48	28.6	3,074	23.8	0	0
Montana Combined Non-MSA	13	3,671	45	620	58	34.5	4,291	33.4	1	69
Billings MSA	10	597	23	563	33	19.6	1,160	9.0	0	0
Great Falls MSA	1	26	24	441	25	14.9	467	3.6	0	0
Statewide***	2	897	2	3,004	4	2.4	3,901	30.3	1	19
Total	26	5,191	142	7,702	168	100.0	12,893	100.0	2	88
<p>The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.</p> <p>* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.</p> <p>** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.</p> <p>*** Statewide means investments in statewide programs that have a purpose, mandate, or function to serve one or more of the bank's assessment areas within the state. Due to rounding, totals may not equal 100.0%</p>										

Missoula MSA

The bank had an excellent level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$3.1 million and represented 6.4 percent of the bank's tier 1 capital allocated to the AA. The investments also included 48 grants and donations totaling \$3.1 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 16.7 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 47.9 percent that focused on community services targeted to low- and moderate-income individuals, and 35.5 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies.

The bank did not use innovative and complex investments to support CD initiatives. The following are examples of CD investments made in this AA:

- WFBNA provided three grants totaling \$35,000 to an organization that utilized community-led solutions to identify and resolve community concerns with a primary focus on education, financial stability, and health. Two grants totaling \$30,000 went directly to support Missoula County's 10-Year Plan to End Homelessness through a financial assistance fund that is available to providers to connect people who are recently homeless or at immediate risk of homelessness to stable, sustainable housing appropriate for their situations.
- WFBNA provided four grants totaling \$65,000 to an organization whose mission was to end hunger in Montana through food acquisition and distribution, education, and advocacy. The grants

supported the organization's programs and its partners that serve Montanans experiencing food insecurity, most of whom were low- and moderate-income.

- WFBNA provided two grants totaling \$200,000 to an that supported the representation of American Indians and Alaska Natives in business and entrepreneurial ventures through education and leadership development opportunities.

Montana Combined Non-MSA

The bank had a poor level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$4.3 million and represented 1.8 percent of the bank's tier 1 capital allocated to the AA. The investments also included 45 grants and donations totaling \$620,000 to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited adequate responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 31 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 53.4 percent that focused on community services targeted to low- and moderate-income individuals, and 15.5 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 48 units of affordable housing in the AA.

The bank rarely used innovative and complex investments to support CD initiatives. None of the current period investments were complex. The following are examples of CD investments made in this AA:

- WFBNA provided three grants totaling \$240,000 to a nonprofit organization in Bozeman, Montana. The organization provided support for women-owned small businesses to help the entrepreneurs start and grow their businesses. The bank's funding supported the organization's mentorship program and business development center.
- WFBNA provided three grants totaling \$40,000 to a nonprofit organization that provided technical assistance to smaller nonprofit organizations throughout Montana. The organization used the grants for employees to attend continuing education to better serve nonprofit clients and Montana communities.

Broader Statewide Investments

WFBNA had four current and prior period investments totaling \$3.9 million with a purpose, mandate, or function to serve one or more AAs in the state. These CD investments were primarily LIHTCs that supported the creation or preservation of affordable housing in the state. These investments were given positive consideration and supported the bank's overall performance under the Investment Test in the state of Montana.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in Billings MSA and Great Falls MSA was consistent with the bank's overall performance under the Investment Test in the full-scope areas.

SERVICE TEST

The bank's performance under the Service Test in the state of Montana is rated High Satisfactory. Performance in the limited-scope AAs had a neutral effect on the overall Service Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Missoula MSA was good and the bank's performance in the Montana Combined Non-MSA was good.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's full-scope AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Missoula MSA	10.8	3	12.0	33.3	0.0	66.7	0.0	1.9	17.6	63.0	17.5
Montana Combined Non-MSA	52.5	15	60.0	6.7	13.3	60.0	20.0	3.4	12.2	57.7	26.6
Billings MSA	26.2	5	20.0	0.0	60.0	20.0	20.0	2.5	19.9	59.8	17.9
Great Falls MSA	10.5	2	8.0	0.0	50.0	50.0	0.0	0.0	18.0	55.7	26.2
Total	100.0	25	100.0	8.0	24.0	52.0	16.0	2.7	15.1	58.6	23.5
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Missoula MSA	0	0	0	0	0	0
Montana Combined Non-MSA	0	7	0	0	-7	0
Billings MSA	0	0	0	0	0	0
Great Falls MSA	0	1	0	-1	0	0
Total	0	8	0	-1	-7	0
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.						

Missoula MSA

WFBNA's service delivery systems were reasonably accessible to geographies and individuals of different income levels in the Missoula MSA. WFBNA operated three branches in the AA, comprising of one branch in a low-income geography and two branches in middle-income geographies. The distribution was augmented by two branches in middle- and upper-income geographies that were within close proximity to and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. The bank had one branch in a middle-income geography opened on Saturdays.

Montana Combined Non-MSA

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Montana Combined Non-MSA. WFBNA operated 15 branches in the AA, comprising of one branch in a low-income geography, two branches in moderate-income geographies, nine branches in middle-income geographies, and three branches in upper-income geographies. The distribution of branches in low-income geographies exceeded the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies. The distribution was augmented by two branches in middle- and upper-income geographies that were within close proximity to and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches generally has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. There were no low- and moderate-income openings or closings.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the two branches opened on Saturdays, none were located in low- and moderate-income geographies.

Community Development Services

The bank provided a limited level of CD services.

Missoula MSA

WFBNA provided a limited level of CD services in the Missoula MSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 13 CD service activities to two organizations and 26 CD service hours during the evaluation period. All of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The following are examples of CD services provided in this AA:

- A WFBNA employee provided four hours of board service for an organization whose mission was to end hunger in Montana through food acquisition and distribution, education and advocacy. This activity was responsive to the identified need for access to health and nutritional resources.
- A WFBNA employee provided two hours of board service for an organization that was an affiliate of a global organization that utilized community-led solutions to identify and resolve community concerns with a primary focus on education, financial stability, and health. More than 95 percent of its clients were low- and moderate-income individuals.

Montana Combined Non-MSA

WFBNA provided a limited level of CD services in the Montana Combined Non-MSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 16 CD service activities to three organizations and 49 CD service hours during the evaluation period. A majority (75 percent) of the bank's assistance was to organizations providing economic development. The other CD services were targeted to affordable housing (12.5 percent) and community services targeted to low- and moderate-income individuals and families (12.5 percent). The following are examples of CD services provided in this AA:

- WFBNA employees provided 21 hours of board service for 12 CD service activities to an organization whose mission was to improve life in Central Montana through grant-making activities and as the fiscal agent for area nonprofits. According to the organization's data, 100 percent of its clients were small businesses as they have gross annual revenues of \$1 million or less or met the size eligibility requirements of the SBA Small Business Development Company or Small Business Investment Company (SBIC) programs. This activity was responsive to the identified need for small business growth and stability.
- A WFBNA employee provided four hours of financial education for a nonprofit housing organization that worked in partnership with people in need to build decent, affordable housing. The houses were sold to those in need at no profit and with no interest charged. According to the organization's data, 100 percent of its clients were low- and moderate-income individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Billings MSA was consistent with the bank's overall performance under the Service Test. The bank's performance

under the Service Test in the Great Falls MSA was stronger than the bank's overall performance under the Service Test primarily due stronger performance in branch distribution in low- and moderate-income geographies.

State of Nebraska

CRA rating for the State of Nebraska³⁹: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited an adequate geographic distribution of loans in its AAs.
- The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank made a low level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments that demonstrated excellent responsiveness to credit and economic development needs, although occasionally in a leadership position. The bank made extensive use of innovative and complex investments to support CD initiatives.
- Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided a limited level of CD services.

Description of Institution's Operations in the State of Nebraska

The state of Nebraska was WFBNA's 34th largest rating area based on its total deposits in the state. As of June 30, 2021, the bank maintained approximately \$2.6 billion or 0.2 percent of its total domestic deposits in branches within the state. Of the 75 depository financial institutions operating in the bank's AAs within the state, WFBNA, with a deposit market share of 10.3 percent, was the second largest. Other top depository financial institutions in the bank's AAs within the state based on market share included Union Bank and Trust Company (16.9 percent), Pinnacle Bank (5.9 percent), First National Bank of Omaha (5.3 percent), U.S. Bank, N.A. (5.3 percent), and Five Points Bank (5 percent). As of December 31, 2021, the bank operated 18 branches and 31 ATMs in the state. WFBNA delineated 10 AAs within the state; however, the OCC combined, analyzed, and presented those AAs at the CSA level where possible for purposes of this evaluation. This resulted in the following three AAs: Grand Island, NE MSA (Grand Island MSA), Lincoln, NE MSA (Lincoln MSA), and Nebraska Combined Non-MSA. The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

Grand Island MSA

The following table provides a summary of the demographics, including housing and business information for the Grand Island MSA.

39 This rating only reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Grand Island MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	19	0.0	21.1	42.1	36.8	0.0
Population by Geography	74,915	0.0	28.5	40.3	31.2	0.0
Housing Units by Geography	30,700	0.0	26.0	42.9	31.1	0.0
Owner-Occupied Units by Geography	18,360	0.0	22.2	42.4	35.4	0.0
Occupied Rental Units by Geography	9,958	0.0	34.2	41.7	24.1	0.0
Vacant Units by Geography	2,382	0.0	20.8	52.1	27.0	0.0
Businesses by Geography	5,640	0.0	21.5	43.2	35.3	0.0
Farms by Geography	722	0.0	6.6	43.9	49.4	0.0
Family Distribution by Income Level	18,807	19.0	18.8	24.1	38.2	0.0
Household Distribution by Income Level	28,318	23.2	17.5	21.2	38.1	0.0
Median Family Income MSA - 24260 Grand Island, NE MSA		\$57,552	Median Housing Value			\$121,360
			Families Below Poverty Level			10.5%
			Median Gross Rent			\$657
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$28,776 and moderate-income families earned at least \$28,776 and less than \$40,042. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$719 for low-income borrowers and \$1,151 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$651. Low- and moderate-income borrowers would be able to afford a mortgage loan for a median-priced home in this AA.

Information from Moody's Analytics indicated that at the end of the evaluation period, the Grand Island MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Manufacturing and agriculture were the main economic drivers in Grand Island. The recovery in Grand Island had been a slow process due to sharp employment losses in the public sector and persistent layoffs among private service providers. High prices for agricultural commodities were benefiting the area's farm sector, but mounting shortages and rising input costs were concerns. However, the high prices paid by farmers for inputs were on the rise amid supply shortages and inflation for everything from fuel to fertilizer. The Grand Island MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Manufacturing, Government, Retail Trade, Education and Health Services, and Leisure and Hospitality Services. Major employers in the Grand Island MSA include JBS, CHI Health St. Francis, Hornady Manufacturing, CNH Industrial America, and Walmart Inc. According to the Bureau of Labor Statistics, the December 2021 non-

seasonally adjusted unemployment rate for the Grand Island MSA was 1.9 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by four local organizations that were contacted during the evaluation period and served the Grand Island MSA. The contacts included 1) an organization that focused on attracting new business to and expanding local businesses in the area, 2) two local organizations that helped provide business and community resources, and 3) an entity developed to help create wealth through real estate transactions. The bank also provided an assessment of community needs based on research completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were needs within the community:

- Construction of affordable rental housing units and rental assistance
- Development of single-family affordable housing
- Rehabilitation of housing units/improvement of the quality of housing stock
- Access to emergency shelters, health care services, and transitional housing for the homeless
- Access to capital for small businesses
- Support for job readiness and technical skills programs

Opportunities for participation by financial institutions included the following:

- Available of community outreach programs for small businesses
- Access to funding for local businesses

Lincoln MSA

The following table provides a summary of the demographics, including housing and business information for the Lincoln MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Lincoln MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	78	6.4	26.9	30.8	29.5	6.4
Population by Geography	315,078	5.3	24.9	36.2	30.6	3.0
Housing Units by Geography	130,739	6.9	26.7	36.0	29.6	0.7
Owner-Occupied Units by Geography	74,366	1.5	18.3	40.4	39.6	0.1
Occupied Rental Units by Geography	49,649	14.4	38.1	30.6	15.2	1.6
Vacant Units by Geography	6,724	11.8	34.9	27.7	24.6	1.0
Businesses by Geography	24,941	3.5	25.2	32.1	37.5	1.7
Farms by Geography	1,251	1.1	9.8	29.8	59.2	0.1
Family Distribution by Income Level	75,038	21.0	17.1	21.4	40.5	0.0
Household Distribution by Income Level	124,015	23.4	16.7	17.5	42.4	0.0
Median Family Income MSA - 30700 Lincoln, NE MSA		\$70,200	Median Housing Value			\$152,363
			Median Gross Rent			\$723
			Families Below Poverty Level			9.1%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$35,100 and moderate-income families earned at least \$35,100 and less than \$56,160. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$878 for low-income borrowers and \$1,404 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$818. Low- and moderate-income borrowers would be able to afford a mortgage loan for a median-priced home in this AA.

Information from Moody's Analytics indicated that at the end of the evaluation period, the Lincoln MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Lincoln MSA area recovery had been steady given the rebound of jobs in key financial and professional/business services. Lincoln has one of the highest concentrations in state government jobs given it is the home to the state capital and the University of Nebraska. The Lincoln MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Government, Education and Health Services, Professional and Business Services, and Retail Trade. Major employers in the Lincoln MSA include University of Nebraska, Lincoln, Bryan LGH Medical Center, B&R Stores, Horizon Holding, Inc., Saint Elizabeth Regional Medical Center, and Hy-Vee Inc. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Lincoln MSA was 1.6 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Lincoln MSA. The organizations included an economic development organization that helped to attract and retain businesses in the area and an organization developed to provide affordable, safe, sanitary, and decent housing to qualifying families currently undergoing financial stress. The bank also provided an assessment of community needs based on research completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were needs within the community:

- Construction of affordable rental housing units and rental assistance
- Development of single-family affordable housing
- Rehabilitation of housing units/improvement of the quality of housing stock
- Access to emergency shelters, health care services, and transitional housing for the homeless
- Access to capital for small businesses
- Support for job readiness and technical skills programs

Opportunities for participation by financial institutions included the following:

- Increased funding opportunities for affordable housing

Scope of Evaluation in the State of Nebraska

The OCC selected the Grand Island MSA and Lincoln MSA for full-scope reviews and based conclusions and ratings primarily on activity within these geographical areas. These AAs carried significant weight in determining the overall ratings for the state of Nebraska because of the significance of the bank's presence in these AAs. More weight was given to the Lincoln MSA due to the larger deposit base, lending, and branch presence.

During the evaluation period, the bank originated or purchased 7,465 home mortgage loans, small loans to businesses, and small loans to farms totaling \$991 million. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within each AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. In each of the AAs, the OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF NEBRASKA

LENDING TEST

The bank's performance under the Lending Test in the state of Nebraska is rated High Satisfactory. Performance in the limited-scope areas had a neutral effect on the overall Lending Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Grand Island MSA was excellent and the performance in the Lincoln MSA was good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Grand Island MSA	417	243	21	0	681	9.1	13.2
Lincoln MSA	3,250	1,492	13	9	4764	63.7	60.7
Nebraska Combined Non-MSA	1,219	576	234	8	2037	27.2	26.1
Total	4,886	2,311	268	17	7,482	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Grand Island MSA	59,609	6,318	1,106	0	67,033	6.8	13.2
Lincoln MSA	652,892	31,771	619	469	685,751	69.1	60.7
Nebraska Combined Non-MSA	179,281	29,232	30,198	1,303	240,014	24.2	26.1
Total	891,781	67,321	31,923	1,772	992,798	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Grand Island MSA

As of June 30, 2021, WFBNA had a deposit market share of 10.7 percent. The bank ranked second among 21 depository financial institutions placing it in the top 10 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 4.4 percent based on the number of home mortgage loans originated or purchased. The bank ranked 11th among 136 home mortgage lenders in the AA, which placed it in the top 9 percent of lenders. The top lenders in this AA based on market share were Home Federal Savings and Loan (8.4 percent), Five Points Bank (7.7 percent), U.S. Bank, N.A. (7.7 percent), First National Bank of Omaha (7 percent).

According to peer small business data for 2021, WFBNA had a market share of 6.1 percent based on the number of small loans to businesses originated or purchased. The bank ranked eighth out of 53 small business lenders, which placed it in the top 16 percent of lenders. The top lenders in this AA based on market share were First National Bank of Omaha (14.2 percent), Pinnacle Bank (11.9 percent), American Express National Bank (9.9 percent), Cornerstone Bank (9.2 percent), and Capital One Bank, N.A. (8.6 percent).

According to peer small farm data for 2021, WFBNA had a market share of 0.6 percent based on the number of small loans to farms originated or purchased. The bank ranked 11th out of 14 small farm lenders, which placed it in the bottom 79 percent of lenders. The top lenders in this AA based on market share were Pinnacle Bank (40.9 percent), Cornerstone Bank (22.5 percent), and John Deere Financial, FSB (15.2 percent).

Lincoln MSA

As of June 30, 2021, WFBNA had a deposit market share of 12.4 percent. The bank ranked second among 31 depository financial institutions placing it in the top 7 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 5.2 percent based on the number of home mortgage loans originated or purchased. The bank ranked seventh among 263 home mortgage lenders in the AA, which placed it in the top 3 percent of lenders. The top lenders in this AA based on market share were CBNA (8.8 percent), Lincoln Federal Savings Bank of Nebraska (6.4 percent), U.S. Bank, N.A. (6.4 percent), and Union Bank and Trust Company (6.3 percent).

According to peer small business data for 2021, WFBNA had a market share of 7.4 percent based on the number of small loans to businesses originated or purchased. The bank ranked sixth out of 81 small business lenders, which placed it in the top 8 percent of lenders. The top lenders in this AA based on market share were Union Bank and Trust Company (19.8 percent), JPMorgan Chase Bank, N.A. (12.1 percent), American Express National Bank (10.7 percent), and US Bank N.A. (10.3 percent).

According to peer small farm data for 2021, WFBNA had a market share of 0.7 percent based on the number of small loans to farms originated or purchased. The bank ranked 10th out of 18 small farm lenders, which placed it in the bottom 56 percent of lenders. The top lenders in this AA based on market share were Union Bank and Trust Company (31.1 percent), Pinnacle Bank (30.6 percent), and John Deere Financial FSB (15 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AAs. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data. The bank's performance was excellent in the Grand Island MSA and adequate in the Lincoln MSA.

Grand Island MSA

Home Mortgage Loans

Refer to Table O in the state of Nebraska section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

There were no low-income geographies in this AA. The bank's percentage of home mortgage loans in moderate-income geographies exceeded both the percentage of owner-occupied housing units in moderate-income geographies and the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Nebraska section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

There were no low-income geographies in this AA. The bank's percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses in moderate-income geographies and the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Nebraska section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

There were no low-income geographies in this AA. The bank did not originate any small loans to farms in moderate-income geographies. However, this performance was consistent with all lenders.

Lincoln MSA

Home Mortgage Loans

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans in low-income geographies was well below the percentage of owner-occupied housing units in low-income geographies and it was significantly below the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was below both the percentage of owner-occupied housing units in moderate-income geographies and the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Nebraska section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was below the percentage of businesses in low-income geographies but it was near to the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was below the percentage of businesses in moderate-income geographies but it was near to the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies in the Grand Island MSA and Lincoln MSA. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses and farms of different sizes. The bank's performance was excellent in the Grand Island MSA and excellent in the Lincoln MSA.

Grand Island MSA

Home Mortgage Loans

Refer to Table P in the state of Nebraska section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but it exceeded the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Nebraska section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 31.7 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with gross annual revenues of \$1 million or less was below the percentage of businesses in the AA with gross annual revenues of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with gross annual revenues of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Nebraska section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was adequate.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 38.1 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with gross annual revenues of \$1 million or less was well below the percentage of farms in the AA with gross annual revenues of \$1 million or less and it was below the aggregate distribution of small loans to farms with gross annual revenues of \$1 million or less by all lenders.

Lincoln MSA

Home Mortgage Loans

Refer to Table P in the state of Nebraska section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but it exceeded the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and it approximated the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Nebraska section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 28.2 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's

percentage of small loans to businesses with gross annual revenues of \$1 million or less was below was below the percentage of businesses in the AA with gross annual revenues of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with gross annual revenues of \$1 million or less by all lenders.

Community Development Lending

The bank made a low level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

Nebraska Combined Non-MSA

WFBNA made a low level of CD loans in the Nebraska Combined Non-MSA. WFBNA made eight CD loans totaling more than \$1.3 million, which represented 1.5 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 98.5 percent of these loans were for affordable housing purposes. The following is an example of CD loans made in this AA:

- WFBNA provided a \$1.3 million loan for a multifamily housing development in the AA. The development was located in an underserved middle-income geography and comprised 90 units of affordable housing restricted to tenants earning less than 37 percent of the median family income.

Grand Island MSA

WFBNA did not originate any CD loans in this AA during the evaluation period.

Lincoln MSA

WFBNA made a low level of CD loans in the Lincoln MSA. WFBNA made nine CD loans totaling approximately \$468,910, which represented 0.2 percent of the allocated tier 1 capital. CD loans were primarily made for revitalization/stabilization purposes. By dollar volume, 7.2 percent of these loans were for affordable housing purposes, 49.3 percent funded revitalization and stabilization efforts, and 43.5 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA made a \$20 million loan to a CDFI, of which \$29,877 benefitted the AA. The CDFI provided funding to improve access to high-quality health and elder care, healthy foods, housing, and education for low-income communities.
- WFBNA provided a \$10 million line of credit to a CDFI, of which \$14,938 benefitted the AA. The organization provided flexible capital for development of affordable housing.

Product Innovation and Flexibility

Grand Island MSA

WFBNA made little use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 45 loans under its flexible lending programs totaling \$4.1 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	19	3,000
Dream. Plan. Home.	5	568
PPP	21	542
Total	45	4,110

Lincoln MSA

WFBNA made extensive use of and/or flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 311 loans under its flexible lending programs totaling \$26.9 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	97	18,900
Dream. Plan. Home.	22	3,800
PPP	192	4,200
Total	311	26,900

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Nebraska Combined Non-MSA was consistent with the bank's overall performance under the Lending Test in the full-scope areas.

Refer to Tables O through T in the state of Nebraska section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Nebraska is rated Outstanding. Performance in the limited-scope areas had a neutral effect on the overall Investment Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Grand Island MSA and Lincoln MSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Grand Island MSA	8	2,514	4	2,465	12	10.1	4,979	9.5	4	2,057
Lincoln MSA	8	2,992	34	12,116	42	35.3	15,109	28.7	7	11,810
Nebraska Combined Non-MSA	14	20,398	28	168	42	35.3	20,566	39.1	11	1,148
Statewide***	11	5,940	12	6,051	23	19.3	11,991	22.8	5	3,035
Total	41	31,844	78	20,800	119	100.0	52,645	100.0	27	18,050

The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.
 * '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 tracked and recorded by the institution's financial reporting system.
 *** Statewide means investments in statewide programs that have a purpose, mandate, or function to serve one or more of the bank's assessment areas within the state. Due to rounding, totals may not equal 100.0%

Grand Island MSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$5 million and represented 11.4 percent of the bank's tier 1 capital allocated to the AA. The investments also included three grants and donations totaling \$765,000 to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 83.3 percent of the bank's investment dollars focused on affordable housing, and 16.7 percent that focused on economic development. In total, the bank's investments helped create or retain 106 units of affordable housing in the AA.

The bank made significant use of innovative or complex investments to support CD initiatives. Approximately 69 percent of current period investment dollars were complex LIHTC investments. The following are examples of CD investments made in this AA:

- WFBNA provided two grants totaling \$750,000 to an organization through the Open for Business Fund CDFI Program. The funds were used to provide affordable credit, capital, technical assistance, and related programs to help build strong and self-sufficient Native American business owners in Nebraska, Iowa, and southeast South Dakota that were disproportionately damaged by the effects of the pandemic.
- WFBNA provided a \$500,000 grant to a CDFI for its Open for Business Fund CDFI Program. The mission of the organization was to provide affordable credit, capital, technical assistance, and related programs to help build strong and self-sufficient business owners, families, and citizens of all tribes in Nebraska, Iowa, and southeast South Dakota.

- WFBNA invested \$20 million in an LIHTC fund, of which \$1.7 million was allocated to a 28-unit housing development in the Grand Island MSA. All units were income restricted to tenants earning up to 60 percent of the area median family income with nine units representing the bank's 32 percentage share of the fund's investment into the property. WFBNA demonstrated active involvement in supporting the development of affordable housing, evidenced by its long-term working relationship with the sponsor for over seven years and providing financing on nine developments.

Lincoln MSA

The bank had an excellent level of qualified CD investments and grants occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$15.1 million and represented 7.5 percent of the bank's tier 1 capital allocated to the AA. The investments also included 32 grants and donations totaling \$376,000 to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 31 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA and 69 percent that focused on community services targeted to low- and moderate-income individuals. In total, the bank's investments helped create or retain 411 units of affordable housing in the AA.

The bank made extensive use of innovative or complex investments to support CD initiatives. Approximately 96.9 percent of current period investment dollars were complex LIHTC investments. The following are examples of CD investments made in this AA:

- WFBNA invested \$20 million in an LIHTC fund that benefitted multiple AAs. Of this total investment, \$6.9 million supported an LIHTC development located in Lincoln, Nebraska with 98 units restricted to tenants earning up to 60 percent of the AMI. WFBNA demonstrated active involvement, evidenced by its long-term working relationship with the syndicator of the investment for over seven years and providing financing on nine developments. This activity was complex due to the inherent nature of LIHTC transactions, and it was responsive to the identified need for affordable housing.
- WFBNA provided a \$28,000 grant to an organization in support of its programming. The organization was an affiliate of a global organization that utilized community-led solutions to identify and resolve community concerns with a primary focus on education, financial stability, and health. According to the organization, 85 percent of its clients were low- to moderate-income as they earned less than 80 percent of the area median family income.
- WFBNA provided a \$62,000 grant to an organization in support of its programming. The mission of the organization was to provide comprehensive services and opportunities to support low-income,

high needs families and individuals as they strived to lift themselves out of poverty and achieve economic self-sufficiency.

Broader Statewide Investments

WFBNA had 23 current and prior period investments totaling \$11.9 million with a purpose, mandate, or function to serve one or more AAs in the state. These CD investments were primarily LIHTCs that supported the creation or preservation of affordable housing in the state. These investments were given positive consideration and supported the bank's overall performance under the Investment Test in the state of Nebraska.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Nebraska Combined Non-MSA was consistent with the bank's overall performance under the Investment Test in the full-scope area.

SERVICE TEST

The bank's performance under the Service Test in the state of Nebraska is rated Low Satisfactory. Performance in the limited-scope area had a positive effect on the overall Service Test rating as the limited-scope AA represented a large presence that does impact the overall full-scope ratings.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Grand Island MSA was good and the bank's performance in the Lincoln MSA was adequate.

Retail Banking Services

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the bank's full-scope AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Grand Island MSA	13.2	2	11.1	0.0	50.0	50.0	0.0	0.0	28.5	40.3	31.2
Lincoln MSA	60.7	8	44.4	0.0	50.0	25.0	25.0	5.3	24.9	36.2	30.6
Nebraska Combined Non-MSA	26.1	8	44.4	0.0	25.0	75.0	0.0	0.0	14.1	65.4	20.6
Total	100.0	18	100.0	0.0	38.9	50.0	11.1	2.8	21.5	47.0	27.1
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Grand Island MSA	0	0	0	0	0	0
Lincoln MSA	0	0	0	0	0	0
Nebraska Combined Non-MSA	0	2	0	0	-1	-1
Total	0	2	0	0	-1	-1
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.						

Grand Island MSA

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Grand Island MSA. WFBNA operated two branches in the AA, comprising of one branch in a moderate-income geography, and one branch in a middle-income geography. The bank also operated five ATMs with four ATMs located in moderate-income geographies, and one ATM located in a middle-income geography.

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, generally did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Only the branch located in a middle-income geography was opened for business on Saturday.

Lincoln MSA

WFBNA's service delivery systems were reasonably accessible to geographies and individuals of different income levels in the Lincoln MSA. WFBNA operated eight branches in the AA, comprising of four branches in moderate-income geographies, two branches in middle-income geographies, and two branches in upper-income geographies. The distribution of branches in low-income geographies was significantly below the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies. The distribution was augmented by two branches in middle- and upper-income geographies that were within close proximity to serve moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in the moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts,

deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the five branches opened on Saturdays, two were located in moderate-income geographies.

Community Development Services

The bank provided a limited level of CD services.

Grand Island MSA

WFBNA provided few, if any, CD services in the Grand Island MSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for one CD service activity and two CD service hours during the evaluation period. All of the bank's assistance was to an organization providing community services targeted to low- and moderate-income individuals and families.

Lincoln MSA

WFBNA provided an adequate level of CD services in the Lincoln MSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 60 CD service activities and 87 CD service hours since the last evaluation. A majority (96.7 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The other CD service was targeted to economic development (3.3 percent). The bank's assistance provided was responsive to the identified needs in the AA. The following are examples of CD services provided in this AA:

- A WFBNA employee provided two hours of financial education to an organization whose mission was to provide comprehensive services and opportunities to support low-income, high needs families and individuals as they strive to lift themselves out of poverty and achieve economic self-sufficiency.
- A WFBNA employee provided 12 hours of board service for a CDFI whose mission was to provide capital, technical assistance, and training opportunities for small business in the state of Nebraska. This activity was responsive to the identified need for small business growth and stability. WFBNA demonstrated active involvement and leadership with an employee serving on the organization's board of directors.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Nebraska Combined Non-MSA was stronger than the bank's overall performance under the Service Test in the full-scope areas primarily due to the stronger branch distribution in low- and moderate-income geographies.

State of Nevada

CRA rating for the State of Nevada⁴⁰: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AAs.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments that demonstrated excellent responsiveness to credit and economic development needs, although occasionally in a leadership position. The bank made extensive use of innovative and complex investments to support CD initiatives.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided a limited level of CD services.

Description of Institution's Operations in the State of Nevada

The state of Nevada was WFBNA's 14th largest rating area based on its total deposits in the state. As of June 30, 2021, the bank maintained approximately \$26.5 billion or 1.8 percent of its total domestic deposits in branches within the state. Of the 45 depository financial institutions operating in the bank's AAs within the state, WFBNA, with a deposit market share of 21.2 percent, was the largest. Other top depository financial institutions in the bank's AAs within the state based on market share included Bank of America, N.A. (18.2 percent), Wells Fargo National Bank West (13.8 percent), Charles Schwab Trust Bank (8.6 percent), U.S. Bank N.A. (6.8 percent), JPMorgan Chase Bank, N.A. (6 percent), Western Alliance Bank (5.6 percent) and Zions Bancorporation, N.A. (5.3 percent). As of December 31, 2021, the bank operated 102 branches and 322 ATMs in the state. WFBNA delineated 11 AAs within the state; however, the OCC combined, analyzed, and presented those AAs at the CSA level where possible for purposes of this evaluation. This resulted in the following three AAs: Las Vegas-Henderson, NV CSA (Las Vegas CSA), Reno-Carson City-Fernley, NV CSA (Reno CSA), and Nevada Combined Non-MSA. The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

⁴⁰ This rating only reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Las Vegas CSA

The following table provides a summary of the demographics, including housing and business information for the Las Vegas CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Las Vegas CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	497	5.6	26.6	37.2	30.2	0.4
Population by Geography	2,078,197	4.9	25.8	39.3	29.8	0.2
Housing Units by Geography	879,034	5.5	25.5	38.8	30.0	0.2
Owner-Occupied Units by Geography	392,712	1.8	18.0	41.7	38.5	0.0
Occupied Rental Units by Geography	349,161	8.6	33.3	37.0	20.9	0.2
Vacant Units by Geography	137,161	7.8	27.6	35.2	28.8	0.6
Businesses by Geography	139,272	3.8	21.2	38.8	35.6	0.6
Farms by Geography	1,979	2.0	20.6	40.1	37.1	0.2
Family Distribution by Income Level	476,849	20.8	18.5	20.6	40.2	0.0
Household Distribution by Income Level	741,873	22.8	17.1	18.8	41.3	0.0
Median Family Income MSA - 29820 Las Vegas-Henderson-Paradise, NV MSA		\$59,993	Median Housing Value			\$167,742
Median Family Income Non-MSAs - NV		\$61,350	Median Gross Rent			\$1,028
			Families Below Poverty Level			11.9%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$29,997 to \$30,675 and moderate-income families earned at least \$29,997 to \$30,675 and less than \$47,994 to \$49,080, depending on the metropolitan or nonmetropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$750 to \$767 for low-income borrowers and ranging from \$1,200 to \$1,227 for moderate-income borrowers, depending on the metropolitan or nonmetropolitan area. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$900. Low- and moderate-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Las Vegas-Henderson-Paradise, NV MSA (Las Vegas MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Las Vegas MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Las Vegas MSA economy was growing faster than any other area on the West. The rise in tourism was driving the leisure/hospitality job growth. Visitation to Las Vegas reached about 85 percent of the pre-pandemic numbers. However, the labor market still lagged behind the rest of the

county in its growth. Approximately 48 percent of the housing units in the area were owner occupied and 40 percent were renter occupied. The remaining 12 percent was vacant. While housing prices continued to rise, housing and rental affordability in Las Vegas was consistent with other areas in Nevada and lower than the other areas in the United States. The Las Vegas MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Leisure and Hospitality Services, Professional and Business Services, Government, Education and Health Services, and Retail Trade. Major employers in the Las Vegas MSA include Nellis Air Force Base and a host of hotels/casino corporations, including Mandalay Bay Resort & Casinos, Las Vegas Sands Corp., Caesars Entertainment Corp., MGM Resorts International, and Flamingo Las Vegas Hotel & Casino. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Las Vegas MSA was 5 percent compared to the national unemployment rate of 3.7 percent.

Pahrump, NV Micro Area (Nye County)

Pahrump is a Micropolitan Statistical Area located in Nye County, Nevada. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Pahrump MSA was 4 percent compared to the national unemployment rate of 3.7 percent.

The county had a total population of 45,514 in 2020. In 2020, the median household income was \$47,308 and the median property value was \$172,300, up 5.5 percent from one year prior. Homeownership rates in 2020 were 71.5 percent, up from 70.8 percent in 2019 and well above the national average of 64.4 percent. Employment in the county grew 4.1 percent in 2019 to 2020 from 14,600 employees to 15,200 employees. The top industries in the county were Retail Trade, Accommodation and Food Services, Arts, Entertainment, Recreation, Construction, Mining, Quarrying, and Oil & Gas Extraction.

Community Contacts

This evaluation considered comments provided by four local organizations that were contacted during the evaluation period and served the Las Vegas CSA. The organizations included 1) a small business development center that provided free, confidential consulting, free workshops, and low cost training to entrepreneurs, 2) an economic development company that offered services to existing and start-up businesses, 3) a housing counseling agency and housing developer that offered property rehabilitation and assistance to low- and moderate-income families, and 4) a local housing division which helped revitalize neighborhoods and strengthen the communities throughout Nevada. The bank also provided an assessment of community needs based on research completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were needs within the community:

- Affordable rental housing units
- Single-family affordable housing
- Rental assistance
- Rehabilitation of housing units/improvement of the quality of housing stock
- Workforce development
- Financial literacy

Opportunities for participation by financial institutions included the following:

- Home-ownership counseling
- Closing cost assistance
- Affordable home mortgage loans

Reno CSA

The following table provides a summary of the demographics, including housing and business information for the Reno CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Reno CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	154	6.5	18.8	39.0	29.9	5.8
Population by Geography	592,346	6.3	19.9	44.6	28.2	1.0
Housing Units by Geography	258,062	7.1	20.5	42.3	29.3	0.8
Owner-Occupied Units by Geography	135,557	1.9	14.4	46.7	36.8	0.3
Occupied Rental Units by Geography	93,452	14.0	29.2	39.2	16.3	1.4
Vacant Units by Geography	29,053	9.1	20.8	32.2	36.2	1.7
Businesses by Geography	41,559	6.5	22.6	31.9	35.2	3.9
Farms by Geography	1,104	4.3	16.8	44.2	33.9	0.9
Family Distribution by Income Level	143,866	21.0	17.7	20.8	40.4	0.0
Household Distribution by Income Level	229,009	24.0	16.0	18.1	41.9	0.0
Median Family Income MSA - 16180 Carson City, NV MSA		\$58,947	Median Housing Value			\$219,447
Median Family Income MSA - 39900 Reno, NV MSA		\$65,722	Median Gross Rent			\$935
Median Family Income Non-MSAs - NV		\$61,350	Families Below Poverty Level			10.1%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$29,474 to \$32,861 and moderate-income families earned at least \$29,474 to \$32,861 and less than \$47,158 to \$52,578, depending on the metropolitan or nonmetropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$737 to \$822 for low-income borrowers and ranging from \$1,179 to \$1,314 for moderate-income borrowers, depending on the metropolitan or nonmetropolitan area. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$1,178. Low- and moderate-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Reno-Carson City-Fernley, NV MSA (Reno MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Reno MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Reno's economy was strengthening due to the elevated visitation to the area. The leisure/hospitality industry was a key source of jobs in Reno. In addition to an increase in this industry, the manufacturing sector experienced consistent growth as job creation proceeded at an above-average pace. The Reno MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Professional and Business Services, Leisure and Hospitality Services, Government, Manufacturing, and Retail Trade. Major employers in the Reno MSA include University of Nevada-Reno, Silver Legacy Resort Casino, Sierra Nevada Healthcare System, Harrah's Reno Casino, and St. Mary's Health Network. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Reno MSA was 2.4 percent compared to the national unemployment rate of 3.7 percent.

Carson City, NV MSA (Carson City MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Carson City MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Carson City was recovering at a good pace post COVID-19, with the private sector driving majority of the recovery. Healthcare, retail, and leisure/hospitality employed over half of the area's private sector workers. Other private services continued to benefit from business re-openings, but the public sector continued to experience a slower rebound. The Carson City MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Government, Education and Health Services, Retail Trade, Leisure and Hospitality Services, and Manufacturing. Major employers in the Carson City MSA include Carson Tahoe Hospital, Click Bond, Inc., Gold Dust West Carson City, Carson City Nugget, and PCC Structural of Carson City. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Carson City MSA was 2.8 percent compared to the national unemployment rate of 3.7 percent.

Fernley, NV Micro Area (Lyon County)

Fernley is a Micropolitan Statistical Area location in Lyon County, Nevada. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for Lyon County was 3.3 percent compared to the national unemployment rate of 3.7 percent.

According to census.gov, the 2020 population in the county totaled approximately 59,000 and the median household income averaged \$58,800. The 2020 median property value in the county totaled \$239,000, an 11 percent increase year-over-year. The homeownership rate was 73 percent, which was higher than the national average of 64.4 percent. The most common industries in the county were Retail Trade, Manufacturing, Health Care and Social Assistance, Construction, and Public Administration.

Gardnerville Ranchos, NV Micro Area (Douglas County)

Gardnerville Ranchos is a Micropolitan Statistical Area located in Douglas County, Nevada. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for Douglas County was 2.8 percent compared to the national unemployment rate of 3.7 percent.

Per the Douglas County website, Douglas County was the fifth most populated county in Nevada with roughly 48,000 residents. According to Zillow, the median housing price as of September 2022, in the county was \$701,663, up 9.4 percent year-over-year. Major employment industries in the county, per the county's website, included Technology, Manufacturing, and Research. Additionally, with its proximity to Lake Tahoe, tourism played a major role in the area's employment industry. Approximately 30 percent of the workforce in the county was employed in the tourism and leisure industry.

Community Contacts

This evaluation considered comments provided by five local organizations that were contacted during the evaluation period and served the Reno CSA. The contacts included 1) an organization that worked to improve the quality of life for residents, especially low-income households, homeless, disabled, and at-risk citizens, 2) an organization that provided guidance/assistance to start and grow businesses to entrepreneurs and start-ups, 3) a local entity that advocated for businesses in the area 4) a community development entity that provided high quality small business loans and technical support services to clients, and 5) a local agency that provided livable, accessible, and affordable housing to low-income households and homeless, disabled, and at-risk citizens in the area. The bank also provided an assessment of community needs based on research completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing units
- Single-family affordable housing
- Rental assistance
- Rehabilitation of housing units/improvement of the quality of housing stock
- Workforce development
- Financial literacy

Opportunities for participation by financial institutions included the following:

- Home-ownership counseling
- Closing cost assistance
- Affordable home mortgage loans
- Financial literacy/education
- Credit counseling

Scope of Evaluation in the State of Nevada

The OCC selected the Las Vegas CSA and Reno CSA for full-scope reviews and based conclusions and ratings on activity within these geographical areas. These AAs carried significant weight in determining the overall ratings for the state of Nevada because of the significance of the bank's presence in these AAs. More weight was given to the Las Vegas CSA due to the larger deposit base, lending, and branch presence.

During the evaluation period, the bank originated or purchased 64,724 home mortgage loans, small loans to businesses, and small loans to farms totaling \$9.7 billion. The bank's primary loan products in the rating area were small loans to businesses and home mortgage loans. Small farm lending was not a

strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within each AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. In each of the AAs, the OCC placed more weight based on the number of loans on small loans to businesses versus home mortgage loans and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF NEVADA

LENDING TEST

The bank's performance under the Lending Test in the state of Nevada is rated Outstanding. Performance in the limited-scope areas had a neutral effect on the overall Lending Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Las Vegas CSA and Reno CSA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Las Vegas CSA	22,467	25,294	88	43	47,892	73.9	71.6
Reno CSA	6,586	8,430	105	21	15,142	23.4	25.7
Nevada Combined Non-MSA	736	889	129	4	1,758	2.7	2.6
Total	29,789	34,613	322	68	64,792	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Las Vegas CSA	6,183,055	656,056	2,334	476,913	7,318,358	71.3	71.6
Reno CSA	2,432,255	267,898	1,472	70,681	2,772,306	27.0	25.7
Nevada Combined Non-MSA	138,450	23,298	4,084	8,829	174,661	1.7	2.6
Total	8,753,760	947,252	7,890	556,423	10,265,325	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Las Vegas CSA

As of June 30, 2021, WFBNA had a deposit market share of 18.1 percent. The bank ranked second among 42 depository financial institutions placing it in the top 5 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 3.7 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked seventh among 609 home mortgage lenders in this AA, which placed it in the top 2 percent of lenders. The top lenders in this AA based on market share were Rocket Mortgage (7.4 percent), United Wholesale Mortgage (4 percent), and PennyMac Loan Services LLC (4 percent).

According to peer small business data for 2021, WFBNA had a market share of 10.6 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked fourth out of 253 small business lenders, which placed it in the top 2 percent of lenders. The top lenders in this AA based on market share were American Express National Bank (19.4 percent), Bank of America, N.A. (13.7 percent), and JPMorgan Chase Bank, N.A. (13.1 percent).

According to peer small farm data for 2021, WFBNA had a market share of 25.2 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked second out of 16 small farm lenders, which placed it in the top 13 percent of lenders. The other top lenders in this AA based on market share were JPMorgan Chase Bank, N.A. (29.7 percent) and U.S. Bank, N.A. (15.3 percent), and Capital One Bank (USA), N.A. (6.3 percent).

Reno CSA

As of June 30, 2021, WFBNA had a deposit market share of 36.8 percent. The bank ranked first among 18 depository financial institutions placing it in the top 6 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 3.9 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked fourth among 448 home mortgage lenders in this AA, which placed it in the top 2 percent of lenders. The top lenders in this AA based on market share were Guild Mortgage Company LLC (9.5 percent), Rocket Mortgage (7.5 percent), and U.S. Bank, N.A. (4.1 percent).

According to peer small business data for 2021, WFBNA had a market share of 14.1 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked second out of 149 small business lenders, which placed it in the top 2 percent of lenders. The other top lenders in this AA based on market share were American Express National Bank (15.1 percent), Bank of America, N.A. (12.2 percent).

According to peer small farm data for 2021, WFBNA had a market share of 34.9 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked first out of 13 small farm lenders, which placed it in the top 8 percent of lenders. The other top lenders in this AA based on market share were JPMorgan Chase Bank, N.A. (15.1 percent) and U.S. Bank, N.A. (9.5 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AAs. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data. The bank's performance was good in the Las Vegas CSA and excellent in the Reno CSA.

Las Vegas CSA***Home Mortgage Loans***

Refer to Table O in the state of Nevada section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was below the percentage of owner-occupied housing units in low-income geographies but it was equal to the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied housing units in moderate-income geographies but it approximated to the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Nevada section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was below both the percentage of businesses in low-income geographies and the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was below the percentage of businesses in moderate-income geographies but it was near to the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Nevada section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

The bank originated or purchased no small loans to farms in low-income geographies. The bank's percentage of small loans to farms in moderate-income geographies was below the percentage of farms in moderate-income geographies but it exceeded the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Reno CSA***Home Mortgage Loans***

Refer to Table O in the state of Nevada section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans in low-income geographies was near to the percentage of owner-occupied housing units in low-income geographies and it exceeded the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied housing units in moderate-income geographies but it was near to the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Nevada section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies was near to both the percentage of businesses in low-income geographies and the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was near to the percentage of businesses in moderate-income geographies and it exceeded the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Nevada section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was excellent.

The bank's percentages of small loans to farms in low- and moderate-income geographies exceeded the percentages of farms in low- and moderate-income geographies and the aggregate distributions of small loans to farms in low- and moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies in the Las Vegas CSA and Reno CSA. The OCC analyzed geographic lending patterns of

home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes. The bank's performance was good in both the Las Vegas CSA and the Reno CSA.

Las Vegas CSA

Home Mortgage Loans

Refer to Table P in the state of Nevada section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but it exceeded the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers approximated the percentage of moderate-income families and it exceeded the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Nevada section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 23.7 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with gross annual revenues of \$1 million or less was below the percentage of businesses in the AA with gross annual revenues of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with gross annual revenues of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Nevada section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was adequate.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 29.5 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with gross annual revenues of \$1 million or less was well below the percentage of farms in the AA with gross annual revenues of \$1 million or less but it was near to the aggregate distribution of small loans to farms with gross annual revenues of \$1 million or less by all lenders.

Reno CSA

Home Mortgage Loans

Refer to Table P in the state of Nevada section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but it exceeded the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers approximated the percentage of moderate-income families and it exceeded the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Nevada section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 20.2 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with gross annual revenues of \$1 million or less was below the percentage of businesses in the AA with gross annual revenues of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with gross annual revenues of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Nevada section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 29.5 percent of its small loans to farms. Based on those farms with known revenues, the bank's

percentage of small loans to farms with gross annual revenues of \$1 million or less was well below the percentage of farms in the AA with gross annual revenues of \$1 million or less but it exceeded the aggregate distribution of small loans to farms with gross annual revenues of \$1 million or less by all lenders.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

Las Vegas CSA

WFBNA was a leader in making CD loans in the Las Vegas CSA. WFBNA made 43 CD loans totaling approximately \$476.9 million, which represented 19.3 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 94.5 percent of these loans funded affordable housing that provided 4,931 units of affordable housing, 4.6 percent funded economic development, and less than 1 percent funded revitalization and stabilization efforts and community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$4 million line of credit to a nonprofit organization that provided scholarships to qualified students, as well as related support services and supported higher education. Of this total loan, \$70,776 was allocated to the Las Vegas CSA. Over two-thirds of the financial resources provided were to low-income families. According to the organization, 100 percent of its clients were low- and moderate-income as they earned less than 80 percent of the area median family income.
- WFBNA provided a \$35 million line of credit to an educational organization that worked toward the day when every child would receive an excellent and equitable education. Of this total loan, \$945,950 was allocated to the Las Vegas CSA. The organization nurtured leaders who committed to expanding opportunity for low-income students, beginning with at least two years teaching in a public school.
- WFBNA provided a \$35.1 million loan for a multifamily housing development, which consisted of 65 efficiency units, 152 one-bedroom units, 96 two-bedroom units located in a moderate-income census tract in Las Vegas, Nevada. More than 88 percent of the actual rent rates were below the 2021 Fair Market Rent for the area and 100 percent of the units were affordable to tenants earning up to 69 percent of the area median family income.

Reno CSA

WFBNA was a leader in making CD loans in the Reno CSA. WFBNA made 21 CD loans totaling approximately \$70.7 million, which represented 8 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 99.6 percent of these loans funded affordable housing that provided 489 units of affordable housing and less than 1 percent funded

revitalization and stabilization efforts targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$1.5 million term loan to a CDFI to help fund economic development and affordable housing initiatives. Of this total loan, \$66,066 was allocated to the Reno CSA. According to the organization, 100 percent of its clients were low- and moderate-income as they earned less than 80 percent of the area median family income.
- WFBNA provided a \$2.5 million term loan to an organization that helped rural communities build affordable housing, with a special emphasis on high need and underserved areas and populations. Of this total loan, \$15,765 was allocated to the Reno CSA. According to the organization, 100 percent of its clients were low- and moderate-income as they earned less than 80 percent of the area median family income.
- WFBNA provided a \$25 million line of credit to a CDFI organization for affordable housing. Of this total loan, \$387,992 was allocated to the Reno CSA. The funds were used for multifamily affordable housing, community facilities, nonprofits, small businesses, commercial loans, and community revitalization and economic development.

Product Innovation and Flexibility

Las Vegas CSA

WFBNA used flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 5,349 loans under its flexible lending programs totaling \$342 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	457	121,500
Dream. Plan. Home.	83	15,600
PPP	4,809	204,900
Total	5,349	342,000

Reno CSA

WFBNA used flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 1603 loans under its flexible lending programs totaling \$97.6 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	81	22,800
Dream. Plan. Home.	12	2,400
PPP	1,510	72,400
Total	1603	97,600

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Nevada Combined Non-MSA was consistent with the bank's overall performance under the Lending Test in the full-scope areas.

Refer to Tables O through T in the state of Nevada section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Nevada is rated Outstanding. Performance in the limited-scope areas had a neutral effect on the overall Investment Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Las Vegas CSA was excellent and the bank's performance in the Reno CSA was adequate.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Las Vegas CSA	57	61,615	151	92,904	208	68.9	154,520	85.6	15	80,511
Reno CSA	6	4,296	84	18,979	90	29.8	23,275	12.9	5	768
Nevada Combined Non-MSA	2	2,610	2	35	4	1.3	2,645	1.5	1	77
Statewide***	0	0	0	0	0	0.0	0	0.0	0	0
Total	65	68,521	237	111,919	302	100.0	180,440	100.0	21	81,355

The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

* '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 tracked and recorded by the institution's financial reporting system.

*** Statewide means investments in statewide programs that have a purpose, mandate, or function to serve one or more of the bank's assessment areas within the state. Due to rounding, totals may not equal 100.0%

Las Vegas CSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$154.5 million and represented 6.2 percent of the bank's tier 1 capital allocated to the AA. The investments also included 143 grants and donations totaling \$2.4 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income

individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 36.5 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 48.1 percent that focused on community services targeted to low- and moderate-income individuals, and 15.4 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 2,153 units of affordable housing in the AA.

The bank made extensive use of innovative or complex investments to support CD initiatives. Approximately 92.3 percent of current period investment dollars were complex LIHTC investments. The following are examples of CD investments made in this AA:

- WFBNA provided an equity investment of \$19.9 million to fund the construction of a 195-unit LIHTC apartment complex located in Las Vegas, Nevada. The units were restricted to seniors earning up to 60 percent of the AMI. The development was part of the developer's commitment to provide high-quality living centers, with recreational and residential service components, for low-income seniors, many of whom are on fixed incomes. WFBNA demonstrated active involvement, evidenced by its long-term relationship working with the developer since 2013 and providing financing on over five developments. This activity was complex due to the inherent nature of LIHTC transactions and their multiple sources of funding such as Nevada Housing Division Growing Affordable Housing Program and the County HOME Housing Trust Fund. In addition, WFBNA made a \$45.9 million construction loan for this project. The investment was responsive to the identified need for affordable housing, specifically for seniors.
- WFBNA provided a \$32.1 million investment for an affordable housing development. This LIHTC development was located in Las Vegas, Nevada, with 100 percent of the units restricted to tenants earning up to 80 percent of the area median family income.
- WFBNA provided a \$100,000 grant to an organization for its capacity building initiative and its homeless service provider training program. According to the organization, 100 percent of its clients were low-or moderate-income as they earned less than 80 percent of the area median family income. The organization's mission was to create impactful partnerships and promote collaboration among private, public, and nonprofit sectors through advocacy, events, and education.

Reno CSA

The bank had an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$23.3 million and represented 2.6 percent of the bank's tier 1 capital allocated to the AA. The investments also included 82 grants and donations totaling \$1.5 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited adequate responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 20 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 56.7 percent that focused on community services targeted to low- and

moderate-income individuals, and 23.4 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 362 units of affordable housing in the AA.

The bank made significant use of innovative or complex investments to support CD initiatives. Approximately 53.4 percent of current period investment dollars were complex LIHTC investments. The following are examples of CD investments made in this AA:

- WFBNA made a \$9.9 million equity investment for a 44-unit apartment LIHTC complex located in Reno, Nevada. The units were restricted to seniors earning up to 50 percent of the area median income. Twelve of the units were set aside for formerly homeless seniors or seniors previously living in long-term motels. WFBNA also provided a \$9.5 million construction loan for this project. This investment was responsive to the identified need for affordable housing, specifically for seniors.
- WFBNA invested \$7.5 million in a licensed Small Business Investment Company (SBIC) fund that supported a business in the Reno CSA that provided science-backed marketing, sales training programs, and consulting services to B2B (business-to-business) companies. This investment was responsive to the identified need for small business growth and stability.
- WFBNA provided a \$414,278 grant to an organization for its Open for Business Fund Support program. According to the organization, 95 percent of this program's clients were small businesses as they had gross annual revenues of \$1 million or less, or met the size eligibility requirements of the SBA programs. The organization promoted student success, academic excellence, and access to lifelong learning by supporting high-quality education and services within Washoe County and Reno/Sparks community.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Nevada Combined Non-MSA was weaker than the bank's overall performance under the Investment Test in the full-scope area, primarily due to lower levels of CD investments relative to the bank's presence and capacity to invest in the AA.

SERVICE TEST

The bank's performance under the Service Test in the state of Nevada is rated High Satisfactory. Performance in the limited-scope areas had a neutral effect on the overall Service Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Las Vegas CSA and Reno CSA was good.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's full-scope AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Las Vegas CSA	71.6	69	67.6	5.8	23.2	31.9	39.1	4.9	25.8	39.3	29.8
Reno CSA	25.7	28	27.5	7.1	35.7	32.1	21.4	6.3	19.99	44.6	28.2
Nevada Combined Non-MSA	2.6	5	4.9	0.0	20.0	60.0	20.0	0.0	18.7	32.3	49.0
Total	100.0	102	100.0	5.9	26.5	33.3	33.3	5.0	24.3	40.1	30.3
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Las Vegas CSA	0	3	0	-2	-1	0
Reno CSA	0	1	0	0	-1	0
Nevada Combined Non-MSA	0	1	0	0	-1	0
Total	0	5	0	-2	-3	0
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.						

Las Vegas CSA

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Las Vegas CSA. WFBNA operated 69 branches in the AA, comprising four branches in low-income geographies, 16 branches in moderate-income geographies, 22 branches in middle-income geographies, and 27 branches in upper-income geographies. The distribution of branches in low-income geographies exceeded the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies approximated the distribution of the population in moderate-income geographies.

To the extent changes have been made, the bank's record of opening and closing of branches generally has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the 51 branches opened on Saturdays, three were located in low-income geographies and 12 were located in moderate-income geographies.

Reno CSA

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Reno CSA. WFBNA operated 28 branches in the AA, comprising two branches in low-income geographies, 10 branches in moderate-income geographies, nine branches in middle-income geographies, six branches in upper-income geographies, and one branch in a geography without an income designation. The distribution of branches in low-income geographies exceeded the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies.

To the extent changes have been made, the bank's record of opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank did not open or close any branches in low- and moderate-income geographies.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the three branches opened on Saturdays, none were located in low- and moderate-income geographies.

Community Development Services

The bank provided a limited level of CD services.

Las Vegas CSA

WFBNA provided a limited level of CD services in the Las Vegas CSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 110 CD service activities during the evaluation period. A majority (98.2 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The bank's assistance provided was responsive to the identified needs in the AA. The following are examples of CD services provided in this AA:

- WFNBA employees provided 42 hours of board service to an organization that delivered educational programming focused on financial education, work readiness, and entrepreneurship to students from kindergarten through high school.
- WFNBA employees provided 218 hours of financial education to elementary and high school students. Most of the students attending these schools qualified for the federal free- and reduced-lunch program.

Reno CSA

WFBNA provided a limited level of CD services in the Reno CSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 64 CD service

activities since the last evaluation. All CD service activities were to organizations providing community services targeted to low- and moderate-income individuals and families. The bank's assistance provided was responsive to the identified needs in the AA. The following are examples of CD services provided in this AA:

- WFBNA employees provided 229 hours of financial education to elementary and high school students. Most of these students qualified for the federal free- and reduced-lunch program. This activity was responsive to community development services.
- WFBNA employees provided 36 hours of financial education to young people ages 16 through 24 who participated in a no-cost education and career technical training program.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Nevada Combined Non-MSA was stronger than the bank's overall performance under the Service Test in the full-scope areas. CD services were not evaluated in the limited-scope AA, which resulted in stronger performance.

State of New Mexico

CRA rating for the State of New Mexico⁴¹: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited an excellent geographic distribution of loans in its AAs.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments that demonstrated excellent responsiveness to credit and economic development needs, although occasionally in a leadership position. The bank made significant use of innovative and complex investments to support CD initiatives.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided an adequate level of CD services.

Description of Institution's Operations in the State of New Mexico

The state of New Mexico was WFBNA's 21st largest rating area based on its total deposits in the state. As of June 30, 2021, the bank maintained approximately \$10.7 billion or 0.7 percent of its total domestic deposits in branches within the state. Of the 54 depository financial institutions operating in the bank's AAs within the state, WFBNA, with a deposit market share of 25.9 percent, was the largest. Other top depository financial institutions in the bank's AAs within the state based on market share included Bank of America, N.A. (13 percent), Bank of the West (5.8 percent), BOKF, N.A. (5.3 percent), U.S. Bank, N.A. (5.3 percent), and New Mexico Bank & Trust (5.1 percent). As of December 31, 2021, the bank operated 62 branches and 146 ATMs in the state. WFBNA delineated 21 AAs within the state; however, the OCC combined, analyzed, and presented those AAs at the CSA level where possible for purposes of this evaluation. This resulted in the following four AAs: Albuquerque-Santa Fe-Las Vegas, NM CSA (Albuquerque CSA), Farmington, NM MSA (Farmington MSA), Las Cruces, NM MSA (Las Cruces MSA), New Mexico Combined Non-MSA. The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

Albuquerque CSA

The following table provides a summary of the demographics, including housing and business information for the Albuquerque CSA.

⁴¹ This rating only reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Albuquerque CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	274	4.7	28.5	36.1	29.6	1.1
Population by Geography	1,141,055	5.0	29.2	35.8	29.7	0.3
Housing Units by Geography	497,015	5.2	27.7	36.9	30.0	0.2
Owner-Occupied Units by Geography	296,242	2.4	25.0	37.7	34.8	0.1
Occupied Rental Units by Geography	142,158	11.0	32.6	33.4	22.6	0.4
Vacant Units by Geography	58,615	5.0	29.4	41.8	23.6	0.3
Businesses by Geography	117,269	7.3	21.4	33.9	36.9	0.5
Farms by Geography	2,632	3.7	24.1	37.2	34.8	0.1
Family Distribution by Income Level	274,478	23.8	15.9	18.5	41.8	0.0
Household Distribution by Income Level	438,400	25.8	15.2	16.7	42.3	0.0
Median Family Income MSA - 10740 Albuquerque, NM MSA		\$60,032	Median Housing Value			\$204,552
Median Family Income MSA - 42140 Santa Fe, NM MSA		\$64,734	Median Gross Rent			\$847
Median Family Income Non-MSAs - NM		\$49,356	Families Below Poverty Level			14.2%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$24,678 to \$32,367 and moderate-income families earned at least \$24,678 to \$32,367 and less than \$39,485 to \$51,787, depending on the metropolitan or nonmetropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$617 to \$809 for low-income borrowers and ranging from \$987 to \$1,295 for moderate-income borrowers, depending on the metropolitan or nonmetropolitan area. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$1,098. Low- and moderate-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Albuquerque, NM MSA (Albuquerque MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Albuquerque MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Rebound from the pandemic had been slow, but steady. Healthcare remained a key factor in the area's recovery efforts with more than one in six jobs being in the healthcare industry. Additionally, Albuquerque holds the highest share of state government jobs outside of the state capital however, declining enrollment in the University of New Mexico (UNM) negatively impacted the state's payroll. UNM relied heavily on in-state enrollment, but the school had experienced a 25 percent decline over the past decade. Albuquerque, however, was experiencing material growth from the tech industry with the

recent announcement of expansions from firms such as Facebook and Netflix. Analysts attributed the growth in this industry to the low business costs in the area. The Albuquerque MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Government, Education and Health Services, Professional and Business Services, Retail Trade, and Leisure and Hospitality Services. Major employers in the Albuquerque MSA include Sandia National Laboratories, Presbyterian Healthcare Services, Kirtland Air Force Base, University of New Mexico, and Lovelace Medical Center. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Albuquerque MSA was 4.8 percent compared to the national unemployment rate of 3.7 percent.

Santa Fe, NM MSA (Santa Fe MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Santa Fe MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Santa Fe's post pandemic recovery had been slow compared to other areas in New Mexico and across the United States as the metro area had only regained roughly one-third of the jobs lost due to the pandemic. The strict COVID restrictions in the area negatively impacted Santa Fe's tourism industry and ultimately the payroll in this industry. Conversely, the public sector offered the area stability with limited growth. With the material adverse impact in the tourism industry, the area remained highly reliant on state government employment due to the stability and higher wages. The Santa Fe MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Government, Leisure and Hospitality Services, Education and Health Services, Retail Trade, and Professional and Business Services. Major employers in the Santa Fe MSA include CHIRSTUS St. Vincent Regional Medical Center, Presbyterian Medical Services, Santa Fe Community College, and Santa Fe Opera. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Santa Fe MSA was 4.6 percent compared to the national unemployment rate of 3.7 percent.

Espanola, NM Micro Area (Rio Arriba County)

Espanola, NM Micropolitan Statistical Area comprises Rio Arriba County, Nevada. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for Rio Arriba County was 5.7 percent compared to the national unemployment rate of 3.7 percent. Information on Data USA reports the county had a total population of 38,962 in 2020. The median household income was \$42,264, an increase of 5.8 percent in one year. The median property value also saw an increase of 3.4 percent in one year and as of 2020 totaled \$172,900. Homeownership rates in 2020 were 77 percent, which is no change from 2019 but above the national average of 64.4 percent. Employment in the County grew 2.3 percent from 2019 to 2020 totaling 14,400 employees. The top industries in the County were Health Care and Social Assistance, Professional, Scientific, and Technical Services, Public Administration, Educational Services, and Retail Trade.

Las Vegas, NM Micro Area (Mora and San Miguel Counties)

Las Vegas, NM is a Micropolitan Statistical Area comprising Mora and San Miguel Counties in Nevada. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the two counties was 5.6 percent compared to the national unemployment rate of 3.7 percent. The Data USA shows the micro area had a total population of 32,046 in 2020. The median household income was \$32,141 in 2020, up 4.8 percent in one year. The 2020 median property value experienced a

decline of 4.3 percent in one year to \$124,600 in 2020. In the same year, 73 percent of homes in the area were owner occupied, up slightly from 72 percent one year prior. Employment in the area grew 7.4 percent to 11,900 employees. The top industries were Health Care and Social Assistance, Educational Services, and Public Administration.

Los Alamos, NM Micro Area (Los Alamos County)

Los Alamos, NM is a Micropolitan Statistical Area comprised of Los Alamos County, Nevada. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for Los Alamos County was 2.4 percent compared to the national unemployment rate of 3.7 percent. Los Alamos County had a total population of 18,976 in 2020, up 1.9 percent one year prior. The median household income was \$119,266 and the median property value was \$322,200, up 6.4 percent in one year. In 2020, 73 percent of the houses were owner occupied, down 1 percent from 2019. Employment in the area grew 3.5 percent to 10,100 in 2020 with the top industries being Professional, Scientific, and Technical Services, Educational Services, Public Administration, Health Care and Social Assistance, and Accommodation and Food Services.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Albuquerque CSA. The organizations included 1) a county economic development group that worked to protect taxpayers and foster business start-up, expansion, and retention in the unincorporate areas of the county while also supporting out-of-state recruitment efforts to generate jobs and 2) a governmental agency located in Albuquerque. The bank also provided an assessment of community needs based on research completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were needs within the community:

- Construction of affordable rental housing units and rental assistance programs
- Development of single-family affordable housing
- Housing for persons with special needs
- Financial education training such as credit building counseling
- Products (particularly for the un/underbanked) such as low-cost checking or savings accounts/programs
- Tax preparation services for low- and moderate-income (VITA)
- Emergency shelters and transitional housing
- Access to capital and training for small business growth
- Provide technical assistance for small start-ups

Opportunities for participation by financial institutions included the following:

- Assistance with credit needs for start-ups and expanding businesses
- Financing options (i.e., lines of credit, closed-end loans) for small and startup businesses

New Mexico Combined Non-MSA

The following table provides a summary of the demographics, including housing and business information for the New Mexico Combined Non-MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: New Mexico Combined Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	135	3.0	32.6	40.7	23.7	0.0
Population by Geography	544,258	2.6	32.7	40.4	24.2	0.0
Housing Units by Geography	240,836	2.3	28.8	45.5	23.4	0.0
Owner-Occupied Units by Geography	127,882	1.9	28.3	41.7	28.0	0.0
Occupied Rental Units by Geography	58,165	2.0	31.5	44.5	22.0	0.0
Vacant Units by Geography	54,789	3.5	27.0	55.4	14.1	0.0
Businesses by Geography	34,215	1.9	22.7	43.8	31.6	0.0
Farms by Geography	1,696	1.0	17.2	48.9	32.9	0.0
Family Distribution by Income Level	125,239	23.4	16.8	17.8	42.0	0.0
Household Distribution by Income Level	186,047	25.4	15.6	16.1	42.9	0.0
Median Family Income Non-MSAs - NM		\$49,356	Median Housing Value			\$112,007
			Median Gross Rent			\$714
			Families Below Poverty Level			17.3%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$24,678 and moderate-income families earned at least \$24,678 and less than \$39,485. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$617 for low-income borrowers and \$987 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$601. A mortgage for a median-priced home would be affordable to low- and moderate-income borrowers in this AA.

New Mexico's economy was steadily growing as there has been a significant growth in jobs over the past two quarters. Strengthening in the fossil fuel industry was instrumental in the recovery as energy jobs provided higher wages than any other major industry in the state. Not only was energy a viral source of high-paying jobs, but revenues from oil and gas supported New Mexico's sizable public sector by accounting for about one-third of the state's budget. The state had seen a slow turnaround in homebuilding since the construction of new homes stalled in the aftermath of the recession in 2008. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the counties that comprise the New Mexico Combined Non-MSA ranged from 3.9 percent

(Curry County) to 13.3 percent (Luna County) compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by seven local organizations that were contacted during the evaluation period and served the counties within the New Mexico Combined Non-MSA CSA. All organizations were economic development organization that helped to attract and retain businesses in the area. The bank also provided an assessment of community needs based on research completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were needs within the community:

- Construction of affordable rental housing units and rental assistance programs
- Development of single-family affordable housing
- Housing for persons with special needs
- Financial education training such as credit building counseling
- Products (particularly for the un/underbanked) such as low-cost checking or savings accounts/programs
- Tax preparation services for low- and moderate-income (VITA)
- Emergency shelters and transitional housing
- Access to capital and training for small business growth
- Provide technical assistance for small start-ups

Opportunities for participation by financial institutions included the following:

- Rental assistance and affordable housing programs
- Assistance with credit needs for start-ups and expanding businesses
- Financing options (i.e., lines of credit, closed-end loans) for small and startup businesses
- Financial literacy/education
- Credit counseling
- Assistance with obtaining infrastructure related grants to offset housing development costs

Scope of Evaluation in the State of New Mexico

The OCC selected the Albuquerque CSA and New Mexico Combined Non-MSA for full-scope reviews and based conclusions and ratings primarily on activity within these geographical areas. These AAs carried significant weight in determining the overall ratings for the state of New Mexico because of the significance of the bank's presence in these AAs. More weight was given to the Albuquerque CSA due to the larger deposit base, lending, and branch presence.

During the evaluation period, the bank originated or purchased 22,932 home mortgage loans, small loans to businesses, and small loans to farms totaling \$2.4 billion. The bank's primary loan products in the rating area were small loans to businesses and home mortgage loans. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test

conclusions. Within each AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. In each of the AAs, the OCC placed more weight based on the number of loans on small loans to businesses versus home mortgage loans and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF NEW MEXICO

LENDING TEST

The bank's performance under the Lending Test in state of New Mexico is rated Outstanding. Performance in the limited-scope areas had a neutral effect on the overall Lending Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Albuquerque CSA and New Mexico Combined Non-MSA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Albuquerque CSA	6,218	8,349	109	34	14,710	64.0	69.9
New Mexico Combined Non-MSA	1,968	2,894	152	8	5,022	21.9	17.5
Farmington MSA	335	500	8	3	846	3.7	4.7
Las Cruces MSA	933	1,426	39	4	2,402	10.5	7.8
Total	9,454	13,169	308	49	22,980	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Albuquerque CSA	1,415,734	300,976	2,030	66,275	1,785,015	70.7	69.9
New Mexico Combined Non-MSA	323,743	92,440	3,062	34,079	453,324	18.0	17.5
Farmington MSA	53,098	16,080	113	10,037	79,328	3.1	4.7
Las Cruces MSA	171,931	31,506	1,126	2,230	206,793	8.2	7.8
Total	1,964,506	441,002	6,331	112,621	2,524,460	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Albuquerque CSA

As of June 30, 2021, WFBNA had a deposit market share of 28.3 percent. The bank ranked first among 24 depository financial institutions placing it in the top 5 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 3.2 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked sixth among 503 home mortgage lenders in this AA, which placed it in the top 2 percent of lenders. The top lenders in this AA based on market share were Rocket Mortgage (8.3 percent), Waterstone Mortgage Corporation (5.4 percent), and Nusenda Federal Credit Union (3.8 percent).

According to peer small business data for 2021, WFBNA had a market share of 11.7 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked second out of 177 small business lenders, which placed it in the top 2 percent of lenders. The other top lenders in this AA based on market share were American Express National Bank (15.9 percent), JPMorgan Chase Bank, N.A. (11.1 percent), and Bank of America, N.A. (9 percent).

According to peer small farm data for 2021, WFBNA had a market share of 26.9 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked first out of 17 small farm lenders, which placed it in the top 6 percent of lenders. The other top lenders in this AA based on market share were JPMorgan Chase Bank, N.A. (18.8 percent), U.S. Bank, N.A. (17.5 percent), and Bank of America, N.A. (10.6 percent).

New Mexico Combined Non-MSA

As of June 30, 2021, WFBNA had a deposit market share of 18.9 percent. The bank ranked first among 34 depository financial institutions placing it in the top 3 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 3.7 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked fourth among 387 home mortgage lenders in this AA, which placed it in the top 2 percent of lenders. The top lenders in this AA based on market share were Rocket Mortgage (12.7 percent), PennyMac Loan Services LLC (4.2 percent), and Primary Residential Mortgage (3.8 percent).

According to peer small business data for 2021, WFBNA had a market share of 14.7 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked second out of 121 small business lenders, which placed it in the top 2 percent of lenders. The other top lenders in this AA based on market share were American Express National Bank (17.1 percent), Citibank, N.A. (7.6 percent), and JPMorgan Chase Bank, N.A. (7.5 percent).

According to peer small farm data for 2021, WFBNA had a market share of 16.6 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked third out of 25 small farm lenders, which placed it in the top 12 percent of lenders. The other top lenders in this AA based on market share were John Deere Financial FSB (19.3 percent), New Mexico Bank & Trust (17.4 percent), and JPMorgan Chase Bank, N.A. (12.6 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AAs. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data. The bank's performance was excellent in the Albuquerque CSA and good in the New Mexico Combined Non-MSA.

Albuquerque CSA

Home Mortgage Loans

Refer to Table O in the state of New Mexico section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was well below the percentage of owner-occupied housing units in low-income geographies but it was near to the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied housing units in moderate-income geographies but it was near to the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of New Mexico section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies approximated the percentage of businesses in low-income geographies and it was below the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies exceeded the percentage of businesses in moderate-income geographies and it approximated the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of New Mexico section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was good.

The bank's percentage of small loans to farms in low-income geographies was significantly below the percentage of farms in low-income geographies but it exceeded the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-income geographies exceeded the percentage of farms in moderate-income geographies and it was near to the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

New Mexico Combined Non-MSA

Home Mortgage Loans

Refer to Table O in the state of New Mexico section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans in low-income geographies was significantly below the percentage of owner-occupied housing units in low-income geographies and it was well below the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was significantly below the percentage of owner-occupied housing units in moderate-income geographies but it exceeded the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of New Mexico section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies was equal to the percentage of businesses in low-income geographies and it was below the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies approximated the percentage of businesses in moderate-income geographies and it exceeded the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of New Mexico section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was excellent.

The bank's percentages of small loans to farms in low- and moderate-income geographies exceeded the percentages of farms in low- and moderate-income geographies and the aggregate distributions of small loans to farms in low- and moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies in the Albuquerque CSA and New Mexico Combined Non-MSA. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes. The bank's performance was good in both the Albuquerque CSA and the New Mexico Combined Non-MSA.

Albuquerque CSA

Home Mortgage Loans

Refer to Table P in the state of New Mexico section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but it was equal to the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was near to the percentage of moderate-income families and it approximated the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of New Mexico section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 21.9 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of New Mexico section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

The bank did not collect or consider the GAR in the underwriting of approximately 33.9 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below the percentage of farms in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

New Mexico Combined Non-MSA***Home Mortgage Loans***

Refer to Table P in the state of New Mexico section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but it was near to the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was significantly below the percentage of moderate-income families and it was below the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of New Mexico section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was excellent.

The bank did not collect or consider the GAR in the underwriting of approximately 23.3 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was near to the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of New Mexico section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

The bank did not collect or consider the GAR in the underwriting of approximately 42.8 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below the percentage of farms in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

Albuquerque CSA

WFBNA was a leader in making CD loans in the Albuquerque CSA. WFBNA made 34 CD loans totaling approximately \$66.3 million, which represented 6.8 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 77.8 percent of these loans funded affordable housing that provided 494 units of affordable housing, less than 1 percent funded economic development and revitalization and stabilization efforts, and 20.4 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$850,000 loan for a multifamily housing development located in a moderate-income census tract in Belen, New Mexico. The development consisted of 22 two-bedroom units, with 100 percent of the rental units affordable to tenants earning up to 39 percent of the area median family income.
- WFBNA provided a \$4.9 million construction loan for an LIHTC affordable housing development located in Los Lunas, New Mexico, with 98 percent of the units restricted to tenants who earned up to 60 percent of the area median family income. The mission of the LIHTC was to create and preserve high quality affordable rental homes by offering development, financing, construction, and property management services on a variety of affordable, mixed-income, and market-rate multifamily housing projects.
- WFBNA provided a \$11.4 construction loan for an LIHTC affordable housing development located in Los Alamos, New Mexico, with 100 percent of the units restricted to tenants who earned up to 60 percent of the area median family income.

New Mexico Combined Non-MSA

WFBNA was a leader in making CD loans in the New Mexico Combined Non-MSA. WFBNA made eight CD loans totaling approximately \$34.1 million, which represented 13.9 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 96 percent of these loans funded affordable housing that provided 278 units of affordable housing, less than 1 percent funded revitalization and stabilization efforts, and 3.7 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$10.2 million construction loan for an LIHTC affordable housing development located in Hobbs, New Mexico, with 100 percent of the units restricted to tenants who earned up to 80 percent of the area median family income.
- WFBNA provided a \$11.9 construction loan for an LIHTC affordable housing development located in Grants, New Mexico, with 98 percent of the units restricted to tenants who earned up to 60 percent of the area median family income.
- WFBNA provided a \$10.6 million loan extension for an LIHTC affordable housing development located in Carlsbad, New Mexico, with 100 percent of the units restricted to tenants who earned up to 50 percent of the area median family income.

Product Innovation and Flexibility

Albuquerque CSA

WFBNA used flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 1,446 loans under its flexible lending programs totaling \$69.7 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	99	2,700
Dream. Plan. Home.	20	3,200
PPP	1,327	63,800
Total	1,446	69,700

New Mexico Combined Non-MSA

WFBNA used flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 524 loans under its flexible lending programs totaling \$38.2 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	98	17,200
Dream. Plan. Home.	8	1,000
PPP	418	20,000
Total	524	38,200

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in Farmington MSA was consistent with the bank's overall performance under the Lending Test in the full-scope areas. Performance in the Las Cruces MSA was weaker than the bank's overall performance primarily due to weaker responsiveness to the credit needs in the AA, including lower relative levels of CD loans.

Refer to Tables O through T in the state of New Mexico section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of New Mexico is rated Outstanding. Performance in the limited-scope areas had a neutral effect on the overall Investment Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Albuquerque CSA and New Mexico Combined Non-MSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Albuquerque CSA	11	16,095	178	123,779	189	70.3	139,875	56.0	4	20,135
New Mexico Combined Non-MSA	13	46,842	25	42,119	38	14.1	88,961	35.6	3	139
Farmington MSA	1	13	17	893	18	6.7	906	0.3	0	0
Las Cruces MSA	0	0	21	1,421	21	7.8	1,421	0.6	0	0
Statewide***	2	7,309	1	11,146	3	1.1	18,456	7.4	3	325
Total	27	70,259	242	179,358	269	100.0	249,619	100.0	10	20,599
<p>The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.</p> <p>* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.</p> <p>** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.</p> <p>*** Statewide means investments in statewide programs that have a purpose, mandate, or function to serve one or more of the bank's assessment areas within the state. Due to rounding, totals may not equal 100.0%</p>										

Albuquerque CSA

The bank had an excellent level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$139.9 million and represented 14.3 percent of the bank's tier 1 capital allocated to the AA. The investments also included 166 grants and donations totaling \$10.7 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 18.5 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 57.7 percent that focused on community services targeted to low- and moderate-income individuals, and 23.8 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 659 units of affordable housing in the AA.

The bank made significant use of innovative or complex investments to support CD initiatives. Approximately 60.2 percent of current period investment dollars were complex LIHTC and NMTC investments. The following are examples of CD investments made in this AA:

- WFBNA provided an equity investment of \$10.1 million to finance an affordable housing development in Albuquerque, New Mexico. The city of Albuquerque donated the site. The 80-unit LIHTC development included 68 units restricted to tenants earning 60 percent of the AMI, with 20 of those units subsidized by Project Based Section 8. The development included an onsite residential social service coordinator and a community room with a kitchen used for cooking classes to promote "healthy living," a community garden, a computer room, and a multipurpose room for resident events and social service classes. The development was near a medical office, a grocery store, a pharmacy, a library, transit, and schools. This investment was complex due to the inherent nature of LIHTC transactions and the multiple funding sources including New Mexico Mortgage Finance Authority, Housing Trust, HOME funds from the city of Albuquerque, and National Housing Trust funds. Wells Fargo demonstrated active involvement, evidenced by its long-term working relationship with the sponsor since 1999. WFBNA also provided a \$9.1 million construction loan for the project. The investment was responsive to the identified need for affordable housing.
- WFBNA made a \$17 million NMTC investment for a minority family-owned small business. The business was a paper manufacturer based in New Mexico that operated since 1984. The investment financed two high-speed machines for producing dispenser napkins and associated conveying and robotic packaging technologies. The funding helped this business increase its capacity to support new business from one of its largest customers. Additionally, the investment financed a roof-mounted solar system to reduce reliance on grid energy by roughly 15 percent of the company's annual pre-pandemic energy use. The new equipment created more than 80 permanent full-time jobs and reduced water and energy consumption. This investment was highly complex because of the inherent nature of NMTC transactions. The investment was responsive to the need for job creation.

- WFBNA provided a \$1.2 million grant to an organization for its activator grant program. The nonprofit organization was dedicated to providing the tools entrepreneurs needed to operate, grow, or start their business. It increased access to business credit, made loans, and provided training to help entrepreneurs realize their dreams. The organization offered small business loans ranging from \$1,000 to \$1,000,000 and other support, including credit reporting, business counseling, publicity opportunities, and educational business resource events.

New Mexico Combined Non-MSA

The bank had an excellent level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$89 million and represented 36.2 percent of the bank's tier 1 capital allocated to the AA. The investments also included 17 grants and donations totaling \$674,000 to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 47.4 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 18.4 percent that focused on community services targeted to low- and moderate-income individuals, and 34.3 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 98 units of affordable housing in the AA.

The bank made extensive use of innovative or complex investments to support CD initiatives. Approximately 91 percent of current period investment dollars were complex NMTC investments. The following are examples of CD investments made in this AA:

- WFBNA made a \$20.8 million NMTC investment to extend and improve the wastewater infrastructure system serving the Pueblo of Laguna Tribe. The investment was used to upgrade the existing sewer systems, enlarge one system lagoon, and extend the wastewater system to approximately 150 additional homes, located in the villages of Laguna, Mesita, Paraje, Seama, and Paguatea. Without this investment, the Pueblo of Laguna Tribe would be forced to either use funds earmarked for social and health services for its tribal members or not implement the fourth and final phase of the project. The transaction was complex due to the inherent nature of NMTC transactions and the involvement of multiple funding sources including from the USDA. The investment was responsive to the community need for water infrastructure.
- WFBNA made a \$5.5 million NMTC investment to provide broadband internet services to rural communities in New Mexico including the city of Milan and the towns of Bluewater and San Rafael. The residents and businesses in Milan had no broadband and relied on satellite internet, which was expensive and can be impacted by weather. Broadband internet services have economic, educational, health & safety, as well as social benefits in these rural communities. The transaction was complex due to the inherent nature of NMTC transactions. The investment was responsive to the community need for broadband internet.

- WFBNA invested \$12 million in a highly complex NMTC for a manufacturing facility located in census tract where the poverty rate was 46.4 percent. The project assisted in retaining jobs 120 jobs and creating 15 new jobs. All new and retained jobs created by the project were accessible to low-income persons with a high school diploma. The project company provided on the job training for all new employees and promoted from within. The project has delivered business knowledge and resources to New Mexico entrepreneurs seeking to start or grow a business. Sponsored by public and private entities – all of which share the goal of increasing economic activity and development the organization provides business-building tools and connections.

Broader Statewide Investments

WFBNA had three current and prior period investments totaling \$18.5 million with a purpose, mandate, or function to serve one or more AAs in the state. These CD investments were primarily LIHTCs that supported the creation or preservation of affordable housing in the state. These investments were given positive consideration and supported the bank's overall performance under the Investment Test in the state of New Mexico.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Farmington MSA and Las Cruces MSA was weaker than the bank's overall performance under the Investment Test in the full-scope areas, primarily due to lower levels of CD investments relative to the bank's presence and capacity to invest in those AAs.

SERVICE TEST

The bank's performance under the Service Test in the state of New Mexico is rated Outstanding. Performance in the limited-scope areas had a neutral effect on the overall Service Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Albuquerque CSA was excellent and the bank's performance in the New Mexico Combined Non-MSA was adequate.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's full-scope AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Albuquerque CSA	69.9	33	53.2	6.1	39.4	39.4	15.2	5.0	29.2	35.8	29.7
New Mexico Combined Non-MSA	17.5	19	30.6	0.0	47.4	36.8	15.8	2.6	32.7	40.4	24.2
Farmington MSA	4.7	3	4.8	0.0	33.3	66.7	0.0	3.5	26.0	42.0	28.4
Las Cruces MSA	7.8	7	11.3	28.6	28.6	28.6	14.3	7.7	36.0	26.4	29.8
Total	100.0	62	100.0	6.5	40.3	38.7	14.5	4.5	30.7	36.4	28.2
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Albuquerque CSA	0	11	0	-4	-2	-5
New Mexico Combined Non-MSA	0	3	0	-1	-1	-1
Farmington MSA	0	3	0	-2	0	-1
Las Cruces MSA	0	2	0	-2	0	0
Total	0	19	0	-9	-3	-7
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.						

Albuquerque CSA

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Albuquerque CSA. WFBNA operated 33 branches in the AA, comprising two branches in low-income geographies, 13 branches in moderate-income geographies, 13 branches in middle-income geographies, and five branches in upper-income geographies. The distribution of branches in low-income geographies exceeded the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies.

To the extent changes have been made, the bank's record of opening and closing of branches generally has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations. Despite the closures, its service delivery systems remained readily accessible.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were

opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the 21 branches opened on Saturdays, one was located in a low-income geography and 10 were located in moderate-income geographies.

New Mexico Combined Non-MSA

WFBNA's service delivery systems were accessible to geographies and individuals of different income levels in the New Mexico Combined Non-MSA. WFBNA operated 19 branches in the AA, comprising nine branches in moderate-income geographies, seven branches in middle-income geographies, and three branches in upper-income geographies. WFBNA did not operate any branches in low-income geographies where the population was very limited. The distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies.

To the extent changes have been made, the bank's record of opening and closing of branches generally has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations. With the closures, service delivery systems were accessible.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced, varied in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday. Of the 10 branches opened on Saturdays, five were located in moderate-income geographies.

Community Development Services

The bank provided an adequate level of CD services.

Albuquerque CSA

WFBNA provided an adequate level of CD services in the Albuquerque CSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 263 CD service activities during the evaluation period. A majority (79.5 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The other CD services were targeted to economic development (12.9 percent). The bank's assistance provided was responsive to the identified needs in the AA. The following are examples of CD services provided in this AA:

- WFBNA employees provided 62 hours of board service to an organization that provided community services for children, families, and individuals. The organization provided a variety of behavioral health and support services to children who have experienced trauma.
- WFBNA employees provided 655 hours of financial education to elementary and high school students. Most of the students qualified for the federal free- and reduced-lunch program.

New Mexico Combined Non-MSA

WFBNA provided a limited level of CD services in the New Mexico Combined Non-MSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 81 CD service activities during the evaluation period. A majority (85.2 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The other CD services were targeted to affordable housing (14.8 percent). The bank's assistance provided was responsive to the identified needs in the AA. The following is an example of CD services provided in this AA:

- WFBNA employees provided 172 hours of financial education to elementary and high school students. Most of the students qualified for the federal free- and reduced-lunch program.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Farmington MSA and Las Cruces MSA was consistent with the bank's overall performance under the Service Test in the full-scope areas.

State of North Carolina

CRA rating for the State of North Carolina⁴²: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: High Satisfactory

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AAs.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank made a relatively high level of CD loans. CD lending had a neutral effect on the Lending Test conclusion as it further supported the bank's already excellent lending performance.
- The bank had a significant level of qualified CD investments that demonstrated excellent responsiveness to credit and economic development needs, although occasionally in a leadership position. The bank occasionally used innovative and complex investments to support CD initiatives.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided an adequate level of CD services.

Description of Institution's Operations in the State of North Carolina

The state of North Carolina was WFBNA's 13th largest rating area based on its total deposits in the state. As of June 30, 2021, the bank maintained approximately \$30.1 billion or 2.1 percent of its total domestic deposits in branches within the state. Of the 73 depository financial institutions operating in the bank's AAs within the state, WFBNA, with a deposit market share of 16.7 percent, was the second largest. Other top depository financial institutions in the bank's AAs within the state based on market share included Truist Bank (20.9 percent), First Citizens Bank & Trust Company (11 percent), Pacific Western Bank (8.2 percent), and Bank of America, N.A. (7.5 percent). As of December 31, 2021, the bank operated 183 branches and 422 ATMs in the state. WFBNA delineated 36 AAs within the state; however, the OCC combined, analyzed, and presented those AAs at the CSA level where possible for purposes of this evaluation. This resulted in the following 12 AAs: Asheville-Marion-Brevard, NC CSA (Asheville CSA), Fayetteville-Sanford-Lumberton, NC CSA (Fayetteville CSA), Goldsboro, NC MSA (Goldsboro MSA), Greensboro-Winston-Salem-High Point, NC CSA (Greensboro CSA), Greenville-Kinston-Washington, NC CSA (Greenville CSA), Hickory-Lenoir-Morganton, NC CSA (Hickory CSA), Jacksonville, NC MSA (Jacksonville MSA), New Bern-Morehead City, NC CSA (New Bern CSA), Raleigh-Durham-Cary, NC CSA (Raleigh CSA), Rocky Mount-Wilson, NC CSA (Rocky Mount CSA), Wilmington, NC MSA (Wilmington MSA), and North Carolina Combined Non-MSA. The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

⁴² This rating only reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Asheville CSA

The following table provides a summary of the demographics, including housing and business information for the Asheville CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Asheville CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	122	1.6	14.8	62.3	19.7	1.6
Population by Geography	515,141	1.3	12.5	67.2	19.0	0.0
Housing Units by Geography	256,586	1.6	12.5	66.3	19.7	0.0
Owner-Occupied Units by Geography	145,949	1.1	10.6	67.1	21.2	0.0
Occupied Rental Units by Geography	67,541	2.7	17.3	63.0	17.0	0.0
Vacant Units by Geography	43,096	1.6	11.3	68.6	18.5	0.0
Businesses by Geography	55,442	2.6	14.1	56.8	26.5	0.0
Farms by Geography	2,038	1.1	14.2	65.4	19.4	0.0
Family Distribution by Income Level	134,393	20.0	18.7	20.7	40.6	0.0
Household Distribution by Income Level	213,490	23.3	16.4	18.2	42.1	0.0
Median Family Income MSA - 11700 Asheville, NC MSA		\$57,243	Median Housing Value			\$185,552
Median Family Income Non-MSAs - NC		\$47,217	Median Gross Rent			\$768
			Families Below Poverty Level			11.3%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$23,609 to \$28,622 and moderate-income families earned at least \$23,609 to \$28,622 and less than \$37,774 to \$45,794, depending on the metropolitan or nonmetropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$590 to \$716 for low-income borrowers and ranging from \$944 to \$1,145 for moderate-income borrowers, depending on the metropolitan or nonmetropolitan area. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$996. Low- and moderate-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Asheville, NC MSA (Asheville MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Asheville MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Recovery in Asheville had been relatively strong supported by the rise in nonfarm payroll, which was driven by the strength in the public sector. Increased travel to the area supported the area's overall recovery. Asheville's tourist attractions include its breweries and national parks. Asheville has

the most breweries per capita of any city in the country and the two most visited national parts – Great Smoky Mountains National Park and Blue Ridge Parkway. Combined, these parks brought in more than 20 million recreational visits in 2020. The Asheville MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Government, Retail Trade, Leisure and Hospitality Services, Manufacturing, and Professional and Business Services. Major employers in the Asheville MSA include Ingles Markets Inc., Walmart Inc., Mission Health Hospital, Biltmore Workforce Management Inc., and Veterans Administration (VA). According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Asheville MSA was 2.6 percent compared to the national unemployment rate of 3.7 percent.

Brevard, NC Micro Area (Transylvania County)

Brevard, NC Micropolitan Statistical Area comprises Transylvania County, North Carolina. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for Transylvania County was 2.6 percent compared to the national unemployment rate of 3.7 percent. Total population in the county in 2020 was reported at 34,039. The median household income was \$51,509, an increase of 2.6 percent from 2019. The median property value also experienced an increase of 4.2 percent from 2019 and was reported at \$231,300 in 2020. Homeownership rates in 2020 were relatively stable year-over-year and was 76 percent, well above the national average of 64.4 percent. Employment in the county grew 1 percent to 14,200 employees in 2020. The top industries in the county were Health Care and Social Assistance, Manufacturing, Accommodation and Food Services, Retail Trade, and Construction.

Marion, NC Micro Area (McDowell County)

Marion, NC Micropolitan Statistical Area comprises McDowell County, North Carolina. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for McDowell County was 2.9 percent compared to the national unemployment rate of 3.7 percent. Total population in the county in 2020 was reported at 45,402. The median household income was \$47,085, an increase of 7.9 percent from 2019. The median property value also experienced an increase of 8.6 percent from 2019 and was reported at \$129,400 in 2020. Homeownership rates in 2020 increased 1 percent from 2019 to 73.7 percent in 2020. This is well above the national average of 64.4 percent. Employment in the county grew at a rate of 2.8 percent from 2019 to 2020 and was reported at 19,200 in 2020. The top industries in the county were Manufacturing, Health Care and Social Assistance, Retail Trade, Construction, and Educational Services.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Asheville CSA. The organizations included 1) a county economic development group that worked to protect taxpayers and foster business start-up, expansion, and retention in the unincorporated areas of the county while also supporting out-of-state recruitment efforts to generate jobs and 2) the SBA located in Asheville. The bank also provided an assessment of community needs based on research completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were needs within the community:

- Construction of affordable rental housing units and rental assistance programs
- Development of single-family affordable housing
- Housing for persons with special needs
- Financial education training such as credit building counseling
- Products (particularly for the un/underbanked) such as low-cost checking or savings accounts/programs
- Tax preparation services for low- and moderate-income (VITA)
- Emergency shelters and transitional housing
- Access to capital and training for small business growth
- Technical assistance for small start-ups

Opportunities for participation by financial institutions included the following:

- Assistance with credit needs for start-ups and expanding businesses
- Financing options (i.e., lines of credit, closed-end loans) for small and startup businesses

Greensboro CSA

The following table provides a summary of the demographics, including housing and business information for the Greensboro CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Greensboro CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	376	7.2	22.9	41.0	28.2	0.8
Population by Geography	1,621,491	5.7	22.7	43.2	28.1	0.2
Housing Units by Geography	718,202	5.7	23.0	43.6	27.6	0.1
Owner-Occupied Units by Geography	419,864	2.6	17.4	46.6	33.4	0.0
Occupied Rental Units by Geography	220,234	11.0	31.6	38.0	19.0	0.3
Vacant Units by Geography	78,104	7.6	29.3	42.9	20.0	0.1
Businesses by Geography	143,149	4.3	20.2	38.9	36.3	0.3
Farms by Geography	4,852	1.8	15.2	51.2	31.7	0.1
Family Distribution by Income Level	420,776	22.0	18.0	18.6	41.4	0.0
Household Distribution by Income Level	640,098	23.6	16.7	17.3	42.3	0.0
Median Family Income MSA - 15500 Burlington, NC MSA		\$53,234	Median Housing Value			\$143,627
Median Family Income MSA - 24660 Greensboro-High Point, NC MSA		\$55,218	Median Gross Rent			\$727
Median Family Income MSA - 49180 Winston-Salem, NC MSA		\$56,536	Families Below Poverty Level			13.4%
Median Family Income Non-MSAs - NC		\$47,217				
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$23,609 to \$28,268 and moderate-income families earned at least \$23,609 to \$28,268 and less than \$37,774 to \$45,229, depending on the metropolitan or nonmetropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$590 to \$707 for low-income borrowers and ranging from \$944 to \$1,131 for moderate-income borrowers, depending on the metropolitan or nonmetropolitan area. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$771. Low- and moderate-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Burlington, NC MSA (Burlington MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Burlington MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Burlington's recovery was improving, albeit slow. Total jobs recovery was more complete than other areas in the country. While education, health care, professional services, and retail have added jobs and have surpassed pre-pandemic levels, manufacturing remained a weak link for job growth. Around half of the manufacturing industry's employment was concentrated in textiles and chemical manufacturing, both of which faced challenges from automation and foreign competition. The Burlington MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Retail Trade, Manufacturing, Leisure and Hospitality Services, Government, and Professional and Business Services. Major employers in the Burlington MSA include Laboratory Corporation of America, Cone Health Alamance Regional Medical Center, Elon University, Walmart Inc., and GKN Driveline North America. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Burlington MSA was 3.2 percent compared to the national unemployment rate of 3.7 percent.

Greensboro-High Point, NC MSA (Greensboro MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Greensboro MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Greensboro MSA economy was seeing a satisfactory recovery, even though it still trailed the state's recovery performance. Construction and transportation/warehousing had exceeded their previous employment peaks and were the primary drivers in the recovery. The Greensboro MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Manufacturing, Education and Health Services, Professional and Business Services, Government, and Retail Trade. Major employers in the Greensboro MSA include Cone Health, Ralph Lauren Corp., High Point Regional Hospital, University of North Carolina, and Bank of America, Corp. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Greensboro MSA was 3.7 percent compared to the national unemployment rate of 3.7 percent.

Winston-Salem, NC MSA (Winston-Salem MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Winston-Salem MSA was still recovering from the impacts of the economic shutdown related to the COVID-19

pandemic. Winston-Salem was making steady progress with economic recovery. Manufacturing and logistics fueled the recovery. Transportation and warehousing employment increased by nearly 25 percent since the beginning of 2020. Amazon provided the biggest boost to the logistics industry in the area due to the low costs and favorable geographic location. The financial services industry had a difficult recovery as payrolls fell approximately 10 percent in the first half of 2020. Bank consolidations was the main driver in the weak recovery in the area, with the main culprit being the BB&T/SunTrust merger as several hundred jobs moved from Winston-Salem to the Charlotte area. The Winston-Salem MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Professional and Business Services, Manufacturing, Government, Retail Trade, and Leisure and Hospitality Services. Major employers in the Winston-Salem MSA include Wake Forest University, Congruity HR, Walmart, Inc., Asley Furniture Industries Inc., Forsyth Memorial Hospital, Inc., and Novant Health, Inc. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Winston-Salem MSA was 3.1 percent compared to the national unemployment rate of 3.7 percent.

Mount Airy, NC Micro Area (Surry County)

Mount Airy, NC Micropolitan Statistical Area comprises Surry County. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for Surry County was 2.8 percent compared to the national unemployment rate of 3.7 percent. Total population in the county in 2020 was reported at 71,904. The median household income was \$44,979, an increase of 3.2 percent from 2019. The median property value also experienced an increase of 2.2 percent from 2019 and was reported at \$129,700 in 2020. In 2020, 72.7 percent of housing units in the area were owner occupied, a slight decline from 73.5 percent in 2019; however, the homeownership in 2020 remained above the national average of 64.4 percent. Employment in the county grew less than 1 percent from 2019 to 31,600 employees in 2020. The top industries in the county were Manufacturing, Health Care and Social Assistance, Retail Trade, Construction, and Educational Services.

Community Contacts

This evaluation considered comments provided by one local economic development organization that was contacted during the evaluation period and served the Greensboro CSA. The bank also provided an assessment of community needs based on research completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were needs within the community:

- Construction of affordable rental housing units and rental assistance programs
- Development of single-family affordable housing
- Housing for persons with special needs
- Financial education training such as credit building counseling
- Products (particularly for the un/underbanked) such as low-cost checking or savings accounts/programs
- Tax preparation services for low- and moderate-income (VITA)
- Emergency shelters and transitional housing
- Access to capital and training for small business growth
- Technical assistance for small start-ups

Opportunities for participation by financial institutions included the following:

- Assistance with credit needs for start-ups and expanding businesses
- Financing options (i.e., lines of credit, closed-end loans) for small and startup businesses

Raleigh CSA

The following table provides a summary of the demographics, including housing and business information for the Raleigh CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Raleigh CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	345	8.4	26.4	29.0	33.9	2.3
Population by Geography	1,808,974	7.0	28.0	33.0	31.2	0.7
Housing Units by Geography	741,964	7.0	27.8	33.7	31.4	0.0
Owner-Occupied Units by Geography	435,547	3.0	24.4	36.3	36.4	0.0
Occupied Rental Units by Geography	244,962	13.4	32.4	29.8	24.4	0.0
Vacant Units by Geography	61,455	10.1	34.1	31.4	24.3	0.1
Businesses by Geography	215,868	5.0	22.3	33.5	38.7	0.5
Farms by Geography	5,844	4.0	25.7	43.1	27.1	0.1
Family Distribution by Income Level	448,585	22.4	17.1	18.7	41.8	0.0
Household Distribution by Income Level	680,509	23.5	16.5	17.6	42.5	0.0
Median Family Income MSA - 20500 Durham-Chapel Hill, NC MSA		\$68,020	Median Housing Value			\$220,340
Median Family Income MSA - 39580 Raleigh-Cary, NC MSA		\$78,057	Median Gross Rent			\$917
			Families Below Poverty Level			9.5%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$34,010 to \$39,029 and moderate-income families earned at least \$34,010 to \$39,029 and less than \$54,416 to \$62,446 depending on the MSA. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$850 to \$976 for low-income borrowers and ranging from \$1,360 to \$1,561 for moderate-income borrowers, depending on the MSA. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$1,183. Low- and moderate-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Durham-Chapel Hill, NC MSA (Durham MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Durham MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Goods producers, transportation/warehousing, and professional/business services were recovering ahead of similar industries around the nation. The Durham MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Government, Professional and Business Services, and Manufacturing. Major employers in the Durham MSA include Duke University, Walmart, Inc., IBM Corp, IQVIA, Cisco Systems, and Blue Cross Blue Shield of NC. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Durham MSA was 2.6 percent compared to the national unemployment rate of 3.7 percent.

Raleigh-Cary, NC MSA (Raleigh MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Raleigh MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Raleigh MSA had nearly made a full economic recovery from the pandemic. The office-using sector had been essential in the efforts due to the relatively low business costs and deep talent pool for white-collar firms. The sizable number of professional services and tech jobs in the area was the primary driver of the growth, evidenced by the recent announcement from Apple noting that Raleigh will be the home of its first East Coast campus creating roughly 3,000 high-paying jobs to the area. The Raleigh MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Professional and Business Services, Government, Education and Health Services, Retail Trade, and Leisure and Hospitality Services. Major employers in the Raleigh MSA include IBM Corp, WakeMed Health & Hospitals, North Carolina State University, Rex Healthcare, and SAS Institute, Inc. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Raleigh-Cary, NC MSA was 4 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by five local organizations that were contacted during the evaluation period and served the Raleigh CSA. The organizations included two economic development organizations that attracted and retained businesses in the AA and three organizations providing affordable housing. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Access to healthy food options for low- and moderate-income individuals and communities
- Assistance gaining access to school food services
- Construction of affordable rental housing units and rental assistance
- Development of affordable single-family housing
- Access to flexible, affordable home loan products, down payment assistance, and closing cost programs
- Foreclosure prevention counseling
- Home buyer education, counseling, and financial coaching programs

- Emergency shelters and transitional housing for the homeless
- Demolition or rehabilitation of abandoned properties
- Development/Improvement of public facilities and infrastructure needs
- Access to capital and training programs for small businesses
- Access to payroll protection and emergency funding for small businesses
- Support for job readiness and technical skills programs

Opportunities for participation by financial institutions included the following:

- Lending and investment in affordable housing
- Small business lending

Scope of Evaluation in the State of North Carolina

The OCC selected the Asheville CSA, Greensboro CSA, and Raleigh CSA for full-scope reviews and based conclusions and ratings primarily on activity within these geographical areas. These AAs carried significant weight in determining the overall ratings for the state of North Carolina because of the significance of the bank's presence in these AAs. More weight was given to the Raleigh CSA due to the larger deposit base, lending, and branch presence.

During the evaluation period, the bank originated or purchased 110,361 home mortgage loans, small loans to businesses, and small loans to farms totaling \$17.1 billion. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within each AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. In the Asheville CSA, the OCC placed more weight based on the number of loans on small loans to businesses versus home mortgage loans and small loans to farms. In the remaining AAs, the OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF NORTH CAROLINA

LENDING TEST

The bank's performance under the Lending Test in the state of North Carolina is rated Outstanding. Performance in the limited-scope areas had a neutral effect on the overall Lending Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Asheville CSA and Raleigh CSA was excellent and the bank's performance in the Greensboro CSA was good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Asheville CSA	4,194	4,570	72	3	8,839	8.0	7.4
Greensboro CSA	11,969	9,014	144	17	21,144	19.1	25.6
Raleigh CSA	25,638	18,150	190	17	43,995	39.8	39.4
Fayetteville CSA	6,046	2,477	88	12	8,623	7.8	3.6
Goldsboro MSA	1,167	421	13	1	1,602	1.5	1.1
Greenville CSA	1,436	1,185	99	8	2,728	2.5	2.6
Hickory MSA	1,912	1,652	96	2	3,662	3.3	3.3
Jacksonville MSA	1,629	531	26	3	2,189	2.0	0.5
New Bern CSA	1,716	1,355	49	3	3,123	2.8	2.0
Rocky Mount CSA	929	779	24	2	1,734	1.6	1.6
Wilmington MSA	3,088	2,428	106	7	5,629	5.1	6.5
North Carolina Combined Non-MSA	3,977	2,997	194	8	7,176	6.5	6.3
Total	63,701	45,559	1,101	83	110,444	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Asheville CSA	1,137,839	150,130	1,938	13,647	1,303,554	7.5	7.4
Greensboro CSA	2,273,280	304,150	2,844	13,145	2,593,419	14.9	25.6
Raleigh CSA	7,493,513	457,373	6,378	73,992	8,031,256	46.3	39.4
Fayetteville CSA	1,110,101	74,190	4,957	35,126	1,224,374	7.1	3.6
Goldsboro MSA	199,461	12,263	689	2	212,415	1.2	1.1
Greenville CSA	254,389	58,066	5,862	26,100	344,417	2.0	2.6
Hickory MSA	345,797	57,300	1,619	7,745	412,461	2.4	3.3
Jacksonville MSA	283,929	17,331	625	10,831	312,716	1.8	0.5
New Bern CSA	381,779	34,111	2,749	7,214	425,853	2.5	2.0
Rocky Mount CSA	127,045	51,862	1,104	8,774	188,784	1.1	1.6
Wilmington MSA	1,112,806	60,282	2,100	30,943	1,206,131	6.9	6.5
North Carolina Combined Non-MSA	1,012,985	84,345	8,140	110	1,105,580	6.4	6.3
Total	15,732,924	1,361,403	39,005	227,629	17,360,961	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Asheville CSA

As of June 30, 2021, WFBNA had a deposit market share of 18.8 percent. The bank ranked second among 19 depository financial institutions placing it in the top 11 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 3.9 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked fifth among 593 home mortgage lenders in this AA, which placed it in the top 1 percent of lenders. The top lenders in

this AA based on market share were State Employees Credit Union (8.1 percent), Rocket Mortgage (7.7 percent), and Movement Mortgage, LLC (4.9 percent).

According to peer small business data for 2021, WFBNA had a market share of 8.7 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked third out of 145 small business lenders, which placed it in the top 3 percent of lenders. The other top lenders in this AA based on market share were American Express National Bank (15.9 percent), First Citizens Bank and Trust (10.6 percent), and Bank of America, N.A. (7.8 percent).

According to peer small farm data for 2021, WFBNA had a market share of 21.4 percent based on the number of small loans to farms originated or purchased in this AA. The bank was the top ranked lender of small loans to farms. The other top lenders in this AA based on market share were John Deere Financial FSB (14.5 percent), JPMorgan Chase Bank, N.A. (14.5 percent), and First Citizens Bank and Trust (12.4 percent).

Greensboro CSA

As of June 30, 2021, WFBNA had a deposit market share of 21.2 percent. The bank ranked second among 32 depository financial institutions placing it in the top 7 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 4.6 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked third among 658 home mortgage lenders in this AA, which placed it in the top 1 percent of lenders. The other top lenders in this AA based on market share State Employees Credit Union (9.4 percent), Rocket Mortgage (9 percent) and Truist Bank (4.6 percent).

According to peer small business data for 2021, WFBNA had a market share of 7.2 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked third out of 159 small business lenders, which placed it in the top 2 percent of lenders. The other top lenders in this AA based on market share were American Express National Bank (14.7 percent), Truist Bank (11.5 percent), and Synchrony Bank (6.7 percent).

According to peer small farm data for 2021, WFBNA had a market share of 6.1 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked fifth out of 27 small farm lenders, which placed it in the top 19 percent of lenders. The top lenders in this AA based on market share were The Fidelity Bank (25.7 percent), John Deere Financial FSB (18.7 percent), and First Bank and Trust Company (9.5 percent).

Raleigh CSA

As of June 30, 2021, WFBNA had a deposit market share of 17.6 percent. The bank ranked third among 43 depository financial institutions placing it in the top 7 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 4.9 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked third among 816 home mortgage lenders in this AA, which placed it in the top 1 percent of lenders. The other top lenders in this AA based on market share were Rocket Mortgage (7.6 percent), State Employees Credit Union (7.4 percent), and Truist Bank (4.7 percent).

According to peer small business data for 2021, WFBNA had a market share of 9.3 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked second out of 205 small business lenders, which placed it in the top 1 percent of lenders. The other top lenders in this AA based on market share were American Express National Bank (17.4 percent), Truist Bank (9.3 percent), and Bank of America, N.A. (8.5 percent).

According to peer small farm data for 2021, WFBNA had a market share of 11.9 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked fourth out of 29 small farm lenders, which placed it in the top 14 percent of lenders. The top lenders in this AA based on market share were John Deere Financial FSB (18.5 percent), The Fidelity Bank (15.2 percent), and First Citizens Bank and Trust (13 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AAs. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data. The bank's performance was good in the Asheville CSA, Greensboro CSA, and the Raleigh CSA.

Asheville CSA

Home Mortgage Loans

Refer to Table O in the state of North Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was below both the percentage of owner-occupied housing units in low-income geographies and the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was near to both the percentage of owner-occupied housing units in moderate-income geographies and the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of North Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentages of small loans to businesses in low- and moderate-income geographies were near to both the percentages of businesses in low- and moderate-income geographies and the aggregate distributions of small loans to businesses in low- and moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of North Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

The bank did not originate or purchase any small loans to farms in low-income geographies. The bank's percentage of small loans to farms in moderate-income geographies was below the percentage of farms in moderate-income geographies and it was well below the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Greensboro CSA

Home Mortgage Loans

Refer to Table O in the state of North Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was well below the percentage of owner-occupied housing units in low-income geographies and it was below the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied housing units in moderate-income geographies and it was near to the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of North Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was below the percentage of businesses in low-income geographies and it was near to the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was near to both the percentage of businesses in

moderate-income geographies and the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of North Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was good.

The bank's percentage of small loans to farms in low-income geographies was significantly below the percentage of farms in low-income geographies but it exceeded the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-income geographies exceeded the percentage of farms in moderate-income geographies and it approximated the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Raleigh CSA

Home Mortgage Loans

Refer to Table O in the state of North Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was below both the percentage of owner-occupied housing units in low-income geographies and the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied housing units in moderate-income geographies and it was near to the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of North Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was below the percentage of businesses in low-income geographies and it was near to the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in

moderate-income geographies and the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of North Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

The bank's percentage of small loans to farms in low-income geographies was significantly below both the percentage of farms in low-income geographies and the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-income geographies exceeded the percentage of farms in moderate-income geographies and it was near to the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies in the Asheville CSA, Greensboro CSA, and Raleigh CSA. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AAs.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes. The bank's performance was good in the Asheville CSA, adequate in the Greensboro CSA, and excellent in the Raleigh CSA.

Asheville CSA

Home Mortgage Loans

Refer to Table P in the state of North Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and it was near to the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families and it was near to the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of North Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 29.3 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of North Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was poor.

The bank did not collect or consider the GAR in the underwriting of approximately 72.2 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below both the percentage of farms in the AA with GAR of \$1 million or less and the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Greensboro CSA

Home Mortgage Loans

Refer to Table P in the state of North Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and it approximated the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was below both the percentage of moderate-income families and the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of North Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 27.2 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of North Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was adequate.

The bank did not collect or consider the GAR in the underwriting of approximately 47.9 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below the percentage of farms in the AA with GAR of \$1 million or less but it was near to the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Raleigh CSA

Home Mortgage Loans

Refer to Table P in the state of North Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and it approximated the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of North Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 25.8 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of North Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

The bank did not collect or consider the GAR in the underwriting of approximately 40 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below the percentage of farms in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Community Development Lending

The bank made a relatively high level of CD loans. CD lending further supported the excellent Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

Asheville CSA

WFBNA made a relatively high level of CD loans in the Asheville CSA. WFBNA made 3 CD loans totaling approximately \$13.6 million, which represented 4.7 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 99.9 percent of these loans funded affordable housing that provided 130 units of affordable housing and less than 1 percent funded revitalization and stabilization efforts targeted to low- and moderate-income individuals. The following are the CD loans made in this AA:

- WFBNA provided a \$5.6 million construction loan for an LIHTC affordable housing development located in Marion, North Carolina, with 100 percent of the units restricted to tenants who earned up to 60 percent of the area median family income.
- WFBNA provided a \$8 million construction loan for an LIHTC affordable housing development located in Candler, North Carolina, with 100 percent of the units restricted to tenants who earned up to 60 percent of the area median family income.
- WFBNA provided a \$2.5 million loan extension to a CDFI whose mission was to deliver innovative financial products and technical assistance to mission-aligned organizations to acquire, develop and

preserve quality affordable housing for low- and moderate-income families, and to revitalize their communities by providing access to good jobs, quality affordable housing, schools, transportation and healthy living environments in the communities it serves throughout the United States. Of this total loan, \$13,344 was allocated to Asheville CSA.

Greensboro CSA

WFBNA made a low level of CD loans in the Greensboro CSA. WFBNA made 17 CD loans totaling approximately \$13.1 million, which represented 1.3 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 78.2 percent of these loans funded affordable housing that provided 310 units of affordable housing, 1.9 percent funded revitalization and stabilization efforts, and 19.9 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$4 million line of credit to a nonprofit organization supporting higher education by providing scholarships to qualified students, as well as related support services. Of this total loan, \$30,506 was allocated to Greensboro CSA. Over two-thirds of the financial resources provided were to low-income families. According to the organization, 100 percent of its clients were low- and moderate-income as they earned less than 80 percent of the area median family income.
- WFBNA provided a \$35 million line of credit to an organization that worked toward the day when every child will receive an excellent and equitable education. The organization finds and nurtures leaders that commit to expanding opportunity for low-income students, beginning with at least two years teaching in a public school. Of this total loan, \$945,950 was allocated to Greensboro CSA.
- WFBNA provided a \$10 million line of credit for a certified CDFI organization that provided affordable homes and strengthen communities. Of this total loan, \$76,266 was allocated to Greensboro CSA.

Raleigh CSA

WFBNA made a relatively high level of CD loans in the Raleigh CSA. WFBNA made 17 CD loans totaling approximately \$74 million, which represented 4.8 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 94 percent of these loans funded affordable housing that provided 882 units of affordable housing, less than 1 percent funded revitalization and stabilization efforts, and 5.5 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$1 million line of credit to a nonprofit community development loan fund and certified CDFI, which operated as the first wholesale loan participation network in the industry. Of this total loan, \$12,006 was allocated to the Raleigh CSA. The CDFI provided loans to organizations that promoted affordable housing, neighborhood revitalization, entrepreneurship, and healthy communities in the United States and abroad.
- WFBNA provided a \$2.5 million term loan to an organization that helped underserved areas and populations in rural communities build affordable housing. Of this total loan, \$30,016 was allocated to the Raleigh CSA. According to the organization, 100 percent of its clients were low- and moderate-income as they earned less than 80 percent of the area median family income.

- WFBNA provided a \$10 million line of credit to a certified CDFI organization that delivered the flexible capital needed for its affiliates to provide affordable homes and strengthen communities. Of this total loan, \$120,064 was allocated to the Raleigh CSA.

Product Innovation and Flexibility

Asheville CSA

WFBNA used flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 861 loans under its flexible lending programs totaling \$43.9 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	46	12,000
Dream. Plan. Home.	8	1,100
PPP	807	30,800
Total	861	43,900

Greensboro CSA

WFBNA made extensive use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 2,085 loans under its flexible lending programs totaling \$164.3 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	507	98,800
Dream. Plan. Home.	48	6,300
PPP	1,530	59,200
Total	2,085	164,300

Raleigh CSA

WFBNA made extensive use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 3,936 loans under its flexible lending programs totaling \$291.9 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	549	152,700
Dream. Plan. Home.	122	26,300
PPP	3,265	112,900
Total	3,936	291,900

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Greenville CSA, New Bern CSA, Rocky Mount CSA, and Wilmington MSA was consistent with the bank's overall performance under the Lending Test in the full-scope areas. The bank's performance under the Lending Test in the Fayetteville CSA, Goldsboro MSA, Hickory MSA, Jacksonville MSA, and North Carolina Combined Non-MSA was weaker than the bank's overall performance under the Lending Test in the full-scope areas. Performance in these limited-scope areas was weaker primarily due to weaker borrower income distributions and the lower volume of CD lending relative to the needs and opportunities for CD loans in these areas. Performance in the limited scope areas did not affect the bank's overall rating for the state.

Refer to Tables O through T in the state of North Carolina section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of North Carolina is rated High Satisfactory. Performance in the limited-scope areas had a neutral effect on the overall Investment Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Asheville CSA was adequate, the bank's performance in the Greensboro CSA was excellent, and the bank's performance in the Raleigh CSA was good.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Asheville CSA	8	8,444	66	3,061	74	8.3	11,506	4.0	3	232
Greensboro CSA	63	20,402	196	49,558	259	28.9	69,960	24.6	11	4,575
Raleigh CSA	69	32,306	255	59,371	324	36.2	91,678	32.3	10	9,945
Fayetteville CSA	11	33,215	31	9,277	42	4.7	42,492	15.0	13	2,547
Goldsboro MSA	1	3	13	306	14	1.6	308	0.1	0	0
Greenville, NC CSA	2	2,487	20	763	22	2.5	3,249	1.1	2	220
Hickory MSA	4	2,915	21	826	25	2.8	3,741	1.3	3	100
Jacksonville MSA	2	840	8	149	10	1.1	989	0.3	1	84
New Bern CSA	1	231	18	632	19	2.1	863	0.3	1	9
Rocky Mount CSA	4	23,678	12	402	16	1.8	24,079	8.5	3	161
Wilmington MSA	1	68	34	1,718	35	3.9	1,786	0.6	0	0
North Carolina Combined Non-MSA	12	12,189	32	1,801	44	4.9	13,990	4.9	4	331
Statewide***	2	18,914	9	574	11	1.23	19,488	6.9	0	0
Total	180	155,692	715	128,438	895	100.0	284,129	100.0	51	18,204
<p>The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.</p> <p>* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.</p> <p>** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.</p> <p>*** Statewide means investments in statewide programs that have a purpose, mandate, or function to serve one or more of the bank's assessment areas within the state. Due to rounding, totals may not equal 100.0%</p>										

Asheville CSA

The bank had an adequate level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$11.5 million and represented 4.0 percent of the bank's tier 1 capital allocated to the AA. The investments also included 63 grants and donations totaling \$1.5 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited adequate responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 17.6 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 64.9 percent that focused on community services targeted to low- and moderate-income individuals, and 17.6 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 364 units of affordable housing in the AA.

The bank rarely used innovative and complex investments to support CD initiatives. None of the current period investments were complex. The following are examples of CD investments made in this AA:

- WFBNA provided two grants totaling \$650,000 to a CDFI in Asheville, North Carolina, through the Open for Business Fund. The CDFI's mission was to generate jobs and ensure economic resiliency in Western North Carolina by helping small businesses start, thrive, and grow. WFBNA's funding increased the organization's capacity to provide loans and peer-to-peer business coaching to small businesses. The bank provided an extra \$10,000 grant for operating support after the COVID-19 pandemic in May 2020. The investment was responsive to the identified need for small business funding.
- WFBNA provided a \$20,000 grant to an organization for its general operations. The organization's mission was to pursue justice by providing legal assistance and advocacy to help low-income people in Western North Carolina meet their basic needs and improve their lives. The organization helped to prevent homelessness, secures health care and subsistence income, and stops domestic violence and child abuse.
- WFBNA provided a \$62,000 grant to an organization for its permanent supportive housing program. The organization worked with other organizations to end homelessness.

Greensboro CSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$69.9 million and represented 7.0 percent of the bank's tier 1 capital allocated to the AA. The investments also included 187 grants and donations totaling \$3 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 37.5 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 52.9 percent that focused on community services targeted to low- and moderate-income individuals, and 9.6 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 1122 units of affordable housing in the AA.

The bank occasionally used innovative and complex investments to support CD initiatives. Approximately 12.1 percent of current period investment dollars were complex LIHTC investments. The following are examples of CD investments made in this AA:

- WFBNA invested \$200 million in a Freddie Mac multifamily security. Of this total investment, \$19.3 million was allocated to Brookwood Apartment Homes. This underlying mortgage was made to Brookwood Apartment Homes apartments located in Archdale, North Carolina, with 298 units restricted to tenants earning less than 80 percent of the area median family income.

- WFBNA provided a \$42,600 grant to an organization for its honor card program. The organization served people in need in the Greater Greensboro area through practical action such as a food bank, homeless shelter, and emergency financial assistance.
- WFBNA invested \$20 million in an LIHTC fund. Of this total investment, \$4 million was allocated to Redhill Pointe. This LIHTC development was located in Greensboro, North Carolina, with 84 units restricted to tenants earning up to 60 percent of the area median family income.

Raleigh CSA

The bank had a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$91.7 million and represented 5.9 percent of the bank's tier 1 capital allocated to the AA. The investments also included 247 grants and donations totaling \$17.2 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 33 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 49.4 percent that focused on community services targeted to low- and moderate-income individuals, and 17.6 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 927 units of affordable housing in the AA.

The bank occasionally used innovative and complex investments to support CD initiatives. Approximately 29.3 percent of current period investment dollars were complex LIHTC investments. The following are examples of CD investments made in this AA:

- WFBNA provided \$4 million in grants to a CDFI that operated a loan fund to provide financial support to underserved communities. WFBNA provided a \$3.5 million grant through the Open for Business Fund. This enabled the CDFI to create a low-interest working capital loan product, which provided businesses with funds to sustain operations through the COVID-19 pandemic. The organization provided technical assistance to 100 small businesses. WFBNA also provided a \$338,000 grant to support the CDFI's COVID-19 programs and a \$150,000 grant to support the organization's facilitation of other organizations to create strategies to increase BIPOC homeownership strategies. The investments were responsive to the identified need for small business capital.
- WFBNA provided a \$150,000 grant to an organization for its homeownership planning grants program. The organization was a nonprofit CDFI that concentrated its lending on higher-risk and high-impact business loans. According to the organization, 98 percent of its clients were small businesses as they had gross annual revenues of \$1 million or less or met the size eligibility requirements of the SBA programs.

- WFBNA invested \$20 million in a State of North Carolina municipal security. Of this total investment, \$8.5 million was eligible for CRA credit based on low- and moderate-income population, and \$2.5 million was allocated to Wake County. The proceeds were used for the purpose of funding transportation projects across the state.

Broader Statewide Investments

WFBNA had 11 current and prior period investments totaling \$19.5 million with a purpose, mandate, or function to serve one or more AAs in the state. These CD investments were primarily LIHTCs that supported the creation or preservation of affordable housing in the state. These investments were given positive consideration and supported the bank's overall performance under the Investment Test in the state of North Carolina.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Jacksonville MSA and Non-MSA AA was consistent with the bank's overall performance under the Investment Test in the full-scope areas. Performance in the Fayetteville CSA and Rocky Mount CSA was stronger than the bank's overall performance under the Investment Test in the full-scope areas. Performance was stronger due to higher levels of CD investments relative to the bank's presence and capacity to invest in those AAs. Performance in the Goldsboro MSA, Greenville CSA, Hickory MSA, New Bern CSA, Wilmington MSA was weaker than the bank's overall performance under the Investment Test in the full-scope areas primarily due to lower levels of CD investments relative to the bank's presence and capacity to invest in those AAs.

SERVICE TEST

The bank's performance under the Service Test in the state of North Carolina is rated Outstanding. Performance in the limited-scope AAs had a neutral effect on the overall Service Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Asheville CSA and Greensboro CSA was good, and the bank's performance in the Raleigh CSA was excellent.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's full-scope AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Asheville CSA	17.2	14	10.7	7.1	35.7	42.9	14.3	1.3	12.5	67.2	19.0
Greensboro CSA	18.1	45	11.7	6.7	24.4	33.3	35.6	5.7	22.7	43.2	28.1
Raleigh CSA	9.5	57	13.0	10.5	19.3	21.1	40.4	7.0	28.0	33.0	31.2
Fayetteville CSA	8.6	11	6.4	0.0	36.4	36.4	27.3	2.2	21.6	54.4	21.3
Goldsboro MSA	15.3	3	12.0	0.0	33.3	66.7	0.0	0.0	31.6	56.0	12.4
Greenville CSA	15.9	4	6.7	25.0	0.0	75.0	0.0	7.6	20.7	43.7	28.1
Hickory MSA	15.2	7	10.1	0.0	14.3	57.1	28.6	0.0	12.9	67.4	19.7
Jacksonville MSA	6.0	2	8.3	0.0	100.0	0.0	0.0	0.0	12.0	68.5	15.0
New Bern CSA	16.9	7	16.7	14.3	42.9	14.3	28.6	2.9	12.8	48.5	35.8
Rocky Mount CSA	10.0	4	8.0	0.0	0.0	100.0	0.0	1.2	20.0	52.8	26.0
Wilmington MSA	12.8	7	9.5	42.9	0.0	28.6	28.6	13.2	17.0	40.1	29.7
North Carolina Combined Non-MSA	15.7	22	12.2	4.5	9.1	68.2	18.2	0.5	10.8	71.2	17.5
Total	100.0	183	100.0	8.7	21.9	37.2	29.5	4.5	20.9	48.6	25.7
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Asheville CSA	0	3	0	0	-2	-1
Greensboro CSA	0	12	-1	-4	-4	-3
Raleigh CSA	0	7	0	0	-3	-4
Fayetteville CSA	0	1	0	0	-1	0
Goldsboro MSA	0	0	0	0	0	0
Greenville CSA	0	4	0	-1	-2	-1
Hickory MSA	0	3	0	0	-2	-1
Jacksonville MSA	0	0	0	0	0	0
New Bern CSA	0	1	0	-1	0	0
Rocky Mount CSA	0	0	0	0	0	0
Wilmington MSA	0	2	0	-1	0	-1
North Carolina Combined Non-MSA	0	6	0	-2	-3	-1
Total	0	39	-1	-9	-17	-12
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.						

Asheville CSA

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Asheville CSA. WFBNA operated 14 branches in the AA, comprising one branch in a low-income geography, five branches in moderate-income geographies, six branches in middle-income geographies, and two branches in upper-income geographies. The distribution of branches in low-income geographies exceeded the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies. The distribution was augmented by one branch in a middle- or upper-income geography that was within close proximity to serve a low-income area and one branch in a middle- or upper-income geography that served a moderate-income area. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches generally had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA did not open or close any branches in low- and moderate-income geographies.

Services, including where appropriate, business hours, were tailored to the convenience and needs of portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday and 9:00 a.m. to 12:00 p.m. Saturday for three branches in moderate-income geographies.

Greensboro CSA

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Greensboro CSA. WFBNA operated 45 branches in the AA, comprising three branches in low-income geographies, 11 branches in moderate-income geographies, 15 branches in middle-income geographies, and 16 branches in upper-income geographies. The distribution of branches in low-income geographies exceeded the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies. The distribution was augmented by eight branches in middle- and upper-income geographies that were within close proximity that served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches generally had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. There were no branch openings and 12 branch closures. WFBNA closed one branch in a low-income geography as a result of low customer usage. Another traditional branch was located within one mile away and was a more active site that was able to accommodate additional customers. There were four closures in a moderate-income

geography also as a result of low customer usage. Within two miles of all closed branches were other branches that customers could use. WFBNA also kept an ATM in operation at one of the closed branches.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday and 9:00 a.m. to 12:00 p.m. Saturday for 13 branches.

Raleigh CSA

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Raleigh CSA. WFBNA operated 57 branches in the AA, comprising six branches in low-income geographies, 11 branches in moderate-income geographies, 12 branches in middle-income geographies, 23 branches in upper-income geographies, and five branches in geographies without an income designation. The distribution of branches in low-income geographies exceeded the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies was below the distribution of the population in moderate-income geographies. The distribution was augmented by two branches in middle- and upper-income geographies that were within close proximity to serve low-income areas and four branches in middle- and upper-income geographies that were within close proximity to and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches generally had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA did not open or close any branches in low- and moderate-income geographies.

Services, including where appropriate, business hours, were tailored to the convenience and needs of portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday and 9:00 a.m. to 12:00 p.m. on Saturday for 18 branches. There is one low-income branch with longer Friday and Saturday hours.

Community Development Services

The bank provided an adequate level of CD services.

Asheville CSA

WFBNA provided a limited level of CD services in the Asheville CSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 17 CD service activities and 28 CD service hours during the evaluation period. All of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The bank's assistance provided was responsive to the identified needs in the AA. The following are examples of CD services provided in this AA:

- A WFBNA employee provided two hours of financial education to a high school, where majority of the student's population qualified for free/reduced lunches.
- A WFBNA employee provided one hour of board service for a nonprofit organization that worked to help children facing adversity reach their potential through with professionally supported volunteer mentors that support positive youth development. According to the organization, 88 percent of its clients were low- and moderate-income individuals.

Greensboro CSA

WFBNA provided a limited level of CD services in the Greensboro CSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 69 CD service activities and 176 CD service hours during the evaluation period. A majority (95.7 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The other CD services were targeted to affordable housing (4.4 percent). The bank's assistance provided was responsive to the identified needs in the AA. The following are examples of CD services provided in this AA:

- A WFBNA employee provided two hours of technical expertise for an HUD-approved organization that provided consumer education and comprehensive financial and housing guidance. The organization was also certified by National Foundation for Credit Counseling; accredited by Council On Accreditation; and met National Industry Standards for Homeownership Education. According to the organization, 76 percent of its clients were low- and moderate-income individuals.
- A WFBNA employee provided four hours of tax preparation for an organization that offered free tax help to people who made \$54,000 or less and needed assistance in preparing their own tax returns. IRS-certified volunteers provided free basic income tax return preparation with electronic filing to qualified individuals in local communities. They can inform taxpayers about special tax credits for which they may qualify such as Earned Income Tax Credit, Child Tax Credit, and Credit for the Elderly or the Disabled. The organization sites were generally located at community and neighborhood centers, libraries, schools, shopping malls, and other convenient locations. According to the IRS website, the organization provided assistance to low-income workers at tax time by providing free tax preparation assistance. IRS certified volunteers worked throughout tax season at drop-in sites to prepare taxes for low-income workers.

Raleigh CSA

WFBNA provided a relatively high level of CD services in the Raleigh CSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 122 CD service activities and 254 CD service hours during the evaluation period. A majority (78.7 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-

income individuals and families. The other CD services were targeted to affordable housing (13.1 percent), economic development (3.3 percent), and revitalize/stabilize (4.9 percent). The bank's assistance provided was responsive to the identified needs in the AA. The following are examples of CD services provided in this AA:

- A WFBNA employee provided two hours of board service for a nonprofit human service organization that alleviated the effects of poverty in Wake County by meeting people's basic needs for food, shelter and healthcare, providing services that promote self-sufficiency, building awareness of the issues of poverty within the larger community and maximizing volunteer support and in-kind donations.
- A WFBNA employee provided two hours of board service for a CDFI organization that drove innovation, investment and action to create prosperous, sustainable communities. According to its grant application, the purpose of the organization was revitalization and stabilization of low- and moderate-income communities.
- A WFBNA employee provided eight hours of board service for a statewide nonprofit organization representing the interest of underdeveloped and underutilized sectors of the state's economic base. The organization's working philosophy was that information and business development were critical to wealth creation and to building the asset base among low-wealth sectors of the population. According to the organization, 60 percent of its clients were low- and moderate-income individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Goldsboro MSA, Greenville CSA, Hickory MSA, Jacksonville MSA, and New Bern CSA was consistent with the bank's overall performance under the Service Test in the full-scope areas. The bank's performance in the Fayetteville CSA, Rocky Mount CSA, Wilmington MSA, and North Carolina Combined Non-MSA was weaker than the bank's overall performance under the Service Test in the full-scope areas primarily due to weaker accessibility to service delivery systems.

State of North Dakota

CRA rating for the State of North Dakota⁴³: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected good responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AAs.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank made a relatively high level of CD loans. CD lending had a positive effect on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments that demonstrated excellent responsiveness to credit and economic development needs, although occasionally in a leadership position. The bank made significant use of innovative and complex investments to support CD initiatives.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided few, if any, CD services.

Description of Institution's Operations in the State of North Dakota

The state of North Dakota was WFBNA's 37th largest rating area based on its total deposits in the state. As of June 30, 2021, the bank maintained approximately \$1.4 billion or 0.1 percent of its total domestic deposits in branches within the state. Of the 41 depository financial institutions operating in the bank's AAs within the state, WFBNA, with a deposit market share of 9.5 percent, was the largest. Other top depository financial institutions in the bank's AAs within the state based on market share included Gate City Bank (8.5 percent), First Western Bank & Trust (7.9 percent), First International Bank & Trust (7.6 percent), American Bank Center (6.5 percent), U.S. Bank, N.A. (6 percent), Dakota Community Bank & Trust, N.A. (6 percent), and Starion Bank (5.8 percent). As of December 31, 2021, the bank operated 11 branches and 16 ATMs in the state. WFBNA delineated nine AAs within the state; however, the OCC combined, analyzed, and presented those AAs at the CSA level where possible for purposes of this evaluation. This resulted in the following two AAs: Bismarck, ND MSA (Bismarck MSA) and North Dakota Combined Non-MSA. The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

Bismarck MSA

The following table provides a summary of the demographics, including housing and business information for the Bismarck MSA.

⁴³ This rating only reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Bismarck MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	25	0.0	16.0	76.0	8.0	0.0
Population by Geography	119,027	0.0	13.6	78.9	7.6	0.0
Housing Units by Geography	52,959	0.0	15.5	78.6	5.9	0.0
Owner-Occupied Units by Geography	35,846	0.0	12.0	79.7	8.3	0.0
Occupied Rental Units by Geography	14,315	0.0	23.3	76.0	0.7	0.0
Vacant Units by Geography	2,798	0.0	20.1	77.3	2.7	0.0
Businesses by Geography	13,887	0.0	18.8	72.0	9.2	0.0
Farms by Geography	793	0.0	14.6	76.0	9.3	0.0
Family Distribution by Income Level	31,651	18.0	18.9	25.0	38.2	0.0
Household Distribution by Income Level	50,161	22.0	17.6	19.2	41.2	0.0
Median Family Income MSA - 13900 Bismarck, ND MSA		\$80,768	Median Housing Value			\$189,166
			Families Below Poverty Level			5.0%
			Median Gross Rent			\$735
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$40,384 and moderate-income families earned at least \$40,384 and less than \$64,614. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$1,010 for low-income borrowers and \$1,615 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$1,015. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Information from Moody's Analytics indicated that at the end of the evaluation period, the Bismarck MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Bismarck's economic recovery had been strong but started to slow and level off. While the metro has seen greater than average recovery rates, the employment growth in 2021 lagged that of the state and nation. This slowdown was mainly due to a decrease in public sector hiring; however, many smaller private industry companies were also having difficulties with finding workers. The Bismarck MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Government, Education and Health Services, Retail Trade, Professional and Business Services, and Leisure and Hospitality Services. Major employers in the Bismarck MSA include Sanford Health, CHI St. Alexius, Bismarck State College, Walmart, Inc., and Aetna, Inc. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Bismarck, ND MSA was 2.9 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by four local organizations that were contacted during the evaluation period and served the Bismarck MSA. The organizations included three economic development agencies that attracted and retained businesses and one organization that focused on providing affordable housing. The bank also provided an assessment of community needs based on research completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were needs within the community:

- Construction of affordable rental housing units
- Development of single-family affordable housing
- Rehabilitation of housing unit
- Emergency shelters and transitional housing.
- Job skills training
- Access to capital for small business growth

Opportunities for participation by financial institutions included the following:

- Assistance with credit needs for start-ups and expanding businesses
- Financing options (i.e., lines of credit, closed-end loans) for small and startup businesses
- Expansion in opportunities for commercial lending
- Expand home mortgage loan programs for first time buyers
- Assist with operating costs for housing project programs

North Dakota Combined Non-MSA

The following table provides a summary of the demographics, including housing and business information for the North Dakota Combined Non-MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: North Dakota Combined Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	54	0.0	7.4	66.7	25.9	0.0
Population by Geography	189,807	0.0	6.9	64.2	28.9	0.0
Housing Units by Geography	89,297	0.0	5.9	66.1	28.0	0.0
Owner-Occupied Units by Geography	51,413	0.0	3.8	66.1	30.1	0.0
Occupied Rental Units by Geography	25,915	0.0	11.5	65.6	22.9	0.0
Vacant Units by Geography	11,969	0.0	2.9	66.7	30.4	0.0
Businesses by Geography	22,253	0.0	3.8	61.2	34.9	0.0
Farms by Geography	2,103	0.0	2.1	71.5	26.4	0.0
Family Distribution by Income Level	47,755	17.2	17.2	22.2	43.4	0.0

Household Distribution by Income Level	77,328	21.1	16.0	17.4	45.4	0.0
Median Family Income Non-MSAs - ND		\$72,414	Median Housing Value			\$166,150
			Median Gross Rent			\$836
			Families Below Poverty Level			6.2%
Source: 2015 ACS and 2021 D&B Data						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$36,207 and moderate-income families earned at least \$36,207 and less than \$57,931. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$905 for low-income borrowers and \$1,448 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$892. Low- and moderate-income borrowers would be able to afford a mortgage loan for a median-priced home in this AA.

North Dakota's economy has grown since the pandemic; however, it began to slow as evidenced by the slowing employment rates. The slowdown in the housing market has caused a reduction in the new house construction demand. Mining, on the other hand, remained strong and was outperforming other areas in the nation with employment in this industry up approximately 10 percent. Oil prices have also been up, which has stimulated drilling in the state. Of the more than 380,000 housing units in the area, approximately 52 percent were owner occupied and 33 percent were renter occupied. The remaining 15 percent were vacant. While housing prices continued to rise, home prices in North Dakota were slightly higher than other comparable areas in the United States. This is the same for housing affordability. Affordability in North Dakota is higher than the United States average. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the counties that comprise the North Dakota Combined Non-MSA ranged from a low of 2 percent (Bowman County) to a high of 5.2 percent (Williams County) compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by nine local organizations that were contacted during the evaluation period and served the North Dakota Combined Non-MSA. The organizations included nine economic development organizations that helped to attract and retain businesses in the AA and one organization that provided affordable housing. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing
- Affordable for-sale housing
- Rehabilitation of housing units
- Emergency shelters and transitional housing
- Jobs skills training
- Access to capital for small businesses

Contacts noted the opportunities for participation by financial institutions were being met; however, contacts noted the main area of opportunity lie within commercial lending sector.

Scope of Evaluation in the State of North Dakota

The OCC selected the bank's only two AAs (Bismarck MSA and North Dakota Combined Non-MSA) for full-scope reviews. More weight was given to the Bismarck MSA due to the larger deposit base, lending, and branch presence.

During the evaluation period, the bank originated or purchased 2,586 home mortgage loans, small loans to businesses, and small loans to farms totaling \$360 million. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within each AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. In the Bismarck MSA, the OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms. In the North Dakota Combined Non-MSA, the OCC placed more weight based on the number of loans on small loans to businesses versus home mortgage loans and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF NORTH DAKOTA

LENDING TEST

The bank's performance under the Lending Test in the state of North Dakota is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Bismarck MSA was good and the bank's performance in the North Dakota Combined Non-MSA was excellent.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Bismarck MSA	538	388	46	9	981	37.7	55.7
North Dakota Combined Non-MSA	617	753	244	8	1,622	62.3	44.3
Total	1,155	1,141	290	17	2,603	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Bismarck MSA	124,075	15,404	2,278	2,146	143,903	39.0	55.7
North Dakota Combined Non-MSA	151,575	40,914	25,338	7,037	224,864	61.0	44.3
Total	275,650	56,318	27,616	9,183	368,767	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Bismarck MSA

As of June 30, 2021, WFBNA had a deposit market share of 13.7 percent. The bank ranked second among 18 depository financial institutions placing it in the top 12 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 2.1 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked 16th among 156 home mortgage lenders in this AA, which placed it in the top 11 percent of lenders. The top lenders in this AA based on market share were Gate City Bank (17.8 percent), Capital Credit Union (6.7 percent), and Dakota Community Bank & Trust (5.5 percent).

According to peer small business data for 2021, WFBNA had a market share of 3.7 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked 10th out of 64 small business lenders, which placed it in the top 16 percent of lenders. The top lenders in this AA based on market share were Starion Bank (12.3 percent), U.S. Bank, N.A. (12.1 percent), and American Express National Bank (9.8 percent).

According to peer small farm data for 2021, WFBNA had a market share of 2.1 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked ninth out of 17 small farm lenders, which placed it in the top 53 percent of lenders. The top lenders in this AA based on market share were Starion Bank (38.5 percent), Choice Financial Group (21.1 percent), and Bravera Bank (12 percent).

North Dakota Combined Non-MSA

As of June 30, 2021, WFBNA had a deposit market share of 6.9 percent. The bank ranked fourth among 34 depository financial institutions placing it in the top 12 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 2 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked 19th among 189 home mortgage lenders in this AA, which placed it in the top 11 percent of lenders. The top lenders in this AA based on market share were Gate City Bank (11.8 percent), Rocket Mortgage (5.3 percent), and U.S. Bank, N.A. (5.1 percent).

According to peer small business data for 2021, WFBNA had a market share of 4.4 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked 10th out of 94 small business lenders, which placed it in the top 11 percent of lenders. The top lenders in this AA based

on market share were First International Bank & Trust (12.3 percent), U.S. Bank, N.A. (9.1 percent), Gate City Bank (8.8 percent), and American Express National Bank (8.8 percent).

According to peer small farm data for 2021, WFBNA had a market share of 2 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked ninth out of 23 small farm lenders, which placed it in the top 40 percent of lenders. The top lenders in this AA based on market share were Choice Financial Group (17.8 percent), John Deere Financial FSB (17 percent), Bremer Bank N.A. (16.5 percent), Dacotah Bank (14.7 percent), and First International Bank & Trust (12.8 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AAs. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data. The bank's performance was good in the Bismarck MSA and good in the North Dakota Combined Non-MSA.

Bismarck MSA

Home Mortgage Loans

Refer to Table O in the state of North Dakota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

There were no low-income census tracts. The bank's percentage of home mortgage loans in moderate-income geographies was well below the percentage of owner-occupied housing units in moderate-income geographies and it was below the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of North Dakota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

There were no low-income census tracts. The bank's percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses in moderate-income geographies and the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of North Dakota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was good.

There were no low-income census tracts. The bank's percentage of small loans to farms in moderate-income geographies was below the percentage of farms in moderate-income geographies but it exceeded the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

North Dakota Combined Non-MSA

Home Mortgage Loans

Refer to Table O in the state of North Dakota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

There were no low-income census tracts. The bank's percentage of home mortgage loans in moderate-income geographies was well below the percentage of owner-occupied housing units in moderate-income geographies but it exceeded the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of North Dakota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

There were no low-income census tracts. The bank's percentage of small loans to businesses in moderate-income geographies approximated the percentage of businesses in moderate-income geographies and it was below the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of North Dakota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was very poor.

There were no low-income census tracts. The bank did not originate or purchase any small loans to farms in moderate-income geographies.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies in the Bismarck MSA and North Dakota Combined Non-MSA. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AAs.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes. The bank's performance was adequate in both the Bismarck MSA and in the North Dakota Combined Non-MSA.

Bismarck MSA

Home Mortgage Loans

Refer to Table P in the state of North Dakota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and it was near to the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was below both the percentage of moderate-income families and the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of North Dakota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 21.1 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of North Dakota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was very poor.

The bank did not collect or consider the GAR in the underwriting of approximately 89.1 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was significantly below both the percentage of farms in the AA with GAR of \$1 million or less and the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

North Dakota Combined Non-MSA

Home Mortgage Loans

Refer to Table P in the state of North Dakota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and it was below the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was below both the percentage of moderate-income families and the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of North Dakota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 34.1 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was well below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of North Dakota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was adequate.

The bank did not collect or consider the GAR in the underwriting of approximately 35.2 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less and was well below the percentage of farms in the AA with GAR of \$1 million or less and it was below the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Community Development Lending

The bank made a relatively high level of CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

Bismarck MSA

WFBNA made an adequate level of CD loans in the Bismarck MSA. WFBNA made nine CD loans totaling approximately \$2.1 million, which represented 2.1 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 94.1 percent of these loans funded affordable housing that provided 46 units of affordable housing, 1.1 percent funded revitalization and stabilization efforts, and 4.8 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$4 million line of credit for a scholarship fund. Of this total loan, \$3,479 was allocated to the Bismarck MSA. The fund provided scholarships to qualified students, as well as related support services and was the nation's largest nonprofit organization supporting higher education. Over two-thirds of the financial resources provided were to low-income families. According to the organization, 100 percent of its clients were low- and moderate-income as they earned less than 80 percent of the area median family income.
- WFBNA provided a \$10 million term loan for a Low-Income Investment Fund (LIIF). Of this total loan, \$8,697 was allocated to the Bismarck MSA. The LIIF was dedicated to creating pathways of opportunity for low-income people and communities and fostered healthy communities by providing a bridge between private capital markets and low-income neighborhoods. By investing capital and providing technical assistance for affordable housing, childcare, education and other community development organizations, LIIF spurred economic advancement for the very poor. According to the organization, 100 percent of its clients were low- and moderate-income as they earned less than 80 percent of the area median family income.
- WFBNA provided a \$2 million loan for an LIHTC development in Mandan, North Dakota with 46 units restricted to tenants with income up to 60 percent of the AMI. The apartment community included a craft room, chapel, exercise room and a library furnished with historical elements retrieved and restored from a historic library. A nonprofit agency provided meals five days a week in

the main dining room. The complex was centrally located in downtown Mandan with a grocery store within walking distance. This loan was complex due to the inherent nature of LIHTC transactions. The loan was responsive to the identified need for affordable housing.

North Dakota Combined Non-MSA

WFBNA was a leader in making CD loans in the North Dakota Combined Non-MSA. WFBNA made eight CD loans totaling approximately \$7 million, which represented 8.7 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 99.7 percent of these loans funded affordable housing that provided 54 units of affordable housing and 0.3 percent funded revitalization and stabilization efforts targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$7 million construction loan to finance an LIHTC development in Minot, North Dakota. The development included 54 units restricted to seniors earning less than 80 percent of the AMI. The development included a community room with kitchen, fitness room, and computer/library room. It also included on-site support services and a coordinator who organized activities, social events, and educational opportunities for tenants. The development featured energy efficiency and water efficiency. The building was designed to achieve the Bronze Certification under the National Green Building Standards. This activity was complex due to the inherent nature of LIHTC transactions, and the multiple sources of funding including Community Development Block Grant and North Dakota Housing Incentive Fund. WFBNA demonstrated active involvement, evidenced by its long-term working relationship with the sponsoring organization since 2014. The loan was responsive to the identified need for affordable housing.
- WFBNA provided a \$2.5 million term loan for an organization that helped rural communities build affordable housing, working throughout the United States, but with a special emphasis on high need and underserved areas and populations. Of this total loan, \$1,742 was allocated to the North Dakota Combined Non-MSA. According to the organization, 100 percent of its clients were low- and moderate-income as they earned less than 80 percent of the area median family income.
- WFBNA provided a \$10 million line of credit for a certified CDFI which delivered the flexible capital needed to provide affordable housing and strengthen communities. Of this total loan, \$6,966 was allocated to the North Dakota Combined Non-MSA.

Product Innovation and Flexibility

Bismarck MSA

WFBNA made limited use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 60 loans under its flexible lending programs totaling \$4.7 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	17	3,300
Dream. Plan. Home.	2	218
PPP	41	1,200

Total	60	4,700
--------------	-----------	--------------

North Dakota Combined Non-MSA

WFBNA used flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 133 loans under its flexible lending programs totaling \$10.4 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	27	5,600
Dream. Plan. Home.	2	219
PPP	104	4,600
Total	133	10,400

INVESTMENT TEST

The bank's performance under the Investment Test in the state of North Dakota is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Bismarck MSA and North Dakota Combined Non-MSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Bismarck MSA	13	7,050	15	4,104	28	59.6	11,153	54.0	2	1,603
North Dakota Combined Non-MSA	6	9,352	13	156	19	40.4	9,507	46.0	5	108
Statewide***	0	0	0	0	0	0.0	0	0.0	0	0
Total	19	16,402	28	4,259	47	100.0	20,661	100.0	7	1,710
<p>The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.</p> <p>* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.</p> <p>** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.</p> <p>*** Statewide means investments in statewide programs that have a purpose, mandate, or function to serve one or more of the bank's assessment areas within the state. Due to rounding, totals may not equal 100.0%</p>										

Bismarck MSA

The bank had an excellent level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$11.2 million and represented 11 percent of the bank's tier 1 capital allocated to the AA. The investments also included 14 grants and donations

totaling \$290,000 to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. . Approximately 53.6 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA and 46.4 percent that focused on community services targeted to low- and moderate-income individuals. In total, the bank's investments helped create or retain 109 units of affordable housing in the AA.

The bank made extensive use of innovative or complex investments to support CD initiatives. Approximately 92.9 percent of current period investment dollars were complex LIHTC investments. The following are examples of CD investments made in this AA:

- WFBNA made a \$30 million investment in an LIHTC fund that benefitted multiple AAs. Of this total investment, \$3.8 million supported an LIHTC development located in Bismarck, North Dakota with 35 units restricted to tenants earning up to 60 percent of the AMI. The investment was responsive to the identified need for affordable housing.
- WFBNA provided a \$12,500 grant to an organization for its home fire campaign and "Sound the Alarm. Save a Life" program. The organization was an affiliate of a global humanitarian organization that provided emergency and disaster relief to those in need with a focus on food, shelter, and education.
- WFBNA provided a \$10,000 grant to a tribal organization for its COVID-19 Fund. The mission of the organization was to provide affordable lending services and financial education to Native Americans throughout North Dakota, on or off tribal lands.

North Dakota Combined Non-MSA

The bank had an excellent level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$9.5 million and represented 11.8 percent of the bank's tier 1 capital allocated to the AA. The investments also included 13 grants and donations totaling \$156,000 to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 36.8 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 57.9 percent that focused on community services targeted to low- and moderate-income individuals, and 5.3 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 129 units of affordable housing in the AA.

The bank rarely used innovative and complex investments to support CD initiatives. None of the current period investments were complex. The following are examples of CD investments made in this AA:

- WFBNA provided two grants totaling \$35,000 to a nonprofit organization in Jamestown, North Dakota. The organization helped individuals start and grow their small businesses, particularly those without access to traditional capital. The investment was responsive to the identified need for small business support.
- WFBNA provided a \$75,000 grant to an organization for its homeless services program. According to the organization, 100 percent of this program's clients were low- or moderate-income as they earned less than 80 percent of the area median family income. The organization provided programs to empower women in the greater Minot community through emergency shelter, permanent supportive housing, and case management.
- WFBNA provided a \$10,000 grant to an organization for its women's business conference program. The organization supported business development and rural innovation in the South-Central region of North Dakota through one-on-one business counseling services that helped entrepreneurs start and develop their business. The entrepreneur center also promoted workforce development throughout the region.

SERVICE TEST

The bank's performance under the Service Test in the state of North Dakota is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Bismarck MSA and the North Dakota Combined Non-MSA was good.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's full-scope AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Bismarck MSA	55.7	4	36.4	0.0	50.0	50.0	0.0	0.0	13.6	78.9	7.6
North Dakota Combined Non-MSA	44.3	7	63.6	0.0	14.3	71.4	14.3	0.0	6.9	64.2	28.9
Total	100.0	11	100.0	0.0	27.3	63.6	9.1	0.0	9.5	69.8	20.7
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Bismarck MSA	0	0	0	0	0	0
North Dakota Combined Non-MSA	0	1	0	0	-1	0
Total	0	1	0	0	-1	0
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.						

Bismarck MSA

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Bismarck MSA. WFBNA operated four branches in the AA, comprising two branches in moderate-income geographies and two branches in middle-income geographies. There were no low-income geographies. The distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies.

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday.

North Dakota Combined Non-MSA

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the North Dakota Combined Non-MSA. WFBNA operated seven branches in the AA, comprising one branch in a moderate-income geography, five branches in middle-income geographies, and one branch in an upper-income geography. There were no low-income geographies. The distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies.

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday and one branch had Saturday hours from 9:00 a.m. to 12:00 p.m.

Community Development Services

The bank provided few, if any, CD services.

Bismarck MSA

WFBNA provided few, if any, CD services in the Bismarck MSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for three CD service activities during the evaluation period. A majority (66.7 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The bank's assistance provided was responsive to the identified needs in the AA. The following is an example of CD services provided in this AA:

- One WFBNA employee provided board service to a nonprofit organization that coordinated volunteers to repair homes of low-income elderly and disable individuals.

North Dakota Combined Non-MSA

WFBNA provided a limited level of CD services in the North Dakota Combined Non-MSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 15 CD service activities during the evaluation period. All of the bank's CD service activities were to organizations providing community services targeted to low- and moderate-income individuals and families. The bank's assistance provided was responsive to the identified needs in the AA. The following is an example of CD services provided in this AA:

- WFBNA employees provided 12 hours of financial education at a job center that taught young people the skills needed to become employed, independent, and pursue future education.

State of Oregon

CRA rating for the State of Oregon⁴⁴: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AAs.
- The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank was a leader in making CD loans. CD lending had a neutral effect on the Lending Test conclusion as it further supported the bank's already excellent lending performance.
- The bank had an excellent level of qualified CD investments that demonstrated excellent responsiveness to credit and economic development needs, although occasionally in a leadership position. The bank made extensive use of innovative and complex investments to support CD initiatives.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided a limited level of CD services.

Description of Institution's Operations in the State of Oregon

The state of Oregon was WFBNA's 31st largest rating area based on its total deposits in the state. As of June 30, 2021, the bank maintained approximately \$3.5 billion or 0.2 percent of its total domestic deposits in branches within the state. Of the 22 depository financial institutions operating in the bank's AAs within the state, WFBNA, with a deposit market share of 10.5 percent, was the third largest. Other top depository financial institutions in the bank's AAs within the state based on market share included Umpqua Bank (19.3 percent), U.S. Bank, NA (19.2 percent), JPMorgan Chase, NA (7.6 percent), Banner Bank (7.3 percent), First Interstate Bank (7 percent), Columbia State Bank (6.7 percent), and Washington Federal Bank, N.A. (5.8 percent). As of December 31, 2021, the bank operated 25 branches and 63 ATMs in the state. WFBNA delineated 18 AAs within the state; however, the OCC combined, analyzed, and presented those AAs at the CSA level where possible for purposes of this evaluation. This resulted in the following four AAs: Bend-Prineville, OR CSA (Bend CSA), Eugene-Springfield, OR MSA (Eugene MSA), Medford-Grants Pass, OR CSA (Medford CSA), and Oregon Combined Non-MSA. The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

⁴⁴ This rating only reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Bend CSA

The following table provides a summary of the demographics, including housing and business information for the Bend CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Bend CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	28	0.0	21.4	60.7	17.9	0.0
Population by Geography	187,578	0.0	20.9	62.0	17.1	0.0
Housing Units by Geography	92,067	0.0	22.3	62.3	15.4	0.0
Owner-Occupied Units by Geography	49,152	0.0	16.7	64.3	19.0	0.0
Occupied Rental Units by Geography	26,264	0.0	34.1	53.3	12.6	0.0
Vacant Units by Geography	16,651	0.0	20.4	70.4	9.2	0.0
Businesses by Geography	32,910	0.0	27.1	49.4	23.5	0.0
Farms by Geography	1,372	0.0	15.4	69.6	15.0	0.0
Family Distribution by Income Level	50,249	21.5	18.9	20.0	39.6	0.0
Household Distribution by Income Level	75,416	23.8	17.2	16.8	42.2	0.0
Median Family Income MSA - 13460 Bend, OR MSA		\$62,013	Median Housing Value			\$257,506
Median Family Income Non-MSAs - OR		\$51,555	Median Gross Rent			\$954
			Families Below Poverty Level			10.7%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$25,778 to \$31,007 and moderate-income families earned at least \$25,778 to \$31,007 and less than \$41,244 to \$49,610, depending on the metropolitan or nonmetropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$644 to \$775 for low-income borrowers and ranging from \$1,031 to \$1,240 for moderate-income borrowers, depending on the metropolitan or nonmetropolitan area. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$1,382. Low- and moderate-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Bend-Redmond, OR MSA (Bend MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Bend MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Bend MSA's economic recovery had somewhat slowed over most of 2021; however, despite the lack of job creation, the labor market had regained a majority of the jobs lost in the recession. Tourist-dependent industries continued to see an increase from the surge in consumer spending due to the area's

attractions being centered on outdoor activities which were less affected by COVID-19 restrictions. The Bend MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Retail Trade, Leisure and Hospitality Services, Professional and Business Services, and Government. Major employers in the Bend MSA include St. Charles Medical Center, Mt. Bachelor Inc., Central Oregon Community College, Summit Memorial Group, and Safeway. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Bend MSA was 3.7 percent compared to the national unemployment rate of 3.7 percent.

Prineville, OR Micro Area (Crook County)

Prineville, OR Micropolitan Statistical Area comprises Crook County, Oregon. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for Crook County was 5.2 percent compared to the national unemployment rate of 3.7 percent. Total population in the county in 2020 was reported at 23,733. The median household income was \$59,000, an increase of 20.4 percent from 2019. The median property value also experienced an increase of 7.7 percent from 2019 and was reported at \$265,100 in 2020. Homeownership rates in 2020 increased 1 percent from 2019 to 73.5 percent in 2020. This is well above the national average of 64.4 percent. Employment in the county grew at a rate of 7.3 percent from 2019 to 2020 and was reported at 9,850 in 2020. The top industries in the county were Health Care and Social Assistance, Retail Trade, Construction, Educational Services, and Manufacturing.

Community Contacts

This evaluation considered comments provided by one local organization that was contacted during the evaluation period and served the Bend CSA. The organization was an economic development company that provided financial assistance and helped businesses make connections in the town as well as oversees the affordable housing funds. The bank also provided an assessment of community needs based on research completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were needs within the community:

- Construction of affordable rental housing units and rental assistance
- Development of single-family affordable housing
- Housing for persons with special needs
- Community services, including basic necessities and financial assistance
- Access to early education programs and scholarships for higher education
- Assistance preparing for, or access to tools for virtual learning
- College, technical school, and career readiness programs
- Initiatives to address academic gaps in underperforming schools and programs that address low graduation/high dropout rates
- Financial literacy/education programs
- Education on savings programs and banking products
- Access to capital for small businesses
- Access to payroll protection and emergency fundings
- Access to small business training programs

Opportunities for participation by financial institutions included the following:

- Fund more affordable single-family and rental housing units
- Funding for affordable childcare programs
- Funding for or investment in infrastructure improvements

Eugene MSA

The following table provides a summary of the demographics, including housing and business information for the Eugene MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Eugene MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	87	3.4	20.7	51.7	23.0	1.1
Population by Geography	357,060	4.5	20.3	53.5	21.7	0.0
Housing Units by Geography	157,510	4.6	21.1	54.4	19.9	0.0
Owner-Occupied Units by Geography	85,785	0.8	16.9	57.2	25.0	0.0
Occupied Rental Units by Geography	60,450	9.6	26.8	50.2	13.4	0.0
Vacant Units by Geography	11,275	6.6	22.2	55.2	16.0	0.0
Businesses by Geography	37,649	5.1	23.0	48.6	23.3	0.0
Farms by Geography	1,557	1.2	15.6	53.7	29.5	0.0
Family Distribution by Income Level	86,645	21.4	17.8	20.5	40.3	0.0
Household Distribution by Income Level	146,235	25.1	15.3	17.0	42.6	0.0
Median Family Income MSA - 21660 Eugene-Springfield, OR MSA		\$57,766	Median Housing Value			\$227,588
			Families Below Poverty Level			11.8%
			Median Gross Rent			\$863
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$28,883 and moderate-income families earned at least \$28,883 and less than \$46,213. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$722 for low-income borrowers and \$1,155 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$1,222. Low- and moderate-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Information from Moody's Analytics indicated that at the end of the evaluation period, the Eugene MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic.

Eugene’s economic recovery outpaced that of other areas in Oregon and the United States due in part to the strengthening of the leisure/hospitality industry. Due to population expansion in the recent years, the area has become the regional health care hub. The robust population growth has also increased residential building. Additionally, due to the University, there is also a growing need for rental units. The Eugene MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Government, Retail Trade, Professional and Business Services, Manufacturing, and Leisure and Hospitality Services. Major employers in the Eugene MSA include PeaceHealth Corp., University of Oregon, Espresso Prn., Lane Community College, and Sacred Heart Medical Center. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Eugene MSA was 3.8 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by one local organization that was contacted during the evaluation period and served the Eugene MSA area. This organization was a local governmental agency that supported the business community by extension of borrower community. The other community contact information was taken from a “listening” session in the Eugene MSA that included information from a variety of community development organizations, other nonprofit organizations, and local or regional government entities about current economic trends, community development challenges, and needs of the low-to-moderate income constituents. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank’s needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing and rental assistance
- Housing for persons with special needs
- Affordable for-sale housing
- Rehabilitation of housing units
- Availability of community services and financial assistance for disaster recovery
- Access to early education programs and scholarships for higher education
- Assistance preparing for, or access to tools for virtual learning
- College, technical school, and career readiness programs
- Initiatives to address academic gaps in underperforming schools and programs that address low graduation/high dropout rates
- Financial literacy/education programs
- Education on savings programs and banking products
- Access to capital for small businesses
- Access to payroll protection and emergency fundings
- Access to small business training programs

Opportunities for participation by financial institutions included the following:

- Increased financial services such as second chance checking and/or affordable checking accounts
- Increase opportunities for no- or low-cost accounts for students

- Affordable loan options
- Affordable housing options and/or lending for manufactured homes
- More small business and micro loan options
- Financial literacy/education, credit counseling

Oregon Combined Non-MSA

The following table provides a summary of the demographics, including housing and business information for the Oregon Combined Non-MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Oregon Combined Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	153	0.7	9.2	70.6	15.7	3.9
Population by Geography	575,692	0.6	8.2	74.7	16.5	0.0
Housing Units by Geography	280,105	0.6	8.5	76.3	14.6	0.0
Owner-Occupied Units by Geography	147,442	0.4	7.3	75.9	16.5	0.0
Occupied Rental Units by Geography	79,545	1.2	11.3	73.8	13.7	0.0
Vacant Units by Geography	53,118	0.4	7.6	81.4	10.7	0.0
Businesses by Geography	57,577	0.6	9.2	73.8	16.4	0.0
Farms by Geography	4,616	0.1	4.5	74.3	21.1	0.0
Family Distribution by Income Level	146,975	20.5	17.8	20.5	41.2	0.0
Household Distribution by Income Level	226,987	23.2	16.3	18.3	42.2	0.0
Median Family Income Non-MSAs - OR		\$51,555	Median Housing Value			\$186,053
			Families Below Poverty Level			12.9%
			Median Gross Rent			\$749
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$25,778 and moderate-income families earned at least \$25,778 and less than \$41,244. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$644 for low-income borrowers and \$1,031 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$999. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Oregon's economy grew faster than national averages. The private sector, which was led by the professional/business services industry, was outgrowing other areas, but the government industry had regained a large portion of its jobs back as well. The tourism industry experienced a great rebound in domestic leisure travel as Oregon's visitors tend to focus on outdoor activities with less restrictive COVID-19 rules. According to the Bureau of Labor Statistics, the December 2021 non-seasonally

adjusted unemployment rate for the counties that comprise the Oregon Combined Non-MSA ranged from a low of 2.9 percent (Hood River County) to a high of 5.3 percent (Klamath County) compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by three local organizations that were contacted during the evaluation period and served the Oregon Combined Non-MSA area. The organizations included a nonprofit organization that worked to assist Oregonians achieve housing stability and build financial security and two local governmental organizations that assisted with housing development plans, small business/farming needs, public administrative tasks, etc. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing and rental assistance
- Housing for persons with special needs
- Affordable for-sale housing
- Rehabilitation of housing units
- Availability of community services and financial assistance for disaster recovery
- Access to early education programs and scholarships for higher education
- Assistance preparing for, or access to tools for virtual learning
- College, technical school, and career readiness programs
- Initiatives to address academic gaps in underperforming schools and programs that address low graduation/high dropout rates
- Financial literacy/education programs
- Education on savings programs and banking products
- Access to capital for small businesses
- Access to payroll protection and emergency fundings
- Access to small business training programs

Opportunities for participation by financial institutions included the following:

- Affordable housing options
- Increased small farm lending opportunities
- Increased involvement with CDFIs with a direct connection to affordable housing and small business loans

Scope of Evaluation in the State of Oregon

The OCC selected the Bend CSA, Eugene MSA, and Oregon Combined Non-MSA for full-scope reviews and based conclusions and ratings primarily on activity within these geographical areas. These AAs carried significant weight in determining the overall ratings for the state of Oregon because of the significance of the bank's presence in these AAs. More weight was given to the Oregon Combined Non-MSA due to the larger deposit base, lending, and branch presence.

During the evaluation period, the bank originated or purchased 14,649 home mortgage loans, small loans to businesses, and small loans to farms totaling \$2.5 billion. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within each AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. In the Eugene MSA and Oregon Combined Non-MSA, the OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms. In the Bend CSA and Medford CSA, the OCC placed more weight based on the number of loans on small loans to businesses versus home mortgage loans and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF OREGON

LENDING TEST

The bank's performance under the Lending Test in the state of Oregon is rated Outstanding. Performance in the limited-scope areas had a neutral effect on the overall Lending Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Bend CSA and Eugene MSA was excellent and the bank's performance in the Oregon Combined Non-MSA was good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Bend CSA	2,173	2,226	108	13	4,520	30.8	22.4
Eugene MSA	1,256	1,175	60	15	2,506	17.1	21.5
Oregon Combined Non-MSA	2,133	1,959	283	4	4,379	29.8	32.4
Medford CSA	1,475	1,737	64	11	3,287	22.4	23.7
Total	7,037	7,097	515	43	14,692	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Bend CSA	913,782	60,442	2,196	14,617	991,037	39.4	22.4
Eugene MSA	414,600	44,662	3,334	23,980	486,576	19.4	21.5
Oregon Combined Non-MSA	497,817	70,860	12,607	6,749	588,033	23.4	32.4
Medford CSA	388,517	55,794	1,307	3,336	448,954	17.9	23.7
Total	2,214,716	231,758	19,444	48,682	2,514,600	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Bend CSA

As of June 30, 2021, WFBNA had a deposit market share of 13.9 percent. The bank ranked third among nine depository financial institutions placing it in the top 34 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 3.3 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked seventh among 433 home mortgage lenders in this AA, which placed it in the top 2 percent of lenders. The top lenders in this AA based on market share were Rocket Mortgage (5 percent), Caliber Home Loans, Inc. (4 percent), and U.S. Bank, N.A. (3.8 percent).

According to peer small business data for 2021, WFBNA had a market share of 9.8 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked fifth out of 101 small business lenders, which placed it in the top 5 percent of lenders. The top lenders in this AA based on market share were JPMorgan Chase Bank, N.A. (14.7 percent), U.S. Bank, N.A. (13.9 percent), and Bank of America, N.A. (13 percent).

According to peer small farm data for 2021, WFBNA had a market share of 19.8 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked second out of 11 small farm lenders, which placed it in the top 19 percent of lenders. The other top lenders in this AA based on market share were U.S. Bank, N.A. (27.5 percent), Bank of America, N.A. (13.7 percent), and JPMorgan Chase Bank, N.A. (13.7 percent).

Eugene MSA

As of June 30, 2021, WFBNA had a deposit market share of 10.2 percent. The bank ranked third among 13 depository financial institutions placing it in the top 24 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 1.7 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked 16th among 399 home mortgage lenders in this AA, which placed it in the top 5 percent of lenders. The top lenders in this AA based on market share were Oregon Community Credit Union (9.2 percent), Rocket Mortgage (6.4 percent), and Summit Funding Inc (6 percent).

According to peer small business data for 2021, WFBNA had a market share of 5 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked eighth out of 95 small business lenders, which placed it in the top 9 percent of lenders. The top lenders in this AA based on market share were U.S. Bank, N.A. (15.7 percent), JPMorgan Chase Bank, N.A. (13.8 percent), and American Express National Bank (11.8 percent).

According to peer small farm data for 2021, WFBNA had a market share of 6.6 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked fourth out of 15 small farm lenders, which placed it in the top 27 percent of lenders. The top lenders in this AA based on market share were U.S. Bank, N.A. (30.6 percent), JPMorgan Chase Bank, N.A. (24 percent), and Capital One Bank (USA), N.A. (10.4 percent).

Oregon Combined Non-MSA

As of June 30, 2021, WFBNA had a deposit market share of 9 percent. The bank ranked fifth among 18 depository financial institutions placing it in the top 28 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 2.2 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked ninth among 449 home mortgage lenders in this AA, which placed it in the top 3 percent of lenders. The top lenders in this AA based on market share were Rocket Mortgage (7.6 percent), Umpqua (6.3 percent), and Caliber Home Loans, Inc. (4.1 percent).

According to peer small business data for 2021, WFBNA had a market share of 6.4 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked fifth out of 107 small business lenders, which placed it in the top 5 percent of lenders. The top lenders in this AA based on market share were U.S. Bank, N.A. (19.7 percent), American Express National Bank (10 percent), and JPMorgan Chase Bank, N.A. (7.5 percent).

According to peer small farm data for 2021, WFBNA had a market share of 6.6 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked fifth out of 26 small farm lenders, which placed it in the top 20 percent of lenders. The top lenders in this AA based on market share were Columbia State Bank (27.8 percent), U.S. Bank, N.A. (23.1 percent), and John Deere Financial FSB (8 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AAs. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data. The bank's performance was good in the Bend CSA, Eugene MSA, and Oregon Combined Non-MSA.

Bend CSA

Home Mortgage Loans

Refer to Table O in the state of Oregon section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

There were no low-income census tracts. The bank's percentage of home mortgage loans in moderate-income geographies was below both the percentage of owner-occupied housing units in moderate-income geographies and the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Oregon section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

There were no low-income census tracts. The bank's percentage of small loans to businesses in moderate-income geographies was near to both the percentage of businesses in moderate-income geographies and the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Oregon section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was good.

There were no low-income census tracts. The bank's percentage of small loans to farms in moderate-income geographies was below the percentage of farms in moderate-income geographies but it exceeded the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Eugene MSA

Home Mortgage Loans

Refer to Table O in the state of Oregon section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was below the percentage of owner-occupied housing units in low-income geographies and it was well below the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was near to both the percentage of owner-occupied housing units in moderate-income geographies and the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Oregon section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies exceeded both the percentage of businesses in low-income geographies and the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies exceeded the percentage of businesses in moderate-income geographies and it was near to the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Oregon section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

The bank's percentage of small loans to farms in low-income geographies exceeded both the percentage of farms in low-income geographies and the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-income geographies was significantly below both the percentage of farms in moderate-income geographies and the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Oregon Combined Non-MSA

Home Mortgage Loans

Refer to Table O in the state of Oregon section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was below the percentage of owner-occupied housing units in low-income geographies but it was equal to the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was below both the percentage of owner-occupied housing units in moderate-income geographies and the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Oregon section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies was equal to the percentage of businesses in low-income geographies and it exceeded the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies approximated both the percentage of businesses in moderate-income geographies and the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Oregon section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

The bank did not originate or purchase any small loans to farms in low-income geographies. The bank's percentage of small loans to farms in moderate-income geographies was well below the percentage of farms in moderate-income geographies but it exceeded the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies in the Bend CSA, Eugene MSA, and Oregon Non-MSA. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AAs.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes. The bank's performance was adequate in the Bend CSA, Eugene MSA, and Oregon Combined Non-MSA.

Bend CSA

Home Mortgage Loans

Refer to Table P in the state of Oregon section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and it was below the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-

income borrowers was well below the percentage of moderate-income families and it was below the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Oregon section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 32 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was well below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Oregon section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was poor.

The bank did not collect or consider the GAR in the underwriting of approximately 60.2 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below both the percentage of farms in the AA with GAR of \$1 million or less and the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Eugene MSA

Home Mortgage Loans

Refer to Table P in the state of Oregon section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and it was below the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families but it was equal to the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Oregon section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 26 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Oregon section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was poor.

The bank did not collect or consider the GAR in the underwriting of approximately 50 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below both the percentage of farms in the AA with GAR of \$1 million or less and the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Oregon Combined Non-MSA

Home Mortgage Loans

Refer to Table P in the state of Oregon section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and it was below the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was well below the percentage of moderate-income families and it was below the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Oregon section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 27.4 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Oregon section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was poor.

The bank did not collect or consider the GAR in the underwriting of approximately 59.4 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below both the percentage of farms in the AA with GAR of \$1 million or less and the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

Bend CSA

WFBNA was a leader in making CD loans in the Bend CSA. WFBNA made 13 CD loans totaling approximately \$14.6 million, which represented 14.1 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 99.8 percent of these loans funded affordable housing that provided 72 units of affordable housing and less than 1 percent funded revitalization and stabilization efforts targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$10 million line of credit for a statewide nonprofit CDFI that provided financing and technical assistance for affordable housing development. Of this total loan, \$460,950 was allocated to Bend CSA.

- WFBNA provided a \$20 million term loan to a nonprofit CDFI dedicated to improving access to high-quality health and elder care, healthy foods, housing, and education for low-income communities across the country. Of this total loan, \$14,878 was allocated to the Bend CSA.
- WFBNA provided a \$10 million line of credit to a certified CDFI organization that delivered flexible capital needed to provide affordable homes and strengthen communities. Of this total loan, \$7,439 was allocated to the Bend CSA.

Eugene MSA

WFBNA was a leader in making CD loans in the Eugene MSA. WFBNA made 15 CD loans totaling approximately \$24 million, which represented 24.2 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 91.6 percent of these loans funded affordable housing that provided 203 units of affordable housing, less than 1 percent funded revitalization and stabilization efforts, and 8.4 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$250,000 loan to an organization for affordable housing purposes. The organization helped more than 84,000 individuals and families annually with emergency and homeless services, and affordable housing and was committed to providing comprehensive programs to alleviate poverty and help all individuals find a path out of poverty and into self-sufficiency.
- WFBNA provided a \$2.5 million term loan to an organization that helped rural communities build affordable housing with a special emphasis on high need and underserved areas and populations. Of this total loan, \$1,694 was allocated to the Eugene MSA. According to the organization, 100 percent of its clients were low- and moderate-income as they earned less than 80 percent of the area median family income.
- WFBNA provided a \$10 million line of credit to a certified CDFI organization that delivered flexible capital needed to provide affordable homes and strengthen communities. Of this total loan, \$6,776 was allocated to the Eugene MSA.

Oregon Combined Non-MSA

WFBNA made four CD loans totaling approximately \$6.7 million, which represented 4.5 percent of the allocated tier 1 capital. CD loans were made only for affordable housing purposes that provided 36 units of affordable housing targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$3.2 million construction loan for an LIHTC affordable housing development located in Astoria, Oregon, with 90 percent of the units restricted to tenants earning up to 60 percent of the area median family income.
- WFBNA provided a \$34 million line of credit to a statewide nonprofit CDFI that provided financing and technical assistance for affordable housing development. Of this total loan, \$2.2 million was allocated to the Oregon Combined Non-MSA.

- WFBNA provided a \$10 million line of credit to a statewide nonprofit CDFI that provided financing and technical assistance for affordable housing development. Of this total loan, \$666,429 was allocated to the Oregon Combined Non-MSA.

Product Innovation and Flexibility

Bend CSA

WFBNA used flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 318 loans under its flexible lending programs totaling \$16.2 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	16	5,400
Dream. Plan. Home.	3	400
PPP	299	10,400
Total	318	16,200

Eugene MSA

WFBNA made limited use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 201 loans under its flexible lending programs totaling \$9.1 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	10	800
Dream. Plan. Home.	1	300
PPP	190	8,000
Total	201	9,100

Oregon Combined Non-MSA

WFBNA used flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 317 loans under its flexible lending programs totaling \$17.1 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	19	4,800
Dream. Plan. Home.	6	1,400
PPP	292	10,900
Total	317	17,100

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Medford CSA consistent with the bank's overall performance under the Lending Test in the full-scope areas.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Oregon is rated Outstanding. Performance in the limited-scope areas had a neutral effect on the overall Investment Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Bend CSA, Eugene MSA, and Oregon Combined Non-MSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Bend CSA	7	15,729	29	13,228	36	25.4	28,957	26.2	6	10,014
Eugene MSA	9	9,579	35	11,092	44	31.0	20,671	18.7	2	710
OR-Combined Non-MSA	5	22,567	29	37,932	34	23.9	60,499	54.7	1	20
Medford CSA	2	187	26	365	28	19.7	553	0.5	1	23
Statewide***	0	0	0	0	0	0.0	0	0.0	0	0
Total	23	48,062	119	62,617	142	100.0	110,680	100.0	10	10,768
<p>The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.</p> <p>* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.</p> <p>** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.</p> <p>*** Statewide means investments in statewide programs that have a purpose, mandate, or function to serve one or more of the bank's assessment areas within the state. Due to rounding, totals may not equal 100.0%</p>										

Bend CSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$29 million and represented 27.9 percent of the bank's tier 1 capital allocated to the AA. The investments also included 28 grants and donations totaling \$176,000 to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 41.7 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA and 58.3 percent that focused on community services targeted to low- and

moderate-income individuals. In total, the bank's investments helped create or retain 191 units of affordable housing in the AA.

The bank made extensive use of innovative or complex investments to support CD initiatives. Approximately 98.7 percent of current period investment dollars were complex LIHTC investments. The following are examples of CD investments made in this AA:

- WFBNA provided a \$13.1 million investment for two affordable housing developments located 2.2 miles apart in Bend, Oregon. These LIHTC developments contained a total of 71-units restricted to seniors, veterans, survivors of domestic abuse and persons living with an intellectual or developmental disability (IDD) all of whom had incomes at or below 50 percent of the AMI. The bank also provided a \$12 million construction loan for this project. The investment was responsive to the identified need for affordable housing.
- WFBNA provided \$32,000 in grants to a nonprofit organization that created employment opportunities for the low- and moderate-income individuals through workforce skills training, English classes, computer skills, and resume assistance. The bank's grant funding was leveraged by other private and public funding, as well as volunteer resources, to support the goal to help low-income families gain access to living-wage jobs in the market. The investment was responsive to the community need for workforce education and training.
- WFBNA provided a \$10,000 grant to an organization for its homeownership program. The organization provided environmentally sustainable and permanently affordable homeownership opportunities for those who contributed to the fabric of the Central Oregon economy and community.

Eugene MSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private.

The current and prior period qualified investments totaled \$20.7 million and represented 20.8 percent of the bank's tier 1 capital allocated to the AA. The investments also included 34 grants and donations totaling \$360,000 to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 40.9 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 52.3 percent that focused on community services targeted to low- and moderate-income individuals, and 6.8 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 193 units of affordable housing in the AA.

The bank made extensive use of innovative or complex investments to support CD initiatives. Approximately 96.8 percent of current period investment dollars were complex LIHTC investments. The following are examples of CD investments made in this AA:

- WFBNA provided a \$10.7 million equity investment for an affordable housing development located in Eugene, Oregon. The LIHTC development consisted of 49 units restricted to homeless or formerly homeless veterans or individuals with developmental disabilities who have incomes at or below 60 percent of the AMI. This loan was complex due to the inherent nature of LIHTC transactions and involvement from various funding sources including Oregon HOME funds, Oregon General Housing Account Program funds, and Housing Trust Fund. Financing for this project increases the stock of affordable housing and provides housing opportunities for homeless, special needs, veterans, and low- and moderate-income families. The bank also provided a \$10.7 million construction loan for this project. The investment was responsive to the identified need for affordable housing.
- WFBNA provided grants totaling \$100,000 to a nonprofit organization. The organization was located in Eugene, Oregon and provided technical assistance to small businesses and aspiring entrepreneurs in diverse and rural communities. These rural communities faced challenges resulting from recent wildfires and the impacts of the COVID-19 pandemic causing small businesses to seek support for long-term recovery. The bank's funding supported the organization's programs including financial literacy training, online resource fairs, business adaptation training, and an online support network for the diverse communities' entrepreneurs and small businesses. One grant for \$37,500 supported the organization's Steps to Success Spanish language program, which provided financial literacy and microenterprise development skills and resources to rural low- and moderate-income minorities who aspired to be entrepreneurs. The investment was responsive to the identified need for financing for small businesses.

Oregon Combined Non-MSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$60.5 million and represented 40.4 percent of the bank's tier 1 capital allocated to the AA. The investments also included 26 grants and donations totaling \$3.5 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 41.2 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 38.2 percent that focused on community services targeted to low- and moderate-income individuals, and 20.6 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies.

The bank made extensive use of innovative or complex investments to support CD initiatives. Approximately 90.8 percent of current period investment dollars were complex NMTC investments. The following are examples of CD investments made in this AA:

- WFBNA provided a \$5.5 million NMTC investment for the construction of a public charter school serving the Native American population in Pendleton, Oregon. The facility offered an early childhood education program, after-school programming, adult education, language classes, a Head

Start program, community center, and tribal administration offices. The school outgrew its previous facility and needed to accommodate increasing enrollment and additional educational services in a central location. The school's previous location had a waitlist to attend, the new facility allowed the school to increase enrollment and expand enrollment to tribal children from birth to third grade. The development created 50 temporary construction jobs and 10 permanent jobs, including a mix of teaching, student support, and administrative positions. The bank's funding for this facility expansion helped address the educational needs of the community.

- WFBNA provided a \$17 million NMTC investment for a health center located in the medically underserved rural community of Roseburg, Oregon. The organization was founded 30 years ago as a tiny storefront clinic in downtown Roseburg, delivering health care to underserved members of the community. The organization was a Federally Qualified Health Center and Douglas County's only tier 5 patient-centered primary care center. The facility included 34 exam rooms, eight procedure rooms, a teaching kitchen, and three large conference rooms with collapsing sliding doors that when opened will create one large event space available to other community organizations to host special events. The unemployment rate in this area was 13.4 percent and the poverty rate was 25.5 percent, more than 1.6 times the national average. This investment was highly complex because of the inherent nature of NMTC transactions. The community impact of this development included 256 full time jobs and 16 construction jobs. Historically, the major source of funding to support the clinic was community giving; however, due to the COVID-19 pandemic, local businesses were unable to provide support, and this NMTC investment filled this gap. The investment was responsive to the community need for access to health and nutritional services.
- WFBNA provided a \$3 million grant to an organization for its open for business CDFI Program Strategy program. The organization was a regional nonprofit CDFI that made loans to strengthen the economic, ecological, and family resilience in Oregon and Washington.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Medford CSA was weaker than the bank's overall performance under the Investment Test in the full-scope area, primarily due to lower levels of CD investments relative to the bank's presence and capacity to invest in the AA.

SERVICE TEST

The bank's performance under the Service Test in the state of Oregon is rated High Satisfactory. Performance in the limited-scope AA had a positive effect on the overall Service Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Bend CSA, Eugene MSA, and Oregon Combined Non-MSA was good.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's full-scope AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Bend CSA	22.4	5	20.0	0.0	60.0	40.0	0.0	0.0	20.9	62.0	17.1
Eugene MSA	21.5	4	16.0	0.0	25.0	75.0	0.0	4.5	20.3	53.5	21.7
Oregon Combined Non-MSA	32.4	11	44.0	9.1	18.2	54.5	18.2	0.6	8.2	74.7	16.5
Medford CSA	42.4	5	20.0	20.0	40.0	40.0	0.0	0.7	15.5	59.5	24.3
Total	100.0	25	100.0	8.0	32.0	52.0	8.0	1.5	14.4	64.5	19.5
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Bend CSA	0	1	0	-1	0	0
Eugene MSA	0	3	0	-3	0	0
Oregon Combined Non-MSA	0	3	0	-1	-2	0
Medford CSA	0	3	0	0	-3	0
Total	0	10	0	-5	-5	0
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.						

Bend CSA

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Bend CSA. WFBNA operated five branches in the AA, comprising of three branches in moderate-income geographies and two branches in middle-income geographies. There were no low-income geographies in the AA and the distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies. The distribution was further augmented by one branch in a middle- or upper-income geography that was within close proximity to serve a moderate-income area. Internal customer data for this branch demonstrated a reasonable level of service to customers in a low- and moderate-income area. This middle- or upper-income branch contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches generally had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA did not open any branches but closed one branch in a moderate-income area due to an in-store closure. There was one traditional branch located less than a mile away.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts,

deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday and 9:00 a.m. to 12:00 p.m. Saturday.

Eugene MSA

WFBNA's service delivery systems were accessible to geographies and individuals of different income levels in the Eugene MSA. WFBNA operated four branches in the AA, comprising of one branch in a moderate-income geography and three branches in middle-income geographies. The distribution was augmented by one branch in a middle- or upper-income geography that was within close proximity to serve a low-income area. Internal customer data for this branch demonstrated a reasonable level of service to customers in a low-income area. This middle- or upper-income branch contributed positively to the service delivery systems conclusion. The bank also operated 15 ATMs with one ATM located in a low-income geography, five ATMs located in moderate-income geographies, eight ATMs located in middle-income geographies, and one ATM located in an upper-income geography.

To the extent changes have been made, the bank's record of opening and closing of branches generally had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA did not open any branches but closed three branch closures in moderate-income geographies due to low customer usage and a decline in transactions.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday.

Oregon Combined Non-MSA

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Oregon Combined Non-MSA. WFBNA operated 11 branches in the AA, comprising one branch in a low-income geography, three branches in moderate-income geographies, 16 branches in middle-income geographies, and four branches in upper-income geographies. The distribution of branches in low-income geographies exceeded the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies.

To the extent changes have been made, the bank's record of opening and closing of branches generally had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. There were no branch openings and one branch closure in a moderate-income geography due to an in-store closure.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts,

deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday and 9:00 a.m. to 12:00 p.m. Saturday.

Community Development Services

The bank provided a limited level of CD services.

Bend CSA

WFBNA provided few, if any, CD services in the Bend CSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for one CD service activity and two CD service hours during the evaluation period. The bank's assistance was to an organization providing community services targeted to low- and moderate-income individuals and families.

Eugene MSA

WFBNA did not provide any CD services in the Eugene MSA.

Oregon Combined Non-MSA

WFBNA provided a limited level of CD services in the Oregon Combined Non-MSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 18 CD service activities and 36 CD services hours during the evaluation period. The bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The following are examples of CD services provided in this AA:

- A WFBNA employee provided three hours of technical expertise during an outreach for high school students, where majority of the student's population qualified for free or reduced lunches.
- Seventeen WFBNA employees provided 17 CD service activities and 33 CD service hours of financial education to an organization that provided food, shelter and recovery care to men, women and children in need. This activity was responsive to the identified need for financial health.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review the bank's performance under the Service Test in the Medford CSA was stronger than the bank's overall performance under the Service Test in the full-scope areas due stronger performance in branch openings and closings in low- and moderate-income geographies.

State of Pennsylvania

CRA rating for the State of Pennsylvania⁴⁵: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AAs.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank made a low level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.
- The bank had a significant level of qualified CD investments that demonstrated good responsiveness to credit and economic development needs, although occasionally in a leadership position. The bank rarely innovative and complex investments to support CD initiatives.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided a limited level of CD services.

Description of Institution's Operations in the State of Pennsylvania

The state of Pennsylvania was WFBNA's 28th largest rating area based on its total deposits in the state. As of June 30, 2021, the bank maintained approximately \$5.6 billion or 0.4 percent of its total domestic deposits in branches within the state. Of the 57 depository financial institutions operating in the bank's AAs within the state, WFBNA, with a deposit market share of 7.7 percent, was the fourth largest. The top depository financial institutions in the bank's AAs within the state based on market share were PNC Bank, N.A. (17.4 percent), Fulton Bank, N.A. (11.3 percent), Manufacturers and Traders Trust Group (11.1 percent), Truist Bank (6.8 percent), and First National Bank of Pennsylvania (5.4 percent). As of December 31, 2021, the bank operated 44 branches and 66 ATMs in the state. WFBNA delineated eight AAs within the state; however, the OCC combined, analyzed, and presented those AAs at the CSA level where possible for purposes of this evaluation. This resulted in the following four AAs: Harrisburg-York-Lebanon, PA CSA (Harrisburg CSA), Lancaster, PA MSA (Lancaster MSA), Scranton-Wilkes-Barre, PA MSA (Scranton MSA), and Pennsylvania Combined Non-MSA. The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries

Harrisburg CSA

The following table provides a summary of the demographics, including housing and business information for the Harrisburg CSA.

⁴⁵ This rating only reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area**Assessment Area: Harrisburg CSA**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	245	10.2	16.3	55.5	17.1	0.8
Population by Geography	1,133,634	6.5	12.7	60.4	19.9	0.5
Housing Units by Geography	480,359	6.9	14.0	60.4	18.8	0.0
Owner-Occupied Units by Geography	312,758	2.8	9.8	64.5	22.9	0.0
Occupied Rental Units by Geography	130,583	14.3	22.0	52.6	11.0	0.0
Vacant Units by Geography	37,018	15.4	20.6	52.6	11.5	0.0
Businesses by Geography	103,766	6.7	14.5	58.0	20.8	0.0
Farms by Geography	3,878	1.3	6.1	72.4	20.1	0.0
Family Distribution by Income Level	296,772	19.4	18.4	22.5	39.7	0.0
Household Distribution by Income Level	443,341	22.3	17.0	19.7	41.1	0.0
Median Family Income MSA - 25420 Harrisburg-Carlisle, PA MSA		\$71,723	Median Housing Value			\$166,181
Median Family Income MSA - 30140 Lebanon, PA MSA		\$65,676	Median Gross Rent			\$846
Median Family Income MSA - 49620 York-Hanover, PA MSA		\$69,846	Families Below Poverty Level			7.7%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$32,838 to \$35,862 and moderate-income families earned at least \$32,838 to \$35,862 and less than \$52,541 to \$57,378, depending on the metropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$821 to \$897 for low-income borrowers and ranging from \$1,314 to \$1,434 for moderate-income borrowers, depending on the metropolitan. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$892. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Harrisburg-Carlisle, PA MSA (Harrisburg MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Harrisburg MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Harrisburg's recovery improved but remained below pre-pandemic levels. Travel resumed after the lifting of strict restrictions, which benefited the leisure and hospitality industry. The area has also seen an increase in workforce in the metropolitan area as new positions were being filled with a larger commuter workforce. Housing prices in the area, while increasing, remained lower than other areas in Pennsylvania and the United States. On the other hand, rental and housing affordability in the MSA are higher than other areas in the state and the United States overall. The Harrisburg MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include

Education and Health Services, Government, Professional and Business Services, Transportation/Utilities, and Retail Trade. Major employers in the Harrisburg MSA include UPMC Pinnacle, Highmark Inc., JFC Staffing Associates, Select Medical Corp., and Keystone Human Services. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Harrisburg MSA was 3.6 percent compared to the national unemployment rate of 3.7 percent.

Lebanon, PA MSA (Lebanon MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Lebanon MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Lebanon's economic recovery was slow but improving. Employment in the MSA was trending higher and compared well with pre-pandemic levels. Leading the employment trends was the recovery in the manufacturing industry. Poultry processors capitalized on rising soy and corn prices. Of the more than 58,000 housing units in the area, approximately 66 percent were owner occupied and 27 percent are renter occupied. The remaining 7 percent were vacant. Housing prices in the area, while increasing, remained lower than other areas in Pennsylvania and the United States. On the other hand, rental affordability in the MSA was higher than other areas in the state and the United States overall while housing affordability was consistent with other areas of Pennsylvania but higher than the United States. The Lebanon MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Manufacturing, Education and Health Services, Government, and Professional and Business Services. Major employers in the Lebanon MSA include Sechler Family Foods, Lebanon VA Medical Center, Wellspan Good Samaritan Hospital, Good Samaritan Health Systems, and Lebanon Valley College. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Lebanon MSA was 3.6 percent compared to the national unemployment rate of 3.7 percent.

York-Hanover, PA MSA (York MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the York MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Recovery in the York MSA was strong as the area had regained more than four-fifths of positions lost during the pandemic. Manufacturing had been leading the way as the national demand for food and machinery normalized. With the strong recovery, housing prices increased, and the high homeownership rates and low home turnovers limited housing supplies. The York MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Manufacturing, Education and Health Services, Professional and Business Services, Government, and Retail Trade. Major employers in the York MSA include Wellspan Medical Group, Rutter's Holdings Inc., Steward Group Inc., Kinsley Construction Inc., and Spiritrust Lutheran. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the York MSA was 3.6 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by four local organizations that were contacted during the evaluation period and served the Harrisburg CSA. The contacts included an organization that provided affordable housing and three organizations that provided services to low- and moderate-income

individuals and families. The bank also provided an assessment of community needs based on research completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were needs within the community:

- Construction of affordable rental housing units and rental assistance
- Development of single-family affordable housing
- Rehabilitation of housing units/improvement of the quality of housing stock
- Access to flexible, affordable home loan products, down payment assistance, and closing cost programs
- Homebuyer education, counseling, and financial coaching
- Mortgage payment assistance, deferrals
- Emergency shelters, health services, and transitional housing
- Jobs skills training and support of job readiness programs
- Workforce development/education
- Support of technical skills training programs

Opportunities for participation by financial institutions included the following:

- Increased options for banking accounts, credit counseling programs, and first-time homebuyer support
- Affordable, quality housing for rental and purchase
- Access to small business credit
- Access to public transportation
- Access to funding for minority owned businesses

Lancaster MSA

The following table provides a summary of the demographics, including housing and business information for the Lancaster MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Lancaster MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	98	6.1	14.3	68.4	11.2	0.0
Population by Geography	530,216	4.3	10.6	73.6	11.6	0.0
Housing Units by Geography	205,587	4.0	11.3	72.4	12.3	0.0
Owner-Occupied Units by Geography	134,548	1.6	8.8	76.1	13.5	0.0
Occupied Rental Units by Geography	60,782	8.6	16.0	66.0	9.5	0.0
Vacant Units by Geography	10,257	8.1	16.3	63.2	12.4	0.0
Businesses by Geography	50,073	4.1	11.0	72.4	12.4	0.0
Farms by Geography	2,401	0.8	3.2	86.5	9.5	0.0
Family Distribution by Income Level	137,133	18.3	19.2	23.1	39.4	0.0
Household Distribution by Income Level	195,330	22.1	17.4	19.6	40.8	0.0
Median Family Income MSA - 29540 Lancaster, PA MSA		\$68,937	Median Housing Value			\$188,318
			Median Gross Rent			\$959
			Families Below Poverty Level			7.3%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$34,469 and moderate-income families earned at least \$34,469 and less than \$55,150. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$862 for low-income borrowers and \$1,379 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$1,011. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Information from Moody's Analytics indicated that at the end of the evaluation period, the Lancaster MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Lancaster's economic recovery was rebounding in line with the remainder of Pennsylvania. Manufacturing continued to be the key driver in economic growth as the area is one of the most factory-dependent areas in the Northeast. The Lancaster MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Manufacturing, Retail Trade, Professional and Business Services, Government, and Leisure and Hospitality Services. Major employers in the Lancaster MSA include Lancaster General Hospital, Fulton Financial Corp., High Cos., Lancaster Lebanon Intermediate, and Masonic Villages at Elizabethtown. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Lancaster MSA was 3.3 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Lancaster MSA. The organizations included a nonprofit organization that helped families build and improve affordable homes and a recently built institution formed from a local CDFI designed to execute CRA qualifying activities. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing and rental assistance
- Affordable for-sale housing
- Rehabilitation of housing units
- Access to affordable home loan products, down payment assistance, and closing cost programs
- Homebuyer education, counseling, and financial coaching
- Emergency shelters and transitional housing
- Access to healthcare services
- Jobs skills training and addressing obstacles of employment
- Support of job readiness programs and technical skills training programs

Opportunities for participation by financial institutions included the following:

- Affordable housing options
- Development of skilled labor workforce
- Increased revitalization and stabilization efforts

Scope of Evaluation in the State of Pennsylvania

The OCC selected the Harrisburg CSA and Lancaster MSA for full-scope reviews and based conclusions and ratings primarily on activity within these geographical areas. These AAs carried significant weight in determining the overall ratings for the state of Pennsylvania because of the significance of the bank's presence in these AAs. More weight was given to the Harrisburg CSA due to the larger deposit base, lending, and branch presence.

During the evaluation period, the bank originated or purchased 23,105 home mortgage loans, small loans to businesses, and small loans to farms totaling \$3.2 billion. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within each AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. In each of the AAs, the OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF PENNSYLVANIA

LENDING TEST

The bank's performance under the Lending Test in the state of Pennsylvania is rated High Satisfactory. Performance in the limited-scope areas had a neutral effect on the overall Lending Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Harrisburg CSA was good and the bank's performance in the Lancaster MSA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Harrisburg CSA	8,839	2,430	78	8	11,355	49.1	47.1
Lancaster MSA	3,992	1,908	42	2	5,944	25.7	20.2
Scranton MSA	2,293	1,638	27	1	3,959	17.1	23.8
Pennsylvania Combined Non-MSA	1,249	589	20	8	1,866	8.0	8.9
Total	16,373	6,565	167	19	23,124	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Harrisburg CSA	1,715,266	73,845	3,708	149	1,792,968	55.6	47.1
Lancaster MSA	782,578	50,839	1,331	907	835,655	25.9	20.2
Scranton MSA	339,083	57,665	854	78	397,680	12.3	23.8
Pennsylvania Combined Non-MSA	177,195	18,428	766	3	196,392	6.1	8.9
Total	3,014,122	200,777	6,659	1,137	3,222,695	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Harrisburg CSA

As of June 30, 2021, WFBNA had a deposit market share of 7.8 percent. The bank ranked fourth among 32 depository financial institutions placing it in the top 13 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 4.9 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked third among 593 home mortgage lenders in this AA, which placed it in the top 1 percent of lenders. The other top lenders

in this AA based on market share were Members 1st FCU (8.3 percent), Rocket Mortgage (6.7 percent), and PennyMac Loan Services LLC (2.9 percent).

According to peer small business data for 2021, WFBNA had a market share of 3.8 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked 10th out of 139 small business lenders, which placed it in the top 8 percent of lenders. The top lenders in this AA based on market share were American Express National Bank (15.2 percent), JPMorgan Chase Bank, N.A. (7.5 percent), and U.S. Bank, N.A. (7.4 percent).

According to peer small farm data for 2021, WFBNA had a market share of 3.4 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked 11th out of 29 small farm lenders, which placed it in the top 38 percent of lenders. The top lenders in this AA based on market share were John Deere Financial FSB (12.6 percent), PeoplesBank (11.7 percent), and Fulton Bank, N.A. (11.4 percent).

Lancaster MSA

As of June 30, 2021, WFBNA had a deposit market share of 7.1 percent. The bank ranked fifth among 23 depository financial institutions placing it in the top 22 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 5.5 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked third among 482 home mortgage lenders in this AA, which placed it in the top 1 percent of lenders. The other top lenders in this AA based on market share were Rocket Mortgage (6.7 percent), Fulton Bank, N.A. (6.6 percent), and Members 1st FCU (5.1 percent).

According to peer small business data for 2021, WFBNA had a market share of 4.7 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked eighth out of 139 small business lenders, which placed it in the top 6 percent of lenders. The top lenders in this AA based on market share were American Express National Bank (12 percent), U.S. Bank, N.A. (9.7 percent), and JPMorgan Chase Bank, N.A. (8.7 percent).

According to peer small farm data for 2021, WFBNA had a market share of 1 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked 15th out of 24 small farm lenders, which placed it in the top 63 percent of lenders. The top lenders in this AA based on market share were Univest Bank and Trust Co. (39.4 percent), Truist Bank (8.4 percent), and Fulton Bank, N.A. (8.2 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AAs. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data. The bank's performance was good in the Harrisburg CSA and excellent in the Lancaster MSA.

Harrisburg CSA***Home Mortgage Loans***

Refer to Table O in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was below both the percentage of owner-occupied housing units in low-income geographies and the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied housing units in moderate-income geographies and it was near to the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was below the percentage of businesses in low-income geographies but it was equal to the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was below the percentage of businesses in moderate-income geographies and it was near to the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was excellent.

The bank's percentage of small loans to farms in low-income geographies exceeded both the percentage of farms in low-income geographies and the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-income geographies was below the percentage of farms in moderate-income geographies but it exceeded the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Lancaster MSA***Home Mortgage Loans***

Refer to Table O in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans in low-income geographies exceeded the percentage of owner-occupied housing units in low-income geographies but it was below the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies exceeded the percentage of owner-occupied housing units in moderate-income geographies and it approximated the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentages of small loans to businesses in low- and moderate-income geographies exceeded both the percentages of businesses in low- and moderate-income geographies and the aggregate distributions of small loans to businesses in low- and moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was very poor.

The bank did not originate or purchase any small loans to farms in low- and moderate-income geographies.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies in the Harrisburg CSA and Lancaster MSA. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AAs.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes. The bank's performance was good in both the Harrisburg CSA and Lancaster MSA.

Harrisburg CSA

Home Mortgage Loans

Refer to Table P in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and it was below the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was near to both the percentage of moderate-income families and the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 40.2 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was well below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was very poor.

The bank did not collect or consider the GAR in the underwriting of approximately 89.7 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was significantly below both the percentage of farms in the AA

with GAR of \$1 million or less and the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Lancaster MSA

Home Mortgage Loans

Refer to Table P in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and it was below the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was near to the percentage of moderate-income families and it was below the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 33.2 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was well below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was very poor.

The bank did not collect or consider the GAR in the underwriting of approximately 78.6 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was significantly below both the percentage of farms in the AA with GAR of \$1 million or less and the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Community Development Lending

The bank made a low level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

Harrisburg CSA

WFBNA made a low level of CD loans in the Harrisburg CSA. WFBNA made eight CD loans totaling approximately \$149,358, which represented less than 1 percent of the allocated tier 1 capital. CD loans were primarily made for revitalization/stabilization purposes. By dollar volume, 38.5 percent of these loans were to organizations that helped to provide affordable housing, 53.7 percent funded revitalization and stabilization efforts, and 6.8 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$2.5 million term loan to an organization that helped rural communities build affordable housing, throughout the U.S., with a special emphasis on high need and underserved areas and populations. Of this total loan, \$6,383 was allocated to the Harrisburg CSA. According to the organization, 100 percent of its clients were low- and moderate-income as they earned less than 80 percent of the area median family income.
- WFBNA provided a \$20 million term loan to a nonprofit CDFI dedicated to improving access to high-quality health and elder care, healthy foods, housing, and education for low-income communities across the country organization. Of this total loan, \$51,066 was allocated to the Harrisburg CSA.
- 2021 WFBNA provided a \$10 million line of credit to a certified CDFI organization that aimed to provide affordable homes and strengthen communities. Of this total loan, \$25,533 was allocated to the Harrisburg CSA.

Lancaster MSA

WFBNA made a low level of CD loans in the Lancaster MSA. WFBNA made two CD loans totaling approximately \$900,000, which represented less than 1 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 99.3 percent of these loans were to organizations that helped to provide affordable housing, less than 1 percent funded revitalization and stabilization efforts targeted to low- and moderate-income individuals. The following are the two CD loans made in this AA:

- WFBNA provided a \$2.5 million loan extension to a certified CDFI organization whose mission was to deliver innovative financial products and technical assistance to mission-aligned organizations to acquire, develop and preserve quality affordable housing for low- and moderate-income families, and to revitalize their communities by providing access to good jobs, quality affordable housing, schools, transportation and healthy living environments in the communities it serves throughout the United States. Of this total loan, \$6,556 was allocated to the Lancaster MSA.

- WFBNA provided a \$900,000 loan to a nonprofit affordable housing developer which was a provider of quality affordable apartments, townhomes, and rental housing and that was dedicated to expanding residential opportunities for low-income families, senior citizens, and individuals by providing affordable, safe, and secure housing solutions.

Product Innovation and Flexibility

Harrisburg CSA

WFBNA used flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 463 loans under its flexible lending programs totaling \$40.5 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	130	27,000
Dream. Plan. Home.	30	4,500
PPP	303	9,000
Total	463	40,500

Lancaster MSA

WFBNA used flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 363 loans under its flexible lending programs totaling \$24 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	66	13,700
Dream. Plan. Home.	11	2,200
PPP	286	8,100
Total	363	24,000

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Scranton MSA and Pennsylvania Combined Non-MSA was weaker than the bank's overall performance under the Lending Test in the full-scope areas. Performance was weaker primarily due to weaker borrower distribution and limited level of CD lending relative to community needs and bank's capacity to make loans in those AAs.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Pennsylvania is rated High Satisfactory Performance in the limited-scope areas had a neutral effect on the overall Investment Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Harrisburg CSA was adequate and the bank's performance in the Lancaster MSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Harrisburg CSA	5	8,282	27	3,852	32	23.2	12,134	15.5	0	0
Lancaster MSA	2	12,992	27	12,658	29	21.0	25,651	32.9	0	0
Scranton MSA	2	6,270	40	11,670	42	30.4	17,940	23.0	1	320
Pennsylvania Combined Non-MSA	0	0	8	688	8	5.8	688	0.9	0	0
Statewide***	2	16,712	25	4,925	27	19.6	21,637	27.7	1	1,002
Total	11	44,256	127	33,793	138	100.0	78,050	100.0	2	1,322
<p>The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.</p> <p>* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.</p> <p>** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.</p> <p>*** Statewide means investments in statewide programs that have a purpose, mandate, or function to serve one or more of the bank's assessment areas within the state. Due to rounding, totals may not equal 100.0%</p>										

Harrisburg CSA

The bank had an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$12.1 million and represented 3.5 percent of the bank's tier 1 capital allocated to the AA. The investments also included 23 grants and donations totaling \$446,000 to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited adequate responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 53.1 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 28.1 percent that focused on community services targeted to low- and moderate-income individuals, and 18.8 percent that focused on revitalization and stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 321 units of affordable housing in the AA.

The bank rarely used innovative and complex investments to support CD initiatives. None of the current period investments were complex. The following are examples of CD investments made in this AA:

- WFBNA provided three grants totaling over \$157,000 to an organization that developed affordable housing for low- and moderate-income individuals and families in Cumberland, Dauphin, and Perry

counties. The organization used the majority of the funds to acquire property, demolish blighted properties, and build six new townhomes, transforming an entire city block. The investment was responsive to the identified need for affordable housing.

- WFBNA invested \$79 million in four statewide single-family mortgage revenue bonds of which \$3.4 million was allocated to the Harrisburg CSA. Funds were used to purchase mortgage loans for single family residences and to provide down payment assistance loans for persons and families of low and moderate income. The state agency worked to provide affordable homeownership and rental apartment options for senior adults, low- and moderate-income families, and people with special housing needs. Through its carefully managed mortgage programs and investments in multifamily housing developments, the agency also promoted economic development across the state.
- WFBNA provided a \$30,000 grant to an organization for its COVID-19 response program. The organization's mission was to fight hunger, improve lives, and strengthen communities. The organization reduced hunger in 27 counties by distributing nutritious food to a network of community organizations that directly served people who were hungry.

Lancaster MSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$25.7 million and represented 17.4 percent of the bank's tier 1 capital allocated to the AA. The investments also included 22 grants and donations totaling \$6.2 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 51.7 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 20.7 percent that focused on community services targeted to low- and moderate-income individuals, and 27.5 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 112 units of affordable housing in the AA.

The bank occasionally used innovative and complex investments to support CD initiatives. Approximately 39.5 percent of current period investment dollars were complex NMTC investments. The following are examples of CD investments made in this AA:

- WFBNA made a \$5 million NMTC investment to finance a nonprofit grocery store in Lancaster, Pennsylvania. The grocery store created 40 new jobs with living wages for local community members. They partnered with a nonprofit to place low-income, homeless, and disabled individuals, and those who were previously incarcerated, in these positions. The nonprofit organization served homeless individuals by providing job coaching and skills training to develop competencies needed in the workplace. Lancaster's unemployment rate was more than twice the national average. Additionally, the store donated proceeds to local charities. The project was aligned with the Economic Development Strategic Plan of the City of Lancaster that was created by the Lancaster

City Alliance, city of Lancaster, and county of Lancaster. The Plan identified specific census tracts that were considered food deserts, including the location of this NMTC development. The investment was responsive to the community need for access to nutritional resources and job creation.

- WFBNA provided three grants totaling \$6 million to a CDFI in Lancaster, Pennsylvania that served small businesses within the state. The CDFI focused their work on some of the most economically distressed cities, with an average poverty rate greater than 30 percent. One grant for \$3 million was through the open for business fund, which supported small businesses impacted by the COVID-19 pandemic and economic downturn, providing low-cost loans providing capital to cover restart expenses. One small business owner used a loan to purchase a larger retail space for his store, expanding from 500 square feet to 2,000 square feet in September 2021. The small business owner significantly increased revenue and hired an additional full-time employee. Additional grants from the Diverse Community Capital program provided loan capital. The investment was responsive to the community need for small business capital.
- WFBNA invested \$79 million in four statewide single-family mortgage revenue bonds of which \$1.5 million was allocated to the Lancaster MSA. Funds were used to purchase mortgage loans for single family residences and to provide down payment assistance loans for persons and families of low and moderate income. The state agency worked to provide affordable homeownership and rental apartment options for senior adults, low- and moderate-income families, and people with special housing needs. Through its carefully managed mortgage programs and investments in multifamily housing developments, the agency also promoted economic development across the state.

Broader Statewide Investments

WFBNA had 27 current and prior period investments totaling \$21.6 million with a purpose, mandate, or function to serve one or more AAs in the state. These CD investments were primarily LIHTCs that supported the creation or preservation of affordable housing in the state. These investments were given positive consideration and supported the bank's overall performance under the Investment Test in the state of Pennsylvania.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in Scranton MSA was stronger than the bank's overall performance under the Investment Test in the full-scope areas. Performance was stronger primarily due to higher levels of CD investments relative to the bank's presence and capacity to invest in the AA. Performance in the Pennsylvania Combined Non-MSA was weaker than the bank's overall performance under the Investment Test in the full-scope areas, primarily due to lower levels of CD investments relative to the bank's presence and capacity to invest in the AA.

SERVICE TEST

The bank's performance under the Service Test in the state of Pennsylvania is rated High Satisfactory. Performance in the limited-scope areas had neutral effect on the overall Service Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Harrisburg CSA and Lancaster MSA was good.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's full-scope AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Harrisburg CSA	47.1	18	40.9	5.6	22.2	61.1	11.1	6.5	12.7	60.4	19.9
Lancaster MSA	20.2	10	22.7	10.0	10.0	80.0	0.0	4.3	10.6	73.6	11.6
Scranton MSA	23.8	11	25.0	0.0	18.2	63.6	18.2	3.2	20.5	52.2	23.6
Pennsylvania Combined Non-MSA	8.9	5	11.4	0.0	40.0	40.0	20.0	0.0	14.1	70.0	16.0
Total	100.0	44	100.0	4.5	20.5	63.6	11.4	4.5	14.2	62.4	18.5
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Harrisburg CSA	0	3	0	-2	-1	0
Lancaster MSA	0	3	0	-1	-2	0
Scranton MSA	0	0	0	0	0	0
Pennsylvania Combined Non-MSA	0	0	0	0	0	0
Total	0	6	0	-3	-3	0
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.						

Harrisburg CSA

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Harrisburg CSA. WFBNA operated 18 branches in the AA, comprising one branch in a low-income geography, two branches in moderate-income geographies, six branches in middle-income geographies, and two branches in upper-income geographies. The distribution of branches in low-income geographies was near to the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies.

To the extent changes have been made, the bank's record of opening and closing of branches generally had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday and 10 out of the 18 branches had hours on Saturday from 9:00 a.m. to 12:00 p.m. In addition, one branch located in a moderate-income geography had hours on Saturday from 10:00 a.m. to 1:00 p.m.

Lancaster MSA

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Lancaster MSA. WFBNA operated 10 branches in the AA, comprising one branch in a low-income geography, one branch in a moderate-income geography, and eight branches in middle-income geographies. The distribution of branches in low-income geographies exceeded the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies approximated the distribution of the population in moderate-income geographies.

To the extent changes have been made, the bank's record of opening and closing of branches generally had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday and six of the 10 branches had Saturday hours from 9:00 a.m. to 12:00 p.m.

Community Development Services

The bank provided a limited level of CD services.

Harrisburg CSA

WFBNA provided a limited level of CD services in the Harrisburg CSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 27 CD service activities during the evaluation period. A majority (66.7 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The other CD services were targeted to affordable housing (33.3 percent). The bank's assistance provided was responsive to the identified needs in the AA. The following is an example of CD services provided in this AA:

- WFBNA employees provided 20 hours of board service to an organization whose mission was to improve Pennsylvania's economy and business climate and provided support of small businesses.

Lancaster MSA

WFBNA provided a limited level of CD services in the Lancaster MSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 21 CD service activities during the evaluation period. A majority (57.1 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The other CD services were targeted to affordable housing (23.8 percent) and revitalize/stabilize (19.1 percent). The bank's assistance provided was responsive to the identified needs in the AA. The following are examples of CD services provided in this AA:

- WFBNA employees provided 29 hours of financial education to members of an organization that supported affordable housing and financial independence.
- WFBNA employees provided four hours of ongoing outreach and financial education to members of an organization that supported more affordable housing to low- to moderate-income people living and working in the Lancaster MSA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Pennsylvania Combined Non-MSA was stronger than the bank's overall performance under the Service Test in the full-scope areas. CD services were not evaluated in the limited-scope AA, which resulted in stronger performance. The bank's performance in the Scranton MSA was weaker than the bank's overall performance under the Service Test in the full-scope areas primarily due to weaker accessibility to service delivery systems.

State of South Carolina

CRA rating for the State of South Carolina⁴⁶: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited an adequate geographic distribution of loans in its AAs.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank made an adequate level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.
- The bank had a significant level of qualified CD investments that demonstrated good responsiveness to credit and economic development needs, although occasionally in a leadership position. The bank made significant use of innovative and complex investments to support CD initiatives.
- Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided a limited level of CD services.

Description of Institution's Operations in the State of South Carolina

The state of South Carolina was WFBNA's 17th largest rating area based on its total deposits in the state. As of June 30, 2021, the bank maintained approximately \$17.8 billion or 1.2 percent of its total domestic deposits in branches within the state. Of the 64 depository financial institutions operating in the bank's AAs within the state, WFBNA, with a deposit market share of 18.1 percent, was the largest. Other top depository financial institutions in the bank's AAs within the state based on market share included Bank of America, N.A. (17 percent), Truist Bank (13 percent), First Citizens Bank & Trust Company (8.8 percent), SouthState Bank, N.A. (8.5 percent), and TD Bank, N.A. (5.3 percent). As of December 31, 2021, the bank operated 90 branches and 271 ATMs in the state. WFBNA delineated 17 AAs within the state; however, the OCC combined, analyzed, and presented those AAs at the CSA level where possible for purposes of this evaluation. This resulted in the following seven AAs: Charleston-North Charleston, SC MSA (Charleston MSA), Columbia-Orangeburg-Newberry, SC CSA (Columbia CSA), Florence, SC MSA (Florence MSA), Greenville-Spartanburg-Anderson, SC CSA (Greenville CSA), Hilton Head Island-Bluffton, SC MSA (Hilton Head Island MSA), Sumter, SC MSA (Sumter MSA), and South Carolina Combined Non-MSA. The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

⁴⁶ This rating only reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Charleston MSA

The following table provides a summary of the demographics, including housing and business information for the Charleston MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Charleston MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	156	9.0	22.4	37.8	28.2	2.6
Population by Geography	712,232	6.7	21.4	41.9	29.2	0.8
Housing Units by Geography	309,113	6.7	21.2	40.2	31.1	0.8
Owner-Occupied Units by Geography	173,999	3.3	19.1	42.4	34.9	0.3
Occupied Rental Units by Geography	94,905	12.5	24.4	40.5	21.3	1.4
Vacant Units by Geography	40,209	8.1	22.9	29.9	37.5	1.7
Businesses by Geography	60,837	7.6	18.6	34.6	37.6	1.5
Farms by Geography	1,486	3.4	18.8	44.9	32.4	0.5
Family Distribution by Income Level	173,525	22.6	16.7	19.9	40.8	0.0
Household Distribution by Income Level	268,904	24.5	15.7	17.6	42.2	0.0
Median Family Income MSA - 16700 Charleston-North Charleston, SC MSA		\$65,558	Median Housing Value			\$241,873
			Families Below Poverty Level			11.4%
			Median Gross Rent			\$1,021
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$32,779 and moderate-income families earned at least \$32,779 and less than \$52,446. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$819 for low-income borrowers and \$1,311 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$1,298. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Information from Moody's Analytics indicated that at the end of the evaluation period, the Charleston MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Charleston's economic recovery continued to see steady improvement. This rebound was mostly due to an increase in the tourism industry, which positively impacted leisure and hospitality jobs and boosted the economy. The Charleston MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Government, Professional and Business Services, Education and Health Services, Retail Trade, and Leisure and Hospitality Services. Major employers in the Charleston MSA include

Joint Base Charleston, Medical University of South Carolina (MUSC), Roper St. Francis Healthcare, The Boeing Co., and Trident Health System. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Charleston MSA was 2.9 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Charleston MSA. The contacts included an organization that provided services to low- and moderate-income individuals and families and an organization that attracted and retained businesses in the AA. The bank also provided an assessment of community needs based on research completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were needs within the community:

- Construction of affordable rental housing units and rental assistance
- Rehabilitation of housing units/improvement of the quality of housing stock
- Emergency shelters, health services, and transitional housing
- Jobs skills training and support of job readiness programs
- Access to capital and training for small businesses
- Access to payroll protection, emergency funding, and technical assistance, including business plan development and budgeting for small businesses
- Support of technical skills training programs

Opportunities for participation by financial institutions included the following:

- Access to mortgage and home improvement loans
- Access to small business credit
- Access to funding for minority owned businesses
- Education on start-ups/small businesses
- Ability to foster relationships with local institutions

Columbia CSA

The following table provides a summary of the demographics, including housing and business information for the Columbia CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Columbia CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	219	7.3	27.9	35.2	27.4	2.3
Population by Geography	920,795	5.0	25.6	37.4	30.1	1.9
Housing Units by Geography	399,446	5.5	26.8	38.2	29.4	0.1
Owner-Occupied Units by Geography	233,333	2.3	22.9	39.7	35.1	0.0
Occupied Rental Units by Geography	112,341	11.6	33.0	34.8	20.6	0.0
Vacant Units by Geography	53,772	6.6	30.7	39.1	23.0	0.5
Businesses by Geography	62,005	7.6	23.2	35.3	33.3	0.5
Farms by Geography	2,050	2.0	24.8	43.3	29.9	0.1
Family Distribution by Income Level	223,959	22.9	16.8	19.3	41.0	0.0
Household Distribution by Income Level	345,674	24.4	15.9	17.9	41.8	0.0
Median Family Income MSA - 17900 Columbia, SC MSA		\$62,665	Median Housing Value			\$139,885
Median Family Income Non-MSAs - SC		\$44,609	Median Gross Rent			\$831
			Families Below Poverty Level			12.7%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$22,305 to \$31,333 and moderate-income families earned at least \$22,305 to \$31,333 and less than \$35,687 to \$50,132, depending on the metropolitan or nonmetropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$558 to \$783 for low-income borrowers and ranging from \$892 to \$1,253 for moderate-income borrowers, depending on the metropolitan or nonmetropolitan area. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$751. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in the nonmetropolitan area of the AA.

Columbia, SC MSA (Columbia MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Columbia MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Columbia experienced a slower economic recovery than other areas in the state having recovered approximately 70 percent of job losses. Consumer industries were beginning to see a rebound due to a slowdown in COVID cases. With the decline in cases, consumers were returning to normal activities, which increased sales at local restaurants, bars, and sporting venues. The large military presence also provided stability, which helped offset weaknesses from local and state governments. The Columbia MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Government, Professional and Business Services, Education and Health Services, Retail Trade, and Leisure and Hospitality Services. Major employers in the Columbia MSA include

Prisma Health Midlands, BlueCross Blue Shield of SC, Dominion Energy, Amazon, and AT&T. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Columbia MSA was 3.1 percent compared to the national unemployment rate of 3.7 percent.

Newberry, SC Micro Area (Newberry County)

Newberry, SC Micropolitan Statistical Area comprises Newberry County, South Carolina. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for Newberry County was 2.7 percent compared to the national unemployment rate of 3.7 percent. Total population in the county in 2020 was reported at 38,329. The median household income was \$46,038, an increase of 4.1 percent from 2019. The median property value also experienced an increase of 1.9 percent from 2019 and was reported at \$118,500 in 2020. Homeownership rates in 2020 increased 1.6 percent from 2019 to 74.9 percent in 2020. This is well above the national average of 64.4 percent. Employment in the county grew at a rate of 4.8 percent from 2019 to 2020 and was reported at 17,700 in 2020. The top industries in the county were Manufacturing, Health Care and Social Assistance, Retail Trade, Educational Services, and Public Administration.

Orangeburg, SC Micro Area (Orangeburg County)

Orangeburg, SC Micropolitan Statistical Area comprises Orangeburg County, South Carolina. The December 2021 non-seasonally adjusted unemployment rate for Orangeburg County was 6.2 percent compared to the national unemployment rate of 3.7 percent. Total population in the county in 2020 was reported at 86,953. The median household income was \$36,802, an increase of 3 percent from 2019. The median property value also experienced an increase of 1.1 percent from 2019 and was reported at \$91,700 in 2020. Homeownership rates in 2020 were consistent with 2019 totaling 67.2 percent in 2020. This is slightly above the national average of 64.4 percent. Employment in the county declined at a rate of 1.2 percent from 2019 to 2020 and was reported at 34,600 in 2020. The top industries in the county were Manufacturing, Health Care and Social Assistance, Educational Services, Retail Trade, and Accommodation and Food Services.

Community Contacts

This evaluation considered comments provided by three local organizations that were contacted during the evaluation period and served the Columbia CSA. The contacts include 1) an organization designed to create jobs for the residents in the county, 2) an entity that worked to assist new companies considering expanding in or relocating to the county, and 3) a not-for-profit entity that engaged in recruitment of capital investment in the county. The bank also provided an assessment of community needs based on research completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were needs within the community:

- Construction of affordable rental housing units and rental assistance
- Development of single-family affordable housing
- Rehabilitation of housing units/improvement of the quality of housing stock
- Financial assistance during disaster recovery
- Access to financial education/training and alternatives for payday lending
- Access to basic necessities, emergency shelters, and transitional housing

- Jobs skills training and support of job readiness programs
- Workforce development/education
- Support of technical skills training programs
- Access to capital and training for small businesses
- Access to payroll protection and emergency funding

Opportunities for participation by financial institutions included the following:

- Access to financing for small businesses
- Increased financial literacy/education programs
- Access to credit counseling
- Development of or increased access to construction loans for revitalization

Greenville CSA

The following table provides a summary of the demographics, including housing and business information for the Greenville CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Greenville CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	315	7.0	24.4	42.9	25.7	0.0
Population by Geography	1,372,579	4.7	21.7	43.7	30.0	0.0
Housing Units by Geography	599,122	5.1	22.2	44.2	28.5	0.0
Owner-Occupied Units by Geography	358,575	2.6	18.2	46.0	33.3	0.0
Occupied Rental Units by Geography	164,462	9.5	29.0	40.8	20.7	0.0
Vacant Units by Geography	76,085	7.3	26.4	43.1	23.2	0.0
Businesses by Geography	90,086	4.7	18.0	40.5	36.8	0.0
Farms by Geography	2,724	2.0	17.1	50.0	30.9	0.0
Family Distribution by Income Level	355,550	22.3	17.1	18.7	42.0	0.0
Household Distribution by Income Level	523,037	24.4	15.8	16.8	43.0	0.0
Median Family Income MSA - 24860 Greenville-Anderson, SC MSA		\$58,097	Median Housing Value			\$132,814
Median Family Income MSA - 43900 Spartanburg, SC MSA		\$53,959	Median Gross Rent			\$718
Median Family Income Non-MSAs - SC		\$44,609	Families Below Poverty Level			13.4%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$22,305 to \$29,049 and moderate-income families earned at least \$22,305 to \$29,049 and less than \$35,687 to \$46,478, depending on the metropolitan or nonmetropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of

the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$558 to \$726 for low-income borrowers and ranging from \$892 to \$1,162 for moderate-income borrowers, depending on the metropolitan or nonmetropolitan area. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$713. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Greenville-Anderson, SC MSA (Greenville MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Greenville MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Greenville's economic recovery was improving with approximately 80 percent of jobs lost being regained. Professional and business services along with leisure and hospitality services accounted for the bulk of the net job gains. The Greenville MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Professional and Business Services, Government, Manufacturing, Education and Health Services, Retail Trade, and Leisure and Hospitality Services. Major employers in the Greenville MSA include Prisma Health, Michelin North America, Clemson University, Milliken & Co., and Bon Secours St. Francis Health System. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Greenville MSA was 2.9 percent compared to the national unemployment rate of 3.7 percent.

Spartanburg, SC MSA (Spartanburg MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Spartanburg MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Economic recovery in the Spartanburg MSA was slow but improving. During 2021, the leisure and hospitality industry has led the recovery efforts and job growth; however, recent job cuts in the professional and business sector as well as the public sector negatively impacted the unemployment rates. The Spartanburg MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Manufacturing, Government, Professional and Business Services, Retail Trade, Education and Health Services, and Leisure and Hospitality Services. Major employers in the Spartanburg MSA include BMW Manufacturing Corp., Spartanburg Regional Health Services, Milliken & Company, Adidas, and Michelin North America. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Spartanburg MSA was 3.3 percent compared to the national unemployment rate of 3.7 percent.

Gaffney, SC Micro Area (Cherokee County)

Gaffney, SC Micropolitan Statistical Area comprises Cherokee County, South Carolina. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for Cherokee County was 4.1 percent compared to the national unemployment rate of 3.7 percent. Total population in the county in 2020 was reported at 57,110. The median household income was \$37,787, an increase of 2.5 percent from 2019. The median property value also experienced an increase of 3.2 percent from 2019 and was reported at \$98,300 in 2020. Homeownership rates in 2020 increased 2 percent from 2019 totaling 70.9 percent in 2020. This is slightly above the national average of 64.4 percent. Employment in the county grew at a rate of 1.9 percent from 2019 to 2020 and was reported at

23,600 in 2020. The top industries in the county were Manufacturing, Retail Trade, Health Care and Social Assistance, Accommodation and Food Services, and Educational Services.

Greenwood, SC Micro Area (Greenwood County)

Greenwood, SC Micropolitan Statistical Area comprises Greenwood County, South Carolina. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for Greenwood County was 3.6 percent compared to the national unemployment rate of 3.7 percent. Total population in the county in 2020 was reported at 70,672. The median household income was \$41,081, a decline of 3 percent from 2019. The median property value experienced an increase of 4.2 percent from 2019 and was reported at \$128,000 in 2020. Homeownership rates in 2020 were lower than 2019 totaling 62.3 percent in 2020. This is slightly below the national average of 64.4 percent. Employment in the county declined at a rate of 2.1 percent from 2019 to 2020 and was reported at 29,800 in 2020. The top industries in the county were Manufacturing, Health Care and Social Assistance, Retail Trade, Educational Services, and Accommodation and Food Services.

Seneca, SC Micro Area (Oconee County)

Seneca, SC Micropolitan Statistical Area comprises Oconee County, South Carolina. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for Oconee County was 3 percent compared to the national unemployment rate of 3.7 percent. Total population in the county in 2020 was reported at 78,314. The median household income was \$49,691, an increase of 1.1 percent from 2019. The median property value also experienced an increase of 2.6 percent from 2019 and was reported at \$164,000 in 2020. Homeownership rates in 2020 were fairly consistent with 2019 totaling 73.2 percent in 2020. This is above the national average of 64.4 percent. Employment in the county increased at a rate of 2.8 percent from 2019 to 2020 and was reported at 33,000 in 2020. The top industries in the county were Manufacturing, Educational Services, Health Care and Social Assistance, Retail Trade, and Construction.

Union, SC Micro Area (Union County)

Union, SC Micropolitan Statistical Area comprises Union County, South Carolina. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for Union County was 5.4 percent compared to the national unemployment rate of 3.7 percent. Total population in the county in 2020 was reported at 27,325. The median household income was \$41,117, a decline of less than 1 percent from 2019. The median property value experienced an increase of less than 1 percent from 2019 and was reported at \$80,300 in 2020. Homeownership rates in 2020 were lower than 2019 totaling 66.8 percent in 2020. This is slightly above the national average of 64.4 percent. Employment in the county declined at a rate of 2.4 percent from 2019 to 2020 and was reported at 11,500 in 2020. The top industries in the county were Manufacturing, Retail Trade, Health Care and Social Assistance, Educational Services, and Administrative & Support & Waste Management Services.

Community Contacts

This evaluation considered comments provided by five local organizations that were contacted during the evaluation period and served the Greenville CSA area. The organizations included three organizations that helped to attract and retain businesses in the AA, one organization that helped to provide affordable housing, and one organization that provided services to low- and moderate-income

individuals and families. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing and rental assistance
- Rehabilitation of housing units
- Provision of essential community-wide infrastructure
- Basic necessities for homeless along with emergency shelters and transitional housing
- Access to capital and training for small businesses
- Access to payroll protection and emergency funding for small businesses
- Support of job readiness programs and technical skills training programs

Opportunities for participation by financial institutions included the following:

- Access to lending opportunities for small businesses, entrepreneurs, and minorities
- Affordable housing options
- Support for local companies focused on helping low- and moderate-income residents keep their homes
- More flexible loan programs
- Financial education/literacy programs

Scope of Evaluation in the State of South Carolina

The OCC selected the Charleston MSA, Columbia CSA, and Greenville CSA for full-scope reviews and based conclusions and ratings primarily on activity within these geographical areas. These AAs carried significant weight in determining the overall ratings for the state of South Carolina because of the significance of the bank's presence in these AAs. More weight was given to the Columbia CSA due to the larger deposit base, lending, and branch presence.

During the evaluation period, the bank originated or purchased 51,567 home mortgage loans, small loans to businesses, and small loans to farms totaling \$7.2 billion. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within each AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. In the Charleston MSA, Columbia CSA, Greenville CSA, and Hilton Head Island MSA, the OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms. In the Florence MSA, Sumter MSA, and South Carolina Combined Non-MSA, the OCC placed more weight based on the number of loans on small loans to businesses versus home mortgage loans and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF SOUTH CAROLINA

LENDING TEST

The bank's performance under the Lending Test in the state of South Carolina is rated High Satisfactory. Performance in the limited-scope areas had a neutral effect on the overall Lending Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Charleston MSA and Greenville CSA was good and the bank's performance in the Columbia CSA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Charleston MSA	7,478	6,969	26	17	14,490	28.1	24.6
Columbia CSA	5,654	5,295	189	16	11,154	21.6	35.0
Greenville CSA	9,524	8,448	182	22	18,176	35.2	27.2
Florence MSA	726	975	24	3	1,728	3.3	4.4
Hilton Head Island MSA	2,435	1,723	7	1	4,166	8.1	5.6
Sumter MSA	427	558	20	1	1,006	1.9	1.4
South Carolina Combined Non-MSA	315	544	48	1	908	1.8	1.8
Total	26,559	24,512	496	61	51,628	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Charleston MSA	2,514,007	217,984	497	24,650	2,757,138	37.9	24.6
Columbia CSA	1,002,133	171,550	9,459	31,193	1,214,335	16.7	35.0
Greenville CSA	1,885,958	257,262	4,723	33,906	2,181,849	30.0	27.2
Florence MSA	108,095	25,263	1,251	26,584	161,193	2.2	4.4
Hilton Head Island MSA	764,066	42,063	66	6	806,201	11.1	5.6
Sumter MSA	61,624	15,084	2,043	1	78,752	1.1	1.4
South Carolina Combined Non-MSA	50,166	18,241	4,313	2	72,722	1.0	1.8
Total	6,386,049	747,447	22,352	116,342	7,272,190	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Charleston MSA

As of June 30, 2021, WFBNA had a deposit market share of 21.5 percent. The bank was the top ranked depository financial institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 3.2 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked fourth among 711 home mortgage lenders in this AA, which placed it in the top 1 percent of lenders. The top lenders in this AA based on market share were Rocket Mortgage (6.3 percent), Newrez LLC (4 percent), and Freedom Mortgage Corporation (3.3 percent).

According to peer small business data for 2021, WFBNA had a market share of 9.1 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked third out of 161 small business lenders, which placed it in the top 2 percent of lenders. The other top lenders in this AA based on market share were American Express National Bank (19.8 percent), Bank of America, N.A. (10.4 percent), and JPMorgan Chase Bank, N.A. (6.7 percent).

According to peer small farm data for 2021, WFBNA had a market share of 11 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked fifth out of 20 small farm lenders, which placed it in the top 25 percent of lenders. The top lenders in this AA based on market share were JPMorgan Chase Bank, N.A. (15.4 percent), John Deere Financial FSB (14.3 percent), and Bank of America, N.A. (12.1 percent).

Columbia CSA

As of June 30, 2021, WFBNA had a deposit market share of 21.7 percent. The bank ranked second among 28 depository financial institutions placing it in the top 8 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 3.2 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked fifth among 582 home mortgage lenders in this AA, which placed it in the top 1 percent of lenders. The top lenders in this AA based on market share were Guild Mortgage Company LLC (7 percent), Rocket Mortgage (6.9 percent), and Freedom Mortgage Corporation (4.3 percent).

According to peer small business data for 2021, WFBNA had a market share of 8.8 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked third out of 146 small business lenders, which placed it in the top 3 percent of lenders. The other top lenders in this AA based on market share were American Express National Bank (16.3 percent), First Citizens Bank and Trust (9 percent), and Bank of America, N.A. (8.5 percent).

According to peer small farm data for 2021, WFBNA had a market share of 17.8 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked second out of 22 small farm lenders, which placed it in the top 10 percent of lenders. The other top lenders in this AA based on market share were First Citizens Bank and Trust (20.7 percent), John Deere Financial FSB (16.4 percent), and SouthState Bank, N.A. (9.2 percent).

Greenville CSA

As of June 30, 2021, WFBNA had a deposit market share of 14.5 percent. The bank ranked second among 38 depository financial institutions placing it in the top 6 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 3.6 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked third among 697 home mortgage lenders in this AA, which placed it in the top 1 percent of lenders. The other top lenders in this AA based on market share were Rocket Mortgage (8.3 percent), PennyMac Loan Services LLC (3.9 percent), and Truist Bank (3.4 percent).

According to peer small business data for 2021, WFBNA had a market share of 8.8 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked second out of 174 small business lenders, which placed it in the top 2 percent of lenders. The other top lenders in this AA based on market share were American Express National Bank (16.3 percent), Bank of America, N.A. (8.5 percent), and Truist Bank (7.3 percent).

According to peer small farm data for 2021, WFBNA had a market share of 28 percent based on the number of small loans to farms originated or purchased in this AA. The bank was the top ranked lender of small loans to farms out of 25 small farm lenders. The other top lenders in this AA based on market share were JPMorgan Chase Bank, N.A. (12.5 percent), U.S. Bank, N.A. (12.1 percent), and First Citizens Bank and Trust (9.9 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AAs. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data. The bank's performance was adequate in the Charleston MSA and Greenville CSA and good in the Columbia CSA.

Charleston MSA

Home Mortgage Loans

Refer to Table O in the state of South Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

The bank's percentages of home mortgage loans in low- and moderate-income geographies were well below the percentages of owner-occupied housing units in low- and moderate-income geographies and they were near to the aggregate distributions of home mortgage loans in low- and moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of South Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

The bank's percentages of small loans to businesses in low- and moderate-income were below both the percentages of businesses in low- and moderate-income geographies and the aggregate distributions of small loans to businesses in low- and moderate-income geographies by all lenders.

Columbia CSA

Home Mortgage Loans

Refer to Table O in the state of South Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was below the percentage of owner-occupied housing units in low-income geographies but it exceeded the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was well below the percentage of owner-occupied housing units in moderate-income geographies and it was near to the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of South Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was below the percentage of businesses in low-income geographies and it approximated the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was below the percentage of businesses in moderate-income geographies and it was near to the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of South Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

The bank did not originate or purchase any small loans to farms in low-income geographies. The bank's percentage of small loans to farms in moderate-income geographies exceeded both the percentage of farms in moderate-income geographies and the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Greenville CSA***Home Mortgage Loans***

Refer to Table O in the state of South Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans in low-income geographies was below both the percentage of owner-occupied housing units in low-income geographies and the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was well below the percentage of owner-occupied housing units in moderate-income geographies and it was near to the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of South Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was below both the percentage of businesses in low-income geographies and the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was near to the percentage of businesses in moderate-income geographies and it approximated the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of South Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was good.

The bank's percentage of small loans to farms in low-income geographies was significantly below the percentage of farms in low-income geographies but it was equal to the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-income geographies exceeded the percentage of farms in moderate-income geographies but it was below the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies in the Charleston MSA, Greenville CSA, and Columbia CSA. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AAs.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes. The bank's performance was good in the Charleston MSA, Columbia CSA and Greenville CSA.

Charleston MSA

Home Mortgage Loans

Refer to Table P in the state of South Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and but it approximated the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was near to both the percentage of moderate-income families and the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of South Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 27.4 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Columbia CSA

Home Mortgage Loans

Refer to Table P in the state of South Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but it approximated the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was near to both the percentage of moderate-income families and the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of South Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 27.7 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of South Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was poor.

The bank did not collect or consider the GAR in the underwriting of approximately 77.8 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was significantly below the percentage of farms in the AA with GAR of \$1 million or less and it was well below the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Greenville CSA

Home Mortgage Loans

Refer to Table P in the state of South Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but it approximated the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers approximated the percentage of moderate-income families and it was near to the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of South Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 29.4 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of South Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was poor.

The bank did not collect or consider the GAR in the underwriting of approximately 79.1 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was significantly below the percentage of farms in the AA with

GAR of \$1 million or less and it was well below the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Community Development Lending

The bank made an adequate level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

Charleston MSA

WFBNA made an adequate level of CD loans in the Charleston MSA. WFBNA made 17 CD loans totaling approximately \$24.7 million, which represented 4.3 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 85 percent of these loans funded affordable housing that provided 180 units of affordable housing, less than 1 percent funded revitalization and stabilization efforts, and 14.4 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$973,000 loan for a multifamily housing development located in a low-income census tract in North Charleston, South Carolina. The development included 12 one-bedroom units and three two-bedroom units with 100 percent of the average rental rates below the 2020 Fair Market Rent for the area. The units were affordable to tenants earning up to 55 percent of the 2020 area median family income.
- WFBNA provided a \$10 million term loan an organization for a low-income investment fund dedicated to creating pathways of opportunity for low-income people and communities. Of this total loan, \$42,250 was allocated to the Charleston MSA. By investing capital and providing technical assistance for affordable housing, childcare, education and other community development organizations, the fund spurred economic advancement for the very poor. According to the organization, 100 percent of its clients were low- and moderate-income as they earned less than 80 percent of the area median family income.
- WFBNA provided a \$20 million term loan to a nonprofit CDFI dedicated to improving access to high-quality health and elder care, healthy foods, housing, and education for low-income communities across the country. Of this total loan, \$84,501 was allocated to the Charleston MSA.

Columbia CSA

WFBNA made an adequate level of CD loans in the Columbia CSA. WFBNA made 16 CD loans totaling approximately \$31.1 million, which represented 3.83 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 94.3 percent of these loans funded affordable housing that provided 516 units of affordable housing, less than 1 percent funded revitalization and stabilization efforts, and 4.9 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA renewed a \$300,000 working capital line of credit for a nonprofit organization that provided foster care placements, supportive housing, and related services along with counseling and education in South Carolina and Alabama. The organization had 230 foster homes in South Carolina.
- WFBNA provided a \$4 million loan for a 60-unit affordable housing development located in Newberry, South Carolina, with 100 percent of the units restricted to tenants earning up to 60 percent of the area median family income.
- WFBNA provided a \$20 million term loan to a nonprofit CDFI dedicated to improving access to high-quality health and elder care, healthy foods, housing, and education for low-income communities across the country. Of this total loan, \$148,096 was allocated to the Columbia CSA.

Greenville CSA

WFBNA made a relatively high level of CD loans in the Greenville CSA. WFBNA made 22 CD loans totaling approximately \$33.9 million, which represented 5.37 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 91 percent of these loans funded affordable housing that provided 553 units of affordable housing, 4 percent funded revitalization and stabilization efforts, and 5.1 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$6.3 million loan for a Section 8, 80-unit affordable housing development located in Anderson, South Carolina, with 100 percent of the units restricted to tenants who earned up to 60 percent of the area median family income.
- WFBNA provide a \$5.9 million construction loan for a 46-unit LIHTC affordable housing development in Mauldin, South Carolina. All of the units were restricted to tenants earning up to 60 percent of the AMI.
- WFBNA provided a \$4.2 million loan for a 60-unit LIHTC affordable housing development in Clinton, South Carolina. All of the units were restricted to tenants earning up to 60 percent of the AMI.

Product Innovation and Flexibility

Charleston MSA

WFBNA made extensive use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 1,325 loans under its flexible lending programs totaling \$72.9 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	98	24,200
Dream. Plan. Home.	38	7,600
PPP	1,189	41,100
Total	1,325	72,900

Columbia CSA

WFBNA made extensive use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 993 loans under its flexible lending programs totaling \$63.3 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	155	29,200
Dream. Plan. Home.	29	4,200
PPP	809	29,900
Total	993	63,300

Greenville CSA

WFBNA made extensive use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 1,541 loans under its flexible lending programs totaling \$96.5 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	226	43,400
Dream. Plan. Home.	30	4,700
PPP	1,285	4,400
Total	1,541	96,500

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Lending Test in the Florence MSA was consistent with the bank's overall performance under the Lending Test in the full-scope areas. The bank's performance in the Hilton Head Island MSA, Sumter MSA, and South Carolina Combined Non-MSA was weaker than the bank's overall performance under the Lending Test in the full-scope areas. Performance was weaker primarily due to the lower volumes of CD lending relative to the needs and opportunities for CD loans in these areas.

Refer to Tables O through T in the state of South Carolina section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of South Carolina is rated High Satisfactory. Performance in the limited-scope areas had a neutral effect on the overall Investment Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Charleston MSA and Greenville CSA was adequate and the bank's performance in the Columbia CSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Charleston MSA	37	6,394	68	10,388	105	28.2	16,782	17.4	2	116
Columbia CSA	42	5,761	65	44,178	107	28.8	49,939	51.7	3	4,796
Greenville CSA	33	2,775	81	12,357	114	30.7	15,132	15.7	3	8,105
Florence MSA	3	7,739	22	240	25	6.7	7,979	8.3	2	81
Hilton Head Island MSA	2	315	6	548	8	2.2	863	0.9	0	0
Sumter MSA	1	5,560	7	70	8	2.2	5,630	5.8	1	27
South Carolina Combined Non-MSA	2	49	0	0	2	0.5	49	0.1	1	2
Statewide***	2	195	1	15	3	0.8	210	0.2	1	7
Total	122	28,788	250	67,796	372	100.0	96,584	100.0	13	13,134
<p>The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.</p> <p>* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.</p> <p>** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.</p> <p>*** Statewide means investments in statewide programs that have a purpose, mandate, or function to serve one or more of the bank's assessment areas within the state. Due to rounding, totals may not equal 100.0%</p>										

Charleston MSA

The bank had an adequate level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$16.8 million and represented 2.9 percent of the bank's tier 1 capital allocated to the AA. The investments also included 67 grants and donations totaling \$3.4 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited adequate responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 5.3 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 23.8 percent that focused on community services targeted to low- and moderate-income individuals, and 22.9 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 279 units of affordable housing in the AA.

The bank made significant use of innovative or complex investments to support CD initiatives. Approximately 67.4 percent of current period investment dollars were complex NMTC investments. The following are examples of CD investments made in this AA:

- WFBNA provided a \$7 million NMTC investment to finance a company's new headquarters in Charleston, South Carolina. The company relocated 140 employees in the Charleston area to the new

headquarters and added an additional 100 full-time positions. The building was located in a severely distressed low-income census tract with a poverty rate greater than 35 percent. The investment was responsive to the community need for job creation.

- WFBNA provided a \$1 million grant through the open for business fund to a nonprofit CDFI organization based in Charleston, South Carolina. The CDFI provided capital for CD projects, including women and minority-owned small businesses. Through 2021, 16 small businesses received assistance, including loan rate buydowns. Additionally, 62 businesses received technical assistance from the organization. The bank also supported this organization with a \$500,000 grant to provide small business capital and four additional grants totaling \$100,000 to provide general operational support. WFBNA demonstrated active involvement, evidenced through its grant support during the evaluation period. The investment was responsive to the identified need for small business capital.
- WFBNA provided a \$40,000 grant to an organization for its COVID-19 response program. The organization was an affiliate of a global organization that utilized community-led solutions to identify and resolve community concerns with a primary focus on education, financial stability, and health.

Columbia CSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$49.9 million and represented 6.2 percent of the bank's tier 1 capital allocated to the AA. The investments also included 60 grants and donations totaling \$1.3 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 53.3 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 26.2 percent that focused on community services targeted to low- and moderate-income individuals, and 20.5 percent that focused on economic development and revitalization/stabilization of low- and moderate-income geographies. In total, the bank's investments helped create or retain 741 units of affordable housing in the AA.

The bank made significant use of innovative and complex investments to support CD initiatives. Approximately 50 percent of current period investment dollars were complex LIHTC and NMTC investments. The following are examples of CD investments made in this AA:

- WFBNA invested in an MDI that was also a CDFI located in Columbia, South Carolina. The MDI focused on entrepreneurship, homeownership, and asset accumulation, with an emphasis on systemically underserved people and places. Almost 90 percent of the loans originated by the MDI were to minority- and/or women-owned businesses or in low-income communities. WFBNA provided access to its ATM network, surcharge free, to the MDI's customers. The investment was responsive to the community need for capital.

- WFBNA made a \$12 million NMTC investment in a project located in Winnsboro, South Carolina. The investment supported the renovation of a historic building into a government center for the community. The building was constructed in 1900 and had been vacant for 30 years. The center included the sheriff's department, a parks and recreation department, a new child development center, a new 911 Call Center, a working theater for community meetings and arts performances, and a visitor's center. The project retained 115 full-time employees and created 16 permanent jobs and 61 construction jobs. At least 50 percent of the new jobs created were filled by low-income South Carolinians and those living in low-income communities. WFBNA collaborated with a nonprofit that provided financing for affordable housing, small business, community facilities, and healthy food through revolving loan funds. In addition to the NMTC, the project involved Federal and State Historic Tax Credits, and South Carolina Abandoned Building Tax Credits. This investment was highly complex because of the inherent nature of NMTC transactions. The investment was responsive to the community needs for job creation and neighborhood revitalization.
- WFBNA provided a \$25,000 grant to a nonprofit organization for its Housing Services for Homeless Families program. The organization's continuum of care, from emergency services to transitional and affordable housing, helped keep each family together and met their needs at the right time with the right services. By providing the support to move each family toward a permanent, self-sufficient solution, the organization helped to eradicate family homelessness and helped parents and their children achieve lasting independence. The investment was responsive to the need for homelessness services.

Greenville CSA

The bank had an adequate level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$15.1 million and represented 2.4 percent of the bank's tier 1 capital allocated to the AA. The investments also included 79 grants and donations totaling \$2 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited adequate responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 48.2 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 28.9 percent that focused on community services targeted to low- and moderate-income individuals, and 22.8 percent that focused on economic development and revitalization/stabilization of low- and moderate-income geographies. In total, the bank's investments helped create or retain 768 units of affordable housing in the AA.

The bank made extensive use of innovative or complex investments to support CD initiatives. Approximately 83.7 percent of current period investment dollars were complex LIHTC investments. The following are examples of CD investments made in this AA:

- WFBNA provided a \$6.8 million LIHTC equity investment to finance a 46-unit affordable housing development in Mauldin, South Carolina. All units were restricted to tenants earning up to 60

percent of the AMI. The bank also provided a \$5.9 million construction loan for the project. The investment was responsive to the identified need for affordable housing.

- WFBNA provided a \$1 million grant to a nonprofit CDFI located in the Greenville CSA through the open for business Fund. The CDFI served the communities of Greenville and Spartanburg, supporting small business owners and entrepreneurs and offering programs that supported homeownership. The bank's funding supported the organization's business center that helped struggling businesses through coaching and technical assistance. In 2021, the center helped more than 400 clients. The bank provided four additional grants totaling \$55,000 in support of the organization's small business programs. The investments were responsive to the identified need for small business technical assistance.
- WFBNA invested \$20 million in an LIHTC fund. Of this total investment, \$3.5 million was allocated to an affordable housing development in Pickens, South Carolina, which included 60 units restricted to tenants earning up to 60 percent of the AMI. The bank's portion of its investment in the fund represented 42 of the 60 restricted units.

Broader Statewide Investments

WFBNA had three current and prior period investments totaling \$210,006 with a purpose, mandate, or function to serve one or more AAs in the state. These CD investments were primarily LIHTCs that supported the creation or preservation of affordable housing in the state. These investments were given positive consideration and supported the bank's overall performance under the Investment Test in the state of South Carolina.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the South Carolina Combined Non-MSA was stronger than the bank's overall performance under the Investment Test in the full-scope areas primarily due to higher levels of CD investments relative to the bank's presence in the AA. The bank's performance in the Florence MSA, Hilton Head Island MSA, Sumter MSA was weaker than the bank's overall performance under the Investment Test in the full-scope areas, primarily due to lower levels of CD investments relative to the bank's presence and capacity to invest in those AAs.

SERVICE TEST

The bank's performance under the Service Test in the state of South Carolina is rated Low Satisfactory. Performance in the limited-scope AAs had a neutral effect on the overall Service Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Charleston MSA was good and the bank's performance in the Columbia CSA and Greenville CSA was adequate.

Retail Banking Services

Service delivery systems were accessible to geographies and individuals of different income levels in the bank's full-scope AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Charleston MSA	24.6	19	21.1	15.8	15.8	36.8	26.3	6.7	21.4	41.9	29.2
Columbia CSA	35.0	21	23.3	9.5	14.3	47.6	28.6	5.0	25.6	37.4	30.1
Greenville CSA	27.2	32	35.6	15.6	12.5	46.9	25.0	4.7	21.7	43.7	30.0
Florence MSA	4.4	5	5.6	0.0	40.0	20.0	40.0	2.9	20.3	49.3	27.5
Hilton Head Island MSA	5.6	5	5.6	0.0	20.0	60.0	20.0	0.0	36.4	43.6	20.0
Sumter MSA	1.4	2	2.2	0.0	50.0	50.0	0.0	0.0	23.3	50.4	25.3
South Carolina Combined Non-MSA	1.8	6	6.7	0.0	16.7	83.3	0.0	0.0	31.2	63.2	5.6
Total	100.0	90	100.0	9.3	11.1	16.7	46.7	4.4	23.9	43.3	27.8
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Charleston MSA	0	4	0	-1	-1	-2
Columbia CSA	0	5	0	0	-3	-2
Greenville CSA	1	4	-1	0	-1	-1
Florence MSA	0	2	0	-1	0	-1
Hilton Head Island MSA	0	1	0	0	-1	0
Sumter MSA	0	1	0	0	0	-1
South Carolina Combined Non-MSA	0	1	0	-1	0	0
Total	1	18	-1	-3	-6	-7
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.						

Charleston MSA

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Charleston MSA. WFBNA operated 19 branches in the AA, comprising three branches in low-income geographies, three branches in moderate-income geographies, seven branches in middle-income geographies, five branches in upper-income geographies, and one branch in a geography without an income designation. The distribution of branches in low-income geographies exceeded the distribution of the population in low-income geographies and the distribution of branches in moderate-

income geographies was near to the distribution of the population in moderate-income geographies. The distribution was augmented by one branch in a middle- or upper-income geography that was within close proximity that served a low-income area and one branch in a middle- or upper-income geography that served a moderate-income area. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches generally had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. There were no branch openings and four branch closures. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations. Despite the closures, its service delivery systems remained readily accessible.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday and 9:00 a.m. to 12:00 p.m. Saturday.

Columbia CSA

WFBNA's service delivery systems were accessible to geographies and individuals of different income levels in the Columbia CSA. WFBNA operated 21 branches in the AA, comprising two branches in low-income geographies, three branches in moderate-income geographies, 10 branches in middle-income geographies, and six branches in upper-income geographies. The distribution of branches in low-income geographies exceeded the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies was below the distribution of the population in moderate-income geographies. The distribution was augmented by three branches in middle- and upper-income geographies that were within close proximity that served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches generally had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. There were no low- and moderate-income branch openings and closures. WFBNA closed branches in middle- and upper-income geographies primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations. Despite the closures, its service delivery systems remained readily accessible.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan

applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday with only two of the seven branches with Saturday hours of 9:00 a.m. to 12:00 p.m. were in moderate-income geographies and none in low-income geographies.

Greenville CSA

WFBNA's service delivery systems were accessible to geographies and individuals of different income levels in the Greenville CSA. WFBNA operated 32 branches in the AA, comprising five branches in low-income geographies, four branches in moderate-income geographies, 15 branches in middle-income geographies, and eight branches in upper-income geographies. The distribution of branches in low-income geographies exceeded the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies was below the distribution of the population in moderate-income geographies. The distribution was augmented by two branches in middle- and upper-income geographies that were within close proximity that served low-income areas and four branches in middle- and upper-income geographies that were within close proximity to and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches generally had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. There was one branch opening and four branch closures. One branch closure was in a low-income geography. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations. Despite the closures, its service delivery systems remained readily accessible.

Services, including where appropriate, business hours, were tailored to the convenience and needs of portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday and the only branch with extended Friday hours was in a low-income geography.

Community Development Services

The bank provided a limited level of CD services.

Charleston MSA

WFBNA provided a limited level of CD services in the Charleston MSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 30 CD service activities and 68 CD service hours during the evaluation period. A majority (76.7 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The other CD services were targeted to affordable housing (23.3 percent). The bank's assistance provided was responsive to the identified needs in the AA. The following are examples of CD services provided in this AA:

- A WFBNA employee provided two hours of financial education to an organization whose education program taught kids how to behave well, make good decisions, and build healthy relationships. The organization did this by weaving a comprehensive social and emotional learning curriculum into a fresh and fun after school program. Kids get the life lessons they need to succeed and be happy and they get a safe place to call home after school. According to the organization, 90 percent of its clients were low- and moderate-income individuals.
- A WFBNA employee provided two hours of board service for a nonprofit housing organization that worked in partnership with people in need to build decent and affordable housing. The houses were sold to those in need at no profit and with no interest charged. According to the organization, 100 percent of its clients were low- and moderate-income individuals.

Columbia CSA

WFBNA provided a limited level of CD services in the Columbia CSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for nine CD service activities and 23 CD service hours during the evaluation period. All of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The bank's assistance provided was responsive to the identified needs in the AA. The following is an example of CD services provided in this AA:

- A WFBNA employee provided two hours of board service for a nonprofit organization that believed family homelessness was entirely solvable. Their continuum of care, from emergency services to transitional and affordable housing, helped to keep each family together and meet their needs at the right time with the right services. By providing the support to move each family toward a permanent, self-sufficient solution, the organization can eradicate family homelessness and help parents and their children achieve lasting independence.

Greenville CSA

WFBNA provided a limited level of CD services in the Greenville CSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 28 CD service activities and 139 CD service hours during the evaluation period. All of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The bank's assistance provided was responsive to the identified needs in the AA. The following are examples of CD services provided in this AA:

- A WFBNA employee provided four hours of board service for an organization that provided compassionate direction to children, adults and families through counseling and psychoeducational programs with the vision of building a community where the safety and well-being of all is achieved. The nonprofit agency was known for its strong programs in the area of family violence intervention and sought to end the cycle of abuse by educating abusers as well as victims and by placing special emphasis on reaching children and teenagers who grow up in homes where they have observed or experienced violence. According to the organization, 90 percent of its clients were low- and moderate-income individuals.

- A WFBNA employee provided two hours of tax preparation for a global organization that utilized community-led solutions to identify and resolve community concerns with a primary focus on education, financial stability, and health.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Florence MSA and Sumter MSA was stronger than the bank's overall performance under the Service Test in the full-scope areas. Performance was stronger primarily due to the stronger performance in the branch distribution in low- and moderate-income geographies. The bank's performance in the Hilton Head Island MSA, and South Carolina Combined Non-MSA was weaker than the bank's overall performance under the Service Test in the full-scope areas. Performance was weaker primarily due to lower accessibility of service delivery systems in low- and moderate-income areas.

State of South Dakota

CRA rating for the State of Dakota⁴⁷: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflected good responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AAs.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank made a relatively high level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.
- The bank had a significant level of qualified CD investments that demonstrated excellent responsiveness to credit and economic development needs, occasionally in a leadership position. The bank rarely used innovative and complex investments to support CD initiatives.
- Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided a limited level of CD services.

Description of Institution's Operations in the State of South Dakota

The state of South Dakota was WFBNA's second largest rating area based on its total deposits in the state. As of June 30, 2021, the bank maintained approximately \$253.1 billion or 17.3 percent of its total domestic deposits in branches within the state. However, \$249 billion or 98.4 percent of reported deposits were internal company deposits that were not derived from individuals or businesses residing or operating in the state. After adjusting for those nonretail deposits, statewide deposits totaled \$4.1 billion. Of the 65 depository financial institutions operating in the bank's AAs within the state, WFBNA, with an unadjusted deposit market share of 37.7 percent, was the second largest. The other dominant depository financial institution in the bank's AAs within the state based on market share was Citibank, N.A. (57.6 percent). As of December 31, 2021, the bank operated 33 branches and 53 ATMs in the state. WFBNA delineated 18 AAs within the state; however, the OCC combined, analyzed, and presented those AAs at the CSA level where possible for purposes of this evaluation. This resulted in the following three AAs: Rapid City-Spearfish, SD CSA (Rapid City CSA), Sioux Falls, SD MSA (Sioux Falls MSA), and South Dakota Combined Non-MSA. The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

Rapid City CSA

The following table provides a summary of the demographics, including housing and business information for the Rapid City CSA.

⁴⁷ This rating only reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area**Assessment Area: Rapid City CSA**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	33	3.0	18.2	60.6	18.2	0.0
Population by Geography	157,111	0.5	15.5	63.3	20.7	0.0
Housing Units by Geography	70,750	0.4	14.4	62.8	22.4	0.0
Owner-Occupied Units by Geography	42,579	0.1	10.7	63.3	25.9	0.0
Occupied Rental Units by Geography	20,212	1.1	23.9	63.3	11.7	0.0
Vacant Units by Geography	7,959	0.4	10.2	58.7	30.8	0.0
Businesses by Geography	19,483	0.5	16.1	61.6	21.8	0.0
Farms by Geography	840	0.1	5.7	73.2	21.0	0.0
Family Distribution by Income Level	40,583	18.9	19.3	21.7	40.2	0.0
Household Distribution by Income Level	62,791	21.9	17.6	19.4	41.0	0.0
Median Family Income MSA - 39660 Rapid City, SD MSA		\$63,471	Median Housing Value			\$169,204
Median Family Income Non-MSAs - SD		\$60,845	Median Gross Rent			\$754
			Families Below Poverty Level			8.1%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$30,423 to \$31,736 and moderate-income families earned at least \$30,423 to \$31,736 and less than \$48,676 to \$50,777, depending on the metropolitan or nonmetropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$761 to \$793 for low-income borrowers and ranging from \$1,218 to \$1,269 for moderate-income borrowers, depending on the metropolitan or nonmetropolitan area. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$908. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Information from Moody's Analytics indicated that at the end of the evaluation period, the Rapid City MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Rapid City's economic condition was improving as evidenced by recovery of the majority of job losses experienced during the pandemic. The tourism industry in the area began to see a rebound due to the increased visitation to the area's primary tourist attractions – Mount Rushmore and the Badlands. The agriculture industry in the MSA has also seen a positive rebound due to the increased crop prices. The Rapid City MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Government, Leisure and Hospitality Services, Retail Trade, Professional and Business Services, and Construction. Major employers in the Rapid City MSA include Rapid City Regional Hospital, Ellsworth Air Force Base, Walmart, Inc., Black Hills Healthcare, and Black Hills Corp. According to the Bureau of Labor Statistics, the December 2021 non-

seasonally adjusted unemployment rate for the Rapid City MSA was 2.8 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Rapid City CSA. The contacts included a community economic development organization that provided access to capital through the SBA loan program and a local economic development focused program in place working to attract quality, primary jobs to the area. The bank also provided an assessment of community needs based on research completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were needs within the community:

- Construction of affordable rental housing units and rental assistance
- Development of single-family affordable housing
- Rehabilitation of housing units/improvement of the quality of housing stock
- Housing of persons with special needs
- Basic necessities, emergency shelters, and health care services for the homeless
- Transitional housing and job skills training programs

Opportunities for participation by financial institutions included the following:

- Access to lending for affordable housing development

South Dakota Combined Non-MSA

The following table provides a summary of the demographics, including housing and business information for the South Dakota Combined Non-MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: South Dakota Combined Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	76	1.3	9.2	68.4	21.1	0.0
Population by Geography	292,810	1.4	9.2	67.9	21.5	0.0
Housing Units by Geography	132,039	1.0	9.0	68.6	21.3	0.0
Owner-Occupied Units by Geography	78,546	0.6	6.1	67.7	25.6	0.0
Occupied Rental Units by Geography	38,744	1.7	14.9	70.3	13.2	0.0
Vacant Units by Geography	14,749	1.1	9.5	69.3	20.1	0.0
Businesses by Geography	29,139	0.2	11.3	66.8	21.7	0.0
Farms by Geography	4,079	0.0	2.2	67.4	30.4	0.0
Family Distribution by Income Level	73,058	19.0	17.0	22.4	41.7	0.0
Household Distribution by Income Level	117,290	23.1	15.8	18.2	43.0	0.0
Median Family Income Non-MSAs - SD		\$60,845	Median Housing Value			\$125,524
			Median Gross Rent			\$603
			Families Below Poverty Level			9.3%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$30,423 and moderate-income families earned at least \$30,423 and less than \$48,676. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$761 for low-income borrowers and \$1,218 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$908. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

South Dakota's economy was recovering at a steady pace. Agriculture's commodity prices have benefited from a strong demand and soaring costs in soybeans, wheat, and corn, which were the state's three major crops. The tourism industry in the state continued to bring increased visitation due to the primary attractions in the area, including Mouth Rushmore and the Badlands. Low living costs and natural amenities have supported above-average "in-migration" for the past two decades. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the counties that comprise the South Dakota Combined Non-MSA ranged from a low of 1.9 percent (Jerauld County) to a high of 4.9 percent (Roberts County).

Community Contacts

This evaluation considered comments provided by 13 local organizations that were contacted during the evaluation period and served the South Dakota Combined Non-MSA. The contacts included eight economic development organizations that helped to attract and retain businesses in the AA and five

organizations that provided services to low- and moderate-income individuals and families. The bank also provided an assessment of community needs based on research completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were needs within the community:

- Construction of affordable rental housing units and rental assistance
- Development of single-family affordable housing
- Rehabilitation of housing units/improvement of the quality of housing stock
- Housing of persons with special needs
- Basic necessities, emergency shelters, and health care services for the homeless
- Transitional housing and job skills training programs

Opportunities for participation by financial institutions included the following:

- Financial assistance for community support
- Assistance to low- and moderate-income families in the area
- Assistance with community development projects, including community development loans
- More agriculture lending opportunities
- Residential clean up initiatives and small business expansion
- More personal loan opportunities for families

Scope of Evaluation in the State of South Dakota

The OCC selected the Rapid City CSA and South Dakota Combined Non-MSA for full-scope reviews and based conclusions and ratings primarily on activity within these geographical areas. These AAs carried significant weight in determining the overall ratings for the state of South Dakota because of the significance of the bank's presence in these AAs. More weight was given to the Rapid City CSA due to the larger deposit base, lending, and branch presence.

During the evaluation period, the bank originated or purchased 11,261 home mortgage loans, small loans to businesses, and small loans to farms totaling \$1.5 billion. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within each AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. In the Sioux Falls MSA, the OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms. In the Rapid City CSA and South Dakota Combined Non-MSA, the OCC placed more weight based on the number of loans on small loans to businesses versus home mortgage loans and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF SOUTH DAKOTA

LENDING TEST

The bank's performance under the Lending Test in the state of South Dakota is rated High Satisfactory. Performance in the limited-scope areas had a neutral effect on the overall Lending Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Rapid City CSA was good and the bank's performance in the South Dakota Combined Non-MSA was excellent.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Rapid City CSA	1,031	1,183	58	3	2,275	20.1	38.9
South Dakota Combined Non-MSA	1,346	1,433	601	16	3,396	30.1	35.4
Sioux Falls MSA	3,659	1,863	87	14	5,623	49.8	25.7
Total	6,036	4,479	746	33	11,294	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Rapid City CSA	205,468	41,729	6,824	770	254,791	15.7	38.9
South Dakota Combined Non-MSA	224,531	65,875	90,342	13,124	393,872	24.2	35.4
Sioux Falls MSA	781,049	54,230	6,877	136,631	978,787	60.1	25.7
Total	1,211,048	161,834	104,043	150,525	1,627,450	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Rapid City CSA

As of June 30, 2021, WFBNA had a deposit market share of 30.6 percent. The bank ranked first among 12 depository financial institutions placing it in the top 9 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 3.8 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked eighth among 233 home mortgage lenders in this AA, which placed it in the top 4 percent of lenders. The top lenders in this AA based on market share were Black Hills Federal Credit Union (8.3 percent), CMG Mortgage Inc. (8.0 percent), and Gateway First Bank (5.9 percent).

According to peer small business data for 2021, WFBNA had a market share of 11.7 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked second out of 85 small business lenders, which placed it in the top 3 percent of lenders. The other top lenders in this AA based on market share were U.S. Bank, N.A. (15.1 percent), American Express National Bank (10.5 percent), and First Interstate Bank (10 percent).

According to peer small farm data for 2021, WFBNA had a market share of 3.3 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked sixth out of 18 small farm lenders, which placed it in the top 34 percent of lenders. The top lenders in this AA based on market share were First Interstate Bank (59.1 percent), John Deere Financial FSB (9.3 percent), and U.S. Bank, N.A. (5.3 percent).

South Dakota Combined Non-MSA

As of June 30, 2021, WFBNA had a deposit market share of 10.9 percent. The bank ranked second among 41 depository financial institutions placing it in the top 5 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 4.5 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked seventh among 222 home mortgage lenders in this AA, which placed it in the top 4 percent of lenders. The top lenders in this AA based on market share were First Bank & Trust (8 percent), Plains Commerce Bank (6.4 percent), and Community Bank N.A. (6.1 percent).

According to peer small business data for 2021, WFBNA had a market share of 5.8 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked seventh out of 90 small business lenders, which placed it in the top 8 percent of lenders. The top lenders in this AA based on market share were First Dakota National Bank (19.7 percent), Dacotah Bank (11.4 percent), and First Bank & Trust (8.8 percent).

According to peer small farm data for 2021, WFBNA had a market share of 1.8 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked 12th out of 35 small farm lenders, which placed it in the top 35 percent of lenders. The top lenders in this AA based on market share were Dacotah Bank (24.4 percent), First Bank & Trust (17.7 percent), and John Deere Financial FSB (11.6 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AAs. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data. The bank's performance was good in the Rapid City CSA and South Dakota Combined Non-MSA.

Home Mortgage Loans

Refer to Table O in the state of South Dakota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Rapid City CSA***Home Mortgage Loans***

Refer to Table O in the state of South Dakota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies exceeded the percentage of owner-occupied housing units in low-income geographies but it was well below the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied housing units in moderate-income geographies and it was near to the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of South Dakota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was below the percentage of businesses in low-income geographies but it exceeded the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was well below the percentage of businesses in moderate-income geographies and it was below the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of South Dakota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

The bank did not originate or purchase any small loans to farms in low-income geographies. The bank's percentage of small loans to farms in moderate-income geographies was significantly below the percentage of farms in moderate-income geographies but it exceeded the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

South Dakota Combined Non-MSA***Home Mortgage Loans***

Refer to Table O in the state of South Dakota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

The bank did not originate or purchase home mortgage loans in low-income geographies. The bank's percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied housing units in moderate-income geographies but it was equal to the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of South Dakota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies was equal to the percentage of businesses in low-income geographies and it exceeded the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies approximated the percentage of businesses in moderate-income geographies and it exceeded the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of South Dakota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was excellent.

The bank's percentages of small loans to farms in low- and moderate-income geographies exceeded both the percentages of farms in low- and moderate-income geographies and the aggregate distributions of small loans to farms in low- and moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies in the Rapid City CSA and South Dakota Combined Non-MSA. The OCC analyzed

geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AAs.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes. The bank's performance was good in the Rapid City CSA and excellent in the South Dakota Combined Non-MSA.

Rapid City CSA

Home Mortgage Loans

Refer to Table P in the state of South Dakota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but it approximated the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families but it approximated the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of South Dakota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 24.3 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of South Dakota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was poor.

The bank did not collect or consider the GAR in the underwriting of approximately 34.5 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below both the percentage of farms in the AA with GAR of \$1 million or less and the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

South Dakota Combined Non-MSA

Home Mortgage Loans

Refer to Table P in the state of South Dakota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but it exceeded the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers approximated the percentage of moderate-income families and it was near to the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of South Dakota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was excellent.

The bank did not collect or consider the GAR in the underwriting of approximately 20.1 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was near to the percentage of businesses in the AA with GAR of \$1 million or less and it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of South Dakota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was adequate.

The bank did not collect or consider the GAR in the underwriting of approximately 24.5 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below the percentage of farms in the AA with GAR of

\$1 million or less and it was near to the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Community Development Lending

The bank made a relatively high level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

Rapid City CSA

WFBNA made a low level of CD loans in the Rapid City CSA. The bank made three CD loans totaling approximately \$770,000, which represented less than 1 percent of the allocated tier 1 capital. CD loans were primarily made for revitalization/stabilization purposes. By dollar volume, 64.9 percent funded revitalization and stabilization efforts, and 35.1 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$270,000 loan for a multifamily housing development located in a moderate-income census tract in Rapid City, South Dakota. The development included five efficiency units, five one-bedroom units, and two two-bedroom units with 100 percent of the actual rent rates below the 2019 Fair Market Rent for the area.
- WFBNA provided two \$250,000 term loans for a congressionally chartered nonprofit organization that focused on comprehensive approaches to affordable housing and community development. According to the organization, 78 percent of its clients were low- and moderate-income as they earned less than 80 percent of the area median family income.

South Dakota Combined Non-MSA

WFBNA was a leader in providing CD loans in the South Dakota Combined Non-MSA. The bank made 16 CD loans totaling approximately \$12.5 million, which represented 6.7 percent of the allocated tier 1 capital. CD loans were primarily made for community services purposes. By dollar volume, 33.6 percent of these loans funded affordable housing that provided 100 units of affordable housing, 2.4 percent funded revitalization and stabilization efforts, and 64 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$35 million line of credit to a nonprofit organization that worked toward the day when every child will receive an excellent and equitable education. Of this total loan, \$945,950 was allocated to the South Dakota Combined Non-MSA. The organization nurtured leaders who committed to expanding opportunity for low-income students, beginning with at least two years teaching in a public school.
- WFBNA provided a \$4 million line of credit to a nonprofit organization that provided scholarships to qualified students, as well as related support services which has awarded over \$400 million in scholarships and provided a range of ancillary programs for candidates, scholars, and their families.

Of this total loan, \$7,303 was allocated to the South Dakota Combined Non-MSA. Over two-thirds of the financial resources provided were to low-income families. According to the organization, 100 percent of its clients were low- and moderate-income as they earned less than 80 percent of the area median family income.

- WFBNA provided a \$4 million construction loan for an affordable housing development in the AA which created 40 units of affordable housing. The loan was responsive to the identified need for affordable housing.

Product Innovation and Flexibility

Rapid City CSA

WFBNA used flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 154 loans under its flexible lending programs totaling \$8.2 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	35	7,600
Dream. Plan. Home.	1	100
PPP	118	500
Total	154	8,200

South Dakota Combined Non-MSA

WFBNA used flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 282 loans under its flexible lending programs totaling \$19.1 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	70	10,900
Dream. Plan. Home.	15	1,800
PPP	197	6,400
Total	282	19,100

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Sioux Falls MSA was consistent with the bank's overall performance under the Lending Test in the full-scope areas.

Refer to Tables O through T in the state of South Dakota section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of South Dakota is rated Outstanding, Performance in the limited-scope area had a neutral effect on the overall Investment Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Rapid City CSA and South Dakota Combined Non-MSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Rapid City CSA	2	12,715	24	464	26	14.0	13,178	22.7	0	0
South Dakota Combined Non-MSA	6	11,124	51	491	57	30.6	11,616	20.0	4	445
Sioux Falls MSA	22	22,483	65	7,167	87	46.8	29,649	51.1	11	5,347
Statewide***	0	0	16	3,616	16	8.6	3,616	6.2	0	0
Total	30	46,322	156	11,738	186	100.0	58,059	100.0	15	5,792
<p>The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.</p> <p>* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.</p> <p>** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.</p> <p>*** Statewide means investments in statewide programs that have a purpose, mandate, or function to serve one or more of the bank's assessment areas within the state. Due to rounding, totals may not equal 100.0%</p>										

Rapid City CSA

The bank had an excellent level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$13.2 million and represented 6.4 percent of the bank's tier 1 capital allocated to the AA. The investments also included 24 grants and donations totaling \$464,000 to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. . Approximately 30.8 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 61.5 percent that focused on community services targeted to low- and moderate-income individuals, and 7.6 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 62 units of affordable housing in the AA.

The bank did not use innovative and complex investments to support CD initiatives. The following are examples of CD investments made in this AA:

- WFBNA provided five grants totaling \$205,000 to an organization that managed and administered charitable funds for individuals, families, businesses, and nonprofit organizations that impact the quality of life for residents of the area. One grant for \$150,000 supported the Rapid City Collective Impact (RCCI) efforts that focused on addressing food insecurity and affordable housing and involved multiple community members sharing their specialized perspectives on affordable housing, race relations and health. The additional funding provided rental and utility assistance to help individuals and families in need to achieve housing stability. The investment was responsive to the identified need for affordable housing.
- WFBNA provided a \$15,000 grant to an organization in support of its programming. The organization was a nonprofit housing organization that worked in partnership with people in need to build decent, affordable housing. The houses were sold to those in need at no profit and with no interest charged.
- WFBNA provided a \$25,000 grant to an organization for its affordable housing program. The organization managed and administered charitable funds for individuals, families, businesses, and nonprofit organizations that have a positive impact on the quality of life in the Black Hills area.

South Dakota Combined Non-MSA

The bank had an excellent level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$11.6 million and represented 6.2 percent of the bank's tier 1 capital allocated to the AA. The investments also included 51 grants and donations totaling \$491,000 to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 28.1 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 63.2 percent that focused on community services targeted to low- and moderate-income individuals, and 8.8 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 144 units of affordable housing in the AA.

The bank did not use innovative and complex investments to support CD initiatives. The following are examples of CD investments made in this AA:

- WFBNA provided 51 grants to a variety of nonprofit organizations, totaling more than \$491,000 including grants addressing immediate community needs due to COVID-19.
- WFBNA provided two grants totaling \$160,000 to a nonprofit organization that provided affordable housing and down payment assistance. The bank's funding was used for a down payment and closing cost assistance program to help low- and moderate-income individuals purchase homes. The bank also provided operational support to the organization. WFBNA demonstrated active

involvement, evidenced by its long-term working relationship providing grant support since 2014 and leadership with an employee serving on the Board of Directors for the organization in 2019. The investment was responsive to the identified need for affordable housing.

- WFBNA provided a \$10,600 grant to an organization for its farm aid household COVID-19 relief funds program. The mission of the organization was to organize people and build leadership while developing strong allied relationships. The organization protected environmental resources, advocated for resilient agriculture systems, and empowered people to create policy change that strengthened their communities and cultures.

Broader Statewide Investments

WFBNA had 16 current and prior period investments totaling \$3.6 million with a purpose, mandate, or function to serve one or more AAs in the state. These CD investments were primarily LIHTCs that supported the creation or preservation of affordable housing in the state. These investments were given positive consideration and supported the bank's overall performance under the Investment Test in the state of South Dakota.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Sioux Falls MSA was consistent with the bank's overall performance under the Investment Test in the full-scope areas.

SERVICE TEST

The bank's performance under the Service Test in the state of South Dakota is rated Low Satisfactory. Performance in the limited-scope area had a neutral effect on the overall Service Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Rapid City CSA and South Dakota Combined Non-MSA was adequate.

Retail Banking Services

Service delivery systems were accessible to geographies and individuals of different income levels in the bank's full-scope AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Rapid City CSA	38.9	6	18.2	0.0	33.3	50.0	16.7	0.5	15.5	63.3	20.7
South Dakota Combined Non-MSA	35.4	18	54.5	0.0	38.9	61.1	0.0	1.4	9.2	67.9	21.5
Sioux Falls MSA	25.7	9	27.3	0.0	33.3	44.4	22.2	0.0	27.8	50.7	21.5
Total	100.0	33	100.0	0.0	36.4	54.5	9.1	0.7	17.1	60.8	21.3
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Rapid City CSA	0	0	0	0	0	0
South Dakota Combined Non-MSA	0	3	0	-1	-1	-1
Sioux Falls MSA	0	2	0	-1	-1	0
Total	0	5	0	-2	-2	-1
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.						

Rapid City CSA

WFBNA's service delivery systems were accessible to geographies and individuals of different income levels in the Rapid City CSA. WFBNA operated six branches in the AA, comprising two branches in moderate-income geographies, three branches in middle-income geographies, and one branch in an upper-income geography. The bank had no branches in low-income geographies; however, the OCC considered the very low percentage of the population living in the one low-income geography. The distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies.

The bank did not open or close branches during the evaluation period.

Its services including, where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday and four branches, including two in moderate-income areas, were open 9:00 a.m. to 5:00 p.m. Saturday.

South Dakota Combined Non-MSA

WFBNA's service delivery systems were accessible to geographies and individuals of different income levels in the South Dakota Combined Non-MSA. WFBNA operated 18 branches in the AA, comprising seven branches in moderate-income geographies, and 11 branches in middle-income geographies. The bank had no branches in low-income geographies; however, the OCC considered the very low percentage of the population living in the one low-income geography. The distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies.

To the extent changes have been made, the bank's record of opening and closing of branches generally had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations. Despite the closures, its service delivery systems remained readily accessible.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday except for one middle-income branch that was only open until 4:00 p.m. Two moderate-income branches were opened for business 9:00 a.m. to 12:00 p.m. Saturday.

Community Development Services

The bank provided a limited level of CD services.

Rapid City CSA

WFBNA provided a limited level of CD services in the Rapid City CSA. Bank records showed that employees provided their financial or job-related expertise for 21 CD service activities during the evaluation period. All of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The following is an example of CD services provided in this AA:

- WFBNA employees provided 11 hours of financial education to approximately 175 elementary students. The majority of students in the district (52.7 percent) qualified for the federal free- and reduced lunch program.

South Dakota Combined Non-MSA

WFBNA provided a limited level of CD services in the South Dakota Combined Non-MSA. Bank records showed that employees provided their financial or job-related expertise for 11 CD service activities during the evaluation period. A majority (90.9 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and

families. The other CD services were targeted to economic development (9.1 percent). The following are examples of CD services provided in this AA:

- A bank employee provided five hours serving on the board for the local affiliate of a global community service organization which served the needs of low- and moderate-income individuals and families with a focus on education, financial stability, and health.
- WFBNA employees provided five hours of financial education to approximately 150 elementary students. The majority of students in the district (70.1 percent) qualified for the federal free- and reduced lunch program.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Sioux Falls MSA was stronger than the bank's overall performance under the Service Test in the full-scope areas. CD services were not evaluated in the limited-scope AA, which resulted in stronger performance.

State of Tennessee

CRA rating for the State of Tennessee⁴⁸: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited an excellent geographic distribution of loans in its AAs.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank was a leader in making CD loans. CD lending had a neutral effect on the Lending Test conclusion as it further supported the bank's already excellent lending performance.
- The bank had an excellent level of qualified CD investments that demonstrated excellent responsiveness to credit and economic development needs, although occasionally in a leadership position. The bank occasionally used innovative and complex investments to support CD initiatives.
- Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the bank's AA.
- The bank provided a limited level of CD services.

Description of Institution's Operations in the State of Tennessee

The state of Tennessee was WFBNA's 36th largest rating area based on its total deposits in the state. As of June 30, 2021, the bank maintained approximately \$1.9 billion or 0.1 percent of its total domestic deposits in branches within the state. Of the 63 depository financial institutions operating in the bank's AAs within the state, WFBNA, with a deposit market share of 2.1 percent, was the 11th largest. The top depository financial institutions in the bank's AAs within the state based on market share included Pinnacle Bank (16.4 percent), Regions Bank (12.1 percent), Truist Bank (9.2 percent), First Horizon Bank (7.2 percent), and Firstbank (5.5 percent). As of December 31, 2021, the bank operated 14 branches and 16 ATMs in the state. WFBNA delineated the Nashville-Davidson-Murfreesboro, TN MSA (Nashville MSA) as its only AA within the state. The AA met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

Nashville MSA

The following table provides a summary of the demographics, including housing and business information for the Nashville MSA.

⁴⁸ This rating only reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Nashville MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	374	9.1	25.1	38.5	25.9	1.3
Population by Geography	1,737,565	6.7	24.9	40.1	28.0	0.3
Housing Units by Geography	712,901	7.2	25.8	40.0	26.9	0.1
Owner-Occupied Units by Geography	429,693	3.4	19.5	43.7	33.3	0.1
Occupied Rental Units by Geography	226,419	13.3	36.1	33.9	16.7	0.0
Vacant Units by Geography	56,789	11.4	32.4	36.8	19.4	0.1
Businesses by Geography	194,672	7.6	20.3	31.1	40.2	0.8
Farms by Geography	4,801	3.5	18.9	45.2	32.1	0.4
Family Distribution by Income Level	432,746	20.7	17.7	20.4	41.1	0.0
Household Distribution by Income Level	656,112	22.8	16.8	18.2	42.2	0.0
Median Family Income MSA - 34980 Nashville-Davidson--Murfreesboro-- Franklin, TN MSA		\$66,441	Median Housing Value			\$198,608
			Families Below Poverty Level			10.0%
			Median Gross Rent			\$889
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$33,221 and moderate-income families earned at least \$33,221 and less than \$53,153. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$831 for low-income borrowers and \$1,329 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$1,066. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Information from Moody's Analytics indicated that at the end of the evaluation period, the Nashville MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Nashville MSA economic recovery has seen a steady recovery due to the return of tourist to the area, benefiting the leisure and hospitality industry and adding jobs faster than other areas. The MSA's manufacturing industry experienced a downward turn due to the shortage of microchips, negatively impacting Nissan, the top employer in the area. The Nashville MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Professional and Business Services, Education and Health Services, Government, Leisure and Hospitality Services, and Retail Trade. Major employers in the Nashville MSA include Vanderbilt University Medical Center, Nissan North America, Inc., HCA Inc., Vanderbilt University, and Saint Thomas Health Services. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Nashville MSA was 2.5 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Nashville MSA. The contacts included an economic development agency that supported the vitality and expansion of existing businesses and industries and an entity that focused on providing housing, a suitable living environment, and economic opportunities for low-and moderate-income individuals in the area. The bank also provided an assessment of community needs based on research completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were needs within the community:

- Construction of affordable rental housing units and rental assistance
- Development of single-family affordable housing
- Rehabilitation of housing units/improvement of the quality of housing stock
- Financial literacy/education programs
- Banking products for un/underbanked individuals
- Access to capital and training for small businesses
- Programs to support job readiness and addresses obstacles to employment
- Support of technical skills training programs

Opportunities for participation by financial institutions included the following:

- Re-establishment of the old grant program that benefits small business owners
- Assistance with affordable housing

Scope of Evaluation in the State of Tennessee

The OCC selected the Nashville MSA for a full-scope review. The overall ratings for the state of Tennessee were based solely on performance in the Nashville MSA.

During the evaluation period, the bank originated or purchased 18,733 home mortgage loans, small loans to businesses, and small loans to farms totaling \$4.7 billion. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. The OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. In the Nashville MSA, the OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF TENNESSEE

LENDING TEST

The bank's performance under the Lending Test in the state of Tennessee is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Nashville MSA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Nashville MSA	15,178	3,390	165	14	18,747	100.0	100.0
Total	15,178	3,390	165	14	18,747	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Nashville MSA	4,610,292	119,910	3,864	17,202	4,751,268	100.0	100.0
Total	4,610,292	119,910	3,864	17,202	4,751,268	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

As of June 30, 2021, WFBNA had a deposit market share of 2.1 percent. The bank ranked 11th among 63 depository financial institutions placing it in the top 18 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 2.5 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked 11th among 907 home mortgage lenders in this AA, which placed it in the top 1 percent of lenders. The top lenders in this AA based on market share were Rocket Mortgage (6 percent), U.S. Bank, N.A. (3.3 percent), and First Bank (2.9 percent).

According to peer small business data for 2021, WFBNA had a market share of 1.7 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked 15th out of 244 small business lenders, which placed it in the top 7 percent of lenders. The top lenders in this AA based on market share were American Express National Bank (16.4 percent), JPMorgan Chase Bank, N.A. (11 percent), and Pinnacle Bank (9.9 percent).

According to peer small farm data for 2021, WFBNA had a market share of 4.8 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked seventh out of 40 small farm lenders, which placed it in the top 18 percent of lenders. The top lenders in this AA based on market share were Wilson Bank and Trust (21.2 percent), Citizens Bank of Lafayette (14.5 Percent), and John Deere Financial FSB (9.9 Percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent, geographic distribution of loans in its AA. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data. The bank's performance was ... in the Nashville MSA.

Home Mortgage Loans

Refer to Table O in the state of Tennessee section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans in low-income geographies exceeded both the percentage of owner-occupied housing units in low-income geographies and the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied housing units in moderate-income geographies but it was near to the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Tennessee section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

The bank's percentages of small loans to businesses in low- and moderate-income geographies were below both the percentages of businesses in low- and moderate-income geographies and the aggregate distributions of small loans to businesses in low- and moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Tennessee section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

The bank's percentage of small loans to farms in low-income geographies was significantly below both the percentage of farms in low-income geographies and the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-income geographies exceeded both the percentage of farms in moderate-income geographies and the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies in the Nashville MSA. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes. The bank's performance was good in the Nashville MSA.

Home Mortgage Loans

Refer to Table P in the state of Tennessee section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but it was near to the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was near to the percentage of moderate-income families and it exceeded the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Tennessee section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GARs in the underwriting of approximately 43.7 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GARs of \$1 million or less was well below the percentage of businesses in the AA with GARs of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GARs of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Tennessee section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was very poor.

The bank did not collect or consider the GARs in the underwriting of approximately 88.9 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GARs of \$1 million or less was significantly below both the percentage of farms in the AA with GARs of \$1 million or less and the aggregate distribution of small loans to farms with GARs of \$1 million or less by all lenders.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

WFBNA was a leader in making CD loans in the Nashville MSA. WFBNA made 14 CD loans totaling approximately \$17.2 million, which represented 6.96 percent of the allocated tier 1 capital. CD loans were made for affordable housing, economic development, revitalization/stabilization and community services purposes. By dollar volume, 66.9 percent of these loans funded affordable housing that provided 153 units of affordable housing, 21.7 percent funded economic development, less than 1 percent funded revitalization and stabilization efforts, and 11 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$2.1 million SBA 504 loan to fund the expansion of a small business. This loan was made in conjunction with the SBA's 504 Certified Development Company (CDC) program, a long-term financing tool for economic development within a community. The loan was responsive to the identified need for small business growth and stability.
- WFBNA provided a \$15 million line of credit to a Tax Credit Investment Fund. Of that total, \$473,333 was allocated to an affordable housing development located in Franklin, Tennessee. This development contained 64-rent restricted LIHTC units. The bank's allocation helped create nine units of affordable housing. The loan was responsive to the identified need for affordable housing.
- WFBNA provided a \$35 million line of credit to an organization for community development purposes which worked toward the day when every child receives an excellent and equitable education. Of this total loan, \$945,950 was allocated to the Nashville MSA. The organization would find and nurture leaders who committed to expanding opportunities for low-income students, beginning with at least two years teaching in a public school.

Product Innovation and Flexibility

WFBNA used flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA made 602 loans under its flexible lending programs totaling \$54.7 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	108	37,700
Dream. Plan. Home.	21	4,400
PPP	473	12,600
Total	602	54.700

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Tennessee is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Nashville MSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Nashville MSA	22	9,927	80	25,650	102	82.9	35,578	76.0	4	1,718
Statewide***	2	11,147	19	109	21	17.1	11,255	24.0	1	69
Total	24	21,074	99	25,759	123	100.0	46,833	100.0	5	1,787
* '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 tracked and recorded by the institution's financial reporting system. Due to rounding, totals may not equal 100.0%										

Nashville MSA

The bank had an excellent level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$35.6 million and represented 14.4 percent of the bank's tier 1 capital allocated to the AA. The investments also included 76 grants and donations totaling \$2.5 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 45.1 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 40.2 percent that focused on community services targeted to low- and moderate-income individuals, and 14.7 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 69 units of affordable housing in the AA.

The bank occasionally used innovative and complex investments to support CD initiatives. Approximately 14.2 percent of current period investment dollars were complex LIHTC investments. The following are examples of CD investments made in this AA:

- WFBNA provided a \$1 million grant to a Nashville CDFI through the Open for Business Fund and additional grants totaling \$405,000. The CDFI created a statewide loan fund to support underserved small businesses and low- and moderate-income entrepreneurs, with a focus on metropolitan areas with large African American populations. The grants supported emergency funding, and access to capital with flexible repayment to help small businesses create or enhance revenue streams. The grants were responsive to the identified need to support small businesses.
- WFBNA invested in the nation's oldest MDI, which was located in Nashville, Tennessee. The bank's investment supported the hiring of personnel, technological system upgrades, and expanded customer financial education programs. WFBNA also provided access to its ATM network, surcharge free, to the MDI's customers. The investment was responsive to the need for access to capital.

Broader Statewide Investments

WFBNA had 21 current and prior period investments totaling \$11.3 million with a purpose, mandate, or function to serve one or more AAs in the state. These CD investments were primarily mortgage-backed securities that supported the creation or preservation of affordable housing in the state. These investments were given positive consideration and supported the bank's overall performance under the Investment Test in the state of Tennessee.

SERVICE TEST

The bank's performance under the Service Test in the state of Tennessee is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Nashville MSA was adequate.

Retail Banking Services

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the bank's full-scope AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Nashville MSA	100.0	14	100.0	0.0	7.1	7.1	85.7	6.7	24.9	40.1	28.0
Total	100.0	14	100.0	0.0	7.1	7.1	85.7	6.7	24.9	40.1	28.0
Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Nashville MSA	2	0	0	0	0	2
Total	2	0	0	0	0	2

Nashville MSA

WFBNA's service delivery systems were reasonably accessible to geographies and individuals of different income levels in the Nashville MSA. WFBNA operated 14 branches in the AA, comprising one branch in a moderate-income geography, one branch in a middle-income geography, and 12 branches in upper-income geographies. The distribution of branches in low-income geographies was significantly below the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies was well below the distribution of the population in moderate-income geographies. The distribution was augmented by two branches in middle- and upper-income geographies that were within close proximity to serve low-income areas and one branch in middle- and upper-income geographies that was within close proximity to and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches generally had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. There were no low- and moderate-income openings and closings.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday and three branches were opened for business 9:00 a.m. to 12:00 p.m. Saturday.

Community Development Services

The bank provided a limited level of CD services in the Nashville MSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for two CD service activities during the evaluation period. The bank's assistance was to an organization providing affordable housing targeted to low- and moderate-income individuals and families. The bank's assistance provided was responsive to the identified needs in the AA. The following is an example of CD services provided in this AA:

- Two WFBNA employees provided a total of 15 hours of board service for a nonprofit organization whose sole effort was to provide affordable housing and rehabilitate neighborhoods to low- and moderate-income individuals and families.

State of Texas

CRA rating for the State of Texas⁴⁹: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AAs.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments that demonstrated excellent responsiveness to credit and economic development needs, although occasionally in a leadership position. The bank occasionally used innovative and complex investments to support CD initiatives.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided an adequate level of CD services.

Description of Institution's Operations in the State of Texas

The state of Texas was WFBNA's fourth largest rating area based on its total deposits in the state. As of June 30, 2021, the bank maintained approximately \$94.4 billion or 6.4 percent of its total domestic deposits in branches within the state. Of the 367 depository financial institutions operating in the bank's AAs within the state, WFBNA, with a deposit market share of 6.4 percent, was the fifth largest. The top depository financial institutions in the bank's AAs within the state based on market share included Charles Schwab Bank, SSB (21.9 percent), JPMorgan Chase Bank, N.A. (19.2 percent), Bank of America, N.A. (12 percent), and USAA Federal Savings Bank (6.8 percent). As of December 31, 2021, the bank operated 532 branches and 1,152 ATMs in the state. WFBNA delineated 42 AAs within the state; however, the OCC combined, analyzed, and presented those AAs at the CSA level where possible for purposes of this evaluation. This resulted in the following 20 AAs: Amarillo-Borger, TX CSA (Amarillo CSA), Austin-Round Rock-Georgetown, TX MSA (Austin MSA), Beaumont-Port Arthur, TX MSA (Beaumont MSA), Brownsville-Harlingen-Raymondville, TX CSA (Brownsville CSA), College Station-Bryan, TX MSA (College Station MSA), Corpus Christi-Kingsville-Alice, TX CSA (Corpus Christi CSA), Dallas-Fort Worth-Arlington, TX MSA (Dallas MSA), El Paso, TX MSA (El Paso MSA), Houston-The Woodlands, TX CSA (Houston CSA), Killeen-Temple, TX MSA (Killeen MSA), Laredo, TX MSA (Laredo MSA), Lubbock-Plainview, TX CSA (Lubbock CSA), McAllen-Edinburg, TX MSA (McAllen MSA), Midland-Odessa, TX CSA (Midland CSA), San Angelo, TX MSA (San Angelo MSA), San Antonio-New Braunfels, TX MSA (San Antonio MSA), Victoria-Port Lavaca, TX CSA (Victoria CSA), Waco, TX MSA (Waco MSA), Wichita Falls, TX MSA (Wichita Falls MSA), and Texas Combined Non-MSA. The AAs met the requirements of the CRA and did not arbitrarily exclude any

⁴⁹ This rating only reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

Austin MSA

The following table provides a summary of the demographics, including housing and business information for the Austin MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Austin MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	350	10.6	22.3	36.6	28.9	1.7
Population by Geography	1,889,094	10.1	22.3	37.3	29.2	1.1
Housing Units by Geography	747,159	10.1	20.6	38.2	30.1	0.9
Owner-Occupied Units by Geography	399,483	3.8	18.1	40.3	37.6	0.2
Occupied Rental Units by Geography	289,795	18.4	23.8	35.5	20.5	1.7
Vacant Units by Geography	57,881	12.0	22.1	37.9	26.6	1.5
Businesses by Geography	256,163	6.2	13.0	34.0	45.6	1.2
Farms by Geography	5,288	4.5	16.3	39.4	39.4	0.4
Family Distribution by Income Level	428,451	22.5	16.9	19.8	40.8	0.0
Household Distribution by Income Level	689,278	23.6	16.6	18.0	41.7	0.0
Median Family Income MSA - 12420 Austin-Round Rock-Georgetown, TX MSA		\$78,997	Median Housing Value			\$233,705
			Families Below Poverty Level			9.5%
			Median Gross Rent			\$1,067
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$39,499 and moderate-income families earned at least \$39,499 and less than \$63,198. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$987 for low-income borrowers to \$1,580 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$1,255. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Information from Moody's Analytics indicated that at the end of the evaluation period, the Austin MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Austin MSA had continued to recover with total employment surpassing its pre-pandemic levels. All industries in the area have recorded major gains with core professional services leading the growth. The MSA had seen a steady growth of high-tech companies in the area due to the low operating costs

and lower cost of living. These businesses have attracted a highly training labor force to the area, which has been a benefit for residential construction. The Austin MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Professional and Business Services, Government, Education and Health Services, Leisure and Hospitality Services, and Retail Trade. Major employers in the Austin MSA include University of Texas at Austin, Dell, Inc., Seton Healthcare Network, Walmart Inc., and St. David's Healthcare. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Austin MSA was 2.9 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by five local organizations that were contacted during the evaluation period and served the Austin MSA. The contacts comprised economic development organizations that helped to attract and retain businesses in the AA. The bank also provided an assessment of community needs based on research completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were needs within the community:

- Construction of affordable rental housing units and rental assistance
- Development of single-family affordable housing
- Rehabilitation of housing units/improvement of the quality of housing stock
- Housing for persons with special needs
- Access to early education programs and scholarships for higher education
- Assistance preparing for, or access to tools for virtual learning
- College, technical school, and career readiness programs
- Initiatives that address academic gaps in underperforming schools
- Programs that address low graduation rates/high dropout rates
- Financial literacy/education programs, including saving programs education
- Banking products for un/underbanked individuals
- Addressing foreclosed properties and demolition/rehabilitation of abandoned properties
- Development/improvement of public facilities and infrastructure needs
- Re-development of commercial properties
- Access to capital and training for small businesses

Opportunities for participation by financial institutions included the following:

- Participation in investment needs for the economy/community
- Access to capital for small business
- Development of a microloans program
- More access to mortgage and commercial loans
- Community development involvement in the rural areas

Dallas MSA

The following table provides a summary of the demographics, including housing and business information for the Dallas MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Dallas MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,312	12.9	25.6	28.7	32.2	0.5
Population by Geography	6,771,641	10.8	24.9	30.5	33.7	0.1
Housing Units by Geography	2,583,855	11.3	23.9	30.9	33.7	0.2
Owner-Occupied Units by Geography	1,429,830	5.1	19.3	32.4	43.2	0.1
Occupied Rental Units by Geography	953,182	18.8	29.9	29.3	21.6	0.3
Vacant Units by Geography	200,843	19.4	27.9	28.7	23.8	0.3
Businesses by Geography	796,053	6.8	17.9	27.9	46.8	0.6
Farms by Geography	14,695	4.3	15.8	33.9	45.6	0.4
Family Distribution by Income Level	1,654,593	23.3	16.5	18.2	41.9	0.0
Household Distribution by Income Level	2,383,012	23.8	16.5	17.7	41.9	0.0
Median Family Income MSA - 19124 Dallas-Plano-Irving, TX		\$71,149	Median Housing Value			\$175,471
Median Family Income MSA - 23104 Fort Worth-Arlington-Grapevine, TX		\$69,339	Median Gross Rent			\$978
			Families Below Poverty Level			11.3%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$34,670 to \$35,575 and moderate-income families earned at least \$34,670 to \$35,575 and less than \$55,471 to \$56,919, depending on the metropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$867 to \$889 for low-income borrowers and ranging from \$1,387 to \$1,423 for moderate-income borrowers, depending on the metropolitan area. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$942. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Information from Moody's Analytics indicated that at the end of the evaluation period, the Dallas MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic.

Dallas-Plano-Irving, TX MD (Dallas MD)

The economy in the Dallas MD continued to improve. The financial services sector has driven the growth due to corporate expansions and relations in the banking and related industries. In general, payrolls in the financial industry have risen 40 percent in the last decade. The growing talent pool in the area continued to bring new employers to the industry. The Dallas MD has a moderately-diversified

economy. Key sectors of the economy by percentage of employment include Professional and Business Services, Education and Health Services, Government, and Retail Trade. Major employers in the Dallas MD include Walmart Inc., American Airlines, Baylor Scott and White Health, Lockheed Martin, UT Southwestern Medical Center, and AT&T. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Dallas MD was 3.6 percent compared to the national unemployment rate of 3.7 percent.

Fort Worth-Arlington-Grapevine, TX MD (Fort Worth MD)

The economy in the Fort Worth MD had improved tremendously as evidenced by the MD recouping approximately 95 percent of the jobs lost during the pandemic. This performance, however, varied across the different industries with the professional services industry leading the recovery. The Fort Worth MD has a well-diversified economy. Key sectors of the economy by percentage of employment include Government, Education and Health Services, Retail Trade, Leisure and Hospitality Services, Manufacturing, and Transportation/Utilities. Major employers in the Fort Worth MD include AMR/American Airlines, Lockheed Martin, Texas Health Resources, NAS-Fort Worth-JRB, Arlington ISD, and University of Texas at Arlington. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Fort Worth MD was 3.7 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Dallas MSA. The contacts included an organization developed to promote economic development and investment in the MSA and a nonprofit organization dedicated to eliminating poverty housing worldwide. The bank also provided an assessment of community needs based on research completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were needs within the community:

- Construction of affordable rental housing units and rental assistance
- Development of single-family affordable housing
- Rehabilitation of housing units/improvement of the quality of housing stock
- Housing for persons with special needs
- Access to early education programs and scholarships for higher education
- Assistance preparing for, or access to tools for virtual learning
- College, technical school, and career readiness programs
- Initiatives that address academic gaps in underperforming schools
- Programs that address low graduation rates/high dropout rates
- Financial literacy/education programs, including saving programs education
- Payday lending alternatives/emergency small dollar loans
- Banking products for un/underbanked individuals
- Addressing foreclosed properties and demolition/rehabilitation of abandoned properties
- Development/improvement of public facilities and infrastructure needs
- Re-development of commercial properties

- Access to capital and training for small businesses
- Support of job readiness programs and technical skills training programs
- Addressing obstacles to employment

Opportunities for participation by financial institutions included the following:

- Delivering financial literacy/education programs for individuals and small businesses
- Availability of small business and commercial loans for revitalization of areas

El Paso MSA

The following table provides a summary of the demographics, including housing and business information for the El Paso CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: El Paso MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	162	6.2	34.0	33.3	25.9	0.6
Population by Geography	834,425	3.9	27.6	34.3	34.2	0.0
Housing Units by Geography	284,149	4.4	28.0	33.9	33.7	0.0
Owner-Occupied Units by Geography	160,446	1.8	25.1	33.1	40.0	0.0
Occupied Rental Units by Geography	100,134	8.0	31.6	35.8	24.7	0.0
Vacant Units by Geography	23,569	6.6	33.0	31.8	28.7	0.0
Businesses by Geography	51,108	6.6	26.3	29.8	36.5	0.7
Farms by Geography	662	2.7	32.6	26.1	38.2	0.3
Family Distribution by Income Level	195,692	22.4	17.4	19.1	41.1	0.0
Household Distribution by Income Level	260,580	24.7	15.6	18.1	41.7	0.0
Median Family Income MSA - 21340 El Paso, TX MSA		\$46,033	Median Housing Value			\$119,079
			Families Below Poverty Level			19.6%
			Median Gross Rent			\$763
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$23,027 and moderate-income families earned at least \$23,027 and less than \$36,826. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$575 for low-income borrowers and \$921 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$639. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Information from Moody's Analytics indicated that at the end of the evaluation period, the El Paso MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Recovery in the El Paso MSA was consistent with other areas of the nation. The construction sector rose steadily along with the government sector. The large military presence in the MSA continued to contribute to the economic stability with approximately 38,000 uniformed personnel and 3,000 federal civilian employees in the area. These employees, along with the 33,000 military retirees generate demand for personal services and housing. As such, the housing market remained stable with home sales up 6 percent in 2021. The hospitality industry continued to improve in the MSA with hotel occupancy rebounding more than 80 percent. The El Paso MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Government, Education and Health Services, Retail Trade, Professional and Business Services, and Leisure and Hospitality Services. Major employers in the El Paso MSA include Fort Bliss, T&T Staff Management, Tenet Healthcare, The Hospitals of Providence, and University of Texas at El Paso. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the El Paso MSA was 4.7 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by one local organization that were contacted during the evaluation period and serves the El Paso MSA. The organization was a small business organization that helped individuals start, build, and grow businesses. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were needs within the community:

- Construction of affordable rental housing units and rental assistance
- Development of single-family affordable housing
- Rehabilitation of housing units/improvement of the quality of housing stock
- Housing for persons with special needs
- Access to early education programs and scholarships for higher education
- Assistance preparing for, or access to tools for virtual learning
- College, technical school, and career readiness programs
- Programs that address low graduation rates/high dropout rates
- Financial literacy/education programs, including saving programs education
- Payday lending alternatives/emergency small dollar loans
- Banking products for un/underbanked individuals
- Basic necessities, emergency shelters, and transitional housing for the homeless
- Job skills training
- Access to capital and training for small businesses
- Access to payroll protection and emergency funding
- Providing technical assistance, including business plan development and budgeting

Opportunities for participation by financial institutions included the following:

- Delivering financial literacy/education programs for individuals and small businesses
- Availability of small business and commercial loans for revitalization of areas

Houston CSA

The following table provides a summary of the demographics, including housing and business information for the Houston CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Houston CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,099	14.5	28.8	26.1	29.4	1.2
Population by Geography	6,486,817	11.4	25.8	28.4	34.1	0.4
Housing Units by Geography	2,462,003	11.9	25.2	27.7	35.0	0.3
Owner-Occupied Units by Geography	1,343,960	5.1	21.1	29.8	43.9	0.1
Occupied Rental Units by Geography	870,701	20.5	30.4	24.9	23.6	0.5
Vacant Units by Geography	247,342	18.5	28.7	25.8	26.8	0.3
Businesses by Geography	685,117	9.0	17.9	23.4	49.6	0.2
Farms by Geography	10,868	4.9	15.9	31.4	47.8	0.1
Family Distribution by Income Level	1,560,144	24.3	16.1	17.1	42.5	0.0
Household Distribution by Income Level	2,214,661	24.9	15.9	16.7	42.4	0.0
Median Family Income MSA - 26420 Houston-The Woodlands-Sugar Land, TX MSA		\$69,373	Median Housing Value			\$171,645
Median Family Income Non-MSAs - TX		\$52,198	Median Gross Rent			\$968
			Families Below Poverty Level			12.8%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$26,099 to \$34,687 and moderate-income families earned at least \$26,099 to \$34,687 and less than \$41,758 to \$55,498, depending on the metropolitan or nonmetropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$652 to \$867 for low-income borrowers and ranging from \$1,044 to \$1,387 for moderate-income borrowers, depending on the metropolitan or nonmetropolitan area. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$921. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Houston-The Woodlands-Sugar Land, TX MSA (Houston MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Houston MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Houston MSA experienced a slow, but steady economic recovery. The MSA area had recovered approximately 70 percent of the jobs lost due to the pandemic. The mining industry experienced strong recovery with drilling becoming more profitable. The Houston MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Professional and Business Services, Government, Education and Health Services, Retail Trade, and Leisure and Hospitality Services. Major employers in the Houston MSA include Exxon Mobile Corp., Wood, Landry's Inc., Shell Oil Co, and Fort Bend ISD. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Houston MSA was 4.8 percent compared to the national unemployment rate of 3.7 percent.

Bay City, TX Micro Area (Matagorda County)

Bay City, TX Micro Area comprises Matagorda County, Texas. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for Matagorda County was 7.1 percent compared to the national unemployment rate of 3.7 percent. Total population in the county in 2020 was reported at 36,791. The median household income was \$48,733, a decline of 0.4 percent from 2019. The median property value increased 11.6 percent from 2019 and was reported at \$128,100 in 2020. Homeownership rates in 2020 were consistent with that in 2019 and was reported at 70.5 percent in 2020. This is well above the national average of 64.4 percent. Employment in the county declined 0.7 percent from 2019 to 2020 and was reported at 15,500 in 2020. The top industries in the county were Manufacturing, Construction, Health Care & Social Assistance, Retail Trade, and Educational Services.

Brenham, TX Micro Area (Washington County)

Brenham, TX Micro Area comprises Washington County, Texas. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for Washington County was 3.9 percent compared to the national unemployment rate of 3.7 percent. Total population in the county in 2020 was reported at 35,275. The median household income was \$59,623, an increase of 8.5 percent from 2019. The median property value increased 7.8 percent from 2019 and was reported at \$193,000 in 2020. Homeownership rates in 2020 declined slightly from 2019 and was reported at 73.7 percent in 2020. This is well above the national average of 64.4 percent. Employment in the county increased 2.7 percent from 2019 to 2020 and was reported at 15,900 in 2020. The top industries in the county were Health Care and Social Assistance, Retail Trade, Educational Services, Construction, and Manufacturing.

Huntsville, TX Micro Area (Walker County)

Huntsville, TX Micro Area comprises Walker County, Texas. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for Walker County was 5.1 percent compared to the national unemployment rate of 3.7 percent. Total population in the county in 2020 was reported at 72,295. The median household income was \$41,508, an increase of 5.1 percent from 2019. The median property value increased 5.1 percent from 2019 and was reported at \$160,100 in 2020. Homeownership rates in 2020 were consistent with that in 2019 and was reported at 51.9 percent

in 2020. This is below the national average of 64.4 percent. Employment in the county declined 0.2 percent from 2019 to 2020 and was reported at 26,200 in 2020. The top industries in the county were Public Administration, Educational Services, Retail Trade, Health Care and Social Assistance, and Accommodation and Food Services.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Houston CSA. The contacts included an organization that assisted with the selling of single-family residences in the areas and an organization that provided consulting and assistance for start-up and existing businesses seeking financing. The bank also provided an assessment of community needs based on research completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were needs within the community:

- Construction of affordable rental housing units and rental assistance
- Development of single-family affordable housing
- Rehabilitation of housing units/improvement of the quality of housing stock
- Housing for persons with special needs
- Community services, including basic necessities and financial assistance for disaster recovery purposes
- Access to early education programs and scholarships for higher education
- Assistance preparing for, or access to tools for virtual learning
- College, technical school, and career readiness programs
- Initiatives that address academic gaps in underperforming schools
- Programs that address low graduation rates/high dropout rates
- Financial literacy/education programs, including saving programs education
- Payday lending alternatives/emergency small dollar loans
- Banking products such as low-cost checking or savings accounts
- Jobs targeted to low- and moderate-income communities and job retention
- Addressing foreclosed properties and demolition/rehabilitation of abandoned properties
- Development/improvement of public facilities and infrastructure needs
- Re-development of commercial properties
- Access to capital and training for small businesses
- Technical assistance for small businesses, including business plan development and budgeting

Opportunities for participation by financial institutions included the following:

- Access to residential and commercial lending
- Access to small business financing

Scope of Evaluation in the State of Texas

The OCC selected the Austin MSA, Dallas MSA, El Paso MSA, and Houston CSA for full-scope reviews and based conclusions and ratings primarily on activity within these geographical areas. These AAs carried significant weight in determining the overall ratings for the state of Texas because of the significance of the bank's presence in these AAs. More weight was given to the Dallas MSA and Houston CSA due to the larger deposit base, lending, and branch presence.

During the evaluation period, the bank originated or purchased 324,193 home mortgage loans, small loans to businesses, and small loans to farms totaling \$48.8 billion. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within each AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. In the Austin MSA, Dallas MSA, Amarillo CSA, Beaumont MSA, College Station MSA, Corpus Christi CSA, Killeen MSA, Laredo MSA, Lubbock CSA, Midland CSA, San Angelo MSA, San Antonio MSA, Waco MSA, and Wichita Falls MSA, the OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms. In the El Paso MSA, Houston CSA, Brownsville CSA, McAllen MSA, Victoria CSA, and Texas Combined Non-MSA, the OCC placed more weight based on the number of loans on small loans to businesses versus to home mortgage loans and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF TEXAS

LENDING TEST

The bank's performance under the Lending Test in the state of Texas is rated Outstanding. Performance in the limited-scope areas had a neutral effect on the overall Lending Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Austin MSA, Dallas MSA, El Paso MSA and Houston CSA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Austin MSA	22,619	20,251	201	28	43,099	13.3	12.2
Dallas MSA	61,494	45,295	531	49	107,369	33.1	29.6
El Paso MSA	4,083	5,897	35	7	10,022	3.1	3.5
Houston CSA	44,001	47,776	498	51	92,326	28.5	34.6
Amarillo CSA	881	677	77	0	1,635	0.5	0.5
Beaumont MSA	1,232	1,219	28	0	2,479	0.8	0.9

Brownsville CSA	1,500	1,856	16	6	3,378	1.0	1.2
College Station MSA	1,405	940	59	0	2,404	0.7	1.7
Corpus Christi CSA	2,298	2,141	35	3	4,477	1.4	1.5
Killeen MSA	3,109	619	35	0	3,763	1.2	0.2
Laredo MSA	1,131	1,053	5	2	2,191	0.7	0.5
Lubbock CSA	2,971	1,276	54	0	4,301	1.3	1.2
McAllen MSA	2,162	2,435	45	0	4,642	1.4	0.9
Midland CSA	2,979	2,259	29	0	5,267	1.6	1.7
San Angelo MSA	675	523	23	0	1,221	0.4	0.5
San Antonio MSA	15,492	10,841	324	52	26,709	8.2	5.7
Victoria CSA	576	655	29	0	1,260	0.4	0.7
Waco MSA	1,401	693	51	0	2,145	0.7	0.6
Wichita Falls MSA	606	504	35	2	1,147	0.4	0.6
Texas Combined Non-MSA	1,800	2,392	366	0	4,558	1.4	1.7
Total	172,415	149,302	2,476	200	324,393	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Austin MSA	7,543,888	559,580	5,229	201,951	8,310,648	16.6	12.2
Dallas MSA	16,937,062	1,157,360	10,639	260,953	18,366,014	36.7	29.6
El Paso MSA	676,830	159,090	915	33,370	870,205	1.7	3.5
Houston CSA	11,204,623	1,298,493	11,997	310,369	12,825,482	25.6	34.6
Amarillo CSA	164,384	30,536	7,043	0	201,963	0.4	0.5
Beaumont MSA	209,369	29,927	1,457	0	240,753	0.5	0.9
Brownsville CSA	203,143	47,711	151	36,172	287,177	0.6	1.2
College Station MSA	306,965	28,194	859	0	336,018	0.7	1.7
Corpus Christi CSA	480,962	73,887	973	29,250	585,072	1.2	1.5
Killeen MSA	493,614	18,921	680	0	513,215	1.0	0.2
Laredo MSA	159,208	32,549	83	12,313	204,153	0.4	0.5
Lubbock CSA	532,757	28,254	1,312	0	562,323	1.1	1.2
McAllen MSA	302,471	62,259	985	0	365,715	0.7	0.9
Midland CSA	731,180	58,017	601	0	789,798	1.6	1.7
San Angelo MSA	109,640	13,859	748	0	124,247	0.2	0.5
San Antonio MSA	3,687,062	362,398	7,452	330,168	4,387,080	8.8	5.7
Victoria CSA	126,104	33,368	1,430	0	160,902	0.3	0.7
Waco MSA	274,988	16,036	1,188	0	292,212	0.6	0.6
Wichita Falls MSA	75,036	18,370	1,108	500	95,014	0.2	0.6
Texas Combined Non-MSA	407,051	72,413	10,720	0	490,184	1.0	1.7
Total	44,626,337	4,101,222	65,570	1,215,046	50,008,175	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Austin MSA

As of June 30, 2021, WFBNA had a deposit market share of 18.7 percent. The bank was the top depository financial institution among 68 depository financial institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 3.8 percent based on the number of home mortgage loans originated or purchased. The bank ranked third among 867 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. Other top lenders in this AA based on market share were Rocket Mortgage (4.8 percent) and JPMorgan Chase Bank, N.A. (4.3 percent).

According to peer small business data for 2021, WFBNA had a market share of 8.8 percent based on the number of small loans to businesses originated or purchased. The bank ranked fourth out of 273 small business lenders, which placed it in the top 2 percent of lenders. The top lenders in the AA based on market share were JPMorgan Chase Bank, N.A. (21.4 percent), American Express National Bank (19.9 percent), and Bank of America, N.A. (8.8 percent).

According to peer small farm data for 2021, WFBNA had a market share of 16 percent based on the number of small loans to farms originated or purchased. The bank ranked second out of 32 small farm lenders, which placed it in the top 7 percent of lenders. Other top lenders in this AA based on market share were JPMorgan Chase Bank, N.A. (28.3 percent), and Cadence Bank (13.0 percent).

Dallas MSA

As of June 30, 2021, WFBNA had a deposit market share of 3.6 percent. The bank ranked fifth among 169 depository financial institutions placing it in the top 3 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 4 percent based on the number of home mortgage loans originated or purchased. The bank ranked third among 1,079 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. Other top lenders in this AA based on market share were Rocket Mortgage (6.3 percent) and Lakeview Loan Servicing, LLC (4.1 percent).

According to peer small business data for 2021, WFBNA had a market share of 6.2 percent based on the number of small loans to businesses originated or purchased. The bank ranked fourth out of 353 small business lenders, which placed it in the top 2 percent of lenders. The top lenders in the AA based on market share were American Express National Bank (17.5 percent), JPMorgan Chase Bank, N.A. (16.9 percent), and Bank of America, N.A. (10.1 percent).

According to peer small farm data for 2021, WFBNA had a market share of 11.9 percent based on the number of small loans to farms originated or purchased. The bank ranked second out of 67 small farm lenders, which placed it in the top 3 percent of lenders. Other top lenders in this AA based on market share were JPMorgan Chase Bank, N.A. (21.2 percent) and John Deere Financial FSB (8.5 percent).

El Paso MSA

As of June 30, 2021, WFBNA had a deposit market share of 29.1 percent. The bank was the top ranked depository financial institution among 16 depository financial.

According to peer mortgage data for 2021, WFBNA had a market share of 4.4 percent based on the number of home mortgage loans originated or purchased. The bank ranked third among 393 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. Other top lenders in this AA based on market share were GECU (7.6 percent) and Rocket Mortgage (6.0 percent).

According to peer small business data for 2021, WFBNA had a market share of 11.9 percent based on the number of small loans to businesses originated or purchased. The bank ranked third out of 131 small business lenders, which placed it in the top 3 percent of lenders. Other top lenders in this AA based on market share were American Express National Bank (13.8 percent) and JPMorgan Chase Bank, N.A. (12.2 percent).

According to peer small farm data for 2021, WFBNA had a market share of 31.2 percent based on the number of small loans to farms originated or purchased. The bank was the top lender of small loans to farms. The other top lenders in this AA based on market share were JPMorgan Chase Bank, N.A. (21.3 percent) and John Deere Financial FSB (21.3 percent).

Houston CSA

As of June 30, 2021, WFBNA had a deposit market share of 9.7 percent. The bank ranked second among 103 depository financial institutions placing it in the top 2 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 3.8 percent based on the number of home mortgage loans originated or purchased. The bank ranked third among 1,023 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. Other top lenders in the AA based on market share were Rocket Mortgage (6.7 percent) and JPMorgan Chase Bank, N.A. (4.2 percent).

According to peer small business data for 2021, WFBNA had a market share of 6.4 percent based on the number of small loans to businesses originated or purchased. The bank ranked fourth out of 329 small business lenders, which placed it in the top 2 percent of lenders. The top three lenders in the AA based on market share were JPMorgan Chase Bank, N.A. (18.3 percent), American Express National Bank (17.5 percent) and Bank of America, N.A. (9.6 percent).

According to peer small farm data for 2021, WFBNA had a market share of 15.3 percent based on the number of small loans to farms originated or purchased. The bank ranked second out of 54 small farm lenders, which placed it in the top 4 percent of lenders. The other top lenders in the AA based on market share were JPMorgan Chase Bank, N.A. (24.3 percent) and Prosperity Bank (13.8 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AAs. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data. The bank's performance was excellent in the Austin MSA, adequate in the Dallas MSA, and good in the El Paso MSA and Houston CSA.

Austin MSA***Home Mortgage Loans***

Refer to Table O in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans in low-income geographies approximated the percentage of owner-occupied housing units in low-income geographies and it exceeded the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied housing units in moderate-income geographies but it approximated the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies approximated the percentage of businesses in low-income geographies and it was near to the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies exceeded the percentage of businesses in moderate-income geographies and it was near to the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was good.

The bank's percentage of small loans to farms in low-income geographies was significantly below the percentage of farms in low-income geographies but it exceeded the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-income geographies exceeded both the percentage of farms in moderate-income geographies and the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Dallas MSA***Home Mortgage Loans***

Refer to Table O in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans in low-income geographies was significantly below the percentage of owner-occupied housing units in low-income geographies and it was below the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was well below the percentage of owner-occupied housing units in moderate-income geographies but it was equal to the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was below both the percentage of businesses in low-income geographies and the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was near to both the percentage of businesses in moderate-income geographies and the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

The bank's percentage of small loans to farms in low-income geographies was significantly below the percentage of farms in low-income geographies but it was near to the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-income geographies was below both the percentage of farms in moderate-income geographies and the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

El Paso MSA***Home Mortgage Loans***

Refer to Table O in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was poor.

The bank's percentage of home mortgage loans in low-income geographies was significantly below both the percentage of owner-occupied housing units in low-income geographies and the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was significantly below the percentage of owner-occupied housing units in moderate-income geographies and it was below the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies was near to the percentage of businesses in low-income geographies and it approximated the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was near to both the percentage of businesses in moderate-income geographies and the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

The bank originated or purchased no small loans to farms in low-income geographies. The bank's percentage of small loans to farms in moderate-income geographies exceeded the percentage of farms in moderate-income geographies but it was below the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Houston CSA***Home Mortgage Loans***

Refer to Table O in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans in low-income geographies was significantly below the percentage of owner-occupied housing units in low-income geographies and it was below the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was well below the percentage of owner-occupied housing units in moderate-income geographies but it was near to the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentages of small loans to businesses in low- and moderate-income geographies were near to both the percentages of businesses in low- and moderate-income geographies and the aggregate distributions of small loans to businesses by all lenders.

Small Loans to Farms

Refer to Table S in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was good.

The bank's percentage of small loans to farms in low-income geographies was significantly below the percentage of farms in low-income geographies but it exceeded the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-income geographies was near to both the percentage of farms in moderate-income geographies and the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies in the Austin MSA and Dallas MSA, El Paso MSA, and Houston CSA. The OCC analyzed

geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AAs.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes. The bank's performance was good in the Austin MSA, Dallas MSA, and Houston CSA and adequate in the El Paso MSA.

Austin MSA

Home Mortgage Loans

Refer to Table P in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but it approximated the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers approximated the percentage of moderate-income families and it exceeded the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 28.9 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was well below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was poor.

The bank did not collect or consider the GAR in the underwriting of approximately 61.2 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below both the percentage of farms in the AA with GAR of \$1 million or less and the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Dallas MSA

Home Mortgage Loans

Refer to Table P in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but it was near to the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families but it approximated the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 29.5 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was poor.

The bank did not collect or consider the GAR in the underwriting of approximately 63.1 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below both the percentage of farms in the AA with

GAR of \$1 million or less and the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

El Paso MSA

Home Mortgage Loans

Refer to Table P in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was poor.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and it was below the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was significantly below both the percentage of moderate-income families and the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 25.1 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

The bank did not collect or consider the GAR in the underwriting of approximately 25.7 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was below the percentage of farms in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Houston CSA***Home Mortgage Loans***

Refer to Table P in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and it was below the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was well below the percentage of moderate-income families but it was near to the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 28.7 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was poor.

The bank did not collect or consider the GAR in the underwriting of approximately 67.9 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below both the percentage of farms in the AA with GAR of \$1 million or less and the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

Austin MSA

WFBNA was a leader in providing CD loans in the Austin MSA. WFBNA made 28 CD loans totaling approximately \$202 million, which represented 13.4 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 96.2 percent of these loans funded affordable housing that provided 1,662 units of affordable housing, 3.7 percent funded community services targeted to low- and moderate-income individuals, and 0.1 percent funded revitalization and stabilization efforts. The following are examples of CD loans made in this AA:

- WFBNA renewed a \$15.5 million loan for an affordable housing development located in a moderate-income census tract in San Marcos, Texas. The property included 48 one-bedroom units, 112 two-bedroom units, and eight three-bedroom units with 100 percent of the actual rent rates below the 2021 Fair Market Rent for the area and affordable to individuals earning up to 80 percent of the median family income. The loan was responsive to the identified need for affordable housing.
- WFBNA provided a \$9 million loan for an LIHTC affordable housing development located in Austin, Texas. All of the units were restricted to tenants earning less than 60 percent of the area median family income. The loan was responsive to the identified need for affordable housing.
- WFBNA renewed a \$750,000 loan for a nonprofit organization that provided first class, affordable homes and support services for thousands of low-income families and individuals, empowering them with the tools they need to succeed. They offered an innovative, proven model that enabled residents and neighbors to achieve educational success and financial stability. They owned and operated 17 properties in Austin and North Texas, provided affordable homes to over 2,600 families, created enriched learning environments for over 700 children as well as ongoing adult education and financial coaching, and helped over 17,000 low-income residents file their taxes free of charge every year returning \$27 million in refunds to the local economy. According to the organization, 100 percent of its clients were low- to moderate-income as they earned less than 80 percent of the area median family income.

Dallas MSA

WFBNA was a leader in providing CD loans in the Dallas MSA. WFBNA made 49 CD loans totaling approximately \$261 million, which represented 7.2 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 96.5 percent of these loans funded affordable housing that provided 4,052 units of affordable housing, 2.4 percent funded community services targeted to low- and moderate-income individuals, 0.9 percent funded economic development, and 0.3 percent funded revitalization and stabilization efforts. The following are examples of CD loans made in this AA:

- WFBNA provided a \$6 million loan for a multifamily housing development located in a moderate-income census tract in Terrell, Texas. The property included 16 one-bedroom units, 86 two-bedroom units and 14 three-bedroom units with 100 percent of the actual rental rates below the 2021 Fair

Market Rent for the area and 100 percent of the units affordable to tenants earning less than 50 percent of the area median family income. The loan was responsive to the identified need for affordable housing.

- WFBNA provided a \$5.4 million term loan for an affordable housing development located in a moderate-income census tract in Mesquite, Texas. The property included 256 one-bedroom units, 128 two-bedroom units, with 99.2 percent of the actual rental rates below the 2021 Fair Market Rent for the area and 100 percent of the units affordable to tenants earning less than 80 percent of the area median family income. The loan was responsive to the identified need for affordable housing.
- WFBNA provided an \$11 million loan for a multifamily housing development located in a moderate-income census tract in Dallas, Texas. The property included 24 one-bedroom units, 128 two-bedroom units, six three-bedroom units with 99.4 percent of the actual rental rates below the Fair Market Rent for the area and 100 percent of the units affordable to tenants earning less than 80 percent of the area median family income. The loan was responsive to the identified need for affordable housing.

El Paso MSA

WFBNA was a leader in providing CD loans in the El Paso MSA. WFBNA made seven CD loans totaling approximately \$33.4 million, which represented 7.8 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 99.4 percent of these loans funded affordable housing that provided 575 units of affordable housing, and 0.6 percent funded community services targeted to low- and moderate-income individuals. The following is an example of a CD loan made in this AA:

- WFBNA renewed a \$500,000 term loan for a multifamily housing development located in a moderate-income census tract in EL Paso, Texas. The property included one one-bedroom unit, 58 two-bedroom units, and one three-bedroom unit with 98.3 percent of the actual rent rates below the Fair Market Rent for the area and 98.3 percent of the units affordable to tenants earning less than 50 percent of the area median family income. The loan was responsive to the identified need for affordable housing.

Houston CSA

WFBNA was a leader in providing CD loans in the Houston CSA. WFBNA made 51 CD loans totaling approximately \$310.4 million, which represented 7.3 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 88.7 percent of these loans funded affordable housing that provided 3,136 units of affordable housing, 8.1 percent funded economic development, 2.6 percent funded community services targeted to low- and moderate-income individuals, and 0.6 percent funded revitalization and stabilization efforts. The following are examples of CD loans made in this AA:

- WFBNA provided an \$11.8 million loan for a multifamily housing development located in a low-income census tract in Houston, Texas. The property included 66 one-bedroom units, 104 two-bedroom units, 18 three-bedroom units with 99.5 percent of the actual rental rates below the Fair Market Rent for the area and 99.5 percent of the units affordable to tenants earning less than 80

percent of the area median family income. The loan was responsive to the identified need for affordable housing.

- WFBNA provided a \$22 million loan for an affordable Section 8 housing development located in The Woodlands, Texas. The property included 152 units. All of the units were restricted to tenants earning up to 60 percent of the area median family income. The loan was responsive to the identified need for affordable housing.
- WFBNA provided a \$40 million loan for an LIHTC 300-unit affordable housing development located in The Woodlands, Texas. All units were restricted to tenants earning up to 60 percent of the area median family income. The loan was responsive to the identified need for affordable housing.

Product Innovation and Flexibility

Austin MSA

WFBNA made extensive use of/used flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 3,401 loans under its flexible lending programs totaling \$157.4 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	85	23,500
Dream. Plan. Home.	20	3,900
PPP	3,296	130,000
Total	3,401	157,400

Dallas MSA

WFBNA made extensive use of/used flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 7,653 loans under its flexible lending programs totaling \$410.5 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	618	154,400
Dream. Plan. Home.	68	12,400
PPP	6,967	243,700
Total	7,653	410,500

El Paso MSA

WFBNA made extensive use of/used flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 1,008 loans under its flexible lending programs totaling \$40.2 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	27	4,400
Dream. Plan. Home.	0	0
PPP	981	35,800
Total	1,008	40,200

Houston CSA

WFBNA made extensive use of/used flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 8,795 loans under its flexible lending programs totaling \$405.5 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	448	102,600
Dream. Plan. Home.	90	14,700
PPP	8,257	302,900
Total	8,795	405,500

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Brownsville CSA and San Antonio MSA was consistent with the bank's overall performance under the Lending Test in the full-scope areas. The bank's performance under the Lending Test in the Amarillo CSA, Beaumont MSA, College Station MSA, Corpus Christi CSA, Killeen MSA, Laredo MSA, Lubbock CSA, McAllen MSA, Midland CSA, San Angelo, Victoria CSA, Waco MSA, Wichita Falls MSA, and Texas Combined Non-MSA was weaker than the bank's overall performance under the Lending Test in the full-scope areas due to weaker geographic distributions, borrower distributions and lower levels of CD lending.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Texas is rated Outstanding. Performance in the limited-scope areas had a neutral effect on the overall Investment Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Austin MSA, Dallas MSA, El Paso MSA, and Houston CSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Austin MSA	50	76,255	147	134,282	197	12.1	210,537	11.6	18	75,976
Dallas MSA	164	117,620	351	332,697	515	31.7	450,316	24.7	18	46,949
El Paso MSA	7	41,952	79	89,244	86	5.3	131,197	7.2	3	185
Houston CSA	123	78,788	221	387,135	344	21.2	465,923	25.6	16	95,366
Amarillo CSA	1	2,926	31	249	32	2.0	3,175	0.2	1	136
Beaumont MSA	4	14,351	12	11,580	16	1.0	25,931	1.4	3	1,072
Brownsville CSA	2	23,990	23	5,070	25	1.5	29,060	1.6	3	2,658
College Station MSA	2	39	8	22,031	10	0.6	22,070	1.2	1	73
Corpus Christi CSA	8	49,185	32	65,423	40	2.5	114,609	6.3	6	22,034
Killeen MSA	1	8,064	1	10	2	0.1	8,074	0.4	0	0
Laredo MSA	0	0	12	71	12	0.7	71	0.0	0	0
Lubbock CSA	2	2,004	35	33,741	37	2.3	35,745	2.0	1	84
McAllen MSA	1	10,258	40	891	41	2.5	11,149	0.6	0	0
Midland CSA	1	6	16	173	17	1.1	179	0.0	1	13
San Angelo MSA	1	0	5	38	6	0.4	38	0.0	1	101
San Antonio MSA	16	61,465	143	123,931	159	9.9	185,396	10.2	12	36,254
Victoria CSA	0	0	5	76	5	0.3	76	0.0	0	0
Waco MSA	2	9,037	18	8,309	20	1.2	17,346	1.0	2	169
Wichita Falls MSA	4	12,094	15	35,241	19	1.2	47,335	2.6	4	1,424
Texas Combined Non-MSA	1	972	7	21	8	0.5	993	0.1	1	479
Statewide***	16	61,465	16	163	32	2.0	62,097	3.4	12	1,071
Total	406	570,471	1,217	1,250,376	1,623	100.0	1,821,317	100.0	103	284,044
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.										
* '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 tracked and recorded by the institution's financial reporting system.										
*** Statewide means investments in statewide programs that have a purpose, mandate, or function to serve one or more of the bank's assessment areas within the state. Due to rounding, totals may not equal 100.0%										

Austin MSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$210.5 million and represented 14 percent of the bank's tier 1 capital allocated to the AA. The investments also included 137 grants and donations totaling \$6.8 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 45.7 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 33 percent that focused on community services targeted to low- and moderate-income individuals, and 21.3 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 2876 units of affordable housing in the AA.

The bank made significant use of innovative or complex investments to support CD initiatives. Approximately 72.8 percent of current period investment dollars were complex LIHTC investments. The following are examples of CD investments made in this AA:

- WFBNA made an equity investment of \$15.2 million to finance an LIHTC affordable housing development with 132 housing units located in Austin, Texas. All units were affordable to tenants earning less than 50 percent of the area median family income. This activity was complex due to the inherent nature of LIHTC transactions and their multiple sources of funding such as the City of Austin and Federal Home Loan Bank. In addition to financing the development, WFBNA renewed a \$750,000 loan used for the development's operations. The bank also provided a \$10 million construction loan for the project. The investment was responsive to the identified needs for affordable housing, financial health, and disaster recovery.
- WFNBA awarded a total of \$65,000 in four grants to an organization dedicated to supporting low-income families. These grants aimed to enhance parenting skills, promote long-term educational success for children, and break trans-generational cycles of poverty. The funding supported various programs, including English as a Second Language (ESL) in collaboration with Austin Community College and Little Thinker Science, Technology, Engineering, and Math (STEM) programs benefiting 70 low-income Spanish-speaking parents and their children in Austin. Additionally, financial health education initiatives catered to 600 low-income, Spanish-speaking individuals, alongside general operational support. During the pandemic, these grants were crucial for serving one of the most underserved and vulnerable demographics, helping prevent poverty and homelessness. The bank demonstrated its commitment through active involvement, including a bank employee serving on the organization's board and another employee contributing five hours of service. This partnership has been sustained for nearly a decade, reflecting the bank's ongoing dedication to addressing educational and financial health needs in the community.

Dallas MSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$450 million and represented 12.4 percent of the bank's tier 1 capital allocated to the AA. The investments also included 309 grants and donations totaling \$14.5 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income

individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 40.8 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 32.1 percent that focused on community services targeted to low- and moderate-income individuals, and 17.1 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 3279 units of affordable housing in the AA.

The bank occasionally used innovative and complex investments to support CD initiatives. Approximately 16.8 percent of current period investment dollars were complex LIHTC and NMTC investments. The following are examples of CD investments made in this AA:

- WFBNA made a \$5 million NMTC investment for a historically black college that accepted underprivileged, low-income minority youth from severely distressed communities and provided them with the academic skills and self-discipline required to succeed in today's competitive workforce. This investment allowed the college to increase its student body by more than 20 percent. An estimated 5,000 non-student community members used the gymnasium and community space each year. The funding was expected to create 134 part-time jobs for students and eight full-time positions at the facility. Additionally, the development created 185 temporary construction jobs for local community residents. Minority and/or women-owned businesses received approximately 75 percent of the construction contracts. The gymnasium was expanded to be large enough to accommodate events such as high school athletics and social events, in response to the request from the local community. This investment was highly complex because of the inherent nature of NMTC transactions. Financing provided to this institution increased opportunities for the youth in this underserved community. The investment was responsive to the need for education, specifically college and career readiness programs.
- WFBNA made a \$9.5 million NMTC investment for the largest homeless shelter provider in North Texas. The investment financed the renovation and expansion of the current facility from 82,000 square feet to 100,000 square feet. The shelter provided homeless services including medical, dental, and vision clinics; commercial kitchen and dining room; and 90 private sleeping quarters for homeless with 40 units reserved for veterans. Additionally, the facility provided services for children including library, playroom, and daycare. Finally, the new location included space for counseling, meeting, and gathering; a computer room; and a convenience store. The investment created 69 temporary construction jobs and 12 new full-time jobs; and retained 54 full-time jobs. The shelter hired full-time workers, particularly in daycare, from the low-income community. The facility served hundreds of low-income persons each year who have been chronically homeless and typically have barriers to employment such as intermittent work history, past incarceration, legal, and credit issues. This investment was highly complex because of the inherent nature of NMTC transactions. The investment was responsive to the identified needs for workforce development, job readiness, job creation, and homeless services.
- WFBNA provided \$5.5 million in grants to a nonprofit organization for its Neighborhood LIFT program. The organization promoted reinvestment in urban, suburban, and rural communities by local institutions working cooperatively with residents and local government. According to the organization, 100 percent of its clients were low- and moderate-income as they earned less than 80 percent of the median family income.

El Paso MSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$131.2 million and represented 30.8 percent of the bank's tier 1 capital allocated to the AA. The investments also included 74 grants and donations totaling \$1.3 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 17.4 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 59.3 percent that focused on community services targeted to low- and moderate-income individuals, and 23.2 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 715 units of affordable housing in the AA.

The bank occasionally used innovative and complex investments to support CD initiatives. Approximately 24.8 percent of current period investment dollars were complex LIHTC investments. The following are examples of CD investments made in this AA:

- WFBNA made a \$11.1 million LIHTC equity investment to fund the development of a 96-unit apartment complex located in Socorro, Texas. The units were restricted to tenants earning up to 60 percent of the AMI. The bank demonstrated active involvement, evidenced by its long-term working relationship working with the sponsor since 2014 and providing financing on seven developments. This activity was complex due to the inherent nature of LIHTC transactions. The bank also provided two term loans totaling \$12.9 million. The investment was responsive to the identified need for affordable housing.
- WFBNA provided four grants totaling \$110,000 to an organization that utilized community-led solutions to identify and resolve community concerns with a primary focus on education, financial stability, and health. The grants went directly to important efforts such as a reading initiative to increase literacy rates among school-aged children; a financial stability collaborative that strives to put every person on a path toward financial empowerment that starts with job training, credit counseling and money management programs; its Learn Local program that aimed to decrease high school dropout rates and provide COVID-19 response support. The investment was responsive to the need for education and financial health.

Houston CSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private.

The current and prior period qualified investments totaled \$485.9 million and represented 11.4 percent of the bank's tier 1 capital allocated to the AA. The investments also included 185 grants and donations

totaling \$38.4 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 48.4 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 37.7 percent that focused on community services targeted to low- and moderate-income individuals, and 13.9 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 4642 units of affordable housing in the AA.

The bank occasionally used innovative and complex investments to support CD initiatives. Approximately 44.5 percent of current period investment dollars were complex LIHTC and NMTC investments. The following are examples of CD investments made in this AA:

- WFBNA provided a \$22.7 million LIHTC equity investment to fund the development of a 332-unit affordable apartment complex located in The Woodlands, Texas. The units were restricted to residents earning up to 80 percent of the AMI with 139 of the units under Section 8. The property included 23 two-story walk-up buildings a community space and pool. This activity was complex due to the inherent nature of LIHTC transactions. The bank also provided two terms loans totaling \$43 million for the project. The investment was responsive to the identified need for affordable housing.
- WFBNA provided a \$31.4 million LIHTC equity investment to fund the development of a 300-unit affordable apartment complex located in The Woodlands, Texas. The units were restricted to seniors aged 62 and older earning up to 60 percent of the AMI. The project was a pet-friendly community with more than 220 miles of hiking and biking trails and 100 parks to help the residents stay active and engaged. The location offered convenient access to a nearby grocery store and neighborhood shopping. Site amenities included on-site management, laundry facilities, community room with kitchen, fitness center and library. The site had a waitlist of 92 applicants. This activity was complex due to the inherent nature of LIHTC transactions. The bank also provided two term loans totaling \$45 million for the project. Financing for this development helped to increase the stock of affordable housing and provides housing opportunities for seniors. The investment was responsive to the identified need for affordable housing.
- WFBNA invested in an MDI located in Houston, Texas. The MDI provided banking services to historically underserved business and individuals in the Houston area. WFBNA provided access to its ATM network, surcharge free, to the MDI's customers.

Broader Statewide Investments

WFBNA had 32 current and prior period investments totaling \$62.1 million with a purpose, mandate, or function to serve one or more AAs in the state. These CD investments were primarily LIHTCs that supported the creation or preservation of affordable housing in the state. These investments were given positive consideration and supported the bank's overall performance under the Investment Test in the state of Texas.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Beaumont MSA, Brownsville CSA, College Station MSA, Corpus Christi CSA, Killeen MSA, Lubbock CSA, McAllen MSA, San Antonio MSA, Waco MSA, and Wichita Falls MSA was consistent with the bank's overall performance under the Investment Test in the full-scope areas. Performance in the Amarillo CSA, Laredo MSA, Midland CSA, San Angelo MSA, Victoria CSA, and Texas Combined Non-MSA was weaker than the bank's overall performance under the Investment Test in the full-scope areas primarily due to lower levels of CD investments relative to the bank's presence and capacity to invest in those AAs.

SERVICE TEST

The bank's performance under the Service Test in the state of Texas is rated Outstanding. Performance in the limited-scope AAs had a neutral effect on the overall Service Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Austin MSA was good and the performance in the Dallas MSA, El Paso MSA, and Houston CSA was excellent.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's full-scope AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Austin MSA	12.2	61	11.4	9.8	13.1	42.6	31.1	10.1	22.3	37.3	29.2
Dallas MSA	29.6	155	29.0	10.3	22.6	29.0	38.1	10.8	24.9	30.5	33.7
El Paso MSA	3.5	14	2.6	7.1	21.4	28.6	42.9	3.9	27.6	34.3	34.2
Houston CSA	34.6	162	30.3	11.7	19.1	21.6	47.5	11.4	25.8	28.4	34.1
Amarillo CSA	0.5	6	1.1	0.0	16.7	33.3	50.0	1.9	26.7	35.8	35.5
Beaumont MSA	0.9	6	1.1	0.0	0.0	83.3	16.7	4.8	23.1	40.6	28.7
Brownsville CSA	1.2	10	1.9	10.0	30.0	20.0	40.0	1.4	36.4	29.3	32.9
College Station MSA	1.7	6	1.1	16.7	33.3	33.3	16.7	10.4	29.7	30.4	25.7
Corpus Christi CSA	1.5	12	2.2	8.3	8.3	41.7	41.7	4.2	29.8	38.9	26.5
Killeen MSA	0.2	1	0.2	0.0	0.0	0.0	100.0	1.5	17.1	54.4	25.8
Laredo MSA	0.5	4	0.7	0.0	75.0	0.0	25.0	2.2	40.4	31.4	26.0
Lubbock CSA	1.2	10	1.9	20.0	10.0	30.0	40.0	4.8	25.2	40.1	29.8
McAllen MSA	0.9	7	1.3	0.0	28.6	14.3	57.1	1.7	27.6	41.2	28.8
Midland CSA	1.7	6	1.1	0.0	16.7	50.0	33.3	2.6	19.4	43.9	34.0
San Angelo MSA	0.5	4	0.7	75.0	0.0	25.0	0.0	2.2	27.5	50.9	19.4
San Antonio MSA	5.7	42	7.9	11.9	16.7	28.6	42.9	6.2	28.8	31.4	33.6
Victoria CSA	0.7	4	0.7	0.0	25.0	25.0	50.0	2.8	30.0	28.7	38.6
Waco MSA	0.6	3	0.6	0.0	33.3	66.7	0.0	9.7	30.0	25.1	33.7
Wichita Falls MSA	0.6	3	0.6	0.0	0.0	0.0	100.0	5.4	21.2	35.1	38.3
Texas Combined Non-MSA	1.7	19	3.6	0.0	31.6	47.4	21.1	0.9	13.2	57.7	28.2
Total	100.0	535	100.0	10.3	19.8	29.5	40.0	8.6	25.7	32.8	32.6
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Austin MSA	0	6	-1	0	-3	-2
Dallas MSA	2	19	1	-4	-7	-7
El Paso MSA	0	0	0	0	0	0
Houston CSA	4	26	-1	-1	-8	-12
Amarillo CSA	0	2	-1	-1	0	0
Beaumont MSA	0	4	0	-1	-1	-2
Brownsville CSA	0	1	0	0	-1	0
College Station MSA	0	0	0	0	0	0
Corpus Christi CSA	0	5	0	-2	0	-2
Killeen MSA	0	0	0	0	0	0
Laredo MSA	0	0	0	0	0	0
Lubbock CSA	0	1	0	-1	0	0
McAllen MSA	0	0	0	0	0	0
Midland CSA	0	0	0	0	0	0
San Angelo MSA	0	0	0	0	0	0
San Antonio MSA	1	7	0	-3	-2	-1
Victoria CSA	0	1	0	0	-1	0
Waco MSA	0	0	0	0	0	0
Wichita Falls MSA	0	3	0	-1	-1	-1
Texas Combined Non-MSA	0	6	0	0	-3	-3
Total	7	81	--2	--14	--27	--30
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. There was a net closure in a tract where the income designation was unknown.						

Austin MSA

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Austin MSA. WFBNA operated 61 branches in the AA, comprising six branches in low-income geographies, eight branches in moderate-income geographies, 26 branches in middle-income geographies, 19 branches in upper-income geographies, and two branches in geographies without an income designation. The distribution of branches in low-income geographies approximated the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies was below the distribution of the population in moderate-income geographies. The distribution was augmented by five branches in middle- and upper-income geographies that were within close proximity to serve low-income areas and five branches in middle- and upper-income geographies that were within close proximity to and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches generally had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank closed one branch in a

low-income geography. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations. Despite the closures, its service delivery systems remained readily accessible.

Services, including where appropriate, business hours, were tailored to the convenience and needs of portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. The majority of branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday and had Saturday business hours of 9:00 a.m. to 12:00 p.m. One low-income branch had extended hours of 7:30 a.m. to 6:00 p.m. and 9:00 a.m. to 2:00 p.m. on Saturday (the only branch with extended hours in Austin MSA).

Dallas MSA

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Dallas MSA. WFBNA operated 155 branches in the AA, comprising 16 branches in low-income geographies, 35 branches in moderate-income geographies, 45 branches in middle-income geographies, and 59 branches in upper-income geographies. The distribution of branches in low- and moderate-income geographies approximated the distribution of the population in low- and moderate-income geographies. The distribution was augmented by two branches in middle- and upper-income geographies that were within close proximity to serve low-income areas and 16 branches in middle- and upper-income geographies that were within close proximity to and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. There were four moderate-income branch closures as a result of either an in-store branch closure, low customer patronage and deposits, or duplicate coverage from other branches. Despite the closure branch delivery systems were readily accessible to customers. Each closure had a receiving branch within a mile to handle migrating transactions and customers.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. The majority of branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday and 9:00 a.m. to 12:00 p.m. Saturday.

El Paso MSA

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the El Paso MSA. WFBNA operated 14 branches in the AA, comprising one branch in a low-income geography, three branches in moderate-income geographies, four branches in middle-

income geographies, and six branches in upper-income geographies. The distribution of branches in low-income geographies exceeded the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies was near to the distribution of the population in moderate-income geographies. The distribution was augmented by two branches in middle- and upper-income geographies that were within close proximity to and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. There were no low- and moderate-income openings or closings.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. The majority of branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday and 9:00 a.m. to 12:00 p.m. Saturday.

Houston CSA

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Houston CSA. WFBNA operated 162 branches in the AA, comprising 19 branches in low-income geographies, 31 branches in moderate-income geographies, 35 branches in middle-income geographies, and 77 branches in upper-income geographies. The distribution of branches in low-income geographies exceeded the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies was near to the distribution of the population in moderate-income geographies. The distribution was augmented by three branches in middle- and upper-income geographies that were within close proximity to serve low-income areas and five branches in middle- and upper-income geographies that were within close proximity to and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches generally had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank closed one branch in a low-income geography and one branch in a moderate-income geography. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations. Despite the closures, its service delivery systems remained readily accessible.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan

applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday and a majority of the branches were opened for business 9:00 a.m. to 12:00 p.m. Saturday.

Community Development Services

The bank provided a limited level of CD services.

Austin MSA

WFBNA provided a limited level of CD services in the Austin MSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 47 CD service activities and 147 CD service hours during the evaluation period. A majority (85.1 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The other CD services were targeted to affordable housing (14.9 percent). The bank's assistance provided was responsive to the identified needs in the AA. The following are examples of CD services provided in this AA:

- Three WFBNA employees provided over 47 hours of board service to an all-girls college preparatory public school, where the majority of the student's population qualified for free/reduced lunches. This CD activity demonstrated multi-faceted support during the exam period as the bank also provided three grants to this school that have enhanced the organization's impact in the community.
- Two WFBNA employees provided a total of six hours of financial education to a nonprofit organization providing first class, affordable homes and support services for thousands of low-income families and individuals, empowering them with the tools they need to succeed. This organization offered an innovative, proven model that enabled residents and neighbors to achieve educational success and financial stability. The organization owned and operated 17 properties in Austin and North Texas, providing affordable homes to over 2,600 families, created enriched learning environments for over 700 children as well as ongoing adult education and financial coaching, and helped over 17,000 low-income residents file their taxes free of charge every year returning \$27 million in refunds to the local economy.
- A WFBNA employee provided two hours of financial education to 250 students at an elementary school where the majority of the student's population qualified for free or reduced lunches.

Dallas MSA

WFBNA provided an adequate level of CD services in the Dallas MSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 150 CD service activities and 635 CD service hours during the evaluation period. A majority (92.7 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The other CD services were targeted to affordable housing (5.3 percent) and economic development (2 percent). The bank's assistance provided was responsive to the identified needs in the AA. The following are examples of CD services provided in this AA:

- A WFBNA employee provided five hours of board service to an organization that was dedicated to addressing the most critical needs of women in Dallas County, offering programs in the areas of financial capability and work skills support, pregnancy and parenting education, and small business development. The organization worked to respond to the growing challenges of poverty in the Dallas community.
- A WFBNA employee provided eight hours of financial education to 105 students at an elementary school where the majority of the student's population qualified for free or reduced lunches.
- Two WFBNA employees provided a total of four hours of technical expertise to a HUD certified nonprofit housing organization to address critical revitalization needs in targeted areas of the city and county with 100 percent of its clients being low- and moderate-income individuals. The mission of this nonprofit organization was to revitalize distressed neighborhoods and to increase the amount of decent, affordable housing available to low- and moderate-income families and individuals with special housing needs. The goal of this nonprofit organization was to help people build wealth through homeownership and lift neighborhoods and strengthen communities.

El Paso MSA

WFBNA provided a relatively high level of CD services in the El Paso MSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 149 CD service activities and 504 CD service hours during the evaluation period. A majority (91.3 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The other CD services were targeted to affordable housing (8.7 percent). The bank's assistance provided was responsive to the identified needs in the AA. The following are examples of CD services provided in this AA:

- A WFBNA employee provided six hours of financial education to 500 students at a middle school where the majority of the student's population qualified for free or reduced lunches.
- A WFBNA employee provided 10 hours of board service to a nonprofit organization. The purpose of the organization was to assist low- and moderate-income individuals to acquire and own decent, safe, sanitary, and affordable housing.
- During 12 separate activities, bank employees provided at total of 32 hours of financial education to a nonprofit organization that provided services to low- and moderate-income veterans with the basic needs including a food pantry, clothing closet, and mental health services.

Houston CSA

WFBNA provided an adequate level of CD services in the Houston CSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 155 CD service activities and 458 CD service hours during the evaluation period. All of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The bank's assistance provided was responsive to the identified needs in the AA. The following are examples of CD services provided in this AA:

- A WFBNA employee provided eight hours of financial education to 25 students at an elementary school where the majority of the student's population qualified for free or reduced lunches.
- A WFBNA employee provided four hours of board service to an organization whose mission was to promote structured independence for low- and moderate-income individuals living with developmental disabilities by providing innovative education, training, housing and employment programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the College Station MSA, Laredo MSA, San Angelo MSA, Victoria CSA, and Waco MSA, was consistent with the bank's overall performance under the Service Test in the full-scope areas. The bank's performance under the Service Test in the Amarillo CSA, Beaumont MSA, Brownsville MSA, Corpus Christi CSA, Killeen MSA, Lubbock CSA, McAllen CSA, Midland CSA, San Antonio MSA, Wichita Falls MSA, and Texas Combined Non-MSA was weaker than the bank's overall performance under the Service Test in the full-scope areas due to the weaker performance in branch distribution in low- and moderate-income geographies.

State of Utah

CRA rating for the State of Utah⁵⁰: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AAs.
- The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank made a relatively high level of CD loans. CD lending had a neutral effect on the Lending Test conclusion as it further supported the bank's already excellent lending performance.
- The bank had an adequate level of qualified CD investments that demonstrated adequate responsiveness to credit and economic development needs, although occasionally in a leadership position. The bank made significant use of innovative and complex investments to support CD initiatives.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided a limited level of CD services.

Description of Institution's Operations in the State of Utah

The state of Utah was WFBNA's 18th largest rating area based on its total deposits in the state. As of June 30, 2021, the bank maintained approximately \$15.7 billion or 1.1 percent of its total domestic deposits in branches within the state. Of the 57 depository financial institutions operating in the bank's AAs within the state, WFBNA, with a deposit market share of 1.5 percent, was the 10th largest. The top depository financial institutions in the bank's AAs within the state based on market share included Morgan Stanley Bank, N.A. (20 percent), Ally Bank (18.7 percent), UBS Bank USA (11.3 percent), American Express National Bank (11.2 percent), Goldman Sachs Bank USA (9.7 percent), and Synchrony Bank (8.1 percent). As of December 31, 2021, the bank operated 79 branches and 117 ATMs in the state. WFBNA delineated 11 AAs within the state; however, the OCC combined, analyzed, and presented those AAs at the CSA level where possible for purposes of this evaluation. This resulted in the following three AAs: Salt Lake City-Provo-Orem, UT CSA (Salt Lake City CSA), St. George, UT MSA (St. George MSA), and Utah Combined Non-MSA. The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

Salt Lake City CSA

The following table provides a summary of the demographics, including housing and business information for the Salt Lake City CSA.

⁵⁰ This rating only reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Salt Lake City CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	487	4.7	20.5	43.1	30.4	1.2
Population by Geography	2,390,713	3.6	19.5	45.9	30.6	0.4
Housing Units by Geography	800,917	3.6	21.3	44.6	30.0	0.6
Owner-Occupied Units by Geography	513,639	1.2	15.6	48.2	34.8	0.2
Occupied Rental Units by Geography	227,951	9.1	34.5	39.6	16.1	0.6
Vacant Units by Geography	59,327	3.4	19.6	31.9	41.8	3.3
Businesses by Geography	268,496	3.4	16.5	41.6	38.0	0.4
Farms by Geography	5,610	2.1	13.7	48.4	35.6	0.2
Family Distribution by Income Level	557,939	18.8	18.1	22.6	40.5	0.0
Household Distribution by Income Level	741,590	21.4	16.7	21.1	40.8	0.0
Median Family Income MSA - 36260 Ogden-Clearfield, UT MSA		\$71,742	Median Housing Value			\$241,020
Median Family Income MSA - 39340 Provo-Orem, UT MSA		\$67,248	Median Gross Rent			\$942
Median Family Income MSA - 41620 Salt Lake City, UT MSA		\$71,849	Families Below Poverty Level			8.8%
Median Family Income Non-MSAs - UT		\$64,772				
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$32,386 to \$35,925 and moderate-income families earned at least \$32,386 to \$35,925 and less than \$57,818 to \$57,479, depending on the metropolitan or nonmetropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$810 to \$898 for low-income borrowers and ranging from \$1,295 to \$1,437 for moderate-income borrowers, depending on the metropolitan or nonmetropolitan area. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$1,294. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Salt Lake City, UT MSA (Salt Lake City MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Salt Lake City MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Although the breadth of job creation was broad-based, services were leading the way while government was finally making headway. The Salt Lake City MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Professional and Business Services, Government, Education and Health Services, Retail Trade, Financial Activities, and Manufacturing. Major employers in the Salt Lake City MSA include University of Utah, Intermountain

Healthcare Inc., Walmart Inc., Zions Bancorp, and Delta Airlines. The unemployment rate plunged to a historical low of 2.2 percent in October 2021 despite robust labor force additions. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Salt Lake City MSA was 1.9 percent compared to the national unemployment rate of 3.7.

Ogden-Clearfield, UT MSA (Ogden MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Ogden MSA's employment recovery had slowed, but post-recession job gains remained on par with the state and well ahead of the rest of the nation. Ogden MSA's labor market had lost ground since July 2021, with the construction industry shedding the most jobs in recent months, followed by professional/business services and leisure/hospitality. However, these losses were partially offset by robust employment gains in Ogden MSA's key public sector. The defense industry is Ogden MSA's most important economic driver and a key source of mid- and high-paying jobs. Hill Air Force Base and defense contractor Northrop Grumman continued to add jobs as part of a multibillion-dollar project to overhaul the nation's nuclear arsenal. The Ogden MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Government, Education and Health Services, Manufacturing, Professional and Business Services, Retail Trade, and Leisure and Hospitality Services. Major employers in the Ogden MSA include Hill Air Force Base, Department of Treasury, McKay-Dee Hospital Center, and Weber State University. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Ogden MSA was 1.9 percent compared to the national unemployment rate of 3.7 percent.

Provo-Orem, UT MSA (Provo MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Provo MSA's economy was at a peak level of performance. The labor market was in tip-top shape with nonfarm payrolls nearly 8 percent above their pre-pandemic peak, ranking third in the nation behind St. George and Pocatello. While the strength was broad-based, goods-producing industries were leading the way as the bellwether professional services industry struggled with labor shortages. The Provo MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Professional and Business Services, Retail Trade, Government, and Construction. Major employers in the Provo MSA include Brigham Young University, Utah Valley University, Utah Valley Regional Medical Center, and Vivint. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Provo MSA was 1.7 percent compared to the national unemployment rate of 3.7 percent.

Heber, UT Micro Area (Summit and Wasatch counties)

According to the U.S. Census Bureau QuickFacts, Heber, UT has a population of 17,290. As of July 2021, the area has 4,651 households with 3.48 persons per household. Between 2016 to 2020, 73.9 percent of housing was owner occupied, which is higher than the national average of 64.4 percent. The largest percent of population is persons 18 years and under at 33.8 percent of the total population. In the civilian labor force, total percent of population age 16 years and above is 74.6 percent. The mean travel time to work for workers aged 16 years and above is 20.9 minutes. The most common employment sectors for those who live in Heber, UT, are Accommodation & Food Services (1,237 people), Retail Trade (1,047 people), and Educational Services (771 people). According to the Bureau of Labor

Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Heber, UT was 1.9 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Salt Lake City CSA. The organizations included one community development organization that helped to address the causes and conditions of poverty and one economic development organization that helped to attract and retain businesses in the area. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing units
- Single-family affordable housing
- Rental assistance
- Rehabilitation of housing units/improvement of the quality of housing stock
- Workforce development
- Financial literacy

Opportunities for participation by financial institutions included the following:

- Home-ownership counseling
- Closing cost assistance
- Affordable home mortgage loans
- Lending and investment in economic development and workforce development
- Small business lending
- Supporting nonprofit health providers and prevention

Scope of Evaluation in the State of Utah

The OCC selected the Salt Lake City CSA for a full-scope review and based conclusions and ratings primarily on activity within this geographical area. This AA carried significant weight in determining the overall ratings for the state of Utah because of the significance of the bank's presence in this AA.

During the evaluation period, the bank originated or purchased 38,601 home mortgage loans, small loans to businesses, and small loans to farms totaling \$5.2 billion. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within each AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. In the Salt Lake City CSA and St. George MSA, the OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms. In the Utah Combined Non-MSA, the OCC placed more weight based on the number of loans on small loans to businesses versus home mortgage loans and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF UTAH

LENDING TEST

The bank's performance under the Lending Test in the state of Utah is rated Outstanding. Performance in the limited-scope areas had a neutral effect on the overall Lending Test rating.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Salt Lake City CSA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Salt Lake City CSA	22,982	19,297	259	46	42,584	86.9	90.8
St George MSA	2,180	1,620	16	1	3,817	7.8	5.0
Utah Combined Non-MSA	1,068	1,395	118	1	2,582	5.3	4.2
Total	26,230	22,312	393	48	48,983	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Salt Lake City CSA	7,524,184	666,324	5,051	89,450	8,285,009	90.1	90.8
St George MSA	607,489	51,826	1,011	8	660,334	7.2	5.0
Utah Combined Non-MSA	203,152	42,191	3,479	7	248,829	2.7	4.2
Total	8,334,825	760,341	9,541	89,465	9,194,172	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

As of June 30, 2021, WFBNA had a deposit market share of 1.9 percent. The bank ranked 10th among 55 depository financial institutions placing it in the top 19 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 2 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked 10th among 559 home mortgage lenders in this AA, which placed it in the top 2 percent of lenders. The top lenders in this AA based on market share were United Wholesale Mortgage (9.9 percent), Americas First Federal Credit Union (6.2 percent), and Mountain America Federal Credit (5.3 percent).

According to peer small business data for 2021, WFBNA had a market share of 9.9 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked third out of 208 small business lenders, which placed it in the top 2 percent of lenders. The other top lenders in this

AA based on market share were American Express National Bank (26 percent), JPMorgan Chase Bank, N.A. (15.5 percent) and Zions Bancorporation, N.A. (7.9 percent).

According to peer small farm data for 2021, WFBNA had a market share of 13.7 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked third out of 26 small farm lenders, which placed it in the top 12 percent of lenders. The other top lenders in this AA based on market share were Cache Valley Bank (30 percent), D.L. Evans Bank (17.2 percent), and JPMorgan Chase Bank, N.A. (10.7 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O in the state of Utah section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was both below the percentage of owner-occupied housing units in low-income geographies and the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied housing units in moderate-income geographies but it was near to the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Utah section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentages of small loans to businesses in low- and moderate-income geographies were near to both the percentages of businesses in low- and moderate-income geographies and the aggregate distributions of small loans to businesses in low- and moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Utah section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

The bank did not originate or purchase any small loans to farms in low-income geographies. The bank's percentage of small loans to farms in moderate-income geographies was significantly below the percentage of farms in moderate-income geographies and it was well below the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies in the Salt Lake City CSA. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses and farms of different sizes. The bank's performance was excellent in the Salt Lake City CSA.

Home Mortgage Loans

Refer to Table P in the state of Utah section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but it approximated to the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Utah section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 25.9 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Utah section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was adequate.

The bank did not collect or consider the GAR in the underwriting of approximately 51.4 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below the percentage of farms in the AA with GAR of \$1 million or less and it was below the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Community Development Lending

The bank made a relatively high level of CD loans. CD lending further supported the excellent Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

WFBNA made a relatively high level of CD loans in the Salt Lake City CSA. WFBNA made 48 CD loans totaling approximately \$89.4 million, which represented 4.8 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 63 percent of these loans funded affordable housing that provided 680 units of affordable housing, 18.7 percent funded economic development, 6 percent funded revitalization and stabilization efforts, and 12.4 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$12 million construction loan for a 93-unit multifamily housing development located in Murray, Utah. The mixed use, transit oriented, LIHTC project included 65 units restricted to tenants with incomes less than 50 percent of the median family income and the remaining 28 units were at market rates. The loan was responsive to the identified need for affordable housing.
- WFBNA provided a \$16.2 million loan for an LIHTC affordable housing development located in West Haven, Utah, with, with 168 units or 87.5 percent restricted to tenants earning less than 60 percent of the area median family income. The loan was responsive to the identified need for affordable housing.
- WFBNA provided an \$18.1 million loan for an affordable housing development located in West Valley City, Utah, with 251 units 99.6 percent restricted to tenants earning up to 60 percent of the area median family income. One unit was designated as an employee unit. The loan was responsive to the identified need for affordable housing.

Product Innovation and Flexibility

WFBNA used flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA made 2,591 loans under its flexible lending programs totaling \$152.9 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	127	39,400
Dream. Plan. Home.	48	12,300
PPP	2,416	101,200
Total	2,591	152,900

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the St. George MSA and Utah Combined Non-MSA was weaker than the bank's overall performance under the Lending Test in the full-scope area. Performance in these limited-scope areas was weaker primarily due to the lower volume of CD lending relative to the needs and opportunities for CD loans in these areas. Performance in the limited scope areas did not affect the bank's overall rating for the state.

Refer to Tables O through T in the state of Utah section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Utah is rated Low Satisfactory. Performance in the limited-scope areas had a neutral effect on the overall Investment Test rating.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Salt Lake City CSA was adequate.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Salt Lake City CSA	64	45,187	229	10,299	293	87.2	55,486	72.8	4	1,116
St. George MSA	0	0	6	60	6	1.8	60	0.0	0	0
Utah Combined Non-MSA	0	0	34	18,779	34	10.1	18,779	24.6	0	0
Statewide***	0	0	3	1,873	3	0.9	1,873	2.5	0	0
Total	64	45,187	272	31,011	336	100.0	76,198	100.0	4	1,116

The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.
 * '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 tracked and recorded by the institution's financial reporting system.
 *** Statewide means investments in statewide programs that have a purpose, mandate, or function to serve one or more of the bank's assessment areas within the state. Due to rounding, totals may not equal 100.0%

Salt Lake City CSA

The bank had an adequate level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$55.5 million and represented 3 percent of the bank's tier 1 capital allocated to the AA. The investments also included 220 grants and donations totaling \$55.5 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited adequate responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. . Approximately 37.2 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 40.6 percent that focused on community services targeted to low- and moderate-income individuals, and 22.2 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 715 units of affordable housing in the AA.

The bank made significant use of innovative or complex investments to support CD initiatives. Approximately 72.5 percent of current period investment dollars were complex NMTC investments. The following is an example of CD investments made in this AA:

- WFBNA invested \$26.2 million in two rural small business funds through the NMTC program as part of the Utah Rural Jobs Act and the Utah Rural Fund, which served the Salt Lake City CSA and surrounding areas. According to Utah Rural Jobs Act, funding supported eligible small businesses in rural counties, which was any county in Utah except: Weber, Davis, Salt Lake, Utah, Tooele, Cache, and Washington, and Summit counties. This investment was highly complex because of the inherent nature of NMTC transactions. The amount allocated to Salt Lake City CSA was \$7.6 million. The investment was responsive to the identified need for small business growth and stability.

Broader Statewide Investments

WFBNA had three current and prior period investments totaling \$1.9 million with a purpose, mandate, or function to serve one or more AAs in the state. These CD investments were primarily LIHTCs that supported the creation or preservation of affordable housing in the state. These investments were given positive consideration and supported the bank's overall performance under the Investment Test in the state of Utah.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Utah Combined Non-MSA was stronger than the bank's overall performance under the Investment Test in the full-scope area primarily due to higher levels of CD investments relative to the bank's presence in the AA. The bank's performance in the St. George MSA was weaker than the bank's overall performance under the Investment Test in the full-scope area primarily due to the lower level of CD investments relative to the needs, opportunities, and bank's capacity to meet those needs.

SERVICE TEST

The bank's performance under the Service Test in the state of Utah is rated Outstanding. Performance in the limited-scope areas had a neutral effect on the overall Service Test rating.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Salt Lake City CSA was excellent.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's full-scope AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Salt Lake City CSA	90.8	64	82.1	9.4	26.6	42.2	21.9	3.6	19.5	45.9	30.6
St. George MSA	5.0	6	6.8	0.0	0.0	100.0	0.0	0.0	7.6	81.0	11.3
Utah Combined Non-MSA	4.2	9	11.1	0.0	55.6	44.4	0.0	1.6	19.2	74.3	5.0
Total	100.0	79	100.0	7.6	27.8	46.8	17.7	3.3	18.8	50.0	27.5
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Salt Lake City CSA	2	12	0	-6	-4	1
St. George MSA	0	1	0	0	-1	0
Utah Combined Non-MSA	0	4	0	0	-4	0
Total	2	17	0	-6	-9	1
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.						

Salt Lake City CSA

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Salt Lake City CSA. WFBNA operated 64 branches in the AA, comprising six branches in low-income geographies, 17 branches in moderate-income geographies, 27 branches in middle-income geographies, and 14 branches in upper-income geographies. The distribution of branches in low-income geographies exceeded the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies. The distribution was augmented by six branches in middle- and upper-income geographies that were within close proximity to and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches generally had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed six of the 12 closed branches in moderate-income geographies, four in middle-income geographies, and one in a geography without income designation. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations. Despite the closures, its service delivery systems remained readily accessible.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced assessment areas, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday and 9:00 a.m. to 12:00 p.m. Saturday; with the exception of one moderate-income branch, which was opened for business 10:00 a.m. to 6:00 p.m. Monday through Friday and 9:00 a.m. to 1:00 p.m. Saturday.

Community Development Services

The bank provided a low level of CD services.

Salt Lake City CSA

WFBNA provided an adequate level of CD services in the Salt Lake City CSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 202 CD service activities during the evaluation period. A majority (78.8 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The other CD services were targeted to affordable housing (15.3 percent) and to economic development (5.9 percent). The bank's assistance provided was responsive to the identified needs in the AA. The following are examples of CD services provided in this AA:

- A WFBNA employee provided two hours of financial education to 60 middle school students where 60.2 percent of students qualified for the federal free- and reduced-lunch program.
- A WFBNA employee provided five hours of board activity to an organization that specialized in economic development. The organization started 25 years ago with two million dollars in funds, provided by the U.S. Department of Housing & Urban Development, and it was used for traditional small business development. This activity was responsive to the identified need for small business growth and stability.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the St. George MSA and Utah Combined Non-MSA was weaker than the bank's overall performance under the Service Test in the full-scope area primarily due to weaker performance in the branch distribution in low- and moderate-income geographies.

State of Virginia

CRA rating for the State of Virginia⁵¹: Satisfactory

The Lending Test is rated: Outstanding

The Investment Test is rated: High Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited an adequate geographic distribution of loans in its AAs.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank made an adequate level of CD loans. CD lending had a positive effect on the Lending Test conclusion.
- The bank had a significant level of qualified CD investments that demonstrated good responsiveness to credit and economic development needs, although occasionally in a leadership position. The bank made extensive use of innovative and complex investments to support CD initiatives.
- Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided a limited level of CD services.

Description of Institution's Operations in the State of Virginia

The state of Virginia was WFBNA's 16th largest rating area based on its total deposits in the state. As of June 30, 2021, the bank maintained approximately \$23 billion or 1.6 percent of its total domestic deposits in branches within the state. Of the 79 depository financial institutions operating in the bank's AAs within the state, WFBNA, with a deposit market share of 11.2 percent, was the fourth largest. The top depository financial institutions in the bank's AAs within the state based on market share included Capital One Bank (USA), NA (33.9 percent), Bank of America, N.A. (14.7 percent), and Truist Bank (14.1 percent). As of December 31, 2021, the bank operated 136 branches and 294 ATMs in the state. WFBNA delineated 21 AAs within the state; however, the OCC combined, analyzed, and presented those AAs at the CSA level where possible for purposes of this evaluation. This resulted in the following nine AAs: Blacksburg-Christiansburg, VA MSA (Blacksburg MSA), Charlottesville, VA MSA (Charlottesville MSA), Harrisonburg-Staunton, VA CSA (Harrisonburg CSA), Kingsport-Bristol, VA MSA (Kingsport MSA), Lynchburg, VA MSA (Lynchburg MSA), Richmond, VA MSA (Richmond MSA), Roanoke, VA MSA (Roanoke MSA), and Virginia Combined Non-MSA. The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

⁵¹ This rating only reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Lynchburg MSA

The following table provides a summary of the demographics, including housing and business information for the Lynchburg MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Lynchburg MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	60	1.7	23.3	60.0	15.0	0.0
Population by Geography	256,989	1.9	18.4	61.1	18.6	0.0
Housing Units by Geography	114,007	2.1	18.8	62.3	16.9	0.0
Owner-Occupied Units by Geography	70,208	1.5	12.2	65.1	21.2	0.0
Occupied Rental Units by Geography	29,135	3.2	33.9	51.1	11.7	0.0
Vacant Units by Geography	14,664	2.7	19.8	70.9	6.5	0.0
Businesses by Geography	22,063	1.2	19.3	55.6	23.9	0.0
Farms by Geography	1,060	0.7	8.7	69.9	20.8	0.0
Family Distribution by Income Level	66,286	20.8	17.5	21.6	40.0	0.0
Household Distribution by Income Level	99,343	24.3	16.0	18.0	41.8	0.0
Median Family Income MSA - 31340 Lynchburg, VA MSA		\$60,256	Median Housing Value			\$166,909
			Median Gross Rent			\$746
			Families Below Poverty Level			11.0%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$30,128 and moderate-income families earned at least \$30,128 and less than \$48,205. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$753 for low-income borrowers and \$1,205 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$896. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Information from Moody's Analytics indicated that at the end of the evaluation period, Lynchburg's recovery was spinning its wheels compared with steady progress in Virginia. Total employment had flatlined since fall of 2020 and sat further from pre-pandemic employment levels than three-quarters of metro areas nationally. The weakness in the job market carried over to housing where price appreciation was less than half that nationally, and building activity remained quite low. The Lynchburg MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Manufacturing, Government, Retail Trade, Professional and Business Services, and Leisure and Hospitality Services. Major employers in the Lynchburg MSA include Walmart Inc., Centra Health, Babcock & Wilcox Nuclear, and J. Crew Outfitters. According to the Bureau of Labor Statistics,

the December 2021 non-seasonally adjusted unemployment rate for the Lynchburg MSA was 2.8 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Lynchburg MSA. The organizations included one community development organization that helped to address the causes and conditions of poverty and one economic development organization that helped to attract and retain businesses in the area. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing units
- Single-family affordable housing
- Rental assistance
- Rehabilitation of housing units/improvement of the quality of housing stock
- Workforce development
- Financial literacy

Opportunities for participation by financial institutions included the following:

- Home-ownership counseling
- Closing cost assistance
- Affordable home mortgage loans
- Small business lending
- Supporting nonprofit health providers and prevention

Richmond MSA

The following table provides a summary of the demographics, including housing and business information for the Richmond MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Richmond MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	290	12.4	24.5	34.1	26.9	2.1
Population by Geography	1,223,972	8.9	22.5	37.6	30.3	0.8
Housing Units by Geography	506,425	9.7	23.9	37.0	29.1	0.4
Owner-Occupied Units by Geography	301,582	4.5	17.9	41.6	35.9	0.2
Occupied Rental Units by Geography	158,990	17.5	32.9	29.9	19.1	0.5
Vacant Units by Geography	45,853	16.5	31.8	31.2	19.4	1.1
Businesses by Geography	149,639	6.7	22.2	34.2	36.5	0.5
Farms by Geography	3,972	2.8	17.6	44.9	34.6	0.1
Family Distribution by Income Level	298,506	21.0	17.9	20.1	40.9	0.0
Household Distribution by Income Level	460,572	23.3	16.7	18.3	41.8	0.0
Median Family Income MSA - 40060 Richmond, VA MSA		\$75,183	Median Housing Value			\$219,822
			Families Below Poverty Level			8.8%
			Median Gross Rent			\$984
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$37,592 and moderate-income families earned at least \$37,592 and less than \$60,146. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$940 for low-income borrowers and \$1,504 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$1,180. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Information from Moody's Analytics indicated that at the end of the evaluation period, the Richmond MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Richmond's recovery was getting back on its feet but was still trailing the region. The metro area had recouped only about half of its lost jobs, compared with more than three-fourths in the South. Employment fell for the first five months of 2021 and just recently started moving in the right direction. Weakness in financial services, state government and healthcare has weighed on the rebound, while transportation/warehousing has been a bright spot thanks to the boom in online shopping. The Richmond MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Professional and Business Services, Government, Education and Health Services, Retail Trade, Financial Activities, and Leisure and Hospitality Services. Major employers in the Richmond MSA include Fort Lee, VCU Health System, HCA Inc., and Bon Secours Richmond Health System. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Richmond MSA was 3 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Richmond MSA. The organizations included one community development organization that helped to address the causes and conditions of poverty and one economic development organization that helped to attract and retain businesses in the area. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing units
- Single-family affordable housing
- Rental assistance
- Rehabilitation of housing units/improvement of the quality of housing stock
- Workforce development
- Financial literacy

Opportunities for participation by financial institutions included the following:

- Home-ownership counseling
- Closing cost assistance
- Affordable home mortgage loans
- Small business lending
- Supporting nonprofit health providers and prevention

Virginia Beach MSA

The following table provides a summary of the demographics, including housing and business information for the Virginia Beach MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Virginia Beach MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	418	7.4	26.8	35.2	27.5	3.1
Population by Geography	1,697,529	5.8	26.5	35.7	31.6	0.4
Housing Units by Geography	692,799	5.9	26.5	36.2	31.1	0.4
Owner-Occupied Units by Geography	383,899	2.5	18.1	38.7	40.5	0.2
Occupied Rental Units by Geography	243,833	10.5	38.8	33.0	17.3	0.5
Vacant Units by Geography	65,067	8.4	29.5	34.2	26.9	1.0
Businesses by Geography	176,320	4.4	23.3	35.8	35.4	1.1
Farms by Geography	4,261	2.2	17.2	38.1	42.1	0.4
Family Distribution by Income Level	422,174	21.4	17.6	20.2	40.9	0.0
Household Distribution by Income Level	627,732	22.8	16.7	19.0	41.5	0.0
Median Family Income MSA - 47260 Virginia Beach-Norfolk-Newport News, VA-NC MSA		\$69,773	Median Housing Value			\$235,946
			Families Below Poverty Level			9.6%
			Median Gross Rent			\$1,092
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$34,887 and moderate-income families earned at least \$34,887 and less than \$55,818. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$872 for low-income borrowers and \$1,395 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$1,267. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Information from Moody's Analytics indicated that at the end of the evaluation period, the Virginia Beach MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Virginia Beach MSA recovery had stalled in 2021. Leisure/hospitality struggled to pick up the pace due to hiring challenges. However, the logistics industry was booming thanks to record port volumes. Cargo volumes at the Port of Virginia have been strong as manufacturers and retailers try to replenish inventories. Many ports along the U.S. were struggling with extreme loads, but the Port of Virginia has been able to support the high volumes. The Virginia Beach MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Government, Education and Health Services, Professional and Business Services, Retail Trade, Leisure and Hospitality Services, and Manufacturing. Major employers in the Virginia Beach MSA include Huntington Ingalls Industries, Inc., Sentara Healthcare, Walmart Inc., Riverside Regional Medical Center, and Food Lion. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Virginia Beach MSA was 3 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Virginia Beach MSA. The organizations included one community development organization that helped to address the causes and conditions of poverty and one economic development organization that helped to attract and retain businesses in the area. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing units
- Single-family affordable housing
- Rental assistance
- Rehabilitation of housing units/improvement of the quality of housing stock
- Workforce development
- Financial literacy

Opportunities for participation by financial institutions included the following:

- Home-ownership counseling
- Closing cost assistance
- Affordable home mortgage loans
- Small business lending
- Supporting nonprofit health providers and prevention

Scope of Evaluation in the State of Virginia

The OCC selected the Lynchburg MSA, Richmond MSA, and Virginia Beach MSA for full-scope reviews and based conclusions and ratings primarily on activity within these geographical areas. These AAs carried significant weight in determining the overall ratings for the state of Virginia because of the significance of the bank's presence in these AAs. More weight was given to the Richmond MSA and Virginia Beach MSA due to the larger deposit base, lending, and branch presence.

During the evaluation period, the bank originated or purchased 75,147 home mortgage loans, small loans to businesses, and small loans to farms totaling \$12.7 billion. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within each AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. In each of the AAs, the OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF VIRGINIA

LENDING TEST

The bank's performance under the Lending Test in the state of Virginia is rated Outstanding. Performance in the limited-scope areas had a neutral effect on the overall Lending Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Lynchburg MSA was good and the bank's performance in the Richmond MSA and Virginia Beach MSA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Lynchburg MSA	1,471	1,329	70	3	2,873	3.8	6.2
Richmond MSA	18,744	11,528	102	23	30,397	40.4	38.0
Virginia Beach MSA	17,278	8,923	73	21	26,295	35.0	26.8
Blacksburg MSA	1,020	489	12	2	1,523	2.0	3.0
Charlottesville MSA	2,017	1,443	43	5	3,508	4.7	5.4
Harrisonburg CSA	1,677	544	72	6	2,299	3.1	2.2
Kingsport MSA	215	205	17	2	439	0.6	1.7
Roanoke MSA	2,566	1,287	20	11	3,884	5.2	11.1
Virginia Combined Non-MSA	2,454	1,423	125	5	4,007	5.3	5.6
Total	47,442	27,171	534	78	75,225	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Lynchburg MSA	319,706	34,872	3,038	7,540	365,156	2.8	6.2
Richmond MSA	4,862,029	339,554	3,291	41,532	5,246,406	40.5	38.0
Virginia Beach MSA	4,561,361	224,904	1,062	135,770	4,923,097	38.0	26.8
Blacksburg MSA	205,131	11,504	130	19	216,784	1.7	3.0
Charlottesville MSA	612,702	41,019	884	2,284	656,889	5.1	5.4
Harrisonburg CSA	369,828	19,557	1,900	15,639	406,924	3.1	2.2
Kingsport MSA	34,794	7,499	338	12	42,643	0.3	1.7
Roanoke MSA	562,598	42,869	574	780	606,821	4.7	11.1
Virginia Combined Non-MSA	452,471	31,540	4,677	1,237	489,925	3.8	5.6
Total	11,980,620	753,318	15,894	204,813	12,954,645	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Lynchburg MSA

As of June 30, 2021, WFBNA had a deposit market share of 2.8 percent. The bank ranked second among 16 depository financial institutions placing it in the top 13 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 4.1 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked sixth among 373 home mortgage lenders in this AA, which placed it in the top 2 percent of lenders. The top lenders in this AA based on market share were Rocket Mortgage (8.8 percent), Movement Mortgage, LLC (6.2 percent), and Embrace Home Loans, Inc. (5 percent).

According to peer small business data for 2021, WFBNA had a market share of 9.9 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked third out of 85 small business lenders, which placed it in the top 4 percent of lenders. The other top lenders in this AA based on market share were American Express National Bank (15.5 percent), Truist Bank (14.1 percent), and Synchrony Bank (9.4 percent).

According to peer small farm data for 2021, WFBNA had a market share of 8.3 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked second out of 19 small farm lenders, which placed it in the top 11 percent of lenders. The other top lenders in this AA based on market share were First Bank and Trust Company (78.9 percent), John Deere Financial FSB (2.6 percent), and Truist Bank (2.3 percent).

Richmond MSA

As of June 30, 2021, WFBNA had a deposit market share of 6.9 percent. The bank ranked fourth among 29 depository financial institutions placing it in the top 14 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 6.6 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked third among 624 home mortgage lenders in this AA, which placed it in the top 1 percent of lenders. The other top lenders in this AA based on market share were Rocket Mortgage (7.2 percent), Capital Center, L.L.C. (6.7 percent), and Truist Bank (4.5 percent).

According to peer small business data for 2021, WFBNA had a market share of 10.8 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked second out of 176 small business lenders, which placed it in the top 2 percent of lenders. The other top lenders in this AA based on market share were American Express National Bank (18.1 percent), Truist Bank (9.6 percent), and Bank of America, N.A. (7.5 percent).

According to peer small farm data for 2021, WFBNA had a market share of 13.3 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked second out of 23 small farm lenders, which placed it in the top 9 percent of lenders. The other top lenders in this AA based on market share were John Deere Financial FSB (26.9 percent), U.S. Bank, N.A. (10.4 percent), and First Bank and Trust Company (9.7 percent).

Virginia Beach MSA

As of June 30, 2021, WFBNA had a deposit market share of 19.8 percent. The bank ranked third among 23 depository financial institutions placing it in the top 14 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 4.1 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked fifth among 649 home mortgage lenders in this AA, which placed it in the top 1 percent of lenders. The top lenders in this AA based on market share were PennyMac Loan Services LLC (7 percent), Freedom Mortgage Corporation (6 percent), and Rocket Mortgage (5.9 percent).

According to peer small business data for 2021, WFBNA had a market share of 8 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked fifth out of 158 small business lenders, which placed it in the top 4 percent of lenders. The top lenders in this AA based on market share were American Express National Bank (19.1 percent), Truist Bank (9.7 percent), and Townebank (8.9 percent).

According to peer small farm data for 2021, WFBNA had a market share of 8.7 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked third out of 17 small farm lenders, which placed it in the top 18 percent of lenders. The other top lenders in this AA based on market share were First Bank and Trust Company (26.3 percent), John Deere Financial FSB (26.3 percent), and Bank of America, N.A. (6.9 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AAs. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data. The bank's performance was adequate in the Lynchburg MSA and Richmond MSA and good in the Virginia Beach MSA.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies in the Lynchburg MSA, Richmond MSA, and Virginia Beach MSA. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AA.

Lynchburg MSA

Home Mortgage Loans

Refer to Table O in the state of Virginia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was well below the percentage of owner-occupied housing units in low-income geographies and it was below the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies exceeded the percentage of owner-occupied housing units in moderate-income geographies and it was near to the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Virginia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was poor.

The bank's percentage of small loans to businesses in low-income geographies was significantly below both the percentage of businesses in low-income geographies and the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in moderate-income geographies and the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Virginia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was good.

The bank did not originate or purchase any small loans to farms in low-income geographies, which was consistent with the performance of all lenders. The bank's percentage of small loans to farms in moderate-income geographies approximated the percentage of farms in moderate-income geographies and it exceeded the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Richmond MSA

Home Mortgage Loans

Refer to Table O in the state of Virginia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

The bank's percentages of home mortgage loans in low- and moderate-income geographies were below the percentages of owner-occupied housing units in low- and moderate-income geographies and the aggregate distributions of home mortgage loans by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Virginia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was below the percentage of businesses in low-income geographies and it was near to the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in moderate-income geographies and the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Virginia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

The bank did not originate or purchase any small loans to farms in low-income geographies, which was consistent with all lenders. The bank's percentage of small loans to farms in moderate-income geographies was significantly below both the percentage of farms in moderate-income geographies and the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Virginia Beach MSA

Home Mortgage Loans

Refer to Table O in the state of Virginia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was below both the percentage of owner-occupied housing units in low-income geographies and the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was near to both the percentage of owner-occupied

housing units in moderate-income geographies and the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Virginia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

The bank's percentage of small loans to businesses in low-income geographies was below both the percentage of businesses in low-income geographies and the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was below the percentage of businesses in moderate-income geographies and it was near to the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Virginia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

The bank did not originate or purchase any small loans to farms in low-income geographies, which was consistent with all lenders. The bank's percentage of small loans to farms in moderate-income geographies was well below both the percentage of farms in moderate-income geographies and the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes. The bank's performance was good in the Lynchburg MSA, excellent in the Richmond MSA, and adequate in the Virginia Beach MSA.

Lynchburg MSA

Home Mortgage Loans

Refer to Table P in the state of Virginia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and it was near to the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and it was near to the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Virginia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 27.9 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Virginia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

The bank did not collect or consider the GAR in the underwriting of approximately 58.6 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below the percentage of farms in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Richmond MSA

Home Mortgage Loans

Refer to Table P in the state of Virginia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and it approximated the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income

borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Virginia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 25.6 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Virginia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

The bank did not collect or consider the GAR in the underwriting of approximately 42.2 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below the percentage of farms in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Virginia Beach MSA

Home Mortgage Loans

Refer to Table P in the state of Virginia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and it was below the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families and it was near to the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Virginia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 23.8 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Virginia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

The bank did not collect or consider the GAR in the underwriting of approximately 39.7 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below the percentage of farms in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Community Development Lending

The bank made an adequate level of CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

Lynchburg MSA

WFBNA made an adequate level of CD loans in the Lynchburg MSA. WFBNA made three CD loans totaling approximately \$7.5 million, which represented 4.1 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 99.5 percent of these loans funded affordable housing that provided 80 units of affordable housing and less than 1 percent funded revitalization and stabilization efforts targeted to low- and moderate-income individuals. The following is an example of CD loans made in this AA:

- WFBNA provided a \$7.5 million construction loan for an 80-unit LIHTC affordable housing development located in Lynchburg, Virginia, with 100 percent of the units restricted to tenants with

incomes less than 60 percent of the area median family income. The loan was complex due to the inherent nature of LIHTC transactions and their multiple funding sources. The loan was responsive to the identified need for affordable housing.

Richmond MSA

WFBNA made an adequate level of CD loans in the Richmond MSA. WFBNA made 23 CD loans totaling approximately \$41.5 million, which represented 3.6 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 84.5 percent of these loans funded affordable housing that provided 474 units of affordable housing, 4 percent funded revitalization and stabilization efforts, and 11.5 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA refinanced a \$1.3 million loan for a 56-unit LIHTC affordable housing development located in Richmond, Virginia with 100 percent of the units restricted to tenants who earned up to 60 percent of the area median family income.
- WFBNA provided a \$1 million term loan for a CDFI organization whose mission was to offer innovative, flexible financial products and technical assistance designed to support housing and community development ventures, increase jobs and build sustainable communities in low income and underserved markets. Of this total loan, \$196,086 was allocated to the Richmond MSA. According to the organization, 100 percent of its clients were small businesses as they had gross annual revenues of \$1 million or less or met the size eligibility requirements of the Small Business Administration's (SBA) Small Business Development Company or Small Business Investment Company (SBIC) programs.
- WFBNA provided a \$10 million term loan for a low-income investment fund organization dedicated to creating pathways of opportunity for low-income people and communities. Of this total loan, \$85,261 was allocated to the Richmond MSA. According to the organization, 100 percent of its clients were low- and moderate-income as they earned less than 80 percent of the area median family income.

Virginia Beach MSA

WFBNA was a leader in making CD loans in the Virginia Beach MSA. WFBNA made 21 CD loans totaling approximately \$135.8 million, which represented 16.9 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 97.4 percent of these loans funded affordable housing that provided 1214 units of affordable housing, 1.1 percent funded revitalization and stabilization efforts, and 1.5 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$23.8 million loan for a 300-unit affordable multifamily housing development located in Newport News, Virginia. The development consisted of 300 two-bedroom units, with 97.7 percent of the rental rates below the 2019 Fair Market Rent for the area. Of the 300 units, 293 or 99.7 percent were affordable to tenants earning less than 65 percent of the area median family income. The loan was responsive to the identified need for affordable housing.

- WFBNA provided a \$22.7 million term loan for a 228-unit LIHTC affordable housing development located in Newport News, Virginia with 100 percent of the units restricted to tenants who earned up to 60 percent of the area median family income.
- WFBNA provided a \$33 million term loan for a 208-unit LIHTC affordable housing development located in Virginia Beach, Virginia with 100 percent of the units restricted to tenants who earned up to 60 percent of the area median family income.

Product Innovation and Flexibility

Lynchburg MSA

WFBNA made limited use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 192 loans under its flexible lending programs totaling \$9.9 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	27	5,100
Dream. Plan. Home.	9	1,100
PPP	156	3,700
Total	192	9,900

Richmond MSA

WFBNA made extensive use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 2,350 loans under its flexible lending programs totaling \$151.8 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	222	62,600
Dream. Plan. Home.	44	7,600
PPP	2,084	81,600
Total	2,350	151,800

Virginia Beach MSA

WFBNA made extensive use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 1,930 loans under its flexible lending programs totaling \$110.7 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	169	44,000
Dream. Plan. Home.	49	8,500
PPP	1,712	58,200

Total	1,930	110,700
--------------	--------------	----------------

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Harrisonburg CSA was consistent with the bank's overall performance under the Lending Test in the full-scope areas. The bank's performance in the Blacksburg MSA, Charlottesville MSA, Kingsport MSA, Roanoke MSA and Virginia Combined Non-MSA was weaker than the bank's overall performance under the Lending Test in the full-scope areas. Performance in these limited-scope areas was weaker primarily due to the lower volume of CD lending relative to the needs and opportunities for CD loans in these areas.

Refer to Tables O through T in the state of Virginia section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in state of Virginia is rated High Satisfactory. Performance in the limited-scope areas had a neutral effect on the overall Investment Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Lynchburg MSA and Richmond MSA was good and the bank's performance in the Virginia Beach MSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Lynchburg MSA	1	7	23	8,923	24	4.7	8,929	3.6	1	8,133
Richmond MSA	85	5,028	150	55,460	235	45.6	60,488	24.5	5	10,367
Virginia Beach MSA	41	65,290	75	66,470	116	22.5	131,761	53.4	9	35,487
Blacksburg MSA	3	256	8	2,583	11	2.1	2,838	1.2	1	10
Charlottesville MSA	3	52	29	363	32	6.2	415	0.2	0	0
Harrisonburg CSA	4	2,206	10	62	14	2.7	2,267	0.9	2	65
Kingsport MSA	2	67	7	37	9	1.8	104	0.0	0	0
Roanoke MSA	0	0	35	388	35	6.8	388	0.2	0	0
Virginia Combined Non-MSA	5	217	19	35,930	24	4.7	36,147	14.7	1	6
Statewide***	11	3,078	4	102	15	2.9	3,180	1.3	1	2
Total	155	76,201	360	170,318	515	100.0	246,517	100.0	20	54,070
<p>The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.</p> <p>* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.</p> <p>** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.</p> <p>*** Statewide means investments in statewide programs that have a purpose, mandate, or function to serve one or more of the bank's assessment areas within the state. Due to rounding, totals may not equal 100.0%</p>										

Lynchburg MSA

The bank had a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$8.9 million and represented 4.8 percent of the bank's tier 1 capital allocated to the AA. The investments also included 22 grants and donations totaling \$221,000 to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited good responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 16.7 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 50 percent that focused on community services targeted to low- and moderate-income individuals, and 33.3 percent that focused on revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 128 units of affordable housing in the AA.

The bank made extensive use of innovative or complex investments to support CD initiatives. Approximately 97.5 percent of current period investment dollars were complex LIHTC investments. The following are examples of CD investments made in this AA:

- WFBNA made an \$8.7 million equity investment to finance an LIHTC redevelopment. This 80-unit LIHTC development was located in Lynchburg, Virginia and all units were restricted to tenants earning up to 60 percent of the AMI. The investment was complex due to the inherent nature of LIHTC transactions and their multiple funding sources. The bank also provided a \$7.5 million construction loan for the project. The investment was responsive to the identified need for affordable housing.
- WFBNA provided four grants totaling \$88,500 to a nonprofit organization located in Lynchburg, Virginia. The organization provided counseling, early childhood development, mental health, and financial literacy primarily to low- and moderate-income individuals. The bank's funding supported the organization's programming that provided access to affordable credit and financial education to create long-term household financial stability. The grants were responsive to the need for financial health.

Richmond MSA

The bank had a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$60.5 million and represented 5.3 percent of the bank's tier 1 capital allocated to the AA. The investments also included 133 grants and donations totaling \$3.2 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited good responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 52.8 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 23.4 percent that focused on community services targeted to low- and moderate-income individuals, and 23.9 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 839 units of affordable housing in the AA.

The bank made significant use of innovative or complex investments to support CD initiatives. Approximately 54 percent of current period investment dollars were complex LIHTC investments. The following are examples of CD investments made in this AA:

- WFBNA provided \$11 million in equity investments to finance an LIHTC development. This 48-unit LIHTC development in Richmond, Virginia, consisted of two phases constructed simultaneously. The development was restricted to tenants earning up to 60 percent of the AMI. The investment was complex due to the inherent nature of LIHTC transactions and their multiple sources of funding. The bank also provided \$8.6 million in loans for both phases of the project. The investment was responsive to the identified for affordable housing.
- WFBNA provided four grants totaling \$345,000 to a Richmond, Virginia nonprofit organization that advocated for fair housing for all and supports first-time homebuyers and individuals at risk of foreclosure. The bank's funding supported the organization's eviction diversion program that provided financial assistance to cover rent and utilities to more than 300 low-income rental households. Additionally, the organization provided financial literacy, housing counseling, and landlord/tenant educational training to clients. The grants were responsive to the identified for affordable housing.

Virginia Beach MSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$131.8 million and represented 16.4 percent of the bank's tier 1 capital allocated to the AA. The investments also included 25 grants and donations totaling \$6.9 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 55.2 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 25.9 percent that focused on community services targeted to low- and moderate-income individuals, and 19 percent that focused on revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 3293 units of affordable housing in the AA.

The bank made extensive use of innovative or complex investments to support CD initiatives. Approximately 89.8 percent of current period investment dollars were complex LIHTC investments. The following are examples of CD investments made in this AA:

- WFBNA made a \$10.6 million equity investment to finance an LIHTC redevelopment. This 200-unit LIHTC development in Newport News, Virginia, restricted occupancy to tenants earning up to 60 percent of the AMI. Ten units were reconfigured for Americans with Disabilities Act compliance. The investment was complex due to the inherent nature of LIHTC transactions and their multiple sources of funding. The bank also provided a \$20.8 million permanent loan for the project. The investment was responsive to the identified need for affordable housing.
- WFBNA made a \$12.5 million equity investment to finance an LIHTC development. This 72-unit LIHTC development restricted occupancy to tenants earning up to 60 percent of the AMI, with 10 units built to ADA compliance. Site amenities included a community room, a fitness center, and a playground. The development was within walking distance of a bus stop, a grocery store, a medical care, and childcare. This activity was complex due to the inherent nature of LIHTC transactions and multiple funding sources, including Virginia Housing Development Authority, Virginia Department of Housing Community Development, Newport News Redevelopment and Housing Authority, and Commonwealth Catholic Charities. The bank also provided a \$15.5 million construction loan for the project. The investment was responsive to the identified need for affordable housing.

Broader Statewide Investments

WFBNA had 15 current and prior period investments totaling \$3.2 million with a purpose, mandate, or function to serve one or more AAs in the state. These CD investments were primarily LIHTCs that supported the creation or preservation of affordable housing in the state. These investments were given positive consideration and supported the bank's overall performance under the Investment Test in the state of Virginia.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Virginia Combined Non-MSA was stronger than the bank's overall performance under the Investment Test in the full-scope areas. Performance was stronger primarily due to higher levels of CD investments relative to the bank's presence and capacity to invest in the AA. The bank's performance in the Blacksburg MSA, Charlottesville MSA, Harrisonburg CSA, Kingsport MSA, and Roanoke MSA was weaker than the bank's overall performance under the Investment Test in the full-scope areas primarily due to lower levels of CD investments relative to the bank's presence and capacity to invest in those AAs.

SERVICE TEST

The bank's performance under the Service Test in the state of Virginia is rated Low Satisfactory. Performance in the limited-scope AAs had a neutral effect on the overall Service Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Lynchburg MSA and Richmond MSA was adequate and the bank's performance in the Virginia Beach MSA was good.

Retail Banking Services

Service delivery systems were accessible to geographies and individuals of different income levels in the bank's full-scope AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Lynchburg MSA	6.2	8	5.9	0.0	25.0	50.0	25.0	1.9	18.4	61.1	18.6
Richmond MSA	38.0	50	36.8	4.0	24.0	32.0	40.0	8.9	22.5	37.6	30.3
Virginia Beach MSA	26.8	35	25.7	5.7	22.9	40.0	31.4	5.8	26.5	35.7	31.6
Blacksburg MSA	3.0	3	2.2	0.0	0.0	66.7	33.3	0.0	4.6	65.8	21.1
Charlottesville MSA	5.4	7	5.1	0.0	0.0	28.6	71.4	4.4	22.8	47.0	23.9
Harrisonburg CSA	2.2	6	4.4	16.7	50.0	33.3	0.0	2.9	13.6	72.7	10.8
Kingsport MSA	1.7	4	2.9	0.0	25.0	75.0	0.0	0.0	8.5	73.5	18.0
Roanoke MSA	11.1	8	5.9	0.0	12.5	75.0	12.5	3.4	21.6	46.6	28.4
Virginia Combined Non-MSA	5.6	15	11.0	0.0	20.0	66.7	13.3	0.6	23.7	59.9	15.5
Total	100.0	136	100.0	3.7	22.1	43.4	30.9	5.0	22.5	45.5	26.3
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Lynchburg MSA	0	4	0	0	-3	-1
Richmond MSA	0	7	-2	-3	-1	-1
Virginia Beach MSA	0	9	-1	-1	-3	-4
Blacksburg MSA	0	2	0	0	-2	0
Charlottesville MSA	0	1	0	0	-1	0
Harrisonburg CSA	0	0	0	0	0	0
Kingsport MSA	0	0	0	0	0	0
Roanoke MSA	0	1	0	0	0	-1
Virginia Combined Non-MSA	0	3	0	-1	-2	0
Total	0	27	-3	-5	-12	-7
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.						

Lynchburg MSA

WFBNA's service delivery systems were accessible to geographies and individuals of different income levels in the Lynchburg MSA. WFBNA operated eight branches in the AA, comprising two branches in moderate-income geographies, four branches in middle-income geographies, and two branches in upper-income geographies. The distribution of branches in low-income geographies was significantly below the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies. The distribution was augmented by two branches in middle- and upper-income geographies that were within close proximity that served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches generally had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA did not open or close any branches in low- and moderate-income geographies. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations. Despite the closures, its service delivery systems remained accessible.

Services, including where appropriate, business hours, varied in a way that significantly inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday and one branch in a middle-income geography had extended hours. None of the branches in low- and moderate-income geographies were opened for business on Saturday.

Richmond MSA

WFBNA's service delivery systems were accessible to geographies and individuals of different income levels in the Richmond MSA. WFBNA operated 50 branches in the AA, comprising of two branches in low-income geographies, 12 branches in moderate-income geographies, 16 branches in middle-income geographies, and 20 branches in upper-income geographies. The distribution of branches in low-income geographies was well below the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies. The distribution was augmented by five branches in middle- and upper-income geographies that were within close proximity that served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

The extent changes have been made, its record of opening and closing branches generally had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA did not open any branches but closed seven. Two of the branch closures were in low-income geographies and three branch closures were in moderate-income geographies. WFBNA closed branches primarily due to the low customer

traffic, poor operating performance, or to reduce redundancy in branching locations. Despite the closures, its service delivery systems remained accessible.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday and 9:00 a.m. to 12:00 p.m. Saturday.

Virginia Beach MSA

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Virginia Beach MSA. WFBNA operated 35 branches in the AA, comprising of two branches in low-income geographies, eight branches in moderate-income geographies, 14 branches in middle-income geographies, and 11 branches in upper-income geographies. The distribution of branches in low-income geographies approximated the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies was near to the distribution of the population in moderate-income geographies. The distribution was augmented by one branch in middle- and upper-income geography that was within close proximity to serve a low-income area and nine branches in middle- and upper-income geographies that were within close proximity to and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches generally had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA did not open any branches but closed nine. The bank closed one branch in a low-income geography and one branch in a moderate-income geography. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations. Despite the closures, its service delivery systems remained readily accessible.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday and 9:00 a.m. to 12:00 p.m. Saturday.

Community Development Services

The bank provided a limited level of CD services.

Lynchburg MSA

WFBNA provided a limited level of CD services in the Lynchburg MSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for six CD service activities and 42 CD service hours during the evaluation period. All of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The following are examples of CD services provided in this AA:

- Five WFBNA employees provided 40 hours of financial education to a high school, where a majority of the students qualified for free or reduced lunches.
- A WFBNA employee provided two hours of board service of technical expertise for an organization that prepared, cooked, and served meals to the homeless.

Richmond MSA

WFBNA provided a limited level of CD services in the Richmond MSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 44 CD service activities and 172.5 CD service hours during the evaluation period. All of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The following are examples of CD services provided in this AA:

- A WFBNA employee provided 14 hours of technical expertise to a global organization that utilized community-led solutions to identify and resolve community concerns with a primary focus on education, financial stability, and health. According to the organization, 85 percent of its clients were low- and moderate-income individuals.
- A WFBNA employee provided seven hours of technical expertise for a worldwide organization that engaged in wide variety of charitable activities, including providing athletic facilities and educational classes. According to the organization, 100 percent of its clients were low- and moderate-income individuals.

Virginia Beach MSA

WFBNA provided a limited level of CD services in the Virginia Beach MSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for six CD service activities and 15 CD service hours during the evaluation period. All of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The following are examples of CD services provided in this AA:

- A WFBNA employee provided three hours of financial education for an elementary school, where majority of the students qualified for free or reduced lunches.
- A WFBNA employee provided three hours of board service for an organization whose mission was to protect children; strengthen families; maximize independence for people with disabilities; and empower adults in crisis. Programs were aimed at promoting safety, self-sufficiency, and financial stability; improving children's behavior and school performance; preventing child abuse & neglect; counseling individuals & families dealing with trauma associated with abuse; providing safe, secure homes for foster children, and assisting those with disabilities. According to the organization, 85 percent of its clients were low- and moderate-income individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Blacksburg MSA, Roanoke MSA, and Virginia Combined Non-MSA was consistent with the bank's performance under the Service Test in the full-scope areas. The bank's performance in the Harrisonburg CSA and Kingsport MSA was stronger than the bank's performance under the Service Test in the full-scope areas.

Performance was stronger primarily due to the stronger performance of branch distribution in low- and moderate-income geographies. The bank's performance in the Charlottesville MSA was weaker than the bank's overall performance under the Service Test in the full-scope areas due to the weaker performance of branch distribution in low- and moderate-income geographies.

State of Washington

CRA rating for the State of Washington⁵²: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AAs.
- The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments that demonstrated excellent responsiveness to credit and economic development needs, although occasionally in a leadership position. The bank made extensive use of innovative and complex investments to support CD initiatives.
- Service delivery systems were readily accessible to, geographies and individuals of different income levels in the bank's AAs.
- The bank provided a limited level of CD services.

Description of Institution's Operations in the State of Washington

The state of Washington was WFBNA's 15th largest rating area based on its total deposits in the state. As of June 30, 2021, the bank maintained approximately \$23.6 billion or 1.6 percent of its total domestic deposits in branches within the state. Of the 65 depository financial institutions operating in the bank's AAs within the state, WFBNA, with a deposit market share of 11.8 percent, was the third largest. The other top depository financial institutions in the bank's AAs within the state based on market share included Bank of America, N.A. (21.6 percent), JPMorgan Chase Bank, N.A. (13.7 percent), U.S. Bank, N.A. (9.4 percent), and Key Bank, N.A. (7.9 percent). As of December 31, 2021, the bank operated 121 branches and 236 ATMs in the state. WFBNA delineated 17 AAs within the state; however, the OCC combined, analyzed, and presented those AAs at the CSA level where possible for purposes of this evaluation. This resulted in the following seven AAs: Bellingham, WA MSA (Bellingham MSA), Kennewick-Richland, WA MSA (Kennewick MSA), Seattle-Tacoma, WA CSA (Seattle CSA), Spokane-Spokane Valley, WA MSA (Spokane MSA), Wenatchee, WA MSA (Wenatchee MSA), Yakima, WA MSA (Yakima MSA), and Washington Combined Non-MSA. The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

⁵² This rating only reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Seattle CSA

The following table provides a summary of the demographics, including housing and business information for the Seattle CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Seattle CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	898	4.8	21.7	45.0	27.4	1.1
Population by Geography	4,406,712	4.8	22.0	45.3	27.6	0.2
Housing Units by Geography	1,843,523	4.8	21.5	45.3	28.3	0.1
Owner-Occupied Units by Geography	1,041,926	2.2	16.8	48.2	32.7	0.0
Occupied Rental Units by Geography	664,928	8.6	28.7	40.7	21.7	0.3
Vacant Units by Geography	136,669	5.2	22.6	44.9	27.1	0.1
Businesses by Geography	473,413	4.9	18.1	40.9	35.5	0.6
Farms by Geography	10,582	2.8	16.3	48.1	32.0	0.9
Family Distribution by Income Level	1,084,699	20.8	17.7	21.1	40.4	0.0
Household Distribution by Income Level	1,706,854	23.4	16.3	18.5	41.8	0.0
Median Family Income MSA - 14740 Bremerton-Silverdale-Port Orchard, WA MSA		\$75,652	Median Housing Value			\$329,301
Median Family Income MSA - 34580 Mount Vernon-Anacortes, WA MSA		\$65,272	Median Gross Rent			\$1,164
Median Family Income MSA - 36500 Olympia-Lacey-Tumwater, WA MSA		\$74,420	Families Below Poverty Level			7.6%
Median Family Income MSA - 42644 Seattle-Bellevue-Kent, WA		\$92,317				
Median Family Income MSA - 45104 Tacoma-Lakewood, WA		\$71,304				
Median Family Income Non-MSAs - WA		\$58,240				
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$29,120 to \$46,159 and moderate-income families earned at least \$29,120 to \$46,159 and less than \$46,592 to \$73,854, depending on the metropolitan or nonmetropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$728 to \$1,154 for low-income borrowers and ranging from \$1,165 to \$1,846 for moderate-income borrowers, depending on the metropolitan or nonmetropolitan area. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$1,768. Low- and moderate-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Seattle-Tacoma-Bellevue, WA MSA (Seattle MSA)

The HAI score for the Seattle MSA was 117.4, which reflected a higher cost of housing in comparison to the national average of 169.9. Information from Moody's Analytics indicated that at the end of the evaluation period, the Seattle MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic.

Seattle-Bellevue-Kent, WA MD (Seattle MD)

Seattle MD's recovery was gaining momentum and besting the national average. Professional/ business services and information were leading the recovery, contributing more than a third of the net new job additions over the last three months in 2021. The aerospace industry was adding workers faster than the broader economy. Despite strong job gains, the jobless rate was frozen as the labor force rose in line with hiring. The metro area had the third-highest share of information workers in the nation, behind only Silicon Valley and San Francisco. House price appreciation remained well above the national average, but gains moderated in 2021 as a highly competitive market fatigued some potential buyers. The Seattle MD has a well-diversified economy. Key sectors of the economy by percentage of employment include Professional and Business Services, Education and Health Services, Government, Retail Trade, and Manufacturing. Major employers in the Seattle MD include Amazon, Boeing Co., Microsoft Corp, and University of Washington. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Seattle MD was 2.8 percent compared to the national unemployment rate of 3.7 percent.

Tacoma-Lakewood, WA MD (Tacoma MD)

The Tacoma MD's economy shifted into a lower gear, and the jobs recovery was falling further behind the state average. Consumer-facing industries were leading job gains, and growth in retail was triple the U.S. average. However, cash-strapped hospitals were laying off workers and holding back stronger top-line gains. The Tacoma MD has seen little high-tech job growth despite its proximity to tech giants based in Seattle and relatively lower business costs. The metro division lacks many of the advantages of other smaller, lower-cost tech hubs such as Provo, Utah and Boulder, Colorado, which boasted a greater pool of talent and more office space. House price appreciation was above the U.S. average, but gains have moderated as a highly competitive market for homes has fatigued potential homebuyers. The Tacoma MD has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Government, Retail Trade, Professional and Business Services, Leisure and Hospitality Services, and Construction. Major employers in the Tacoma MD include Joint Base Lewis-McChord, Multicare Health System, and Franciscan Health System. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Tacoma MD was 4.5 percent compared to the national unemployment rate of 3.7 percent.

Bremerton-Silverdale-Port Orchard, WA MSA (Bremerton MSA)

Bremerton MSA's recovery had been moving sideways over the course of 2021. The metro area's initial rebound lost its way in late 2020 and payroll employment had weakened as the support from the initial reopening of the economy, fiscal stimulus, and fewer COVID-19 cases faded. Strong growth in leisure/ hospitality in 2021 had been the key to preventing employment from backsliding as there was plenty of weakness elsewhere, including in healthcare and professional/business services. Bremerton MSA's massive federal government employment at Naval Base Kitsap provided less support to the economy

than previously thought. The base resumed a full workload and benefited from the defense budget for fiscal 2021. Still, federal employment in the Bremerton MSA continued to decline in the first half of 2021. The Bremerton MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Government, Education and Health Services, Professional and Business Services, and Hospitality Services. Major employers in the Bremerton MSA include Naval Base Kitsap, St. Michael Medical Center, and Olympic College. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Bremerton MSA was 3.8 percent compared to the national unemployment rate of 3.7 percent.

Mount Vernon-Anacortes, WA MSA (Mount Vernon MSA)

Mount Vernon MSA's labor market improved in the first half of 2021, but the metro area remained a step behind the state. Net hiring within the battered consumer sector accelerated in the second quarter, supported by declining case counts and increased mobility. Though the unemployment rate has returned to near the pre-pandemic level, the rate is slightly understated because of labor force departures. Meanwhile, the housing market has been lukewarm compared with its state and national counterparts. This has weighed on construction payrolls, which remain 6 percent below the prerecession peak. Single-family permit issuance continued to trend near decade lows, but the low supply of available housing was powering house price appreciation above the state average. The Mount Vernon MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Government, Retail Trade, Manufacturing, Education and Health Services, and Leisure and Hospitality Services. Major employers in the Mount Vernon MSA include Skagit Valley Health, Draper Valley Farms, Inc., Island Hospital, and Janicki Industries. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Mount Vernon MSA was 4.8 percent compared to the national unemployment rate of 3.7 percent.

Olympia-Lacey-Tumwater, WA MSA (Olympia MSA)

The Olympia MSA's economy was moving down the road of recovery, albeit more slowly than the average pace in the West. Despite employment growth trailing that of the region, the overall jobs recovery was more complete. Service providers have been slower to add jobs, while goods producers have given back previous gains. Momentum in manufacturing hiring has ground to a halt, while gains generated in the important public sector kept the labor market's wheels turning, albeit slower than elsewhere. Although house prices were appreciating faster than those in other West Coast capitals, high construction costs have given builders pause as single-family permitting growth has taken a breather. The Olympia MSA is home to the largest health system serving southwestern Washington. It captures demand for specialty services not offered in smaller communities that keeps a floor under employment growth. The Olympia MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Government, Education and Health Services, Retail Trade, and Professional and Business Services. Major employers in the Olympia MSA include Providence Hospital, Safeway, and Walmart. The unemployment rate was in the lowest quarter of metro areas in the West and the rate was closer to pre-pandemic lows than in most of the nation. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Olympia MSA was 4 percent compared to the national unemployment rate of 3.7 percent.

Centralia, WA Micro Area (Lewis County)

According to the U.S. Census Bureau QuickFacts, Lewis County has a population of 18,629. As of July 2021, the area has 7,496 households with 2.29 persons per household. Between 2016 to 2020, 52 percent

of housing was owner occupied, which is lower than the national average of 64.4 percent. The largest percent of population is persons 18 years and under at 22.5 percent of the total population. In the civilian labor force, total percent of population age 16 years and above is 53 percent. The mean travel time to work for workers aged 16 years and above is 23 minutes. According to Data USA, the most common employment sectors for those who live in Lewis County, are Retail Trade, Health Care & Social Assistance, and Accommodation & Food Services. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for Lewis County was 5.1 percent compared to the national unemployment rate of 3.7 percent.

Oak Harbor, WA Micro Area (Island County)

According to the U.S. Census Bureau QuickFacts, Island County has a population of 24,709. As of July 2021, the area has 9,611 households with 2.42 persons per household. Between 2016 to 2020, 42.6 percent of housing was owner occupied, which is lower than the national average of 64.4 percent. The largest percent of population is persons 18 years and under at 27 percent of the total population. In the civilian labor force, total percent of population age 16 years and above is 49.7 percent. The mean travel time to work for workers aged 16 years and above is 20.9 minutes. According to Data USA, the most common employment sectors for those who live in Island County, are Health Care & Social Assistance, Retail Trade, and Public Administration. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for Island County was 4.2 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Seattle CSA. The organizations included one community development organization that helped to address the causes and conditions of poverty and one economic development organization that helped to attract and retain businesses in the area. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing units
- Single-family affordable housing
- Rental assistance
- Rehabilitation of housing units/improvement of the quality of housing stock
- Workforce development
- Financial literacy

Opportunities for participation by financial institutions included the following:

- Home-ownership counseling
- Closing cost assistance
- Affordable home mortgage loans
- Small business lending

Spokane MSA

The following table provides a summary of the demographics, including housing and business information for the Spokane MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Spokane MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	117	0.9	29.1	47.9	21.4	0.9
Population by Geography	524,380	0.6	27.0	45.2	26.4	0.8
Housing Units by Geography	226,646	0.5	28.4	44.9	24.9	1.2
Owner-Occupied Units by Geography	132,361	0.1	20.7	47.5	31.4	0.3
Occupied Rental Units by Geography	74,789	1.3	39.8	41.0	15.3	2.6
Vacant Units by Geography	19,496	0.5	37.1	42.6	17.7	2.1
Businesses by Geography	50,454	2.8	34.9	36.8	24.7	0.9
Farms by Geography	1,961	1.0	20.4	47.1	31.4	0.1
Family Distribution by Income Level	132,039	20.7	17.1	22.1	40.1	0.0
Household Distribution by Income Level	207,150	24.4	16.5	17.3	41.8	0.0
Median Family Income MSA - 44060 Spokane-Spokane Valley, WA MSA		\$62,064	Median Housing Value			\$189,335
			Families Below Poverty Level			10.5%
			Median Gross Rent			\$779
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$31,032 and moderate-income families earned at least \$31,032 and less than \$49,651. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$776 for low-income borrowers and \$1,241 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$1,016. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

The HAI score for the Spokane MSA was 153.2, which reflected a higher cost of housing in comparison to the national average of 169.9. Information from Moody's Analytics indicated that at the end of the evaluation period, the Spokane MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Spokane MSA's economy was in the final stages of recovery. The share of recouped jobs was well ahead of the state average, itself an outperformer. Education, healthcare, and leisure/hospitality were leading job gains, while local government had yet to turn the corner. Housing permits were generally tracking around the same pace of the past several years. The Spokane MSA has a moderately-diversified economy. Key sectors of the economy by percentage of

employment include Education and Health Services, Government, Retail Trade, Professional and Business Services, and Leisure and Hospitality Services. Major employers in the Spokane MSA include Fairchild Air Force Base, Providence Health Care, MultiCare, and Kalispel Tribal Economic Authority. The unemployment rate had dipped below the pre-pandemic reading, despite upward pressure from labor force gains. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Spokane MSA was 4.4 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Spokane MSA. The organizations included one community development organization that helped to address the causes and conditions of poverty and one economic development organization that helped to attract and retain businesses in the area. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing units
- Single-family affordable housing
- Rental assistance
- Rehabilitation of housing units/improvement of the quality of housing stock
- Workforce development
- Financial literacy

Opportunities for participation by financial institutions included the following:

- Home-ownership counseling
- Closing cost assistance
- Affordable home mortgage loans
- Small business lending
- Supporting nonprofit health providers and prevention.

Scope of Evaluation in the State of Washington

The OCC selected the Seattle CSA and Spokane MSA for full-scope reviews and based conclusions and ratings primarily on activity within these geographical areas. These AAs carried significant weight in determining the overall ratings for the state of Washington because of the significance of the bank's presence in these AAs. More weight was given to the Seattle CSA due to the larger deposit base, lending, and branch presence.

During the evaluation period, the bank originated or purchased 85,305 home mortgage loans, small loans to businesses, and small loans to farms totaling \$26.8 billion. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within each AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. In each of the AAs

except the Washington Combined Non-MSA, the OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms. In the Washington Combined Non-MSA, the OCC placed more weight based on the number of loans on small loans to businesses versus home mortgage loans and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF WASHINGTON

LENDING TEST

The bank's performance under the Lending Test in the state of Washington is rated Outstanding. Performance in the limited-scope areas had a neutral effect on the overall Lending Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Seattle CSA and Spokane MSA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Seattle CSA	44,840	25,289	353	65	70,547	82.6	87.9
Spokane MSA	3,560	1,451	113	4	5,128	6.0	3.7
Bellingham MSA	1,533	1,053	24	0	2,610	3.1	1.7
Kennewick MSA	1,486	372	110	1	1,969	2.3	0.5
Wenatchee MSA	770	506	38	0	1,314	1.5	2.6
Yakima MSA	773	546	52	0	1,371	1.6	1.2
Washington Combined Non-MSA	1,100	1,191	144	1	2,436	2.9	2.4
Total	54,062	30,408	834	71	85,375	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Seattle CSA	23,076,241	915,155	14,014	656,662	24,662,072	89.6	87.9
Spokane MSA	939,494	75,333	5,264	23,366	1,043,457	3.8	3.7
Bellingham MSA	488,641	45,733	1,081	0	535,455	1.9	1.7
Kennewick MSA	381,194	14,911	3,355	10,500	400,960	1.5	0.5
Wenatchee MSA	217,306	14,516	2,557	0	234,379	0.9	2.6
Yakima MSA	166,142	27,699	5,300	0	199,141	0.7	1.2
Washington Combined Non-MSA	383,614	36,313	10,180	2,000	432,107	1.6	2.4
Total	25,652,632	1,129,660	41,751	692,528	27,516,571	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Seattle CSA

As of June 30, 2021, WFBNA had a deposit market share of 12.2 percent. The bank ranked third among 56 depository financial institutions placing it in the top 6 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 3.3 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked sixth among 750 home mortgage lenders in this AA, which placed it in the top 1 percent of lenders. The top lenders in this AA based on market share were Rocket Mortgage (6.2 percent), Caliber Home Loans, Inc. (5.7 percent), and Boeing Employees Credit Union (5.5 percent).

According to peer small business data for 2021, WFBNA had a market share of 6.1 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked fifth out of 221 small business lenders, which placed it in the top 3 percent of lenders. The top lenders in this AA based on market share were Bank of America, N.A. (19.5 percent), American Express National Bank (13.5 percent), and JPMorgan Chase Bank, N.A. (13 percent).

According to peer small farm data for 2021, WFBNA had a market share of 13.1 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked third out of 23 small farm lenders, which placed it in the top 14 percent of lenders. The other top lenders in this AA based on market share were Bank of America, N.A. (20.6 percent), U.S. Bank, N.A. (18.9 percent), and JPMorgan Chase Bank, N.A. (13 percent).

Spokane MSA

As of June 30, 2021, WFBNA had a deposit market share of 7.7 percent. The bank ranked sixth among 17 depository financial institutions placing it in the top 36 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 2.6 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked sixth among 472 home mortgage lenders in this AA, which placed it in the top 2 percent of lenders. The top lenders in this AA based on market share were Spokane Teachers Credit Union (9.7 percent), Rocket Mortgage (6.8 percent), and Numerica Credit Union (4 percent).

According to peer small business data for 2021, WFBNA had a market share of 4.2 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked ninth out of 96 small business lenders, which placed it in the top 10 percent of lenders. The top lenders in this AA based on market share were JPMorgan Chase Bank, N.A. (13 percent), Washington Trust Bank (12.5 percent), and American Express National Bank (11.7 percent).

According to peer small farm data for 2021, WFBNA had a market share of 16.9 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked first out of 17 small farm lenders, which placed it in the top 6 percent of lenders. The other top lenders in this AA based on market share were Banner Bank (11.5 percent), First Interstate Bank (11.2 percent), and U.S. Bank, N.A. (11.2 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AAs. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data. The bank's performance was good in the Seattle CSA and Spokane MSA.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies in the Seattle CSA and Spokane MSA. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AA.

Seattle CSA

Home Mortgage Loans

Refer to Table O in the state of Washington section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

The bank's percentages of home mortgage loans in low- and moderate-income geographies were below the percentages of owner-occupied housing units in low- and moderate-income geographies and the aggregate distributions of home mortgage loans by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Washington section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentages of small loans to businesses in low- and moderate-income geographies approximated the percentages of businesses in low- and moderate-income geographies and was near to the aggregate distributions of small loans to businesses in low- and moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Washington section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

The bank's percentage of small loans to farms in low-income geographies was significantly below the percentage of farms in low-income geographies and it was near to the aggregate distribution of small loans to farms in low-income geographies by all lenders. The bank's percentage of small loans to farms in moderate-income geographies was well below the percentage of farms in moderate-income geographies and it was below the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Spokane MSA

Home Mortgage Loans

Refer to Table O in the state of Washington section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans in low-income geographies was equal to both the percentage of owner-occupied housing units and the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies exceeded the percentage of owner-occupied housing units in moderate-income geographies and it approximated the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Washington section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

The bank's percentage of small loans to businesses in low-income geographies was well below both the percentage of businesses and the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses and the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Washington section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was good.

The bank did not originate or purchase any small loans to farms in low-income geographies, which was consistent with all lenders. The bank's percentage of small loans to farms in moderate-income geographies exceeded both the percentage of farms in moderate-income geographies and the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes. The bank's performance was adequate in the Seattle CSA and good in the Spokane MSA.

Seattle CSA

Home Mortgage Loans

Refer to Table P in the state of Washington section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and it was below the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families and it was near to the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Washington section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 25.1 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Washington section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was poor.

The bank did not collect or consider the GAR in the underwriting of approximately 66.9 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below both the percentage of farms in the AA with GAR of \$1 million or less and the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Spokane MSA

Home Mortgage Loans

Refer to Table P in the state of Washington section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but it exceeded the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was near to the percentage of moderate-income families and it approximated the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Washington section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 25.6 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Washington section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was very poor.

The bank did not collect or consider the GAR in the underwriting of approximately 77.9 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was significantly below both the percentage of farms in the AA with GAR of \$1 million or less and the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

Seattle CSA

WFBNA was a leader in making CD loans in the Seattle CSA. WFBNA made 65 CD loans totaling approximately \$656.7 million, which represented 24.3 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 93.7 percent of these loans funded affordable housing that provided 3149 units of affordable housing, 1.7 percent funded economic development, and 4.4 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$58 million construction loan for a 260-unit LIHTC affordable housing development located in Seattle, Washington, with 100 percent of the units restricted to tenants who earned up to 60 percent of the area median family income. The LIHTC served low wage working people, their families, seniors, transitioning homeless families, and those with special needs. The loan was responsive to the identified need for affordable housing.
- WFBNA provided a \$17.5 million loan for an LIHTC affordable housing development located in Bellevue, Washington, with 92 units or 96.8 percent targeted to tenants with incomes less than 50 percent of the AMI. The loan was responsive to the identified need for affordable housing.

- WFBNA provided a \$1 million working capital line of credit for a nonprofit organization that helped diverse communities of people with limited resources attain their goals for self-sufficiency, financial independence, health and community building. According to the organization, 100 percent of its clients were low- and moderate-income as they earned less than 80 percent of the area median family income.

Spokane MSA

WFBNA was a leader in making CD loans in the Spokane MSA. WFBNA made four CD loans totaling approximately \$23.4 million, which represented 20.5 percent of the allocated tier 1 capital. CD loans were all made for affordable housing purposes that provided 168 units of affordable housing targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$7.2 million construction loan to an organization for the construction of a 51-unit supportive housing community for extremely low-income, homeless men and women who may be struggling with multiple special needs including mental illness, chemical dependency, developmental disabilities, lack of job skills and chronic poverty. The units were restricted to persons with incomes at or below 50 percent the AMI. All of the units were set-aside as chronically homeless, meaning the person will have been on the streets or in shelters for a duration of one year or longer, or will have had four or more episodes of homelessness in the last three years. One unit was set aside as a manager's unit. The loan was responsive to the identified needs for affordable housing and homelessness services.
- WFBNA provided a \$20 million line of credit for a fund of which \$710,256 allocated to an affordable housing development located in Spokane, Washington. The loan was responsive to the identified need for affordable housing.
- WFBNA provided a \$9.3 million loan for a 93-unit LIHTC affordable housing development located in Spokane, Washington, with 100 percent of its units targeted to tenants with income up to 60 percent of the AMI.

Product Innovation and Flexibility

Seattle CSA

WFBNA made extensive use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 4,577 loans under its flexible lending programs totaling \$314.4 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	186	65,300
Dream. Plan. Home.	117	34,800
PPP	4,274	214,300
Total	4,577	314,400

Spokane MSA

WFBNA used flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 247 loans under its flexible lending programs totaling \$20.3 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	40	10,700
Dream. Plan. Home.	12	2,200
PPP	195	7,400
Total	247	20,300

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Lending Test in Kennewick MSA was consistent the bank's overall performance under the Lending Test in the full-scope areas. The bank's performance under the Lending Test in the Bellingham MSA, Wenatchee MSA, Yakima MSA, and the Washington Combined Non-MSA was weaker than the bank's overall performance under the Lending Test in the full-scope areas. Performance in these limited-scope areas was weaker primarily due to the lower volume of CD lending relative to the needs and opportunities for CD loans in these areas. Performance in the limited scope areas did not affect the bank's overall rating for the state.

Refer to Tables O through T in the state of Washington section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Washington is rated Outstanding. Performance in the limited-scope areas had a neutral effect on the overall Investment Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Seattle CSA and Spokane MSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Seattle CSA	67	112,655	278	388,556	345	71.3	501,210	76.5	34	298,387
Spokane MSA	13	40,000	60	52,179	73	15.1	92,179	14.1	11	33,829
Bellingham MSA	2	13,673	7	125	9	1.9	13,798	2.1	2	129
Kennewick MSA	5	6,091	2	13	7	1.5	6,103	0.9	5	361
Wenatchee MSA	1	4,102	10	87	11	2.3	4,189	0.6	1	129
Yakima MSA	2	9,269	18	190	20	4.1	9,459	1.4	1	58
Washington Combined Non-MSA	1	2,246	12	593	13	2.7	2,838	0.4	1	71
Statewide***	3	22,727	3	2,294	6	1.2	25,021	97.54	2	486
Total	94	210,763	390	444,037	484	100.0	654,797	100.0	57	333,450
<p>The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.</p> <p>* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.</p> <p>** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.</p> <p>*** Statewide means investments in statewide programs that have a purpose, mandate, or function to serve one or more of the bank's assessment areas within the state. Due to rounding, totals may not equal 100.0%</p>										

Seattle CSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$501.2 million and represented 18.5 percent of the bank's tier 1 capital allocated to the AA. The investments also included 258 grants and donations totaling \$6.8 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 37.7 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 50.4 percent that focused on community services targeted to low- and moderate-income individuals, and 11.9 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 4,074 units of affordable housing in the AA.

The bank made extensive use of innovative or complex investments to support CD initiatives. Approximately 97.4 percent of current period investment dollars were complex LIHTC investments. The following are examples of CD investments made in this AA:

- WFBNA made a \$39.4 million LIHTC equity investment for an affordable housing development in SeaTac, Washington. This development consisted of 365 units restricted to tenants with incomes at

or below 60 percent of the AMI. The investment was complex due to the inherent nature of LIHTC transactions involving multiple sources of funding. The bank also provided an \$83 million construction loan for the project. The investment was responsive to the identified need for affordable housing.

- WFBNA made a \$32.4 million LIHTC equity investment for an affordable housing development in Seattle, Washington. This development consisted of 200 units restricted to families earning less than 60 percent of the AMI. Forty of these units were reserved for people with disabilities. The development included retail and community-centered spaces to support resident-initiated social events, including movie nights and potlucks, for low-income families and the surrounding community. NeighborCare Health provided medical services to the tenants at the onsite medical clinic. This activity was complex due to the inherent nature of LIHTC transactions and their multiple funding sources including the city of Seattle, the Seattle Housing Authority, and King County. The bank also provided a \$49.7 million construction loan for the project. The investment was responsive to the identified need for affordable housing.
- WFBNA made an \$18.7 million LIHTC equity investment for an affordable housing development in Federal Way, Washington. The development included 200 units affordable to tenants earning less than 80 percent of the area median family income. The investment was complex due to the inherent nature of LIHTC transactions involving multiple sources of funding. The investment was responsive to the identified need for affordable housing.

Spokane MSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$92.2 million and represented 80.9 percent of the bank's tier 1 capital allocated to the AA. The investments also included 56 grants and donations totaling \$653,000 to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 32.9 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 63 percent that focused on community services targeted to low- and moderate-income individuals, and 4.1 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 743 units of affordable housing in the AA.

The bank made extensive use of innovative or complex investments to support CD initiatives. Approximately 98.8 percent of current period investment dollars were complex LIHTC investments. The following are examples of CD investments made in this AA:

- WFBNA made a \$15.6 million LIHTC equity investment for an affordable housing community in Spokane, Washington. This development consisted of 72 supportive housing units restricted to families earning up to 80 percent of the AMI. Of those, project-based Section 8 subsidized 36 units,

which were reserved for homeless tenants. The development partnered with a family reunification service whose participants were referred through the Children's Administration after family separation due to a court order. The program provided extensive support through family counseling, substance abuse treatment, legal advocacy, employment readiness, and healthcare services to help the family achieve stability. Participants could earn their GED to prepare for independent living. Graduates from the program received referral preference for housing units. This activity was complex due to the inherent nature of LIHTC transactions and their multiple funding sources. The investment was responsive to the identified need for affordable housing.

- WFBNA made a \$10.3 million LIHTC equity investment to build a 51-unit affordable housing development in the Spokane MSA. The development provided supportive housing for extremely low income, homeless men and women who were struggling with multiple special needs including mental illness, chemical dependency, developmental disabilities, lack of job skills and chronic poverty. The units were restricted to persons with incomes at or below 50 percent of the AMI. This activity was complex due to the inherent nature of LIHTC transactions and their multiple funding sources. The investment was responsive to the identified need for affordable housing.
- WFBNA made a \$12.2 million LIHTC equity investment for an affordable housing development in Spokane, Washington. The development included 48 units restricted to tenants earning up to 60 percent of the area median family income. This activity was complex due to the inherent nature of LIHTC transactions and their multiple funding sources. The investment was responsive to the identified need for affordable housing.

Broader Statewide Investments

WFBNA had six current and prior period investments totaling \$25 million with a purpose, mandate, or function to serve one or more AAs in the state. These CD investments were primarily LIHTCs that supported the creation or preservation of affordable housing in the state. These investments were given positive consideration and supported the bank's overall performance under the Investment Test in the state of Washington.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in Bellingham MSA, Kennewick MSA, and Yakima MSA was consistent with the bank's overall performance under the Investment Test in the full-scope areas. Performance in the Wenatchee MSA and Washington Combined Non-MSA was weaker than the bank's overall performance under the Investment Test in the full-scope areas primarily due to lower levels of CD investments relative to the bank's presence and capacity to invest in those AAs.

SERVICE TEST

The bank's performance under the Service Test in the state of Washington is rated High Satisfactory. Performance in the limited-scope areas had a neutral effect on the overall Service Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Seattle CSA was good and the bank's performance in the Spokane MSA was adequate.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's full-scope AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Seattle CSA	87.9	102	84.3	5.9	23.5	40.2	30.4	4.8	22.0	45.3	27.6
Spokane MSA	3.7	6	5.0	0.0	33.3	66.7	0.0	0.6	27.0	45.2	26.4
Bellingham MSA	1.7	2	1.7	0.0	0.0	100.0	0.0	3.4	7.5	74.3	14.0
Kennewick MSA	0.5	1	0.8	0.0	0.0	100.0	0.0	3.1	32.2	34.8	29.9
Wenatchee MSA	2.6	2	1.7	0.0	50.0	50.0	0.0	0.0	15.2	78.0	6.9
Yakima MSA	1.2	2	1.7	0.0	50.0	0.0	50.0	0.0	28.5	42.6	28.9
Washington Combined Non-MSA	2.4	6	5.0	0.0	50.0	50.0	0.0	0.0	12.4	71.9	15.7
Total	100.0	121	100.0	5.0	25.6	43.0	26.4	3.9	22.2	47.3	26.4
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Seattle CSA	6	12	-2	-3	-2	1
Spokane MSA	0	1	0	-1	0	0
Bellingham MSA	6	12	-2	-3	-2	1
Kennewick MSA	0	1	0	-1	0	0
Wenatchee MSA	0	1	0	0	-1	0
Yakima MSA	0	0	0	0	0	0
Washington Combined Non-MSA	0	2	0	0	-2	0
Total	0	1	0	-1	0	0
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.						

Seattle CSA

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Seattle CSA. WFBNA operated 102 branches in the AA, comprising six branches in low-income geographies, 24 branches in moderate-income geographies, 41 branches in middle-income

geographies, and 31 branches in upper-income geographies. The distribution of branches in low-income geographies exceeded the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies. The distribution was augmented by one branch in middle- and upper-income geographies that were within close proximity to serve low-income areas and 13 branches in middle- and upper-income geographies that were within close proximity to and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches generally had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations. Despite the closures, its service delivery systems remained readily accessible.

Services, including where appropriate, business hours, were tailored to the convenience and needs of portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday and 42 out of 102 branches were opened for business 9:00 a.m. to 12:00 p.m. Saturday.

Spokane MSA

WFBNA's service delivery systems were accessible to geographies and individuals of different income levels in the Spokane MSA. WFBNA operated six branches in the AA, comprising two branches in moderate-income geographies and four branches in middle-income geographies. The distribution of branches in low-income geographies was significantly below the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies. The distribution was augmented by one branch in a middle- or upper-income geography that served moderate-income areas. Internal customer data for this branch demonstrated a reasonable level of service to customers in low- and moderate-income areas. The middle- or upper-income branch contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches generally had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations. Despite the closures, its service delivery systems remained accessible.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were

opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday and four out of six branches were opened for business 10:00 a.m. to 12:00 p.m. Saturday.

Community Development Services

The bank provided a limited level of CD services.

Seattle CSA

WFBNA provided a limited level of CD services in the Seattle CSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 82 CD service to 21 organizations, logging a total of 336 hours of CD activities during the evaluation period. A majority (95 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The bank's assistance provided was responsive to the identified needs in the AA. The following is an example of CD services provided in this AA:

- WFBNA employees provided their financial expertise through 160 hours of outreach activities to an organization that assisted the low- and moderate-income communities and fought with hunger as a symptom of poverty throughout the assessment area. This organization sourced surplus food from various outlets such as restaurants, farmers, and grocery stores and repacked the food for pick up or delivery to 350 shelters, food banks, and other meal programs. The organization advocated for equitable solutions and food justice for all. This activity was responsive to the identified need of community services in the AA.

Spokane MSA

WFBNA provided a limited level of CD services in the Spokane MSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 10 CD service to three organizations logging a total of 32 hours of CD service activities during the evaluation period. All of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The bank's assistance provided was responsive to the identified needs in the AA. The following is an example of CD services provided in this AA:

- A WFBNA employee provided five hours of financial education at a middle school in Spokane, Washington where 51.9 percent of the students qualified for federal free or reduced lunches.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Wenatchee MSA and Yakima MSA was stronger than the bank's overall performance under the Service Test in the full-scope areas. CD services were not evaluated in the limited-scope AAs, which resulted in stronger performance. The bank's performance under the Service Test in the Bellingham MSA, Kennewick MSA, and Washington Combined Non-MSA was weaker than the bank's overall performance under the Service Test in the full-scope areas. Performance was weaker primarily due to lower accessibility of retail banking services in low- and moderate-income areas.

State of Wisconsin

CRA rating for the State of Wisconsin⁵³: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited an adequate geographic distribution of loans in its AAs.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank made an adequate level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.
- The bank had a significant level of qualified CD investments that demonstrated good responsiveness to credit and economic development needs, although occasionally in a leadership position. The bank made extensive use of innovative and complex investments to support CD initiatives.
- Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided a limited level of CD services.

Description of Institution's Operations in the State of Wisconsin

The state of Wisconsin was WFBNA's 26th largest rating area based on its total deposits in the state. As of June 30, 2021, the bank maintained approximately \$6.9 billion or 0.5 percent of its total domestic deposits in branches within the state. Of the 146 depository financial institutions operating in the bank's AAs within the state, WFBNA, with a deposit market share of 4.3 percent, was the fifth largest. The top depository financial institutions in the bank's AAs within the state based on market share included U.S. Bank, N.A. (24.5 percent), BMO Harris Bank, N.A. (13.5 percent), Associated Bank, N.A. (10.1 percent), and JPMorgan Chase Bank, N.A. (8.2 percent). As of December 31, 2021, the bank operated 39 branches and 47 ATMs in the state. WFBNA delineated 14 AAs within the state; however, the OCC combined, analyzed, and presented those AAs at the CSA level where possible for purposes of this evaluation. This resulted in the following 10 AAs: Appleton-Oshkosh-Neenah, WI CSA (Appleton CSA), Eau Claire, WI MSA (Eau Claire MSA), Fond du Lac, WI MSA (Fond du Lac MSA), Green Bay, WI CSA (Green Bay CSA), La Crosse-Onalaska, WI MSA (La Crosse MSA), Madison, WI CSA (Madison CSA), Milwaukee-Racine-Waukesha, WI CSA (Milwaukee CSA), Sheboygan, WI MSA (Sheboygan MSA), Wausau-Weston, WI MSA (Wausau MSA), and Wisconsin Combined Non-MSA. The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

⁵³ This rating only reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Madison CSA

The following table provides a summary of the demographics, including housing and business information for the Madison CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Madison CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	146	2.7	19.2	53.4	20.5	4.1
Population by Geography	690,610	3.1	16.0	56.6	21.8	2.6
Housing Units by Geography	303,122	2.6	17.0	57.7	20.9	1.7
Owner-Occupied Units by Geography	175,359	0.6	13.3	62.7	23.5	0.0
Occupied Rental Units by Geography	108,209	6.1	22.7	48.4	18.4	4.3
Vacant Units by Geography	19,554	1.5	19.3	64.9	12.0	2.3
Businesses by Geography	50,799	1.9	16.7	53.4	26.2	1.7
Farms by Geography	3,031	0.4	13.5	65.3	20.6	0.2
Family Distribution by Income Level	170,759	19.6	17.7	23.4	39.3	0.0
Household Distribution by Income Level	283,568	23.0	16.9	18.9	41.3	0.0
Median Family Income MSA - 31540 Madison, WI MSA		\$81,321	Median Housing Value			\$219,535
Median Family Income Non-MSAs - WI		\$60,742	Median Gross Rent			\$904
			Families Below Poverty Level			6.6%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$30,371 to \$40,661 and moderate-income families earned at least \$30,371 to \$40,661 and less than \$37,48,594 to \$65,057, depending on the metropolitan or nonmetropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$759 to \$1,017 for low-income borrowers and ranging from \$1,215 to \$1,626 for moderate-income borrowers, depending on the metropolitan or nonmetropolitan area. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$1,179. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Madison, WI MSA (Madison MSA)

The HAI score for the Madison MSA was 191.7, which reflected a lower cost of housing in comparison to the national average of 169.9. Information from Moody's Analytics indicated that at the end of the evaluation period, the Madison MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Madison MSA's strong economy remained squarely on track in its recovery, closely mirroring the state's trajectory. The unemployment rate had changed little despite an acceleration in job growth, as the labor force had increased in step with employment. Madison is

home to both the state capital and the flagship state university, University of Wisconsin. The Madison MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Government, Professional and Business Services, Education and Health Services Government, and Retail Trade. Major employers in the Madison MSA include University of Wisconsin at Madison, UW Hospital & Clinics Authority, Epic Systems, SSM Health, and American Family Insurance Co. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Madison MSA was 1.7 percent compared to the national unemployment rate of 3.7 percent.

Baraboo, WI Micro Area (Sauk County)

According to the U.S. Census Bureau QuickFacts, Sauk County has a population of 12,398. As of July 2021, the area has 5,542 households with 2.12 persons per household. Between 2016 to 2020, 61.0 percent of housing was owner occupied, which is lower than the national average of 64.4 percent. The largest percent of population is persons 18 years and under at 20.5 percent of the total population. In the civilian labor force, total percent of population age 16 years and above is 65.2 percent. The mean travel time to work for workers aged 16 years and above is 20.6 minutes. According to Data USA, the most common employment sectors for those who live in Sauk County, are Accommodation & Food Services, Health Care & Social Assistance, and Manufacturing. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for Sauk County was 2.5 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Madison CSA. The organizations included one community development organization that helped to address the causes and conditions of poverty and one economic development organization that helped to attract and retain businesses in the area. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing units
- Single-family affordable housing
- Rental assistance
- Rehabilitation of housing units/improvement of the quality of housing stock
- Workforce development
- Financial literacy

Opportunities for participation by financial institutions included the following:

- Home-ownership counseling
- Closing cost assistance
- Affordable home mortgage loans
- Small business lending
- Supporting nonprofit health providers and prevention

Milwaukee CSA

The following table provides a summary of the demographics, including housing and business information for the Milwaukee CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Milwaukee CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	476	21.4	16.2	33.6	27.5	1.3
Population by Geography	1,764,901	15.6	15.5	35.9	33.0	0.1
Housing Units by Geography	753,729	15.0	15.8	37.3	31.8	0.1
Owner-Occupied Units by Geography	429,085	6.8	12.4	38.8	42.0	0.0
Occupied Rental Units by Geography	270,244	24.5	20.8	37.0	17.5	0.2
Vacant Units by Geography	54,400	33.1	17.1	26.9	22.6	0.3
Businesses by Geography	103,691	11.0	12.7	36.4	39.5	0.3
Farms by Geography	2,604	5.6	7.3	39.9	47.2	0.0
Family Distribution by Income Level	438,454	23.1	16.4	19.7	40.9	0.0
Household Distribution by Income Level	699,329	25.0	15.4	17.3	42.3	0.0
Median Family Income MSA - 33340 Milwaukee-Waukesha, WI MSA		\$71,764	Median Housing Value			\$184,171
Median Family Income MSA - 39540 Racine, WI MSA		\$68,728	Median Gross Rent			\$837
			Families Below Poverty Level			10.9%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$30,371 to \$40,661 and moderate-income families earned at least \$30,371 to \$40,661 and less than \$37,48,594 to \$65,057, depending on the metropolitan area. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment ranging from \$759 to \$1,017 for low-income borrowers and ranging from \$1,215 to \$1,626 for moderate-income borrowers, depending on the metropolitan area. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$1,179. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Milwaukee-Waukesha, WI MSA (Milwaukee MSA)

The HAI score for the Milwaukee MSA was 185.3, which reflected a lower cost of housing in comparison to the national average of 169.9. Information from Moody's Analytics indicated that at the end of the evaluation period, the Milwaukee MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Milwaukee MSA's recovery was riding on the back of recovering leisure/hospitality and a surge in manufacturing, helping to offset net payroll losses in

other industries. Education/healthcare and retail have each shown large declines in 2021, in contrast to much of the country, and local government employment has trended downward with most other industries moving sideways. Residential real estate was booming in the low-supply, low-interest-rate environment. House prices at the end of the summer of 2021 were up by double digits compared with a year earlier, the fastest 12-month pace of growth since the late 1970s. The Milwaukee MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services, Professional and Business Services, Manufacturing, and Retail Trade. Major employers in the Milwaukee MSA include Aurora Health Care Inc., Froedtert Health, Ascension Wisconsin, and The Kroger Co. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Milwaukee MSA was 2.6 percent compared to the national unemployment rate of 3.7 percent.

Racine, WI MSA (Racine MSA)

Information from Moody's Analytics indicated that at the end of the evaluation period, the Racine MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. The Racine MSA's recovery was running out of gas. Nonfarm payrolls were moving sideways. Professional/business services were sinking, and the industry was shedding workers faster than any other metro area nationally. The Racine MSA is one of the most factory-dependent metro areas in the nation and is more reliant on exports than average and most of what is exported is destined for Canada. The recovery in the pivotal manufacturing industry was further behind than elsewhere. With meager hiring, the unemployment rate, which was the third highest in the state, had moved sideways since late last 2020. The residential real estate market was underperforming, and house price appreciation was falling further behind the state average. The Racine MSA has a well-diversified economy. Key sectors of the economy by percentage of employment include Manufacturing, Education and Health Services, Government, Retail Trade, Professional and Business Services, and Leisure and Hospitality Services. Major employers in the Racine MSA include All Saints Health Care System, S.C. Johnson & Son Inc., CNH America LLC, and Emerson Electric. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Racine MSA was 2.9 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Milwaukee CSA. The organizations included one community development organization that helped to address the causes and conditions of poverty and one economic development organization that helped to attract and retain businesses in the area. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing units
- Single-family affordable housing
- Rental assistance
- Rehabilitation of housing units/improvement of the quality of housing stock
- Workforce development
- Financial literacy

Opportunities for participation by financial institutions included the following:

- Home-ownership counseling
- Closing cost assistance
- Affordable home mortgage loans
- Small business lending
- Supporting nonprofit health providers and prevention

Scope of Evaluation in the State of Wisconsin

The OCC selected the Madison CSA and Milwaukee CSA for full-scope reviews and based conclusions and ratings primarily on activity within these geographical areas. These AAs carried significant weight in determining the overall ratings for the state of Wisconsin because of the significance of the bank's presence in these AAs. More weight was given to the Milwaukee CSA due to the larger deposit base, lending, and branch presence.

During the evaluation period, the bank originated or purchased 30,578 home mortgage loans, small loans to businesses, and small loans to farms totaling \$5.4 billion. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within each AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. In each of the AAs except the La Crosse MSA, the OCC placed more weight based on the number of loans on home mortgage loans versus small loans to businesses and small loans to farms. In the La Crosse MSA, the OCC placed more weight based on the number of loans on small loans to businesses versus home mortgage loans and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF WISCONSIN

LENDING TEST

The bank's performance under the Lending Test in the state of Wisconsin is rated High Satisfactory. Performance in the limited-scope areas had a neutral effect on the overall Lending Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Madison CSA and Milwaukee CSA was good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Madison CSA	2,423	1,321	68	12	3,824	12.5	13.4
Milwaukee CSA	14,471	3,112	59	16	17,658	57.6	57.8
Appleton CSA	2,322	523	50	3	2,898	9.5	4.5
Eau Claire MSA	573	312	15	3	903	2.9	3.6
Fond du Lac MSA	334	58	16	3	411	1.3	0.9
Green Bay MSA	1,707	647	135	10	2,499	8.2	8.8
La Crosse MSA	263	267	6	3	539	1.8	4.3
Sheboygan MSA	643	300	8	3	954	3.1	4.4
Wausau MSA	347	114	56	3	520	1.7	0.8
Wisconsin Combined Non-MSA	262	148	18	3	431	1.4	1.6
Total	23,345	6,802	431	59	30,637	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Madison CSA	607,562	50,414	1,899	3,606	663,481	12.2	13.4
Milwaukee CSA	3,412,947	103,506	1,097	9,536	3,527,086	64.9	57.8
Appleton CSA	427,231	18,133	1,411	78	446,853	8.2	4.5
Eau Claire MSA	104,214	17,057	211	64	121,546	2.2	3.6
Fond du Lac MSA	54,518	2,473	394	15	57,400	1.1	0.9
Green Bay MSA	305,366	27,281	2,898	201	335,746	6.2	8.8
La Crosse MSA	52,478	11,016	113	73	63,680	1.2	4.3
Sheboygan MSA	104,934	8,577	54	76	113,641	2.1	4.4
Wausau MSA	57,682	6,724	1,150	12	65,568	1.2	0.8
Wisconsin Combined Non-MSA	35,684	4,128	521	27	40,360	0.7	1.6
Total	5,162,616	249,309	9,748	13,688	5,435,361	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Madison CSA

As of June 30, 2021, WFBNA had a deposit market share of 3.2 percent. The bank ranked 12th among 51 depository financial institutions placing it in the top 24 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 1.5 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked 15th among 473 home mortgage lenders in this AA, which placed it in the top 4 percent of lenders. The top lenders in this AA based on market share were Summit Credit Union (21.7 percent), UW Credit Union (17.9 percent), and Fairway Independent Mort Corp (4.5 percent).

According to peer small business data for 2021, WFBNA had a market share of 3.1 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked ninth out of 122 small business lenders, which placed it in the top 8 percent of lenders. The top lenders in this AA based on market share were U.S. Bank, N.A. (14.8 percent), JPMorgan Chase Bank, N.A. (14.6 percent), and American Express National Bank (13.6 percent).

According to peer small farm data for 2021, WFBNA had a market share of 3.3 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked ninth out of 31 small farm lenders, which placed it in the top 30 percent of lenders. The top lenders in this AA based on market share were State Bank of Cross Plains (24.3 percent), John Deere Financial FSB (20.1 percent), and BMO Harris Bank N.A. (9.3 percent).

Milwaukee CSA

As of June 30, 2021, WFBNA had a deposit market share of 4.3 percent. The bank ranked fifth among 47 depository financial institutions placing it in the top 11 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 4.3 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked second among 609 home mortgage lenders in this AA, which placed it in the top 1 percent of lenders. The other top lenders in this AA based on market share were Landmark Credit Union (9.5 percent), Educators Credit Union (3.9 percent), and UW Credit Union (3.8 percent).

According to peer small business data for 2021, WFBNA had a market share of 2.5 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked 11th out of 174 small business lenders, which placed it in the top 7 percent of lenders. The top lenders in this AA based on market share were U.S. Bank, N.A. (18.3 percent), JPMorgan Chase Bank, N.A. (14.9 percent), and American Express National Bank (11.1 percent).

According to peer small farm data for 2021, WFBNA had a market share of 8.3 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked sixth out of 23 small farm lenders, which placed it in the top 27 percent of lenders. The top lenders in this AA based on market share were U.S. Bank, N.A. (22.9 percent), Town Bank NA (17.8 percent), and JPMorgan Chase Bank, N.A. (14.3 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AAs. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data. The bank's performance was adequate in the Madison CSA and Milwaukee CSA.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies in the Madison CSA, and Milwaukee CSA. The OCC analyzed geographic lending patterns

of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AA.

Madison CSA

Home Mortgage Loans

Refer to Table O in the state of Wisconsin section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans in low-income geographies was below both the percentage of owner-occupied housing units in low-income geographies and the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was well below the percentage of owner-occupied housing units in moderate-income geographies and it was below the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Wisconsin section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

The bank's percentage of small loans to businesses in low-income geographies was significantly below the percentage of businesses in low-income geographies and it was well below the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in moderate-income geographies and the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Wisconsin section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

The bank did not originate or purchase any small loans to farms in low-income geographies. There were very few farms in low-income geographies. The bank's percentage of small loans to farms in moderate-income geographies was below the percentage of farms in moderate-income geographies and it was well below the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Milwaukee CSA***Home Mortgage Loans***

Refer to Table O in the state of Wisconsin section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans in low-income geographies was significantly below the percentage of owner-occupied housing units in low-income geographies and it was well below the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was well below the percentage of owner-occupied housing units in moderate-income geographies and it was below the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Wisconsin section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies was near to the percentage of businesses in low-income geographies and it exceeded the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses in moderate-income geographies and the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Wisconsin section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

The bank did not originate or purchase any small loans to farms in low-income geographies. The bank's percentage of small loans to farms in moderate-income geographies was significantly below the percentage of farms in moderate-income geographies and it was near to the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes. The bank's performance was good in the Madison CSA and Milwaukee CSA.

Madison CSA

Home Mortgage Loans

Refer to Table P in the state of Wisconsin section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and it was below the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was equal to the percentage of moderate-income families and it was near to the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Wisconsin section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 41.9 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was well below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Wisconsin section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was poor.

The bank did not collect or consider the GAR in the underwriting of approximately 73.5 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below both the percentage of farms in the AA with

GAR of \$1 million or less and the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Milwaukee CSA

Home Mortgage Loans

Refer to Table P in the state of Wisconsin section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and it was below the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers approximated the percentage of moderate-income families and it was near to the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Wisconsin section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 28.6 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Wisconsin section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was very poor.

The bank did not collect or consider the GAR in the underwriting of approximately 86.4 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was significantly below both the percentage of farms in the AA with GAR of \$1 million or less and the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Community Development Lending

The bank made an adequate level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

Madison CSA

WFBNA made an adequate level of CD loans in the Madison CSA. WFBNA made 12 CD loans totaling approximately \$3.6 million, which represented 3 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 94.2 percent of these loans funded affordable housing that provided 9 units of affordable housing, 5.7 percent funded revitalization and stabilization efforts, and less than 1 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$728,000 loan for a multifamily housing development located in Baraboo, Wisconsin. This development consisted of 16 two-bedroom units, with 56 percent of the actual rental rates below the 2020 Fair Market Rent for the area. All units were affordable to tenants earning less than 50 percent of the area median family income. The loan was responsive to the identified need for affordable housing.
- WFBNA provided a \$2.6 million loan for a local affordable housing and development organization. The mission of the organization was to stimulate the state's economy and improve the quality of life for Wisconsin residents by providing affordable housing and small business financing products. According to its website, as of April 2018, the organization reflects a valid Community. The loan was responsive to identified need for affordable housing.

Milwaukee CSA

WFBNA made an adequate level of CD loans in the Milwaukee CSA. WFBNA made 16 CD loans totaling approximately \$9.5 million, which represented 1.8 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 56.9 percent of these loans funded affordable housing that provided 147 units of affordable housing, 23.1 percent funded revitalization and stabilization efforts, and 20 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$3 million loan for an affordable multifamily housing development in Milwaukee, Wisconsin. This development was located in a low-income census tract, and it consisted of nine efficiency units, 30 one-bedroom units, 57 two-bedroom units, and 10 three-bedroom units, with 99 percent of the actual rental rates below the 2018 Fair Market Rent for the area. All units were affordable to tenants earning less than 50 percent area median family income. The loan was responsive to identified need for affordable housing.
- WFBNA provided a \$2.2 million loan for an affordable multifamily housing development in Milwaukee, Wisconsin. This development was located in a low-income census tract, and it consisted

of eight efficiency units, 31 one-bedroom units, and 28 two-bedroom units, with 63 percent of the actual rent rates below the 2018 Fair Market Rent for the area. All of the units were affordable to tenants earning less than 52 percent of the area median family income. The loan was responsive to identified need for affordable housing.

Product Innovation and Flexibility

Madison CSA

WFBNA used flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 253 loans under its flexible lending programs totaling \$25.7 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	75	19,000
Dream. Plan. Home.	9	1,700
PPP	169	5,000
Total	253	25,700

Milwaukee CSA

WFBNA made extensive use of, used flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 624 loans under its flexible lending programs totaling \$47 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	126	27,400
Dream. Plan. Home.	23	3,600
PPP	475	16,000
Total	624	47,000

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Appleton CSA, Eau Claire MSA, Fond du Lac MSA, Green Bay MSA, La Crosse MSA, Sheboygan MSA, and Wisconsin Combined Non-MSA was consistent with the bank's overall performance under the Lending Test in the full-scope areas. The bank's performance under the Lending Test in the Wausau MA was weaker than the bank's overall performance under the Lending Test in the full-scope areas. Performance was weaker primarily due to the weaker borrower income distribution.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Wisconsin is rated High Satisfactory. Performance in the limited-scope areas had a neutral effect on the overall Investment Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Madison CSA and Milwaukee CSA was good.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Madison CSA	4	123	19	5,276	23	9.7	5,399	10.7	0	0
Milwaukee CSA	11	2,858	105	19,715	116	49.2	22,573	44.8	5	9,825
Appleton CSA	6	2,228	6	83	12	5.1	2,310	4.6	3	105
Eau Claire MSA	1	882	8	75	9	3.8	957	1.9	0	0
Fond du Lac MSA	1	795	0	0	1	0.4	795	1.6	1	41
Green Bay MSA	4	160	14	164	18	7.6	324	0.6	0	0
La Crosse MSA	5	5,889	23	238	28	11.9	6,126	12.1	1	288
Sheboygan MSA	1	96	12	734	13	5.5	831	1.6	1	257
Wausau MSA	3	1,056	0	0	3	1.3	1,056	2.1	2	47
Wisconsin Combined Non-MSA	2	2,088	0	0	2	0.9	2,088	4.1	2	70
Statewide***	9	3,056	2	4,924	11	4.7	7,980	15.8	9	4,671
Total	47	19,231	189	31,209	236	100.0	50,439	100.0	24	15,304
<p>The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.</p> <p>* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.</p> <p>** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.</p> <p>*** Statewide means investments in statewide programs that have a purpose, mandate, or function to serve one or more of the bank's assessment areas within the state. Due to rounding, totals may not equal 100.0%</p>										

Madison CSA

The bank had a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$5.4 million and represented 4.5 percent of the bank's tier 1 capital allocated to the AA. The investments also included 18 grants and donations totaling \$276,000 to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited good responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 47.8 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 47.8 percent that focused on community services targeted to low- and moderate-income individuals, and 4.3 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 144 units of affordable housing in the AA.

The bank made extensive use of innovative or complex investments to support CD initiatives. Approximately 94.8 percent of current period investment dollars were complex NMTC investments. The following is an example of CD investments made in this AA:

- WFBNA made a \$5 million NMTC investment for the purchase and rehabilitation of 16 single-family homes located in low-income communities in Madison, Wisconsin. This innovative transaction sold homes to families in conjunction with an organization providing culturally relevant financial and homeownership education training and coaching and flexible financing (below market interest rates, relaxed credit score requirements, interest-only loans) during the NMTC compliance period. The project included a savings escrow component that projected each of the 16 families will have built estimated home equity of \$34,500 and average savings of \$11,500 after the seven years. This investment was highly complex because of the inherent nature of NMTC transactions. The investment was responsive to the identified needs for affordable housing and revitalization/stabilization.

Milwaukee CSA

The bank had a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$22.6 million and represented 4.4 percent of the bank's tier 1 capital allocated to the AA. The investments also included 103 grants and donations totaling \$6.3 million to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited good responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 31.9 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 47.4 percent that focused on community services targeted to low- and moderate-income individuals, and 20.7 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 298 units of affordable housing in the AA.

The bank made significant use of innovative or complex investments to support CD initiatives. Approximately 61.9 percent of current period investment dollars were complex LIHTC investments. The following are examples of CD investments made in this AA:

- WFBNA provided a \$12.2 million LIHTC equity investment for an affordable housing development located in Milwaukee, Wisconsin. The development included 85 units restricted to tenants earning up to 60 percent of the area median family income. The investment was complex due to the inherent nature of LIHTC transactions and multiple sources of funding. The investment was responsive to the identified need for affordable housing.
- WFBNA provided grants totaling \$225,000 to a nonprofit CDFI dedicated to helping community residents transform distressed neighborhoods into healthy and sustainable communities of choice

and opportunity. The bank also provided a \$15 million line of credit to the CDFI. The grants were responsive to the identified needs for affordable housing and revitalization/stabilization.

Broader Statewide Investments

WFBNA had 11 current and prior period investments totaling \$8 million with a purpose, mandate, or function to serve one or more AAs in the state. These CD investments were primarily LIHTCs that supported the creation or preservation of affordable housing in the state. These investments were given positive consideration and supported the bank's overall performance under the Investment Test in the state of Wisconsin.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Appleton CSA was consistent with the bank's overall performance under the Investment Test in the full-scope areas. The bank's performance in the Fond du Lac MSA, La Crosse MSA, Wausau MSA, and Wisconsin Combined Non-MSA was stronger than the bank's overall performance under the Investment Test in the full-scope areas primarily due to higher levels of CD investments relative to the bank's presence in those AAs. The bank's performance in the Eau Claire MSA, Green Bay MSA, and Sheboygan MSA was weaker than the bank's overall performance under the Investment Test in the full-scope areas primarily due to lower levels of CD investments relative to the bank's presence and capacity to invest in those AAs.

SERVICE TEST

The bank's performance under the Service Test in the state of Wisconsin is rated Low Satisfactory. Performance in the limited-scope areas had a neutral effect on the overall Service Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Madison CSA and Milwaukee CSA was adequate.

Retail Banking Services

Service delivery systems were accessible to geographies and individuals of different income levels in the bank's full-scope AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Madison CSA	13.4	7	17.9	7.7	3.8	38.5	23.1	3.1	16.0	56.6	21.8
Milwaukee CSA	57.8	13	33.3	0.0	42.9	57.1	0.0	15.6	15.5	35.9	33.0
Appleton CSA	4.5	3	7.7	0.0	42.9	57.1	0.0	0.0	12.9	72.7	14.4
Eau Claire MSA	3.6	2	5.1	7.7	30.8	38.5	23.1	0.0	16.6	70.9	12.5
Fond du Lac MSA	0.9	1	2.6	0.0	0.0	100.0	0.0	3.6	5.7	82.0	8.6
Green Bay MSA	8.8	4	10.3	0.0	0.0	100.0	0.0	1.9	24.1	50.5	23.2
La Crosse MSA	4.3	2	5.1	0.0	0.0	100.0	0.0	2.1	15.7	60.3	17.7
Sheboygan MSA	4.4	3	7.7	0.0	25.0	75.0	0.0	0.0	13.0	72.2	14.8
Wausau MSA	0.8	2	5.1	50.0	0.0	50.0	0.0	1.8	10.9	71.4	15.8
Wisconsin Combined Non-MSA	1.6	2	5.1	0.0	33.3	66.7	0.0	0.0	23.0	57.1	19.9
Total	100.0	39	100.0	0.0	0.0	100.0	0.0	7.9	15.7	50.9	24.8
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Madison CSA	0	0	0	0	0	0
Milwaukee CSA	0	1	0	0	0	-1
Appleton CSA	0	0	0	0	0	0
Eau Claire MSA	0	1	0	-1	0	0
Fond du Lac MSA	0	0	0	0	0	0
Green Bay MSA	0	1	0	0	-1	0
La Crosse MSA	0	0	0	0	0	0
Sheboygan MSA	0	2	0	0	-2	0
Wausau MSA	0	0	0	0	0	0
Wisconsin Combined Non-MSA	0	0	0	0	0	0
Total	0	5	0	-1	-3	-1
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.						

Madison CSA

WFBNA's service delivery systems were accessible to geographies and individuals of different income levels in the Madison CSA. WFBNA operated seven branches in the AA, comprising three branches in moderate-income geographies, and four branches in middle-income geographies. The distribution of branches in low-income geographies was significantly below the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies.

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday and three out of seven branches were opened for business 9:00 a.m. to 12:00 p.m. Saturday.

Milwaukee CSA

WFBNA's service delivery systems were accessible to geographies and individuals of different income levels in the Milwaukee CSA. WFBNA operated 13 branches in the AA, comprising one branch in low-income geographies, four branches in moderate-income geographies, six branches in middle-income geographies, and three branches in upper-income geographies. The distribution of branches in low-income geographies was well below the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies. The distribution was augmented by one branch in a middle- or upper-income geography that served moderate-income areas. Internal customer data for this branch demonstrated a reasonable level of service to customers in low- and moderate-income areas. The middle- or upper-income branch contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches generally has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations. Despite the closures, its service delivery systems remained accessible.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday and 10 out of 13 branches were opened for business 9:00 a.m. to 12:00 p.m. Saturday.

Community Development Services

The bank provided a limited level of CD services.

Madison CSA

WFBNA provided a limited level of CD services in the Madison CSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for six CD service activities to four organizations, logging a total of 18 qualified hours within this AA during the evaluation period.

Milwaukee CSA

WFBNA provided a limited level of CD services in the Milwaukee CSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 39 CD service activities to 14 organizations during the evaluation period, logging a total of 127 qualified hours within this AA. A majority (59 percent) of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The other CD services were targeted to revitalization and stabilization (21 percent), affordable housing (13 percent), and the remaining were for economic development. Providing technical expertise to institutions in terms of board membership and outreach activities comprised 62 percent of the activities, and remaining activities focused on financial education. The bank's assistance provided was responsive to the identified needs in the AA. The following are examples of CD services provided in this AA:

- A WFBNA employee provided eight hours of board service for a local organization that was an affiliate of a global organization that utilized community-led solutions to identify and resolve community concerns with a primary focus on education, financial stability, and health. According to the organization, 95 percent of its clients were low- to moderate-income as they earned less than 80 percent of the area median family income.
- A WFBNA employee provided four hours of financial education to an organization that helped young adults from low-income communities build meaningful careers in banking, through a free, eight-week career training, placement assistance, and ongoing coaching. The organization worked in communities where it can have the greatest impact, where young adults lacked access to employment opportunities, and where employers had positions to fill. The organization provided job training to young adults from low-income communities.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Appleton CSA, Eau Claire MSA, Fond du Lac MSA, and Wausau MSA was consistent with the bank's overall performance under the Service Test in the full-scope areas. The bank's performance under the Service Test in the Green Bay MSA, La Crosse MSA, Sheboygan MSA, and Wisconsin Combined Non-MSA was stronger than the bank's overall performance under the Service Test in the full-scope areas. Performance was stronger primarily due to greater accessibility of retail banking services in low- and moderate-income areas.

State of Wyoming

CRA rating for the State of Wyoming⁵⁴: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited an adequate geographic distribution of loans in its AAs.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank made a low level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments that demonstrated excellent responsiveness to credit and economic development needs, although occasionally in a leadership position. The bank made extensive use of innovative and complex investments to support CD initiatives.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided a limited level of CD services.

Description of Institution's Operations in the State of Wyoming

The state of Wyoming was WFBNA's 33rd largest rating area based on its total deposits in the state. As of June 30, 2021, the bank maintained approximately \$3.2 billion or 0.2 percent of its total domestic deposits in branches within the state. Of the 43 depository financial institutions operating in the bank's AAs within the state, WFBNA, with a deposit market share of 16.94 percent, was the largest. Other top depository financial institutions in the bank's AAs within the state based on market share included First Interstate Bank (16.4 percent), Glacier Bank (6.8 percent), Bank of Jackson Hole (6.4 percent), and U.S. Bank, N.A. (5.2 percent). As of December 31, 2021, the bank operated 17 branches and 30 ATMs in the state. WFBNA delineated 12 AAs within the state; however, the OCC combined, analyzed, and presented those AAs at the CSA level where possible for purposes of this evaluation. This resulted in the following three AAs: Casper, WY MSA (Casper MSA), Cheyenne, WY MSA (Cheyenne MSA), Wyoming Combined Non-MSA. The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and moderate-income geographies. Please refer to appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

Cheyenne MSA

The following table provides a summary of the demographics, including housing and business information for the Cheyenne MSA.

⁵⁴ This rating only reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Cheyenne MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	21	0.0	28.6	47.6	19.0	4.8
Population by Geography	95,431	0.0	27.4	51.1	21.5	0.0
Housing Units by Geography	41,256	0.0	28.4	50.1	21.5	0.0
Owner-Occupied Units by Geography	25,632	0.0	22.8	50.7	26.5	0.0
Occupied Rental Units by Geography	11,662	0.0	36.3	49.7	14.0	0.0
Vacant Units by Geography	3,962	0.0	41.5	47.7	10.9	0.0
Businesses by Geography	10,486	0.0	14.5	68.3	16.8	0.4
Farms by Geography	353	0.0	7.1	70.0	22.9	0.0
Family Distribution by Income Level	24,950	19.5	18.2	23.1	39.3	0.0
Household Distribution by Income Level	37,294	22.5	17.6	18.5	41.4	0.0
Median Family Income MSA - 16940 Cheyenne, WY MSA		\$75,732	Median Housing Value			\$183,531
			Families Below Poverty Level			7.1%
			Median Gross Rent			\$845
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$37,866 and moderate-income families earned at least \$37,866 and less than \$60,586. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$947 for low-income borrowers and \$1,515 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$985. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Information from Moody's Analytics indicated that at the end of the evaluation period, the Cheyenne MSA was still recovering from the impacts of the economic shutdown related to the COVID-19 pandemic. Cheyenne's economy was not out of troubled waters. The unemployment rate was low compared with Wyoming's and the nation's and was less than a percentage point ahead of its late-2019 levels. While the jobless rate for the U.S. continued to decline, Cheyenne's jobless rate was tracking sideways. Cheyenne's economy relies heavily on declining industries such as. Most of the high-wage jobs in the metro area were related to the energy sector, particularly logistical support of oil and coal manufacturing. Cheyenne has a far higher share of low-wage workers and low-skill jobs than the nation. The Cheyenne MSA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Government, Retail Trade, Education and Health Services, and Leisure and Hospitality Services. Major employers in the Cheyenne MSA include F.E. Warren Air Force Base, Cheyenne Regional Medical Center, U.S. Army National Guard, and Veterans Affairs Medical Center. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Cheyenne MSA was 3.1 percent compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Cheyenne MSA. The organizations included one community development organization that helped to address the causes and conditions of poverty and one economic development organization that helped to attract and retain businesses in the area. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing units
- Single-family affordable housing
- Rental assistance
- Rehabilitation of housing units/improvement of the quality of housing stock
- Workforce development
- Financial literacy

Opportunities for participation by financial institutions included the following:

- Home-ownership counseling
- Closing cost assistance
- Affordable home mortgage loans
- Small business lending
- Supporting nonprofit health providers and prevention

Wyoming Combined Non-MSA

The following table provides a summary of the demographics, including housing and business information for the Wyoming Combined Non-MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Wyoming Combined Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	69	2.9	8.7	68.1	20.3	0.0
Population by Geography	324,633	1.5	10.1	66.5	21.8	0.0
Housing Units by Geography	151,453	1.1	9.6	67.3	22.0	0.0
Owner-Occupied Units by Geography	86,194	0.3	9.3	68.5	22.0	0.0
Occupied Rental Units by Geography	39,198	3.1	12.3	67.0	17.6	0.0
Vacant Units by Geography	26,061	0.7	6.6	63.8	29.0	0.0
Businesses by Geography	31,767	1.2	8.8	74.0	15.9	0.0
Farms by Geography	1,502	0.5	10.5	73.8	15.3	0.0
Family Distribution by Income Level	81,217	19.5	17.6	22.1	40.8	0.0
Household Distribution by Income Level	125,392	23.1	15.8	18.3	42.8	0.0
Median Family Income Non-MSAs - WY		\$72,833	Median Housing Value			\$250,608
			Median Gross Rent			\$818
			Families Below Poverty Level			7.5%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information in the above table, low-income families earned less than \$36,417 and moderate-income families earned at least \$36,417 and less than \$58,266. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$910 for low-income borrowers and \$1,457 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$1,345. Low-income borrowers would be challenged to afford a mortgage loan for a median-priced home in this AA.

Wyoming's recovery had stalled. After a milder-than-average contraction in 2020, payrolls stagnated in 2021 and stood further below pre-pandemic levels. Job growth in the key mining industry stalled after employment rose gradually in the first half of 2021. Since mid-2021, the employment rate decreased modestly, keeping in step with the national average; however, improvement in Wyoming's unemployment rate was largely due to a declining labor force. Wyoming is one of only three states in the West for which the population declined from 2015 to 2020. Economic strengths statewide include the abundant natural energy resources, its national parks are a tourism magnet, and low business costs relative to the region. Weaknesses include high employment volatility due to exposure to energy industry, below-average educational attainment, few jobs in tech, value-added services, negative net migration, and low economic vitality. The state has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Government, Leisure and Hospitality Services, Retail Trade, and Education and Health Services. According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the counties that comprise the

Wyoming Combined Non-MSA ranged from a low of 2.5 percent (Teton and Weston counties) to a high of 4.2 percent (Sublette County) compared to the national unemployment rate of 3.7 percent.

Community Contacts

This evaluation considered comments provided by two local organizations that were contacted during the evaluation period and served the Wyoming Combined Non-MSA. The organizations included one community development organization that helped to address the causes and conditions of poverty and one economic development organization that helped to attract and retain businesses in the area. The bank also provided an assessment of community needs based on research it completed in its AAs.

A review of community contacts and the bank's needs assessment indicated that the following were identified needs within the community:

- Affordable rental housing units
- Single-family affordable housing
- Rental assistance
- Rehabilitation of housing units/improvement of the quality of housing stock
- Workforce development
- Financial literacy

Opportunities for participation by financial institutions included the following:

- Home-ownership counseling
- Closing cost assistance
- Affordable home mortgage loans
- Small business lending
- Supporting nonprofit health providers and prevention

Scope of Evaluation in the State of Wyoming

The OCC selected the Cheyenne MSA and Wyoming Combined Non-MSA for full-scope reviews and based conclusions and ratings primarily on activity within these geographical areas. These AAs carried significant weight in determining the overall ratings for the state of Wyoming because of the significance of the bank's presence in these AAs. More weight was given to the Wyoming Combined Non-MSA due to the larger deposit base, lending, and branch presence.

During the evaluation period, the bank originated or purchased 7,180 home mortgage loans, small loans to businesses, and small loans to farms totaling \$957 million. The bank's primary loan products in the rating area were home mortgage loans and small loans to businesses. Small farm lending was not a strategic focus of the bank and thus received minimal weight in reaching overall Lending Test conclusions. Within each AA, the OCC placed more weight based on the number of loans on the bank's lending products that had the highest percentage of loans in arriving at conclusions. In each of the AAs, the OCC placed more weight based on the number of loans on small loans to businesses versus home mortgage loans and small loans to farms. The bank originated too few small loans to farms in the Cheyenne MSA for any meaningful analysis. Therefore, no analysis was performed.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF WYOMING

LENDING TEST

The bank's performance under the Lending Test in the state of Wyoming is rated High Satisfactory. Performance in the limited-scope area had a neutral effect on the overall Lending Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Cheyenne MSA was adequate and the bank's performance in the Wyoming Combined Non-MSA was good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Cheyenne MSA	541	1,124	10	1	1,676	23.3	18.0
Wyoming Combined Non-MSA	1,831	2,656	134	12	4,633	64.4	66.9
Casper MSA	408	470	6	1	885	12.3	15.1
Total	2,780	4,250	150	14	7,194	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Cheyenne MSA	125,864	25,089	296	6	151,255	15.8	18.0
Wyoming Combined Non-MSA	617,563	79,965	5,224	3,062	705,814	73.5	66.9
Casper MSA	85,466	17,372	153	5	102,996	10.7	15.1
Total	828,893	122,426	5,673	3,073	960,065	100.0	100.0
*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Source: Bank Data; Due to rounding, totals may not equal 100.0%							

Cheyenne MSA

As of June 30, 2021, WFBNA had a deposit market share of 23.1 percent. The bank ranked first among 19 depository financial institutions placing it in the top 6 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 2.2 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked 14th among 216 home mortgage lenders in this AA, which placed it in the top 7 percent of lenders. The top lenders in this AA based on market share were First Interstate Bank (7.6 percent), Rocket Mortgage (7.1 percent), and Jonah Bank of Wyoming (6.8 percent).

According to peer small business data for 2021, WFBNA had a market share of 12 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked third out of 100 small business lenders, which placed it in the top 3 percent of lenders. The other top lenders in this AA based on market share were American Express National Bank (20 percent), JPMorgan Chase Bank, N.A. (17 percent), and Bank of America, N.A. (12 percent).

Wyoming Combined Non-MSA

As of June 30, 2021, WFBNA had a deposit market share of 15.8 percent. The bank ranked first among 36 depository financial institutions placing it in the top 3 percent of institutions.

According to peer mortgage data for 2021, WFBNA had a market share of 3.5 percent based on the number of home mortgage loans originated or purchased in this AA. The bank ranked eighth among 335 home mortgage lenders in this AA, which placed it in the top 3 percent of lenders. The top lenders in this AA based on market share were Rocket Mortgage (8.7 percent), First Interstate Bank (5.3 percent), and Freedom Mortgage Corporation (5 percent).

According to peer small business data for 2021, WFBNA had a market share of 9 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked third out of 133 small business lenders, which placed it in the top 3 percent of lenders. The other top lenders in this AA based on market share American Express National Bank (22.6 percent), JPMorgan Chase Bank, N.A. (15 percent), and Capital One Bank (USA), N.A. (8.8 percent).

According to peer small farm data for 2021, WFBNA had a market share of 6.3 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked fourth out of 29 small farm lenders, which placed it in the top 14 percent of lenders. The top lenders in this AA based on market share were Glacier Bank (50.1 percent), First Interstate Bank (18 percent), and John Deere Financial FSB (7.2 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AAs. For this analysis, the OCC compared the bank's public data of HMDA, small loans to businesses, and small loans to farms with available demographic information. The OCC also considered any relevant performance context information and aggregate lending data. The bank's performance was adequate in the Cheyenne MSA and adequate in the Wyoming Combined Non-MSA.

Lending Gap Analysis

The OCC noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies in the Cheyenne MSA and Wyoming Combined Non-MSA. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AA.

Cheyenne MSA

Home Mortgage Loans

Refer to Table O in the state of Wyoming section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

There were no low-income geographies in the AA. The bank's percentage of home mortgage loans in moderate-income geographies was well below the percentage of owner-occupied housing units in moderate-income geographies and it was below the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Wyoming section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

There were no low-income geographies in the AA. The bank's percentage of small loans to businesses in moderate-income geographies was well below the percentage of businesses in moderate-income geographies and it was below the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Wyoming Combined Non-MSA

Home Mortgage Loans

Refer to Table O in the state of Wyoming section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was below the percentage of owner-occupied housing units in low-income geographies and it was well below the aggregate distribution of home mortgage loans in low-income geographies by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies exceeded both the percentage of owner-occupied housing units in moderate-income geographies and the aggregate distribution of home mortgage loans in moderate-income geographies by all lenders.

Small Loans to Businesses

Refer to Table Q in the state of Wyoming section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

The bank's percentage of small loans to businesses in low-income geographies was significantly below both the percentage of businesses and the aggregate distribution of small loans to businesses in low-income geographies by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was below the percentage of businesses in moderate-income geographies and it was near to the aggregate distribution of small loans to businesses in moderate-income geographies by all lenders.

Small Loans to Farms

Refer to Table S in the state of Wyoming section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

The bank did not originate or purchase any small loans to farms in low-income geographies, which was consistent with all lenders. The bank's percentage of small loans to farms in moderate-income geographies was below the percentage of farms in moderate-income geographies and it was significantly below the aggregate distribution of small loans to farms in moderate-income geographies by all lenders.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes. The bank's performance was good in the Cheyenne MSA and good in the Wyoming Combined Non-MSA.

Cheyenne MSA

Home Mortgage Loans

Refer to Table P in the state of Wyoming section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and it was below the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and it was near to the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Wyoming section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 36.7 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was well below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Wyoming Combined Non-MSA***Home Mortgage Loans***

Refer to Table P in the state of Wyoming section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but it was near to the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was near to the percentage of moderate-income families and it approximated the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

Refer to Table R in the state of Wyoming section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the GAR in the underwriting of approximately 33.9 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but it exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Small Loans to Farms

Refer to Table T in the state of Wyoming section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was poor.

The bank did not collect or consider the GAR in the underwriting of approximately 53 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with GAR of \$1 million or less was well below both the percentage of farms in the AA with GAR of \$1 million or less and the aggregate distribution of small loans to farms with GAR of \$1 million or less by all lenders.

Community Development Lending

The bank made few, if any, CD loans. CD lending had a negative effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualified as CD loans.

Cheyenne MSA

WFBNA made few, if any, CD loans in the Cheyenne MSA. WFBNA made one CD loan totaling \$5,600, which represented less than 1 percent of the allocated tier 1 capital. The loan was made for affordable housing purposes targeted to low- and moderate-income individuals.

Wyoming Combined Non-MSA

WFBNA made a low level of CD loans in the Wyoming Combined Non-MSA. WFBNA made 12 CD loans totaling approximately \$3.1 million, which represented 1.1 percent of the allocated tier 1 capital. CD loans were primarily made for affordable housing purposes. By dollar volume, 98.1 percent of these loans funded affordable housing projects that provided 65 units of affordable housing, 1.7 percent funded revitalization and stabilization efforts, and less than 1 percent funded community services targeted to low- and moderate-income individuals. The following are examples of CD loans made in this AA:

- WFBNA provided a \$4 million line of credit for a nonprofit scholarship fund that provided scholarships to students, as well as related support services. Of this total loan, \$7,909 was allocated to the Wyoming Combined Non-MSA. The organization was the nation's largest nonprofit organization supporting higher education and has awarded over \$400 million in scholarships to qualified students. The organization also provided a range of ancillary programs for candidates, scholars, and their families. Over two-thirds of the financial resources provided were to low-income families. According to the organization, 100 percent of its clients were low- and moderate-income as they earned less than 80 percent of the area median family income.

- WFBNA provided a \$10 million term loan for a Low-Income Investment Fund (LIIF) dedicated to creating pathways of opportunity for low-income people and communities. Of this total loan, \$19,773 was allocated to the Wyoming Combined Non-MSA. The LIIF fostered healthy communities by providing a bridge between private capital markets and low-income neighborhoods. By investing capital and providing technical assistance for affordable housing, childcare, education, and other community development organizations, LIIF spurred economic advancement for the very poor. According to the organization, 100 percent of its clients were low- and moderate-income as they earned less than 80 percent of the area median family income.
- WFBNA provided a \$20 million term loan for a nonprofit CDFI dedicated to improving access to high-quality health and elder care, healthy foods, housing, and education for low-income communities across the country. Of this total loan, \$39,546 was allocated to the Wyoming Combined Non-MSA. This nonprofit had been lending since 1982, and while it started its lending history making loans only to cooperatives, it became most active in lending to charter schools and community health facilities.

Product Innovation and Flexibility

Cheyenne MSA

WFBNA used flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 131 loans under its flexible lending programs totaling \$5.7 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	7	1,900
Dream. Plan. Home.	1	200
PPP	123	3,600
Total	131	5,700

Wyoming Combined Non-MSA

WFBNA made extensive use of flexible lending practices in order to serve AA credit needs. As shown in the table below, WFBNA originated or purchased 440 loans under its flexible lending programs totaling \$29.4 million. Refer to the comments in the Flexible Lending Programs and Other Lending Information section of this PE for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (\$000s)
yourFirstMortgage	70	16,700
Dream. Plan. Home.	8	1,900
PPP	362	10,800
Total	440	29,400

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Casper MSA was consistent with the bank's overall performance under the Lending Test in the full-scope areas.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Wyoming is rated Outstanding. Performance in the limited-scope area had a neutral effect on the overall Investment Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Cheyenne MSA and Wyoming Combined Non-MSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Cheyenne MSA	3	9,297	17	7,800	20	18.9	17,097	8.7	3	272
Wyoming Combined Non-MSA	7	4,441	57	21,134	64	60.4	25,576	13.0	5	498
Casper MSA	1	4,430	19	237	20	18.9	4,667	2.4	1	106
Statewide***	1	147	1	3	2	1.9	150	76.0	0	0
Total	12	18,315	94	29,174	106	100.0	47,490	100.0	9	876
<p>The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.</p> <p>* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.</p> <p>** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.</p> <p>*** Statewide means investments in statewide programs that have a purpose, mandate, or function to serve one or more of the bank's assessment areas within the state. Due to rounding, totals may not equal 100.0%</p>										

Cheyenne MSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The current and prior period qualified investments totaled \$17.1 million and represented 23 percent of the bank's tier 1 capital allocated to the AA. The investments also included 16 grants and donations totaling \$141,000 to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 30 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA and 70 percent that focused on community services targeted to low- and

moderate-income individuals. In total, the bank's investments helped create or retain 180 units of affordable housing in the AA.

The bank made extensive use of innovative or complex investments to support CD initiatives. Approximately 98.2 percent of current period investment dollars were complex LIHTC investments. The following is an example of CD investments made in this AA:

- WFBNA invested \$13.8 million in an LIHTC fund. Of this total investment, \$7.6 million supported an LIHTC development located in Cheyenne, Wyoming with 72 units restricted to tenants earning up to 60 percent of the AMI. The investment was complex due to the inherent nature of LIHTC transactions and multiple sources of financing. The investment was responsive to the identified need for affordable housing.

Wyoming Combined Non-MSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private.

The current and prior period qualified investments totaled \$25.6 million and represented 9.2 percent of the bank's tier 1 capital allocated to the AA. The investments also included 55 grants and donations totaling \$961,000 to a variety of organizations that primarily supported affordable housing, economic development, and community services.

The bank exhibited excellent responsiveness to community development needs including economic development, affordable housing, community services targeted to low- and moderate-income individuals, and revitalization/stabilization for low- and moderate-income geographies. Approximately 29.7 percent of the bank's investment dollars focused on affordable housing, a primary community development need in the AA, 56.3 percent that focused on community services targeted to low- and moderate-income individuals, and 14.1 percent that focused on economic development and revitalization/stabilization of low- and moderate-income individuals and geographies. In total, the bank's investments helped create or retain 107 units of affordable housing in the AA.

The bank made extensive use of innovative or complex investments to support CD initiatives. Approximately 95.5 percent of current period investment dollars were complex LIHTC and NMTC investments. The following are examples of CD investments made in this AA:

- WFBNA made an \$18 million NMTC investment for the construction of an addition to a hospital in Laramie, Wyoming that qualified as a Sole Community Hospital, as defined by the Social Security Act. The hospital served patients across a broad rural area of more than 200 square miles. The addition provided a modern women's health, pediatrics, and family care clinic. The project created 60 new permanent jobs and approximately 120 construction jobs. The investment was highly complex due to the nature of NMTC transactions. The investment was responsive to the identified needs for revitalization/stabilization and access to healthcare.
- WFBNA invested \$28 million in an LIHTC fund that benefitted multiple AAs. Of the total investment, \$2.1 million supported a 75-unit affordable housing development in Sheridan, Wyoming. All units were restricted to tenants earning up to 60 percent of the AMI. The investment

was complex due to the nature of LIHTC transactions and multiple sources of funding. The investment was responsive to the identified need for affordable housing.

Broader Statewide Investments

WFBNA had two current and prior period investments totaling \$149,964 with a purpose, mandate, or function to serve one or more AAs in the state. These CD investments were primarily LIHTCs that supported the creation or preservation of affordable housing in the state. These investments were given positive consideration and supported the bank's overall performance under the Investment Test in the state of Wyoming.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review the bank's performance under the Investment Test in the Casper MSA was consistent with the bank's overall performance under the Investment Test in the full-scope areas.

SERVICE TEST

The bank's performance under the Service Test in the state of Wyoming is rated High Satisfactory. Performance in the limited-scope area had a neutral effect on the overall Service Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Cheyenne MSA was excellent and the bank's performance in the Wyoming Combined Non-MSA was good.

Retail Banking Services

Service delivery systems were readily accessible to, geographies and individuals of different income levels in the bank's full-scope AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Cheyenne MSA	18.0	2	11.8	0.0	50.0	50.0	0.0	0.0	27.4	51.1	21.5
Wyoming Combined Non-MSA	66.9	12	70.6	8.3	8.3	66.7	16.7	1.5	10.1	66.5	21.8
Casper MSA	15.1	3	17.6	33.3	33.3	33.3	0.0	5.7	11.3	68.4	14.5
Total	100.0	17	100.0	11.8	17.6	58.8	11.8	1.9	13.6	63.9	20.6
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Due to rounding, totals may not equal 100.0 percent.											

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Cheyenne MSA	0	0	0	0	0	0
Wyoming Combined Non-MSA	0	5	0	-1	-2	-2
Casper MSA	0	0	0	0	0	0
Total	0	5	0	-1	-2	-2
The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.						

Cheyenne MSA

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Cheyenne MSA. WFBNA operated two branches in the AA, comprising one branch in a moderate-income geography and one branch in a middle-income geography. There were no low-income geographies. The distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies. The distribution was augmented by one branch in a middle- or upper-income geography that served moderate-income areas. Internal customer data for this branch demonstrated a reasonable level of service to customers in low- and moderate-income areas. The middle- or upper-income branch contributed positively to the service delivery systems conclusion.

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday and one branch was opened 9:00 a.m. to 12:00 p.m. Saturday.

Wyoming Combined Non-MSA

WFBNA's service delivery systems were readily accessible to geographies and individuals of different income levels in the Wyoming Combined Non-MSA. WFBNA operated 12 branches in the AA, comprising one branch in a low-income geography, one branch in a moderate-income geography, eight branches in middle-income geographies, and two branches in upper-income geographies. The distribution of branches in low-income geographies exceeded the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies was near to the distribution of the population in moderate-income geographies. The distribution was augmented by two branches in middle- and upper-income geographies that were within close proximity and served moderate-income areas. Internal customer data for these branches demonstrated a reasonable level of service to customers in low- and moderate-income areas. These middle- and upper-income branches contributed positively to the service delivery systems conclusion.

To the extent changes have been made, the bank's record of opening and closing of branches generally has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. WFBNA closed branches primarily due to the low customer traffic, poor operating performance, or to reduce redundancy in branching locations. Despite the closures, its service delivery systems remained readily accessible.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank offered traditional products and services at its branches such as personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, business, home equity, lines of credit, and personal loans. Branches were opened for business 9:00 a.m. to 5:00 p.m. Monday through Friday and five out of 12 branches were opened for business 9:00 a.m. to 12:00 p.m. Saturday.

Community Development Services

The bank provided a limited level of CD services.

Cheyenne MSA

WFBNA provided an adequate level of CD services in the Cheyenne MSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 25 CD service activities to two organizations, logging a total of 43 hours during the evaluation period. All of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. Board membership in organizations that catered to low- and moderate-income communities comprised 92 percent of the CD service activities, and the remaining was focused on financial education. The bank's assistance provided was responsive to the identified needs in the AA. The following is an example of CD services provided in this AA:

- WFBNA employees provided 39 hours of technical expertise in terms of board membership for an organization that had a mission to provide the most essential needs of low- and moderate-income communities through a food pantry, thrift store, and provided school supplies and holiday meals. The organization also offered other low- and moderate-income services such as adopting a family through a volunteer program. This activity was responsive to the identified need for community services within the AA.

Wyoming Combined Non-MSA

WFBNA provided a limited level of CD services in the Wyoming Combined Non-MSA. Bank records showed that employees provided their financial or job-related expertise and/or technical assistance for 37 CD service activities to seven organizations, logging a total of 47 hours during the evaluation period. All of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families focusing on financial education and outreach. The bank's assistance provided was responsive to the identified needs in the AA. The following is an example of CD services provided in this AA:

- WFBNA employees provided 29 hours of financial education to an organization that was funded by the U.S. government and provided free career training and education to low- and moderate-income

youth. Through its services, the organization's students were able to gain the experience needed to begin a career and if desired proceed to higher education. The organization provided a variety of skillset training through in-person career technical and on the job training in 10 high-growth industries. The organization also assisted the low- and moderate-income youth to earn their high school diploma or the equivalent and a driver's license to get to the job location. Other services that the organization provided included career planning, job placement services, housing, food, health and dental care, a biweekly basic living allowance, and basic uniforms and equipment for career training. This activity was responsive to the need for community services within the AA.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Casper MSA was stronger than the bank's overall performance under the Service Test in the full-scope areas. CD services were not evaluated in the limited-scope AA, which resulted in stronger performance.

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 MSAs and non-MSAs 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:	(01/01/2019 to 12/31/2021)	
Bank Products Reviewed:	Home mortgage, small business, small farm, CD loans, CD investments, CD services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Wells Fargo Foundation	Affiliate	CD Investments (Grants)

List of Assessment Areas and Type of Examination					
Rating Area	Exam Type	Assessment Area Name	Metropolitan Areas	States	Counties
Allentown-Bethlehem-Easton, PA-NJ	Full-Scope	Allentown MSA	Allentown-Bethlehem-Easton, PA-NJ MSA	NJ	Warren
				PA	Carbon
					Lehigh
					Northampton
Augusta-Richmond County, GA-SC	Full-Scope	Augusta MSA	Augusta-Richmond County, GA-SC MSA	GA	Burke
					Columbia
					Lincoln
					McDuffie
					Richmond
				SC	Aiken
Charlotte-Concord, NC-SC	Full-Scope	Charlotte CSA	Albemarle, NC Micro Area	NC	Stanly
			Charlotte-Concord-Gastonia, NC-SC MSA	NC	Anson
					Cabarrus
					Gaston
					Iredell
					Lincoln
					Mecklenburg
					Rowan
					Union
				SC	Chester
					Lancaster
		Columbus CSA	Auburn-Opelika, AL MSA	AL	York
					Cleveland
		Columbus CSA	Auburn-Opelika, AL MSA	AL	Lee

Columbus-Auburn- Opelika, GA-AL	Full- Scope		Columbus, GA-AL MSA	AL	Russell
				GA	Chattahoochee
					Harris
					Marion
					Muscogee
					Stewart
					Talbot
Davenport-Moline, IA- IL	Full- Scope	Davenport MSA	Davenport-Moline-Rock Island, IA-IL MSA	IL	Henry
					Mercer
					Rock Island
				IA	Scott
Fargo-Wahpeton, ND- MN	Full- Scope	Fargo CSA	Fargo, ND-MN MSA	MN	Clay
				ND	Cass
			Wahpeton, ND Micro Area	ND	Richland
Grand Forks, ND-MN	Full- Scope	Grand Forks MSA	Grand Forks, ND-MN MSA	MN	Polk
				ND	Grand Forks
Logan, UT-ID	Full- Scope	Logan MSA	Logan, UT-ID MSA	ID	Franklin
				UT	Cache
Memphis, TN-MS	Full- Scope	Memphis MSA	Memphis, TN-MS MSA	MS	DeSoto
					Marshall
					Tate
					Tunica
				TN	Fayette
					Shelby
					Tipton
Minneapolis-St. Paul, MN-WI	Full- Scope	Minneapolis CSA	Faribault-Northfield, MN Micro Area	MN	Rice
			Hutchinson, MN Micro Area	MN	McLeod
			Minneapolis-St. Paul- Bloomington, MN-WI MSA	MN	Anoka
					Carver
					Chisago
					Dakota
					Hennepin
					Isanti
					Le Sueur
					Mille Lacs
					Ramsey
					Scott
					Sherburne
					Washington
					Wright
				WI	Pierce
					St. Croix

			Owatonna, MN Micro Area	MN	Steele
			Red Wing, MN Micro Area	MN	Goodhue
			St. Cloud, MN MSA	MN	Benton
					Stearns
Myrtle Beach-Conway, SC-NC	Full-Scope	Myrtle Beach CSA	Georgetown, SC Micro Area	SC	Georgetown
			Myrtle Beach-Conway-North Myrtle Beach, SC-NC MSA	NC	Brunswick
				SC	Horry
New York-Newark, NY-NJ-CT-PA	Full-Scope	New York CSA	Bridgeport-Stamford-Norwalk, CT MSA	CT	Fairfield
			New Haven-Milford, CT MSA	CT	New Haven
			Torrington, CT Micro Area	CT	Litchfield
			New Brunswick-Lakewood, NJ MD	NJ	Middlesex
					Monmouth
					Ocean
					Somerset
			Newark, NJ-PA MD	NJ	Essex
					Hunterdon
					Morris
					Sussex
					Union
				PA	Pike
			Trenton-Princeton, NJ MSA	NJ	Mercer
			Kingston, NY MSA	NY	Ulster
			Nassau County-Suffolk County, NY MD	NY	Nassau
					Suffolk
			New York-Jersey City-White Plains, NY-NJ MD	NJ	Bergen
					Hudson
					Passaic
				NY	Bronx
					Kings
					New York
					Putnam
					Queens
					Richmond
					Rockland
					Westchester
			Poughkeepsie-Newburgh-Middletown, NY MSA	NY	Dutchess
					Orange
			East Stroudsburg, PA MSA	PA	Monroe
Omaha-Council Bluffs, NE-IA	Full-Scope	Omaha MSA	Omaha-Council Bluffs, NE-IA MSA	IA	Harrison
				Mills	
				Pottawattamie	
				NE	Cass

					Douglas
					Sarpy
					Saunders
					Washington
Philadelphia-Reading-Camden, PA-NJ-DE	Full-Scope	Philadelphia CSA	Dover, DE MSA	DE	Kent
			Wilmington, DE MD	DE	New Castle
			Atlantic City-Hammonton, NJ MSA	NJ	Atlantic
			Camden, NJ MD	NJ	Burlington
					Camden
					Gloucester
			Ocean City, NJ MSA	NJ	Cape May
			Montgomery County-Bucks County-Chester County, PA MD	PA	Bucks
					Chester
					Montgomery
			Philadelphia, PA MD	PA	Delaware
					Philadelphia
			Reading, PA MSA	PA	Berks
Portland-Vancouver-Salem, OR-WA	Full-Scope	Portland CSA	Albany-Lebanon, OR MSA	OR	Linn
			Corvallis, OR MSA	OR	Benton
			Portland-Vancouver-Hillsboro, OR-WA MSA	OR	Clackamas
					Columbia
					Multnomah
					Washington
					Yamhill
				WA	Clark
					Skamania
			Salem, OR MSA	OR	Marion
					Polk
Texarkana, TX-AR	Full-Scope	Texarkana MSA	Texarkana, TX-AR MSA	AR	Little River
					Miller
				TX	Bowie
Washington-Baltimore-Arlington, DC-MD-VA	Full-Scope	Washington CSA	Washington-Arlington-Alexandria, DC-VA-MD MD	DC	District of Columbia
				MD	Calvert
					Charles
					Prince George's
				VA	Alexandria City
					Arlington
					Clarke
					Culpeper
					Fairfax
					Fairfax City

					Falls Church City
					Fauquier
					Fredericksburg City
					Loudoun
					Madison
					Manassas City
					Manassas Park City
					Prince William
					Rappahannock
					Spotsylvania
					Stafford
					Warren
			Baltimore-Columbia-Towson, MD MSA	MD	Anne Arundel
					Baltimore
					Baltimore City
					Carroll
					Harford
					Howard
					Queen Anne's
			Frederick-Gaithersburg-Rockville, MD MD	MD	Frederick
					Montgomery
			Winchester, VA MSA	VA	Frederick
					Winchester City
Alabama	Full-Scope	Birmingham CSA	Birmingham-Hoover, AL MSA	AL	Bibb
					Blount
					Chilton
					Jefferson
					Shelby
					St. Clair
			Cullman, AL Micro Area	AL	Cullman
			Jasper, AL Micro Area	AL	Walker
			Talladega-Sylacauga, AL Micro Area	AL	Talladega
	Full-Scope	Mobile CSA	Daphne-Fairhope-Foley, AL MSA	AL	Baldwin
			Mobile, AL MSA	AL	Mobile
					Washington
	Limited-Scope	Anniston MSA	Anniston-Oxford, AL MSA	AL	Calhoun
	Limited-Scope	Dothan CSA	Dothan, AL MSA	AL	Geneva
					Henry
					Houston
			Ozark, AL Micro Area	AL	Dale
	Limited-Scope	Florence MSA	Florence-Muscle Shoals, AL MSA	AL	Colbert
					Lauderdale

	Limited-Scope	Gadsden MSA	Gadsden, AL MSA	AL	Etowah
	Limited-Scope	Huntsville CSA	Decatur, AL MSA	AL	Lawrence
					Morgan
			Huntsville, AL MSA	AL	Limestone
					Madison
	Limited-Scope	Montgomery CSA	Alexander City, AL Micro Area	AL	Coosa
			Montgomery, AL MSA	AL	Tallapoosa
					Autauga
					Elmore
					Lowndes
					Montgomery
			Selma, AL Micro Area	AL	Dallas
	Limited-Scope	Tuscaloosa MSA	Tuscaloosa, AL MSA	AL	Greene
					Hale
					Pickens
					Tuscaloosa
	Limited-Scope	Alabama Combined Non-MSA	Albertville, AL Micro Area	AL	Marshall
			Andalusia, AL Non-Metro	AL	Covington
			Enterprise, AL Micro Area	AL	Coffee
			Hamilton, AL Non-Metro	AL	Marion
			Roanoke, AL Non-Metro	AL	Clay
					Randolph
			Troy, AL Micro Area	AL	Pike
Alaska	Full-Scope	Anchorage MSA	Anchorage, AK MSA	AK	Anchorage Municipality
					Matanuska-Susitna Borough
	Full-Scope	Alaska Combined Non-MSA	Barrow-Nome, AK Non-Metro	AK	Nome Census Area
					North Slope Borough
					Northwest Arctic Borough
			Juneau, AK Micro Area	AK	Juneau City and Borough
			Ketchikan, AK Micro Area	AK	Ketchikan Gateway Borough
			Petersburg-Skagway-Sitka, AK Non-Metro	AK	Petersburg Borough
					Prince of Wales-Hyder Census Area
					Sitka City and Borough
					Skagway Municipality
					Wrangell City and Borough
			Soldotna-Valdez, AK Non-Metro	AK	Bethel Census Area
					Bristol Bay Borough

					Dillingham Census Area
					Kenai Peninsula Borough
					Kodiak Island Borough
					Southeast Fairbanks Census Area
					Valdez-Cordova Census Area
	Limited-Scope	Fairbanks MSA	Fairbanks, AK MSA	AK	Fairbanks North Star Borough
Arizona	Full-Scope	Phoenix CSA	Payson, AZ Micro Area	AZ	Gila
			Phoenix-Mesa-Chandler, AZ MSA	AZ	Maricopa
					Pinal
	Full-Scope	Tucson CSA	Nogales, AZ Micro Area	AZ	Santa Cruz
			Tucson, AZ MSA	AZ	Pima
	Limited-Scope	Flagstaff MSA	Flagstaff, AZ MSA	AZ	Coconino
	Limited-Scope	Lake Havasu City MSA	Lake Havasu City-Kingman, AZ MSA	AZ	Mohave
	Limited-Scope	Prescott Valley MSA	Prescott Valley-Prescott, AZ MSA	AZ	Yavapai
	Limited-Scope	Sierra Vista MSA	Sierra Vista-Douglas, AZ MSA	AZ	Cochise
	Limited-Scope	Yuma MSA	Yuma, AZ MSA	AZ	Yuma
	Limited-Scope	Arizona Combined Non-MSA	Parker, AZ Non-Metro	AZ	La Paz
			Safford, AZ Micro Area	AZ	Graham
			Show Low, AZ Micro Area	AZ	Navajo
			St. Johns, AZ Non-Metro	AZ	Apache
California	Full-Scope	Fresno CSA	Fresno, CA MSA	CA	Fresno
			Hanford-Corcoran, CA MSA	CA	Kings
			Madera, CA MSA	CA	Madera
	Full-Scope	Los Angeles CSA	Anaheim-Santa Ana-Irvine, CA MD	CA	Orange
			Los Angeles-Long Beach-Glendale, CA MD	CA	Los Angeles
			Oxnard-Thousand Oaks-Ventura, CA MSA	CA	Ventura
			Riverside-San Bernardino-Ontario, CA MSA	CA	Riverside
					San Bernardino
	Full-Scope	San Diego MSA	San Diego-Chula Vista-Carlsbad, CA MSA	CA	San Diego
	Full-Scope	San Jose CSA	Merced, CA MSA	CA	Merced
			Modesto, CA MSA	CA	Stanislaus
			Napa, CA MSA	CA	Napa
			Oakland-Berkeley-Livermore, CA MD	CA	Alameda
					Contra Costa
			San Francisco-San Mateo-Redwood City, CA MD	CA	San Francisco
					San Mateo
				CA	San Benito

			San Jose-Sunnyvale-Santa Clara, CA MSA		Santa Clara
			San Rafael, CA MD	CA	Marin
			Santa Cruz-Watsonville, CA MSA	CA	Santa Cruz
			Santa Rosa-Petaluma, CA MSA	CA	Sonoma
			Stockton, CA MSA	CA	San Joaquin
			Vallejo, CA MSA	CA	Solano
	Limited-Scope	Bakersfield MSA	Bakersfield, CA MSA	CA	Kern
	Limited-Scope	Chico MSA	Chico, CA MSA	CA	Butte
	Limited-Scope	El Centro MSA	El Centro, CA MSA	CA	Imperial
	Limited-Scope	Redding CSA	Red Bluff, CA Micro Area	CA	Tehama
			Redding, CA MSA	CA	Shasta
	Limited-Scope	Sacramento CSA	Sacramento-Roseville-Folsom, CA MSA	CA	El Dorado
					Placer
					Sacramento
					Yolo
			Truckee-Grass Valley, CA Micro Area	CA	Nevada
			Yuba City, CA MSA	CA	Sutter
	Limited-Scope	Salinas MSA	Salinas, CA MSA	CA	Yuba
	Limited-Scope	San Luis Obispo MSA	San Luis Obispo-Paso Robles, CA MSA	CA	Monterey
	Limited-Scope	Santa Maria MSA	Santa Maria-Santa Barbara, CA MSA	CA	San Luis Obispo
	Limited-Scope	Visalia MSA	Visalia, CA MSA	CA	Santa Barbara
	Limited-Scope	California Combined Non-MSA	Bishop, CA Non-Metro	CA	Tulare
			Clearlake, CA Micro Area	CA	Inyo
			Colusa, CA Non-Metro	CA	Lake
			Downieville, CA Non-Metro	CA	Colusa
			Eureka-Arcata, CA Micro Area	CA	Sierra
			Jackson-San Andreas, CA Non-Metro	CA	Humboldt
					Amador
			Mammoth Lakes, CA Non-Metro	CA	Calaveras
			Sonora, CA Micro Area	CA	Mono
			Ukiah, CA Micro Area	CA	Tuolumne
Colorado	Full-Scope	Denver CSA	Boulder, CO MSA	CO	Mendocino
			Denver-Aurora-Lakewood, CO MSA	CO	Siskiyou
					Boulder
					Adams
					Arapahoe
					Broomfield
					Clear Creek
					Denver
					Douglas

					Elbert
					Gilpin
					Jefferson
					Park
			Greeley, CO MSA	CO	Weld
	Limited-Scope	Colorado Springs MSA	Colorado Springs, CO MSA	CO	El Paso
					Teller
	Limited-Scope	Fort Collins MSA	Fort Collins, CO MSA	CO	Larimer
	Limited-Scope	Grand Junction MSA	Grand Junction, CO MSA	CO	Mesa
	Limited-Scope	Pueblo CSA	Canon City, CO Micro Area	CO	Fremont
			Pueblo, CO MSA	CO	Pueblo
	Limited-Scope	Colorado Combined Non-MSA	Breckenridge, CO Micro Area	CO	Summit
			Delta-Gunnison, CO Non-Metro	CO	Delta
					Gunnison
			Durango, CO Micro Area	CO	La Plata
			Edwards, CO Micro Area	CO	Eagle
			Fort Morgan, CO Micro Area	CO	Morgan
			Glenwood Springs, CO Micro Area	CO	Garfield
					Pitkin
			Montrose, CO Micro Area	CO	Montrose
					Ouray
			Pagosa Springs, CO Non-Metro	CO	Archuleta
			Steamboat Springs, CO Micro Area	CO	Routt
			Sterling, CO Micro Area	CO	Logan
			Telluride, CO Non-Metro	CO	San Miguel
			Westcliffe, CO Non-Metro	CO	Custer
			Winter Park, CO Non-Metro	CO	Grand
Connecticut	Full-Scope	Hartford MSA	Hartford-East Hartford-Middletown, CT MSA	CT	Hartford
					Middlesex
					Tolland
Delaware	Full-Scope	Salisbury MSA	Salisbury, DE MSA	DE	Sussex
Florida	Full-Scope	Jacksonville CSA	Jacksonville, FL MSA	FL	Baker
					Clay
					Duval
					Nassau
					St. Johns
	Full-Scope	Miami CSA	Fort Lauderdale-Pompano Beach-Sunrise, FL MD	FL	Broward
			Key West, FL Micro Area	FL	Monroe
			Miami-Miami Beach-Kendall, FL MD	FL	Miami-Dade
			Port St. Lucie, FL MSA	FL	Martin
					St. Lucie
			Sebastian-Vero Beach, FL MSA	FL	Indian River
			West Palm Beach-Boca Raton-Boynton Beach, FL MD	FL	Palm Beach

	Full-Scope	Orlando CSA	Deltona-Daytona Beach-Ormond Beach, FL MSA	FL	Flagler
					Volusia
			Lakeland-Winter Haven, FL MSA	FL	Polk
			Orlando-Kissimmee-Sanford, FL MSA	FL	Lake
					Orange
					Osceola
					Seminole
			The Villages, FL MSA	FL	Sumter
	Limited-Scope	Cape Coral CSA	Cape Coral-Fort Myers, FL MSA	FL	Lee
			Naples-Marco Island, FL MSA	FL	Collier
	Limited-Scope	Crestview MSA	Crestview-Fort Walton Beach-Destin, FL MSA	FL	Okaloosa
					Walton
	Limited-Scope	Gainesville CSA	Gainesville, FL MSA	FL	Alachua
					Gilchrist
					Levy
	Limited-Scope	Homosassa Springs MSA	Homosassa Springs, FL MSA	FL	Citrus
	Limited-Scope	North Port CSA	Arcadia, FL Micro Area	FL	DeSoto
			North Port-Sarasota-Bradenton, FL MSA	FL	Manatee
			Punta Gorda, FL MSA	FL	Sarasota
	Limited-Scope	Ocala MSA	Ocala, FL MSA	FL	Charlotte
					Marion
					Brevard
	Limited-Scope	Palm Bay MSA	Palm Bay-Melbourne-Titusville, FL MSA	FL	Bay
	Limited-Scope	Panama City MSA	Panama City, FL MSA	FL	
	Limited-Scope	Pensacola CSA	Pensacola-Ferry Pass-Brent, FL MSA	FL	Escambia
					Santa Rosa
	Limited-Scope	Sebring MSA	Sebring-Avon Park, FL MSA	FL	Highlands
	Limited-Scope	Tallahassee MSA	Tallahassee, FL MSA	FL	Gadsden
					Jefferson
					Leon
					Wakulla
	Limited-Scope	Tampa MSA	Tampa-St. Petersburg-Clearwater, FL MSA	FL	Hernando
					Hillsborough
					Pasco
					Pinellas
	Limited-Scope	Florida Combined Non-MSA	Jackson-Marianna, FL Non-Metro	FL	Holmes
					Jackson
					Washington
			Madison-Perry, FL Non-Metro	FL	Madison
Georgia	Full-Scope	Atlanta CSA	Athens-Clarke County, GA MSA	GA	Taylor
					Clarke
					Madison
					Oconee
				GA	Oglethorpe
				GA	Barrow

			Atlanta-Sandy Springs-Alpharetta, GA MSA		Bartow
					Butts
					Carroll
					Cherokee
					Clayton
					Cobb
					Coweta
					Dawson
					DeKalb
					Douglas
					Fayette
					Forsyth
					Fulton
					Gwinnett
					Haralson
					Heard
					Henry
					Jasper
					Lamar
					Meriwether
					Morgan
					Newton
					Paulding
					Pickens
					Pike
					Rockdale
					Spalding
					Walton
			Gainesville, GA MSA	GA	Hall
			Jefferson, GA Micro Area	GA	Jackson
			Rome, GA MSA	GA	Floyd
	Full-Scope	Chattanooga CSA	Calhoun, GA Micro Area	GA	Gordon
			Chattanooga, GA MSA	GA	Catoosa
					Dade
					Walker
			Dalton, GA MSA	GA	Murray
	Limited-Scope	Brunswick MSA	Brunswick, GA MSA	GA	Whitfield
					Brantley
					Glynn
	Limited-Scope	Macon CSA	Macon-Bibb County, GA MSA	GA	McIntosh
					Bibb
					Crawford
					Jones
					Monroe
			Warner Robins, GA MSA	GA	Twiggs
					Houston
	Limited-Scope	Savannah CSA	Hinesville, GA MSA	GA	Peach
			Savannah, GA MSA	GA	Liberty
					Long
			Savannah, GA MSA	GA	Bryan

	Limited-Scope	Georgia Combined Non-MSA			Chatham
					Effingham
			Statesboro, GA Micro Area	GA	Bulloch
			Americus, GA Micro Area	GA	Schley
					Sumter
			Dahlonega, GA Non-Metro	GA	Lumpkin
			Douglas, GA Micro Area	GA	Atkinson
					Coffee
			Dublin, GA Micro Area	GA	Johnson
					Laurens
					Treutlen
			Fitzgerald, GA Micro Area	GA	Ben Hill
			Greensboro, GA Non-Metro	GA	Greene
Idaho	Full-Scope	Boise City CSA	Boise City, ID MSA	ID	Ada
					Boise
					Canyon
					Gem
					Owyhee
	Full-Scope	Coeur d'Alene MSA	Mountain Home, ID Micro Area	ID	Elmore
					Kootenai
	Limited-Scope	Idaho Falls CSA	Blackfoot, ID Micro Area	ID	Bingham
					Bonneville
					Butte
					Jefferson
	Limited-Scope	Lewiston MSA	Rexburg, ID Micro Area	ID	Fremont
					Madison
	Limited-Scope	Pocatello MSA	Lewiston, ID MSA	ID	Nez Perce
					Bannock
					Power
	Limited-Scope	Twin Falls MSA	Pocatello, ID MSA	ID	Jerome
					Twin Falls
	Limited-Scope	Idaho Combined Non-MSA	Twin Falls, ID MSA	ID	Boundary
					Cassia
					Minidoka
					Teton
					Gooding
					Lincoln
					Benewah
					Clearwater
					Custer
					Idaho
	Limited-Scope	Idaho Combined Non-MSA	Grangeville-Orofino, ID Non-Metro	ID	Lemhi
					Lewis
					Shoshone
	Limited-Scope	Idaho Combined Non-MSA	Hailey, ID Micro Area	ID	Blaine

					Camas
			Moscow, ID Micro Area	ID	Latah
			Sandpoint, ID Micro Area	ID	Bonner
			Weiser-Payette, ID Non-Metro	ID	Payette
					Washington
Illinois	Full-Scope	Chicago CSA	Chicago-Naperville-Evanston, IL MD	IL	Cook
					DuPage
					Grundy
					McHenry
					Will
			Elgin, IL MD	IL	DeKalb
					Kane
					Kendall
	Limited-Scope	Peoria MSA	Peoria, IL MSA	IL	Fulton
					Marshall
					Peoria
					Stark
					Tazewell
					Woodford
	Limited-Scope	Illinois Combined Non-MSA	Galesburg, IL Micro Area	IL	Knox
			Monmouth, IL Non-Metro	IL	Warren
			Sterling, IL Micro Area	IL	Whiteside
Iowa	Full-Scope	Des Moines CSA	Ames, IA MSA	IA	Boone
					Story
			Des Moines-West Des Moines, IA MSA	IA	Dallas
					Guthrie
					Jasper
					Madison
					Polk
					Warren
			Pella, IA Micro Area	IA	Marion
	Full-Scope	Iowa Combined Non-MSA	Atlantic, IA Non-Metro	IA	Cass
			Clarion, IA Non-Metro	IA	Wright
			Denison, IA Non-Metro	IA	Crawford
			Emmetsburg, IA Non-Metro	IA	Palo Alto
			Fayette, IA Non-Metro	IA	Fayette
			Fort Dodge, IA Micro Area	IA	Webster
			Grinnell, IA Non-Metro	IA	Poweshiek
			Jefferson, IA Non-Metro	IA	Greene
			Marshalltown, IA Micro Area	IA	Marshall
			Mason City, IA Micro Area	IA	Cerro Gordo
					Worth
			Ottumwa, IA Micro Area	IA	Wapello
	Limited-Scope	Cedar Rapids CSA	Cedar Rapids, IA MSA	IA	Benton
					Jones
					Linn
			Iowa City, IA MSA	IA	Johnson
	Limited-Scope	Sioux City MSA	Sioux City, IA MSA	IA	Washington
					Woodbury

	Limited-Scope	Waterloo MSA	Waterloo-Cedar Falls, IA MSA	IA	Black Hawk
					Bremer
					Grundy
Kansas	Full-Scope	Kansas City CSA	Atchison, KS Micro Area	KS	Atchison
			Kansas City, KS MSA	KS	Johnson
					Leavenworth
					Linn
					Miami
					Wyandotte
	Full-Scope	Wichita MSA	Wichita, KS MSA	KS	Butler
					Harvey
					Sedgwick
					Sumner
Minnesota	Full-Scope	Minnesota Combined Non-MSA	Albert Lea, MN Micro Area	MN	Freeborn
			Alexandria, MN Micro Area	MN	Douglas
			Baudette-International Falls, MN Non-Metro	MN	Koochiching
					Lake of the Woods
			Bemidji, MN Micro Area	MN	Beltrami
			Blue Earth-Waseca, MN Non-Metro	MN	Faribault
					Waseca
			Brainerd, MN Micro Area	MN	Cass
					Crow Wing
			Detroit Lakes, MN Non-Metro	MN	Becker
			Fergus Falls, MN Micro Area	MN	Otter Tail
			Grand Rapids, MN Micro Area	MN	Itasca
			Litchfield, MN Non-Metro	MN	Meeker
			Marshall, MN Micro Area	MN	Lyon
			Pine City, MN Non-Metro	MN	Pine
			Thief River Falls, MN Non-Metro	MN	Pennington
			Willmar, MN Micro Area	MN	Kandiyohi
			Winona, MN Micro Area	MN	Winona
			Worthington, MN Micro Area	MN	Nobles
	Full-Scope	Rochester CSA	Austin, MN Micro Area	MN	Mower
			Rochester, MN MSA	MN	Dodge
					Fillmore
					Olmsted
	Limited-Scope	Duluth MSA	Duluth, MN MSA	MN	Wabasha
					Carlton
					Lake
	Limited-Scope	Mankato CSA	Mankato, MN MSA	MN	St. Louis
					Blue Earth
			New Ulm, MN Micro Area	MN	Nicollet
Mississippi	Full-Scope	Gulfport MSA	Gulfport-Biloxi, MS MSA	MS	Brown
					Hancock
					Harrison
					Jackson
	Full-Scope	Jackson MSA	Jackson, MS MSA	MS	Stone
					Copiah
					Hinds

					Holmes
					Madison
					Rankin
					Simpson
					Yazoo
	Limited-Scope	Hattiesburg CSA	Hattiesburg, MS MSA	MS	Covington
					Forrest
					Lamar
					Perry
Montana	Full-Scope	Missoula MSA	Missoula, MT MSA	MT	Missoula
	Full-Scope	Montana Combined Non-MSA	Anaconda-Dillon, MT Non-Metro	MT	Beaverhead
					Deer Lodge
					Ravalli
			Bozeman, MT Micro Area	MT	Gallatin
			Butte-Silver Bow, MT Micro Area	MT	Silver Bow
			Forsyth, MT Non-Metro	MT	Rosebud
			Glasgow, MT Non-Metro	MT	Valley
			Havre-Shelby-Valier, MT Non-Metro	MT	Glacier
					Hill
					Liberty
					Pondera
					Toole
			Helena, MT Micro Area	MT	Jefferson
					Lewis and Clark
			Kalispell, MT Micro Area	MT	Flathead
			Lewiston, MT Non-Metro	MT	Fergus
			Livingston, MT Non-Metro	MT	Park
			Sidney, MT Non-Metro	MT	Richland
	Limited-Scope	Billings MSA	Billings, MT MSA	MT	Carbon
					Stillwater
					Yellowstone
	Limited-Scope	Great Falls MSA	Great Falls, MT MSA	MT	Cascade
Nebraska	Full-Scope	Grand Island MSA	Grand Island, NE MSA	NE	Hall
					Howard
					Merrick
	Full-Scope	Lincoln MSA	Lincoln, NE MSA	NE	Lancaster
					Seward
	Limited-Scope	Nebraska Combined Non-MSA	Alliance-Bridgeport, NE Non-Metro	NE	Box Butte
					Morrill
			Hastings, NE Micro Area	NE	Adams
			Kearney, NE Micro Area	NE	Buffalo
					Kearney
			McCook, NE Non-Metro	NE	Red Willow
			Norfolk, NE Micro Area	NE	Madison
					Pierce
					Stanton
			North Platte, NE Micro Area	NE	Lincoln

					Logan
					McPherson
			Valentine, NE Non-Metro	NE	Cherry
			West Point, NE Non-Metro	NE	Cuming
Nevada	Full-Scope	Las Vegas CSA	Las Vegas-Henderson-Paradise, NV MSA	NV	Clark
			Pahrump, NV Micro Area	NV	Nye
	Full-Scope	Reno CSA	Carson City, NV MSA	NV	Carson City
			Fernley, NV Micro Area	NV	Lyon
			Gardnerville Ranchos, NV Micro Area	NV	Douglas
			Reno, NV MSA	NV	Storey
					Washoe
	Limited-Scope	Nevada Combined Non-MSA	Elko, NV Micro Area	NV	Elko
					Eureka
			Ely, NV Non-Metro	NV	White Pine
			Fallon, NV Micro Area	NV	Churchill
			Winnemucca, NV Micro Area	NV	Humboldt
			Battle Mountain-Lovelock, NV Non-Metro	NV	Lander
New Mexico	Full-Scope	Albuquerque CSA	Albuquerque, NM MSA	NM	Bernalillo
					Sandoval
					Torrance
					Valencia
			Espanola, NM Micro Area	NM	Rio Arriba
			Las Vegas, NM Micro Area	NM	Mora
					San Miguel
			Los Alamos, NM Micro Area	NM	Los Alamos
			Santa Fe, NM MSA	NM	Santa Fe
	Full-Scope	New Mexico Combined Non-MSA	Alamogordo, NM Micro Area	NM	Otero
			Carlsbad-Artesia, NM Micro Area	NM	Eddy
			Clovis, NM Micro Area	NM	Curry
			Deming, NM Micro Area	NM	Luna
			Gallup, NM Micro Area	NM	McKinley
			Grants, NM Micro Area	NM	Cibola
			Hobbs, NM Micro Area	NM	Lea
			Portales, NM Micro Area	NM	Roosevelt
			Raton, NM Non-Metro	NM	Colfax
			Roswell, NM Micro Area	NM	Chaves
			Ruidoso, NM Micro Area	NM	Lincoln
			Silver City, NM Micro Area	NM	Grant
			Socorro, NM Non-Metro	NM	Socorro
			Tucumcari-Santa Rosa, NM Non-Metro	NM	Guadalupe
					Quay
	Limited-Scope	Farmington MSA	Farmington, NM MSA	NM	San Juan
	Limited-Scope	Las Cruces MSA	Las Cruces, NM MSA	NM	Dona Ana
North Carolina	Full-Scope	Asheville CSA	Asheville, NC MSA	NC	Buncombe
					Haywood

					Henderson
					Madison
			Brevard, NC Micro Area	NC	Transylvania
			Marion, NC Micro Area	NC	McDowell
	Full-Scope	Greensboro CSA	Burlington, NC MSA	NC	Alamance
			Greensboro-High Point, NC MSA	NC	Guilford
					Randolph
					Rockingham
			Mount Airy, NC Micro Area	NC	Surry
			Winston-Salem, NC MSA	NC	Davidson
					Davie
					Forsyth
					Stokes
					Yadkin
	Full-Scope	Raleigh CSA	Durham-Chapel Hill, NC MSA	NC	Chatham
					Durham
					Granville
					Orange
					Person
			Raleigh-Cary, NC MSA	NC	Franklin
					Johnston
					Wake
	Limited-Scope	Fayetteville CSA	Fayetteville, NC MSA	NC	Cumberland
					Harnett
					Hoke
			Laurinburg, NC Micro Area	NC	Scotland
			Lumberton, NC Micro Area	NC	Robeson
			Pinehurst-Southern Pines, NC Micro Area	NC	Moore
			Sanford, NC Micro Area	NC	Lee
	Limited-Scope	Goldsboro MSA	Goldsboro, NC MSA	NC	Wayne
	Limited-Scope	Greenville, NC CSA	Greenville, NC MSA	NC	Pitt
			Kinston, NC Micro Area	NC	Lenoir
			Washington, NC Micro Area	NC	Beaufort
	Limited-Scope	Hickory MSA	Hickory-Lenoir-Morganton, NC MSA	NC	Alexander
					Burke
					Caldwell
					Catawba
	Limited-Scope	Jacksonville, NC MSA	Jacksonville, NC MSA	NC	Onslow
	Limited-Scope	New Bern CSA	Morehead City, NC Micro Area	NC	Carteret
			New Bern, NC MSA	NC	Craven
					Jones
					Pamlico
	Limited-Scope	Rocky Mount CSA	Rocky Mount, NC MSA	NC	Edgecombe
					Nash
	Limited-Scope	Wilmington MSA	Wilmington, NC MSA	NC	Wilson
					New Hanover
					Pender

	Limited-Scope	North Carolina Combined Non-MSA	Boone, NC Micro Area	NC	Watauga
			Burnsville-Newland, NC Non-Metro	NC	Avery
					Mitchell
					Yancey
			Clinton-Elizabethtown, NC Non-Metro	NC	Bladen
					Sampson
			Cullowhee, NC Micro Area	NC	Jackson
					Swain
			Elizabeth City, NC Micro Area	NC	Pasquotank
					Perquimans
			Forest City, NC Micro Area	NC	Rutherford
			Franklin, NC Non-Metro	NC	Macon
			Kill Devil Hills, NC Micro Area	NC	Dare
			North Wilkesboro, NC Micro Area	NC	Wilkes
North Dakota	Full-Scope	Bismarck MSA	Bismarck, ND MSA	ND	Burleigh
					Morton
					Oliver
	Full-Scope	North Dakota Combined Non-MSA	Bowman, ND Non-Metro	ND	Bowman
			Dickinson, ND Micro Area	ND	Billings
					Stark
			Grafton, ND Non-Metro	ND	Walsh
			Hillsboro, ND Non-Metro	ND	Traill
			Jamestown, ND Micro Area	ND	Stutsman
			Minot, ND Micro Area	ND	McHenry
					Renville
					Ward
			Valley City, ND Non-Metro	ND	Barnes
			Williston, ND Micro Area	ND	Williams
Oregon	Full-Scope	Bend CSA	Bend, OR MSA	OR	Deschutes
			Prineville, OR Micro Area	OR	Crook
	Full-Scope	Eugene MSA	Eugene-Springfield, OR MSA	OR	Lane
	Full-Scope	Oregon Combined Non-MSA	Astoria, OR Micro Area	OR	Clatsop
			Baker City, OR Non-Metro	OR	Baker
			Coos Bay, OR Micro Area	OR	Coos
			Hermiston-Pendleton, OR Micro Area	OR	Morrow
					Umatilla
			Hood River, OR Micro Area	OR	Hood River
			Klamath Falls, OR Micro Area	OR	Klamath
			La Grande, OR Micro Area	OR	Union
			Madras, OR Non-Metro	OR	Jefferson
			Newport, OR Micro Area	OR	Lincoln
			Ontario, OR Micro Area	OR	Malheur
			Roseburg, OR Micro Area	OR	Douglas

			The Dalles, OR Micro Area	OR	Wasco
			Tillamook, OR Non-Metro	OR	Tillamook
	Limited-Scope	Medford CSA	Grants Pass, OR MSA	OR	Josephine
			Medford, OR MSA	OR	Jackson
Pennsylvania	Full-Scope	Harrisburg CSA	Harrisburg-Carlisle, PA MSA	PA	Cumberland
					Dauphin
					Perry
			Lebanon, PA MSA	PA	Lebanon
			York-Hanover, PA MSA	PA	York
	Full-Scope	Lancaster MSA	Lancaster, PA MSA	PA	Lancaster
	Limited-Scope	Scranton MSA	Scranton--Wilkes-Barre, PA MSA	PA	Lackawanna
					Luzerne
					Wyoming
	Limited-Scope	Pennsylvania Combined Non-MSA	Hawley, PA Non-Metro	PA	Wayne
Pottsville, PA Micro Area			PA	Schuylkill	
Sunbury, PA Micro Area			PA	Northumberland	
South Carolina	Full-Scope	Charleston MSA	Charleston-North Charleston, SC MSA	SC	Berkeley
					Charleston
					Dorchester
	Full-Scope	Columbia CSA	Columbia, SC MSA	SC	Calhoun
					Fairfield
					Kershaw
					Lexington
					Richland
					Saluda
			Newberry, SC Micro Area	SC	Newberry
			Orangeburg, SC Micro Area	SC	Orangeburg
	Full-Scope	Greenville, SC CSA	Gaffney, SC Micro Area	SC	Cherokee
			Greenville-Anderson, SC MSA	SC	Anderson
					Greenville
					Laurens
					Pickens
			Greenwood, SC Micro Area	SC	Greenwood
			Seneca, SC Micro Area	SC	Oconee
			Spartanburg, SC MSA	SC	Spartanburg
			Union, SC Micro Area	SC	Union
	Limited-Scope	Florence MSA	Florence, SC MSA	SC	Darlington
					Florence
	Limited-Scope	Hilton Head Island MSA	Hilton Head Island-Bluffton, SC MSA	SC	Beaufort
					Jasper
	Limited-Scope	Sumter MSA	Sumter, SC MSA	SC	Clarendon
					Sumter
	Limited-Scope	South Carolina Combined Non-MSA	Bamberg-Walterboro, SC Non-Metro	SC	Bamberg
			Colleton		
			Bennettsville, SC Micro Area	SC	Marlboro
			Cheraw, SC Non-Metro	SC	Chesterfield
Dillon-Marion, SC Non-Metro			SC	Dillon	
Marion					
South Dakota		Rapid City CSA	Rapid City, SD MSA	SD	Meade

	Full-Scope				Pennington
			Spearfish, SD Micro Area	SD	Lawrence
	Full-Scope	South Dakota Combined Non-MSA	Aberdeen, SD Micro Area	SD	Brown
					Edmunds
			Belle Fourche, SD Non-Metro	SD	Butte
			Brookings, SD Micro Area	SD	Brookings
					Brule
					Lyman
					Todd
					Tripp
			Hot Springs, SD Non-Metro	SD	Fall River
			Huron, SD Micro Area	SD	Beadle
					Jerauld
			Madison, SD Non-Metro	SD	Lake
			Milbank-Sisseton, SD Non-Metro	SD	Grant
					Roberts
			Mitchell, SD Micro Area	SD	Davison
					Hanson
			Mobridge, SD Non-Metro	SD	Walworth
			Pierre, SD Micro Area	SD	Hughes
					Stanley
			Redfield, SD Non-Metro	SD	Spink
			Vermillion, SD Micro Area	SD	Clay
			Watertown, SD Micro Area	SD	Codington
					Hamlin
			Yankton, SD Micro Area	SD	Yankton
	Limited-Scope	Sioux Falls MSA	Sioux Falls, SD MSA	SD	Lincoln
					McCook
					Minnehaha
					Turner
Tennessee	Full-Scope	Nashville CSA	Nashville-Davidson--Murfreesboro--Franklin, TN MSA	TN	Cannon
					Cheatham
					Davidson
					Dickson
					Macon
					Maury
					Robertson
					Rutherford
					Smith
					Sumner
					Trousdale
					Williamson
Texas	Full-Scope	Austin MSA	Austin-Round Rock-Georgetown, TX MSA	TX	Bastrop
					Caldwell
					Hays
					Travis
					Williamson
	Full-Scope	Dallas MSA	Dallas-Plano-Irving, TX MD	TX	Collin
					Dallas

					Denton
					Ellis
					Hunt
					Kaufman
					Rockwall
			Fort Worth-Arlington-Grapevine, TX MD	TX	Johnson
					Parker
					Tarrant
					Wise
	Full-Scope	El Paso MSA	El Paso, TX MSA	TX	El Paso
					Hudspeth
	Full-Scope	Houston CSA	Bay City, TX Micro Area	TX	Matagorda
			Brenham, TX Micro Area	TX	Washington
			Houston-The Woodlands-Sugar Land, TX MSA	TX	Austin
					Brazoria
					Chambers
					Fort Bend
					Galveston
					Harris
					Liberty
					Montgomery
					Waller
			Huntsville, TX Micro Area	TX	Walker
	Limited-Scope	Amarillo CSA	Amarillo, TX MSA	TX	Armstrong
					Carson
					Oldham
					Potter
					Randall
			Borger, TX Micro Area	TX	Hutchinson
	Limited-Scope	Beaumont MSA	Beaumont-Port Arthur, TX MSA	TX	Hardin
					Jefferson
					Orange
	Limited-Scope	Brownsville CSA	Brownsville-Harlingen, TX MSA	TX	Cameron
			Raymondville, TX Micro Area	TX	Willacy
	Limited-Scope	College Station MSA	College Station-Bryan, TX MSA	TX	Brazos
					Burleson
					Robertson
	Limited-Scope	Corpus Christi CSA	Alice, TX Micro Area	TX	Duval
					Jim Wells
			Corpus Christi, TX MSA	TX	Nueces
			Kingsville, TX Micro Area	TX	San Patricio
					Kenedy
			Rockport, TX Micro Area	TX	Kleberg
					Aransas
	Limited-Scope	Killeen MSA	Killeen-Temple, TX MSA	TX	Bell
					Coryell
					Lampasas
	Limited-Scope	Laredo MSA	Laredo, TX MSA	TX	Webb

	Limited-Scope	Lubbock CSA	Lubbock, TX MSA	TX	Crosby
					Lubbock
					Lynn
			Plainview, TX Micro Area	TX	Hale
	Limited-Scope	McAllen CSA	McAllen-Edinburg-Mission, TX MSA	TX	Hidalgo
	Limited-Scope	Midland CSA	Midland, TX MSA	TX	Martin
					Midland
			Odessa, TX MSA	TX	Ector
	Limited-Scope	San Angelo MSA	San Angelo, TX MSA	TX	Irion
					Sterling
					Tom Green
	Limited-Scope	San Antonio MSA	San Antonio-New Braunfels, TX MSA	TX	Atascosa
					Bandera
					Bexar
					Comal
					Guadalupe
					Kendall
					Medina
					Wilson
	Limited-Scope	Victoria CSA	Port Lavaca, TX Micro Area	TX	Calhoun
			Victoria, TX MSA	TX	Goliad
					Victoria
	Limited-Scope	Waco MSA	Waco, TX MSA	TX	Falls
					McLennan
	Limited-Scope	Wichita Falls MSA	Wichita Falls, TX MSA	TX	Archer
					Clay
					Wichita
	Limited-Scope	Texas Combined Non-MSA	Atlanta, TX Non-Metro	TX	Cass
			Big Spring, TX Micro Area	TX	Howard
			Burnet-Kingsland, TX Non-Metro	TX	Burnet
					Llano
			Centerville-Navasota, TX Non-Metro	TX	Freestone
					Grimes
					Leon
					Madison
			Dalhart, TX Non-Metro	TX	Hartley
			Denver City, TX Non-Metro	TX	Yoakum
			Gonzales-Hallettsville-Kenedy, TX Non-Metro	TX	DeWitt
					Fayette
					Gonzales
					Jackson
					Karnes
					Lavaca
			Hillsboro, TX Non-Metro	TX	Hill
			Kerrville, TX Micro Area	TX	Kerr
			Nocona, TX Non-Metro	TX	Montague
			Post, TX Non-Metro	TX	Garza
Utah	Full-Scope	Salt Lake City CSA	Heber, UT Micro Area	UT	Summit
					Wasatch

			Ogden-Clearfield, UT MSA	UT	Box Elder
			Provo-Orem, UT MSA	UT	Davis
					Morgan
					Weber
					Juab
					Utah
			Salt Lake City, UT MSA	UT	Salt Lake
					Tooele
	Limited-Scope	St. George MSA	St. George, UT MSA	UT	Washington
	Limited-Scope	Utah Combined Non-MSA	Beaver-Mount Pleasant-Richfield, UT Non-Metro	UT	Beaver
					Millard
					Sanpete
					Sevier
			Blanding-Moab, UT Non-Metro	UT	Grand
					San Juan
			Cedar City, UT Micro Area	UT	Iron
			Duchesne, UT Non-Metro	UT	Duchesne
			Price, UT Micro Area	UT	Carbon
			Vernal, UT Micro Area	UT	Uintah
Virginia	Full-Scope	Lynchburg MSA	Lynchburg, VA MSA	VA	Amherst
					Appomattox
					Bedford
					Campbell
					Lynchburg City
	Full-Scope	Richmond MSA	Richmond, VA MSA	VA	Amelia
					Charles City
					Chesterfield
					Colonial Heights City
					Dinwiddie
					Goochland
					Hanover
					Henrico
					Hopewell City
					King and Queen
					King William
					New Kent
					Petersburg City
					Powhatan
					Prince George
					Richmond City
					Sussex
	Full-Scope	Virginia Beach MSA	Virginia Beach-Norfolk-Newport News, VA MSA	VA	Chesapeake City
					Franklin City
					Gloucester
					Hampton City
					Isle of Wight
					James City
					Mathews

					Newport News City
					Norfolk City
					Poquoson City
					Portsmouth City
					Southampton
					Suffolk City
					Virginia Beach City
					Williamsburg City
					York
	Limited-Scope	Blacksburg MSA	Blacksburg-Christiansburg, VA MSA	VA	Giles
					Montgomery
					Pulaski
					Radford City
	Limited-Scope	Charlottesville MSA	Charlottesville, VA MSA	VA	Albemarle
					Charlottesville City
					Fluvanna
					Greene
					Nelson
	Limited-Scope	Harrisonburg CSA	Harrisonburg, VA MSA	VA	Harrisonburg City
			Staunton, VA MSA	VA	Rockingham
					Augusta
					Staunton City
					Waynesboro City
	Limited-Scope	Kingsport MSA	Kingsport-Bristol, VA MSA	VA	Bristol City
					Scott
					Washington
	Limited-Scope	Roanoke MSA	Roanoke, VA MSA	VA	Botetourt
					Craig
					Franklin
					Roanoke
					Roanoke City
					Salem City
	Limited-Scope	Virginia Combined Non-MSA	Big Stone Gap, VA Micro Area	VA	Norton City
			Bluefield, VA Micro Area	VA	Wise
					Bland
			Clarksville-South Boston, VA Non-Metro	VA	Tazewell
					Halifax
			Clintwood-Royal City, VA Non-Metro	VA	Mecklenburg
					Buchanan
			Covington, VA Non-Metro	VA	Dickenson
					Alleghany
			Danville, VA Micro Area	VA	Covington City
					Danville City
			Farmville, VA Non-Metro	VA	Pittsylvania
			Galax, VA Non-Metro	VA	Prince Edward
					Carroll
					Galax City

					Grayson
			Lexington, VA Non-Metro	VA	Buena Vista City
					Lexington City
					Rockbridge
			Louisa-Orange, VA Non-Metro	VA	Louisa
					Orange
			Marion, VA Non-Metro	VA	Smyth
Washington	Full-Scope	Seattle CSA	Bremerton-Silverdale-Port Orchard, WA MSA	WA	Kitsap
			Centralia, WA Micro Area	WA	Lewis
			Mount Vernon-Anacortes, WA MSA	WA	Skagit
			Oak Harbor, WA Micro Area	WA	Island
			Olympia-Lacey-Tumwater, WA MSA	WA	Thurston
			Seattle-Bellevue-Kent, WA MD	WA	King
					Snohomish
			Tacoma-Lakewood, WA MD	WA	Pierce
	Full-Scope	Spokane MSA	Spokane-Spokane Valley, WA MSA	WA	Spokane
					Stevens
	Limited-Scope	Bellingham MSA	Bellingham, WA MSA	WA	Whatcom
	Limited-Scope	Kennewick CSA	Kennewick-Richland, WA MSA	WA	Benton
					Franklin
	Limited-Scope	Wenatchee MSA	Wenatchee, WA MSA	WA	Chelan
					Douglas
	Limited-Scope	Yakima MSA	Yakima, WA MSA	WA	Yakima
	Limited-Scope	Washington Combined Non-MSA	Ellensburg, WA Micro Area	WA	Kittitas
			Friday Harbor, WA Non-Metro	WA	San Juan
			Okanogan, WA Non-Metro	WA	Okanogan
			Port Angeles, WA Micro Area	WA	Clallam
			Port Townsend, WA Non-Metro	WA	Jefferson
Wisconsin	Full-Scope	Madison CSA	Baraboo, WI Micro Area	WI	Sauk
			Madison, WI MSA	WI	Columbia
					Dane
					Green
					Iowa
	Full-Scope	Milwaukee CSA	Milwaukee-Waukesha, WI MSA	WI	Milwaukee
					Ozaukee
					Washington
					Waukesha
			Racine, WI MSA	WI	Racine
	Limited-Scope	Appleton CSA	Appleton, WI MSA	WI	Calumet
					Outagamie
			Oshkosh-Neenah, WI MSA	WI	Winnebago
			Eau Claire, WI MSA	WI	Chippewa

	Limited-Scope	Eau Claire MSA			Eau Claire
	Limited-Scope	Fond du Lac MSA	Fond du Lac, WI MSA	WI	Fond du Lac
	Limited-Scope	Green Bay CSA	Green Bay, WI MSA	WI	Brown
					Kewaunee
					Oconto
	Limited-Scope	La Crosse MSA	La Crosse-Onalaska, WI MSA	WI	La Crosse
	Limited-Scope	Sheboygan MSA	Sheboygan, WI MSA	WI	Sheboygan
	Limited-Scope	Wausau MSA	Wausau-Weston, WI MSA	WI	Lincoln
					Marathon
Wyoming	Limited-Scope	Wisconsin Combined Non-MSA	Ladysmith-Phillips, WI Non-Metro	WI	Rusk
			Manitowoc, WI Micro Area	WI	Manitowoc
	Full-Scope	Cheyenne MSA	Cheyenne, WY MSA	WY	Laramie
			Cody, WY Non-Metro	WY	Park
			Evanston, WY Micro Area	WY	Uinta
			Gillette, WY Micro Area	WY	Campbell
					Crook
					Weston
			Jackson, WY Micro Area	WY	Teton
			Laramie, WY Micro Area	WY	Albany
			Pinedale-Thayne, WY Non-Metro	WY	Lincoln
					Sublette
			Riverton, WY Micro Area	WY	Fremont
			Rock Springs, WY Micro Area	WY	Sweetwater
			Sheridan, WY Micro Area	WY	Sheridan
			Wheatland, WY Non-Metro	WY	Platte
	Limited-Scope	Casper MSA	Casper, WY MSA	WY	Natrona

Appendix B: Summary of Multistate MSA/CSA and State Ratings

RATINGS WELLS FARGO BANK, N.A.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/ Multistate Rating
	Outstanding	Outstanding	Outstanding	Outstanding
Multistate or State:				
Allentown MMSA	Outstanding	Needs to Improve	Outstanding	Satisfactory
Augusta MMSA	High Satisfactory	Needs to Improve	Low Satisfactory	Satisfactory
Charlotte MCSA	Outstanding	Outstanding	Outstanding	Outstanding
Columbus MCSA	High Satisfactory	Needs to Improve	High Satisfactory	Satisfactory
Davenport MMSA	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Fargo MCSA	Outstanding	Outstanding	Outstanding	Outstanding
Grand Forks MMSA	Outstanding	Outstanding	Low Satisfactory	Outstanding
Logan MMSA	Outstanding	Needs to Improve	Low Satisfactory	Satisfactory
Memphis MMSA	High Satisfactory	Needs to Improve	Low Satisfactory	Satisfactory
Minneapolis MCSA	Outstanding	Outstanding	Outstanding	Outstanding
Myrtle Beach MCSA	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
New York MCSA	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Omaha MMSA	Outstanding	Outstanding	High Satisfactory	Outstanding
Philadelphia MCSA	Outstanding	Outstanding	High Satisfactory	Outstanding
Portland MCSA	Outstanding	Outstanding	High Satisfactory	Outstanding
Texarkana MMSA	Low Satisfactory	Needs to Improve	High Satisfactory	Satisfactory
Washington MCSA	Outstanding	Outstanding	High Satisfactory	Outstanding
ALABAMA	High Satisfactory	High Satisfactory	Outstanding	Satisfactory
ALASKA	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
ARIZONA	Outstanding	High Satisfactory	High Satisfactory	Outstanding
CALIFORNIA	Outstanding	Outstanding	High Satisfactory	Outstanding
COLORADO	Outstanding	Outstanding	Outstanding	Outstanding
CONNECTICUT	Outstanding	Outstanding	High Satisfactory	Outstanding

DELAWARE	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
FLORIDA	Outstanding	Outstanding	Outstanding	Outstanding
GEORGIA	Outstanding	High Satisfactory	Outstanding	Outstanding
IDAHO	High Satisfactory	Low Satisfactory	Outstanding	Satisfactory
ILLINOIS	High Satisfactory	Outstanding	Needs to Improve	Satisfactory
IOWA	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
KANSAS	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory
MINNESOTA	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
MISSISSIPPI	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
MONTANA	Outstanding	Needs to Improve	High Satisfactory	Satisfactory
NEBRASKA	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
NEVADA	Outstanding	Outstanding	High Satisfactory	Outstanding
NEW MEXICO	Outstanding	Outstanding	Outstanding	Outstanding
NORTH CAROLINA	Outstanding	High Satisfactory	Outstanding	Outstanding
NORTH DAKOTA	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
OREGON	Outstanding	Outstanding	High Satisfactory	Outstanding
PENNSYLVANIA	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
SOUTH CAROLINA	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
SOUTH DAKOTA	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
TENNESSEE	Outstanding	Outstanding	Low Satisfactory	Outstanding
TEXAS	Outstanding	Outstanding	Outstanding	Outstanding
UTAH	Outstanding	Low Satisfactory	Outstanding	Outstanding
VIRGINIA	Outstanding	High Satisfactory	Low Satisfactory	Satisfactory
WASHINGTON	Outstanding	Outstanding	High Satisfactory	Outstanding
WISCONSIN	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
WYOMING	High Satisfactory	Outstanding	High Satisfactory	Satisfactory

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

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. 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 with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental 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 Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have GAR of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including low- and moderate-income areas, 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.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always

equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

Geography: A census tract 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 conduct 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, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

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, and branch distribution).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) 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, and half below, a range of incomes.

Metropolitan Division (MD): As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an

employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography.

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Multistate Metropolitan Statistical Area (MMSA)/Multistate Combined Statistical Area (MCSA): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

Owner-Occupied Housing Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rating Area: A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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

Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Appendix D: Tables of Performance Data

Content of Standardized Tables⁵⁵

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of 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: (1) purchased loans are treated the same as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - 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 aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - 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 MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were 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) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with GAR of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

⁵⁵ The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the lending activity table due to how the underlying loan data is rounded in each table.

Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography - 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. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

Table T. Assessment Area Distribution of Loans to Farms by GAR - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500,000) originated and purchased by the bank to farms with GAR of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Allentown MSA	8,684	1,735,444,512	100.0	39,571	20.5	5.5	7.2	18.1	16.9	18.0	21.1	21.2	22.1	40.3	38.1	34.9	0.0	18.3	17.8
Total	8,684	1,735,444,512	100.0	39,571	20.5	5.5	7.2	18.1	16.9	18.0	21.1	21.2	22.1	40.3	38.1	34.9	0.0	18.3	17.8
Source: 2015 ACS: 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Allentown MSA	5,673	139,723	100.0	21,334	7.0	5.0	5.0	16.2	16.1	15.9	39.2	38.9	39.6	37.6	40.0	39.1	0.0	0.0	0.4
Total	5,673	139,723	100.0	21,334	7.0	5.0	5.0	16.2	16.1	15.9	39.2	38.9	39.6	37.6	40.0	39.1	0.0	0.0	0.4
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Allentown MSA	5,673	139,723	100.0	21,334	88.6	67.2	48.5	3.6	7.5	7.9	25.3
Total	5,673	139,723	100.0	21,334	88.6	67.2	48.5	3.6	7.5	7.9	25.3
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Allentown MSA	55	993	100.0	168	1.8	1.8	0.0	8.2	1.8	2.1	44.7	67.3	43.8	45.4	29.1	52.8	0.0	0.0	1.4
Total	55	993	100.0	168	1.8	1.8	0.0	8.2	1.8	2.1	44.7	67.3	43.8	45.4	29.1	52.8	0.0	0.0	1.4
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2019-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Allentown MSA	55	993	100.0	168	97.4	40.0	68.1	1.6	0.0	1.0	60.0
Total	55	993	100.0	168	97.4	40.0	68.1	1.6	0.0	1.0	60.0
Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Augusta MSA	4,518	805,774,265	100.0	29,964	3.7	1.9	1.5	25.9	15.1	14.1	38.3	38.2	38.2	32.1	44.8	46.1	0.0	0.0	0.0
Total	4,518	805,774,265	100.0	29,964	3.7	1.9	1.5	25.9	15.1	14.1	38.3	38.2	38.2	32.1	44.8	46.1	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Augusta MSA	4,518	805,774,265	100.0	29,964	24.6	3.5	4.3	16.2	10.6	13.7	17.9	17.1	19.8	41.4	33.3	34.7	0.0	35.5	27.5
Total	4,518	805,774,265	100.0	29,964	24.6	3.5	4.3	16.2	10.6	13.7	17.9	17.1	19.8	41.4	33.3	34.7	0.0	35.5	27.5
Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Augusta MSA	2,830	76,648	100.0	11,208	7.1	5.3	5.7	24.0	18.4	21.3	32.3	32.6	34.1	36.6	43.6	38.3	0.0	0.0	0.6
Total	2,830	76,648	100.0	11,208	7.1	5.3	5.7	24.0	18.4	21.3	32.3	32.6	34.1	36.6	43.6	38.3	0.0	0.0	0.6
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Augusta MSA	2,830	76,648	100.0	11,208	88.2	65.2	43.1	2.9	8.4	8.9	26.4
Total	2,830	76,648	100.0	11,208	88.2	65.2	43.1	2.9	8.4	8.9	26.4
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Augusta MSA	88	3,217	100.0	172	4.1	0.0	0.0	30.4	34.1	39.1	37.1	47.7	44.9	28.4	18.2	15.9	0.0	0.0	0.0
Total	88	3,217	100.0	172	4.1	0.0	0.0	30.4	34.1	39.1	37.1	47.7	44.9	28.4	18.2	15.9	0.0	0.0	0.0
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Augusta MSA	88	3,217	100.0	172	97.9	17.0	37.7	1.5	3.4	0.7	79.5
Total	88	3,217	100.0	172	97.9	17.0	37.7	1.5	3.4	0.7	79.5
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Charlotte CSA	33,478	9,995,223,618	100.0	182,916	2.9	1.9	2.3	21.1	12.8	15.8	39.5	29.8	34.5	36.6	55.4	47.3	0.0	0.0	0.0
Total	33,478	9,995,223,618	100.0	182,916	2.9	1.9	2.3	21.1	12.8	15.8	39.5	29.8	34.5	36.6	55.4	47.3	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%
Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Charlotte CSA	33,478	9,995,223,618	100.0	182,916	22.6	3.6	4.8	17.2	12.6	14.7	18.9	15.7	19.5	41.4	42.9	45.5	0.0	25.2	15.5
Total	33,478	9,995,223,618	100.0	182,916	22.6	3.6	4.8	17.2	12.6	14.7	18.9	15.7	19.5	41.4	42.9	45.5	0.0	25.2	15.5

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%
Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Charlotte CSA	25,534	715,540	100.0	87,676	6.3	5.0	6.2	19.7	15.7	19.2	30.3	29.4	31.2	43.1	49.7	42.7	0.6	0.3	0.7
Total	25,534	715,540	100.0	87,676	6.3	5.0	6.2	19.7	15.7	19.2	30.3	29.4	31.2	43.1	49.7	42.7	0.6	0.3	0.7

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%
Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Charlotte CSA	25,534	715,540	100.0	87,676	88.4	64.4	46.3	3.5	8.7	8.1	26.9
Total	25,534	715,540	100.0	87,676	88.4	64.4	46.3	3.5	8.7	8.1	26.9
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Charlotte CSA	294	8,129	100.0	633	3.6	1.0	0.7	19.5	23.5	22.7	45.8	54.4	55.6	30.9	21.1	20.1	0.2	0.0	0.7
Total	294	8,129	100.0	633	3.6	1.0	0.7	19.5	23.5	22.7	45.8	54.4	55.6	30.9	21.1	20.1	0.2	0.0	0.7
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Charlotte CSA	294	8,129	100.0	633	96.7	23.5	49.7	1.9	3.4	1.3	73.1
Total	294	8,129	100.0	633	96.7	23.5	49.7	1.9	3.4	1.3	73.1
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Columbus CSA	2,932	594,031,692	100.0	20,761	3.0	0.9	0.9	21.0	14.4	13.6	45.0	42.3	44.5	30.9	42.2	40.7	0.2	0.2	0.4
Total	2,932	594,031,692	100.0	20,761	3.0	0.9	0.9	21.0	14.4	13.6	45.0	42.3	44.5	30.9	42.2	40.7	0.2	0.2	0.4
Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Columbus CSA	2,932	594,031,692	100.0	20,761	23.4	3.0	4.3	17.1	8.0	13.8	18.3	14.2	19.0	41.2	35.7	35.3	0.0	39.1	27.6
Total	2,932	594,031,692	100.0	20,761	23.4	3.0	4.3	17.1	8.0	13.8	18.3	14.2	19.0	41.2	35.7	35.3	0.0	39.1	27.6
Source: 2015 ACS: 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Columbus CSA	2,312	54,945	100.0	9,601	6.1	4.2	4.4	24.4	18.7	24.3	39.5	42.7	42.2	29.5	34.0	28.3	0.5	0.4	0.8
Total	2,312	54,945	100.0	9,601	6.1	4.2	4.4	24.4	18.7	24.3	39.5	42.7	42.2	29.5	34.0	28.3	0.5	0.4	0.8
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2019-21											
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Columbus CSA	2,312	54,945	100.0	9,601	87.0	68.1	40.7	3.3	5.3	9.7	26.6
Total	2,312	54,945	100.0	9,601	87.0	68.1	40.7	3.3	5.3	9.7	26.6
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Columbus CSA	39	2,179	100.0	99	3.1	10.3	2.3	20.2	17.9	18.6	44.1	51.3	62.8	32.4	20.5	16.3	0.2	0.0	0.0
Total	39	2,179	100.0	99	3.1	10.3	2.3	20.2	17.9	18.6	44.1	51.3	62.8	32.4	20.5	16.3	0.2	0.0	0.0
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2019-21											
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Columbus CSA	39	2,179	100.0	99	96.1	43.6	50.0	1.6	5.1	2.2	51.3
Total	39	2,179	100.0	99	96.1	43.6	50.0	1.6	5.1	2.2	51.3
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Davenport MSA	1,498	293,474,435	100.0	18,944	0.7	0.5	0.5	18.0	12.7	13.4	60.0	56.9	57.6	21.3	29.9	28.6	0.0	0.0	0.0
Total	1,498	293,474,435	100.0	18,944	0.7	0.5	0.5	18.0	12.7	13.4	60.0	56.9	57.6	21.3	29.9	28.6	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregat e
Davenport MSA	1,498	293,474,435	100.0	18,944	19.9	5.4	10.1	18.1	15.1	19.5	21.7	18.0	19.7	40.3	32.8	31.5	0.0	28.7	19.2
Total	1,498	293,474,435	100.0	18,944	19.9	5.4	10.1	18.1	15.1	19.5	21.7	18.0	19.7	40.3	32.8	31.5	0.0	28.7	19.2
Source: 2015 ACS: 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Davenport MSA	1,246	41,377	100.0	6,296	5.5	5.1	5.1	18.3	17.4	20.0	50.6	43.9	50.4	25.5	33.6	24.2	0.0	0.0	0.3
Total	1,246	41,377	100.0	6,296	5.5	5.1	5.1	18.3	17.4	20.0	50.6	43.9	50.4	25.5	33.6	24.2	0.0	0.0	0.3
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Davenport MSA	1,246	41,377	100.0	6,296	83.0	68.3	47.6	4.7	9.2	12.4	22.5
Total	1,246	41,377	100.0	6,296	83.0	68.3	47.6	4.7	9.2	12.4	22.5

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%
Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Davenport MSA	49	4,187	100.0	401	1.1	0.0	0.0	7.4	0.0	2.1	67.2	73.5	75.5	24.3	26.5	22.4	0.0	0.0	0.0
Total	49	4,187	100.0	401	1.1	0.0	0.0	7.4	0.0	2.1	67.2	73.5	75.5	24.3	26.5	22.4	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%
Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Davenport MSA	49	4,187	100.0	401	97.5	34.7	61.9	1.4	10.2	1.1	55.1
Total	49	4,187	100.0	401	97.5	34.7	61.9	1.4	10.2	1.1	55.1
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Fargo CSA	1,564	335,902,882	100.0	14,186	0.0	0.0	0.0	13.5	10.6	10.7	53.8	38.2	40.3	32.1	50.8	48.4	0.5	0.4	0.7
Total	1,564	335,902,882	100.0	14,186	0.0	0.0	0.0	13.5	10.6	10.7	53.8	38.2	40.3	32.1	50.8	48.4	0.5	0.4	0.7
Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Fargo CSA	1,564	335,902,882	100.0	14,186	18.7	6.6	7.7	18.9	17.5	20.4	23.1	22.8	20.5	39.3	39.3	27.0	0.0	13.7	24.5
Total	1,564	335,902,882	100.0	14,186	18.7	6.6	7.7	18.9	17.5	20.4	23.1	22.8	20.5	39.3	39.3	27.0	0.0	13.7	24.5
Source: 2015 ACS: 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Fargo CSA	1,147	72,527	100.0	8,075	0.0	0.0	0.0	27.1	33.4	25.8	38.4	33.7	36.9	34.0	33.0	36.7	0.4	0.0	0.6
Total	1,147	72,527	100.0	8,075	0.0	0.0	0.0	27.1	33.4	25.8	38.4	33.7	36.9	34.0	33.0	36.7	0.4	0.0	0.6
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Fargo CSA	1,147	72,527	100.0	8,075	84.2	58.0	42.8	5.3	9.3	10.5	32.7
Total	1,147	72,527	100.0	8,075	84.2	58.0	42.8	5.3	9.3	10.5	32.7
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Fargo CSA	229	36,549	100.0	1,022	0.0	0.0	0.0	6.6	0.4	1.2	68.6	73.8	76.6	24.7	25.8	22.2	0.1	0.0	0.0
Total	229	36,549	100.0	1,022	0.0	0.0	0.0	6.6	0.4	1.2	68.6	73.8	76.6	24.7	25.8	22.2	0.1	0.0	0.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Fargo CSA	229	36,549	100.0	1,022	97.0	64.6	58.0	2.3	15.7	0.7	19.7
Total	229	36,549	100.0	1,022	97.0	64.6	58.0	2.3	15.7	0.7	19.7
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Grand Forks MSA	372	75,506,204	100.0	4,001	0.3	0.0	0.3	15.0	10.5	11.7	61.9	59.7	57.1	22.7	29.8	30.9	0.0	0.0	0.0
Total	372	75,506,204	100.0	4,001	0.3	0.0	0.3	15.0	10.5	11.7	61.9	59.7	57.1	22.7	29.8	30.9	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Grand Forks MSA	372	75,506,204	100.0	4,001	20.2	5.9	5.8	19.0	18.0	19.3	21.1	21.2	20.8	39.7	37.4	31.0	0.0	17.5	23.0
Total	372	75,506,204	100.0	4,001	20.2	5.9	5.8	19.0	18.0	19.3	21.1	21.2	20.8	39.7	37.4	31.0	0.0	17.5	23.0

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Grand Forks MSA	242	16,514	100.0	2,453	2.1	1.2	0.8	16.0	11.2	13.4	56.9	64.9	57.3	25.0	22.7	28.1	0.0	0.0	0.4
Total	242	16,514	100.0	2,453	2.1	1.2	0.8	16.0	11.2	13.4	56.9	64.9	57.3	25.0	22.7	28.1	0.0	0.0	0.4

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Grand Forks MSA	242	16,514	100.0	2,453	80.1	54.5	54.6	5.5	8.3	14.4	37.2
Total	242	16,514	100.0	2,453	80.1	54.5	54.6	5.5	8.3	14.4	37.2

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%
Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Grand Forks MSA	10	759	100.0	927	0.0	0.0	0.0	10.8	30.0	2.6	73.6	70.0	82.8	15.6	0.0	14.5	0.0	0.0	0.1
Total	10	759	100.0	927	0.0	0.0	0.0	10.8	30.0	2.6	73.6	70.0	82.8	15.6	0.0	14.5	0.0	0.0	0.1

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%
Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Grand Forks MSA	10	759	100.0	927	96.3	0.0	65.2	3.1	30.0	0.6	70.0
Total	10	759	100.0	927	96.3	0.0	65.2	3.1	30.0	0.6	70.0
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Logan MSA	1,030	235,603,320	100.0	10,306	1.3	1.8	1.7	11.1	11.7	11.1	53.9	48.0	53.6	33.7	38.5	33.5	0.0	0.0	0.0
Total	1,030	235,603,320	100.0	10,306	1.3	1.8	1.7	11.1	11.7	11.1	53.9	48.0	53.6	33.7	38.5	33.5	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Logan MSA	1,030	235,603,320	100.0	10,306	19.5	4.7	3.3	18.8	18.9	15.8	22.5	27.0	23.9	39.1	42.2	39.2	0.0	7.2	17.7
Total	1,030	235,603,320	100.0	10,306	19.5	4.7	3.3	18.8	18.9	15.8	22.5	27.0	23.9	39.1	42.2	39.2	0.0	7.2	17.7
Source: 2015 ACS: 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Logan MSA	618	15,765	100.0	3,521	5.7	2.6	4.2	17.4	16.8	16.5	45.7	47.2	48.4	31.3	33.3	30.1	0.0	0.0	0.7
Total	618	15,765	100.0	3,521	5.7	2.6	4.2	17.4	16.8	16.5	45.7	47.2	48.4	31.3	33.3	30.1	0.0	0.0	0.7
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Logan MSA	618	15,765	100.0	3,521	86.8	59.9	51.3	3.2	5.5	10.0	34.6
Total	618	15,765	100.0	3,521	86.8	59.9	51.3	3.2	5.5	10.0	34.6

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Logan MSA	29	522	100.0	304	1.3	3.4	0.0	5.2	6.9	2.0	71.8	58.6	82.9	21.6	31.0	14.1	0.0	0.0	1.0
Total	29	522	100.0	304	1.3	3.4	0.0	5.2	6.9	2.0	71.8	58.6	82.9	21.6	31.0	14.1	0.0	0.0	1.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Logan MSA	29	522	100.0	304	97.7	62.1	69.5	1.7	10.3	0.6	27.6
Total	29	522	100.0	304	97.7	62.1	69.5	1.7	10.3	0.6	27.6
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Memphis MSA	10,778	2,267,852,957	100.0	56,556	9.8	2.2	3.8	17.4	7.0	9.7	26.5	21.4	24.2	46.2	69.4	62.4	0.1	0.0	0.0
Total	10,778	2,267,852,957	100.0	56,556	9.8	2.2	3.8	17.4	7.0	9.7	26.5	21.4	24.2	46.2	69.4	62.4	0.1	0.0	0.0

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%
Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Memphis MSA	2,093	80,205	100.0	29,621	12.0	9.6	11.1	16.9	15.9	16.0	22.4	25.2	22.7	47.8	48.6	49.1	0.9	0.7	1.1
Total	2,093	80,205	100.0	29,621	12.0	9.6	11.1	16.9	15.9	16.0	22.4	25.2	22.7	47.8	48.6	49.1	0.9	0.7	1.1

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%
Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Memphis MSA	2,093	80,205	100.0	29,621	86.2	50.2	39.0	4.2	5.8	9.6	44.1
Total	2,093	80,205	100.0	29,621	86.2	50.2	39.0	4.2	5.8	9.6	44.1
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Memphis MSA	130	4,059	100.0	319	6.2	3.1	1.1	16.4	12.3	13.6	29.9	49.2	54.3	46.8	35.4	30.4	0.6	0.0	0.7
Total	130	4,059	100.0	319	6.2	3.1	1.1	16.4	12.3	13.6	29.9	49.2	54.3	46.8	35.4	30.4	0.6	0.0	0.7
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Memphis MSA	130	4,059	100.0	319	95.2	0.8	40.4	2.9	0.0	1.8	99.2
Total	130	4,059	100.0	319	95.2	0.8	40.4	2.9	0.0	1.8	99.2
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Minneapolis CSA	53,617	13,476,828,637	100.0	254,419	1.8	1.5	2.1	14.6	11.9	13.8	52.5	49.3	51.5	31.0	37.3	32.7	0.0	0.1	0.1
Total	53,617	13,476,828,637	100.0	254,419	1.8	1.5	2.1	14.6	11.9	13.8	52.5	49.3	51.5	31.0	37.3	32.7	0.0	0.1	0.1

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Minneapolis CSA	53,617	13,476,828,637	100.0	254,419	20.1	7.8	8.6	17.5	22.6	21.3	22.3	21.6	21.8	40.1	33.8	31.1	0.0	14.1	17.3
Total	53,617	13,476,828,637	100.0	254,419	20.1	7.8	8.6	17.5	22.6	21.3	22.3	21.6	21.8	40.1	33.8	31.1	0.0	14.1	17.3

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Minneapolis CSA	46,874	1,205,316	100.0	97,493	4.4	3.9	4.5	16.8	13.8	16.5	47.9	45.6	47.7	30.7	36.5	31.0	0.2	0.1	0.4
Total	46,874	1,205,316	100.0	97,493	4.4	3.9	4.5	16.8	13.8	16.5	47.9	45.6	47.7	30.7	36.5	31.0	0.2	0.1	0.4

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Minneapolis CSA	46,874	1,205,316	100.0	97,493	87.9	67.8	47.8	4.4	7.8	7.7	24.4
Total	46,874	1,205,316	100.0	97,493	87.9	67.8	47.8	4.4	7.8	7.7	24.4

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Minneapolis CSA	505	22,110	100.0	1,985	1.2	0.2	0.3	10.7	5.0	8.1	60.7	63.0	68.3	27.3	31.9	23.4	0.0	0.0	0.1
Total	505	22,110	100.0	1,985	1.2	0.2	0.3	10.7	5.0	8.1	60.7	63.0	68.3	27.3	31.9	23.4	0.0	0.0	0.1

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Minneapolis CSA	505	22,110	100.0	1,985	96.8	54.1	54.2	1.9	5.0	1.3	41.0
Total	505	22,110	100.0	1,985	96.8	54.1	54.2	1.9	5.0	1.3	41.0
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Myrtle Beach CSA	6,205	1,415,306,976	100.0	48,177	0.4	0.5	0.3	14.4	7.7	10.5	63.5	61.8	61.0	21.6	29.9	28.1	0.2	0.1	0.1
Total	6,205	1,415,306,976	100.0	48,177	0.4	0.5	0.3	14.4	7.7	10.5	63.5	61.8	61.0	21.6	29.9	28.1	0.2	0.1	0.1

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Myrtle Beach CSA	6,205	1,415,306,976	100.0	48,177	19.8	3.4	4.1	17.8	12.0	13.5	20.8	19.0	18.3	41.6	52.7	47.4	0.0	12.9	16.7
Total	6,205	1,415,306,976	100.0	48,177	19.8	3.4	4.1	17.8	12.0	13.5	20.8	19.0	18.3	41.6	52.7	47.4	0.0	12.9	16.7

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Myrtle Beach CSA	2,857	71,598	100.0	17,169	3.3	4.5	3.6	14.2	8.1	13.5	55.5	60.3	57.8	26.6	26.8	24.4	0.4	0.4	0.7
Total	2,857	71,598	100.0	17,169	3.3	4.5	3.6	14.2	8.1	13.5	55.5	60.3	57.8	26.6	26.8	24.4	0.4	0.4	0.7

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Myrtle Beach CSA	2,857	71,598	100.0	17,169	87.1	67.4	45.6	3.5	5.0	9.4	27.5
Total	2,857	71,598	100.0	17,169	87.1	67.4	45.6	3.5	5.0	9.4	27.5
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Myrtle Beach CSA	49	1,878	100.0	171	0.8	0.0	1.3	21.7	16.3	18.8	60.0	69.4	71.4	17.0	12.2	7.1	0.5	2.0	1.3
Total	49	1,878	100.0	171	0.8	0.0	1.3	21.7	16.3	18.8	60.0	69.4	71.4	17.0	12.2	7.1	0.5	2.0	1.3
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Myrtle Beach CSA	49	1,878	100.0	171	97.6	14.3	54.5	1.5	0.0	0.8	85.7
Total	49	1,878	100.0	171	97.6	14.3	54.5	1.5	0.0	0.8	85.7
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
New York CSA	155,421	77,671,180,152	100.0	750,242	3.1	2.2	3.7	13.7	10.4	13.7	38.4	34.6	37.2	44.7	52.6	45.3	0.1	0.1	0.1
Total	155,421	77,671,180,152	100.0	750,242	3.1	2.2	3.7	13.7	10.4	13.7	38.4	34.6	37.2	44.7	52.6	45.3	0.1	0.1	0.1

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
New York CSA	155,421	77,671,180,152	100.0	750,242	24.8	2.5	4.0	15.6	11.1	14.4	17.5	18.4	21.4	42.0	54.9	45.5	0.0	13.0	14.7
Total	155,421	77,671,180,152	100.0	750,242	24.8	2.5	4.0	15.6	11.1	14.4	17.5	18.4	21.4	42.0	54.9	45.5	0.0	13.0	14.7

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
New York CSA	78,587	2,684,612	100.0	930,515	7.8	6.7	7.2	17.2	14.4	16.9	30.8	30.5	31.3	43.2	47.7	43.4	1.0	0.7	1.2
Total	78,587	2,684,612	100.0	930,515	7.8	6.7	7.2	17.2	14.4	16.9	30.8	30.5	31.3	43.2	47.7	43.4	1.0	0.7	1.2

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
New York CSA	78,587	2,684,612	100.0	930,515	90.9	60.0	39.3	3.5	10.7	5.5	29.3
Total	78,587	2,684,612	100.0	930,515	90.9	60.0	39.3	3.5	10.7	5.5	29.3
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
New York CSA	376	7,797	100.0	1,469	4.7	0.8	1.5	15.0	6.1	9.4	35.9	36.4	36.2	44.2	56.6	51.6	0.2	0.0	1.4
Total	376	7,797	100.0	1,469	4.7	0.8	1.5	15.0	6.1	9.4	35.9	36.4	36.2	44.2	56.6	51.6	0.2	0.0	1.4
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
New York CSA	376	7,797	100.0	1,469	97.2	49.5	63.3	1.7	1.9	1.1	48.7
Total	376	7,797	100.0	1,469	97.2	49.5	63.3	1.7	1.9	1.1	48.7
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Omaha MSA	11,563	2,511,873,658	100.0	54,773	4.6	1.9	3.0	17.5	10.9	13.8	46.2	37.7	42.2	31.7	49.5	41.1	0.0	0.0	0.0	
Total	11,563	2,511,873,658	100.0	54,773	4.6	1.9	3.0	17.5	10.9	13.8	46.2	37.7	42.2	31.7	49.5	41.1	0.0	0.0	0.0	
Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Omaha MSA	11,563	2,511,873,658	100.0	54,773	20.4	6.9	7.3	17.9	19.1	18.4	21.5	21.8	20.2	40.2	40.2	31.1	0.0	12.1	23.1
Total	11,563	2,511,873,658	100.0	54,773	20.4	6.9	7.3	17.9	19.1	18.4	21.5	21.8	20.2	40.2	40.2	31.1	0.0	12.1	23.1
Source: 2015 ACS: 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Omaha MSA	4,921	136,230	100.0	20,248	6.2	5.1	5.7	15.0	14.3	13.4	47.5	40.9	46.6	31.3	39.6	34.0	0.0	0.0	0.3
Total	4,921	136,230	100.0	20,248	6.2	5.1	5.7	15.0	14.3	13.4	47.5	40.9	46.6	31.3	39.6	34.0	0.0	0.0	0.3
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues**2019-21**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Omaha MSA	4,921	136,230	100.0	20,248	84.7	61.5	54.6	5.1	6.5	10.3	32.0
Total	4,921	136,230	100.0	20,248	84.7	61.5	54.6	5.1	6.5	10.3	32.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography**2019-21**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Omaha MSA	71	3,740	100.0	1,188	2.1	4.2	0.3	8.4	2.8	6.5	61.5	62.0	74.5	28.0	31.0	18.4	0.0	0.0	0.3
Total	71	3,740	100.0	1,188	2.1	4.2	0.3	8.4	2.8	6.5	61.5	62.0	74.5	28.0	31.0	18.4	0.0	0.0	0.3

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues**2019-21**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Omaha MSA	71	3,740	100.0	1,188	97.9	35.2	65.6	1.2	9.9	0.9	54.9
Total	71	3,740	100.0	1,188	97.9	35.2	65.6	1.2	9.9	0.9	54.9

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Philadelphia CSA	73,041	19,714,916,530	100.0	355,308	3.8	2.0	2.4	17.2	13.3	15.4	43.7	42.2	43.7	35.3	42.4	38.4	0.1	0.1	0.1
Total	73,041	19,714,916,530	100.0	355,308	3.8	2.0	2.4	17.2	13.3	15.4	43.7	42.2	43.7	35.3	42.4	38.4	0.1	0.1	0.1

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Philadelphia CSA	73,041	19,714,916,530	100.0	355,308	21.9	5.7	6.8	17.2	16.0	17.4	20.0	20.1	20.8	40.8	41.2	36.2	0.0	17.0	18.7
Total	73,041	19,714,916,530	100.0	355,308	21.9	5.7	6.8	17.2	16.0	17.4	20.0	20.1	20.8	40.8	41.2	36.2	0.0	17.0	18.7

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Philadelphia CSA	39,069	1,197,380	100.0	202,757	5.2	4.1	4.4	18.5	15.8	17.1	38.5	39.0	40.7	37.3	40.8	37.0	0.5	0.3	0.7
Total	39,069	1,197,380	100.0	202,757	5.2	4.1	4.4	18.5	15.8	17.1	38.5	39.0	40.7	37.3	40.8	37.0	0.5	0.3	0.7

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Philadelphia CSA	39,069	1,197,380	100.0	202,757	89.8	64.2	43.8	3.6	9.8	6.5	26.0
Total	39,069	1,197,380	100.0	202,757	89.8	64.2	43.8	3.6	9.8	6.5	26.0
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Philadelphia CSA	229	6,300	100.0	1,262	2.0	0.9	0.8	13.0	8.3	12.4	49.1	48.9	62.1	35.7	41.9	23.8	0.2	0.0	0.9
Total	229	6,300	100.0	1,262	2.0	0.9	0.8	13.0	8.3	12.4	49.1	48.9	62.1	35.7	41.9	23.8	0.2	0.0	0.9
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Philadelphia CSA	229	6,300	100.0	1,262	95.9	50.2	64.8	2.7	9.6	1.4	40.2
Total	229	6,300	100.0	1,262	95.9	50.2	64.8	2.7	9.6	1.4	40.2
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Portland CSA	20,988	6,983,720,457	100.0	212,385	1.1	0.8	1.0	18.7	16.6	18.7	49.0	45.2	48.6	31.1	37.3	31.7	0.1	0.0	0.0
Total	20,988	6,983,720,457	100.0	212,385	1.1	0.8	1.0	18.7	16.6	18.7	49.0	45.2	48.6	31.1	37.3	31.7	0.1	0.0	0.0
Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Portland CSA	20,988	6,983,720,457	100.0	212,385	21.5	4.7	5.1	17.5	18.6	17.1	20.4	21.9	24.6	40.7	43.2	38.0	0.0	11.6	15.2
Total	20,988	6,983,720,457	100.0	212,385	21.5	4.7	5.1	17.5	18.6	17.1	20.4	21.9	24.6	40.7	43.2	38.0	0.0	11.6	15.2
Source: 2015 ACS: 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Portland CSA	21,613	770,509	100.0	83,362	2.6	2.7	2.8	22.3	21.9	22.3	41.3	40.5	41.8	32.0	33.6	31.2	1.8	1.4	1.9
Total	21,613	770,509	100.0	83,362	2.6	2.7	2.8	22.3	21.9	22.3	41.3	40.5	41.8	32.0	33.6	31.2	1.8	1.4	1.9
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Portland CSA	21,613	770,509	100.0	83,362	90.6	64.7	50.2	3.0	11.4	6.4	23.9
Total	21,613	770,509	100.0	83,362	90.6	64.7	50.2	3.0	11.4	6.4	23.9

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Portland CSA	524	21,891	100.0	1,613	1.6	0.2	0.7	14.6	10.7	7.3	55.3	62.6	62.6	28.2	26.3	28.6	0.4	0.2	0.8
Total	524	21,891	100.0	1,613	1.6	0.2	0.7	14.6	10.7	7.3	55.3	62.6	62.6	28.2	26.3	28.6	0.4	0.2	0.8

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Portland CSA	524	21,891	100.0	1,613	96.0	43.3	59.3	2.7	4.4	1.3	52.3
Total	524	21,891	100.0	1,613	96.0	43.3	59.3	2.7	4.4	1.3	52.3
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Texarkana MSA	326	45,760,654	100.0	4,264	0.8	0.0	0.2	13.2	12.3	10.1	61.8	55.8	58.7	24.2	31.9	30.9	0.0	0.0	0.1
Total	326	45,760,654	100.0	4,264	0.8	0.0	0.2	13.2	12.3	10.1	61.8	55.8	58.7	24.2	31.9	30.9	0.0	0.0	0.1

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%
Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Texarkana MSA	326	45,760,654	100.0	4,264	23.0	1.8	3.2	16.1	7.1	10.6	19.5	13.2	19.5	41.4	33.1	40.2	0.0	44.8	26.5
Total	326	45,760,654	100.0	4,264	23.0	1.8	3.2	16.1	7.1	10.6	19.5	13.2	19.5	41.4	33.1	40.2	0.0	44.8	26.5

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%
Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Texarkana MSA	278	6,146	100.0	3,000	0.6	0.7	0.4	23.5	17.6	18.1	51.2	56.8	52.6	24.6	24.8	28.3	0.2	0.0	0.7
Total	278	6,146	100.0	3,000	0.6	0.7	0.4	23.5	17.6	18.1	51.2	56.8	52.6	24.6	24.8	28.3	0.2	0.0	0.7

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%
Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2019-21**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Texarkana MSA	29	893	100.0	349	0.5	0.0	0.0	11.0	6.9	7.4	63.7	72.4	65.8	24.8	20.7	26.8	0.0	0.0	0.0
Total	29	893	100.0	349	0.5	0.0	0.0	11.0	6.9	7.4	63.7	72.4	65.8	24.8	20.7	26.8	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2019-21**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Texarkana MSA	29	893	100.0	349	96.1	13.8	55.4	2.4	0.0	1.6	86.2
Total	29	893	100.0	349	96.1	13.8	55.4	2.4	0.0	1.6	86.2

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Washington CSA	91,640	35,873,865,563	100.0	630,808	4.1	3.4	3.4	17.6	14.7	15.6	38.9	37.3	39.5	39.3	44.5	41.4	0.1	0.2	0.1
Total	91,640	35,873,865,563	100.0	630,808	4.1	3.4	3.4	17.6	14.7	15.6	38.9	37.3	39.5	39.3	44.5	41.4	0.1	0.2	0.1

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Washington CSA	91,640	35,873,865,563	100.0	630,808	22.1	6.2	7.3	16.9	17.6	17.5	20.1	19.5	20.3	40.8	37.0	31.5	0.0	19.7	23.3
Total	91,640	35,873,865,563	100.0	630,808	22.1	6.2	7.3	16.9	17.6	17.5	20.1	19.5	20.3	40.8	37.0	31.5	0.0	19.7	23.3

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Washington CSA	53,172	1,614,233	100.0	278,354	5.3	4.1	4.9	19.0	17.9	18.2	36.7	36.3	37.2	38.4	41.4	39.1	0.5	0.3	0.6
Total	53,172	1,614,233	100.0	278,354	5.3	4.1	4.9	19.0	17.9	18.2	36.7	36.3	37.2	38.4	41.4	39.1	0.5	0.3	0.6

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2019-21											
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Washington CSA	53,172	1,614,233	100.0	278,354	89.3	60.4	47.1	3.6	9.5	7.0	30.1
Total	53,172	1,614,233	100.0	278,354	89.3	60.4	47.1	3.6	9.5	7.0	30.1
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2019-21																			
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Washington CSA	493	11,637	100.0	1,177	3.2	2.8	1.7	18.8	19.3	16.0	41.3	44.4	46.0	36.6	33.3	35.2	0.1	0.2	1.2
Total	493	11,637	100.0	1,177	3.2	2.8	1.7	18.8	19.3	16.0	41.3	44.4	46.0	36.6	33.3	35.2	0.1	0.2	1.2
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2019-21											
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Washington CSA	493	11,637	100.0	1,177	96.0	23.5	53.3	2.3	1.4	1.7	75.1
Total	493	11,637	100.0	1,177	96.0	23.5	53.3	2.3	1.4	1.7	75.1
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Birmingham CSA	7,908	1,689,953,140	33.8	62,747	4.3	1.5	1.4	18.7	10.1	11.7	42.6	33.9	36.9	34.4	54.4	50.0	0.0	0.0	0.0
Mobile CSA	3,606	720,621,457	15.4	34,588	3.6	0.5	0.5	14.5	10.9	11.9	49.2	46.4	47.6	32.7	42.2	40.0	0.0	0.0	0.0
Anniston MSA	313	41,161,070	1.3	3,903	3.2	0.3	0.5	15.2	9.3	11.8	69.3	74.4	74.2	11.8	15.0	13.1	0.5	1.0	0.4
Dothan CSA	1,158	185,377,063	4.9	7,524	1.0	0.5	0.5	10.8	6.8	7.7	54.5	47.1	49.1	33.8	45.6	42.8	0.0	0.0	0.0
Florence MSA	537	98,632,324	2.3	6,744	1.5	0.4	0.5	11.7	8.8	10.4	66.6	61.3	64.2	20.2	29.6	24.9	0.0	0.0	0.0
Gadsden MSA	361	56,866,816	1.5	3,397	4.0	0.0	1.0	19.7	10.5	9.9	43.5	35.7	38.3	32.9	53.7	50.8	0.0	0.0	0.0
Huntsville CSA	5,310	1,158,855,600	22.7	40,570	3.8	1.8	2.3	19.8	14.7	14.6	41.5	35.8	39.6	34.9	47.6	43.6	0.0	0.0	0.0
Montgomery CSA	1,763	350,251,192	7.5	18,465	5.7	1.3	0.7	19.2	12.1	9.7	40.9	34.8	35.8	34.2	51.7	53.7	0.0	0.1	0.1
Tuscaloosa MSA	1,399	281,557,927	6.0	10,486	3.1	0.2	0.6	21.2	9.3	10.4	40.3	34.3	37.2	35.0	55.4	51.1	0.4	0.8	0.6
Alabama Combined Non-MSA	1,056	169,601,596	4.5	10,107	0.0	0.0	0.0	11.2	6.4	7.2	53.0	42.3	43.5	35.8	51.2	49.3	0.0	0.0	0.0
Total	23,411	4,752,878,182	100.0	198,531	3.6	1.2	1.2	17.1	11.0	11.6	46.2	38.6	41.7	33.0	49.2	45.5	0.1	0.1	0.1
Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Birmingham CSA	7,908	1,689,953,140	33.8	62,747	23.7	4.3	5.6	16.1	14.4	16.2	18.8	17.8	20.0	41.3	41.4	39.2	0.0	22.1	19.0
Mobile CSA	3,606	720,621,457	15.4	34,588	22.8	5.4	4.9	16.2	12.3	15.2	19.7	17.0	20.0	41.3	40.3	40.3	0.0	25.2	19.6
Anniston MSA	313	41,161,070	1.3	3,903	22.9	5.8	6.8	16.2	9.9	19.5	20.9	16.9	23.2	40.0	30.4	26.2	0.0	37.1	24.3
Dothan CSA	1,158	185,377,063	4.9	7,524	20.9	4.4	5.1	16.3	10.2	13.3	18.6	16.7	17.3	44.3	39.9	33.6	0.0	28.8	30.6
Florence MSA	537	98,632,324	2.3	6,744	21.4	7.3	7.4	17.4	12.3	16.7	20.8	16.6	19.4	40.4	45.3	33.7	0.0	18.6	22.7
Gadsden MSA	361	56,866,816	1.5	3,397	24.6	5.8	8.7	16.1	10.8	18.7	19.2	16.6	23.6	40.1	37.1	28.8	0.0	29.6	20.3
Huntsville CSA	5,310	1,158,855,599	22.7	40,570	23.2	6.1	6.3	17.1	13.4	14.8	18.0	19.6	18.5	41.7	42.2	36.1	0.0	18.7	24.4
Montgomery CSA	1,763	350,251,191	7.5	18,465	25.0	3.2	5.4	16.1	8.8	15.9	18.0	11.4	18.8	40.8	32.0	38.3	0.0	44.6	21.6
Tuscaloosa MSA	1,399	281,557,926	6.0	10,486	24.8	1.9	4.1	15.9	8.9	14.2	17.9	18.1	18.2	41.4	44.7	32.9	0.0	26.4	30.6
Alabama Combined Non-MSA	1,056	169,601,596	4.5	10,107	19.7	3.0	2.8	17.5	8.2	10.6	18.7	14.9	18.4	44.1	45.8	44.8	0.0	28.0	23.4
Total	23,411	4,752,878,182	100.0	198,531	23.2	4.7	5.5	16.4	12.4	15.3	18.8	17.4	19.4	41.6	40.9	37.8	0.0	24.6	22.0
Source: 2015 ACS: 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Birmingham CSA	5,271	143,463	36.3	29,508	6.3	6.0	6.2	20.5	16.0	19.0	33.8	30.4	30.5	38.3	47.1	43.0	1.1	0.5	1.3
Mobile CSA	3,261	70,642	22.5	19,665	4.3	2.7	3.9	19.6	16.3	17.4	43.2	44.8	42.1	32.9	36.2	35.9	0.1	0.0	0.6
Anniston MSA	218	7,580	1.5	1,444	5.0	3.7	3.1	30.2	27.5	25.9	55.1	55.5	60.6	7.9	12.4	8.5	1.8	0.9	1.9
Dothan CSA	839	21,103	5.8	3,999	6.0	4.9	7.6	14.4	13.9	12.9	44.6	45.2	43.6	35.0	36.0	35.0	0.0	0.0	1.1
Florence MSA	227	10,102	1.6	2,744	9.5	14.5	7.2	15.2	21.6	11.4	55.2	45.4	55.5	20.0	18.5	25.5	0.0	0.0	0.4
Gadsden MSA	266	9,045	1.8	1,732	5.2	2.3	3.6	21.1	17.3	18.9	47.1	51.9	47.1	26.7	28.6	29.8	0.0	0.0	0.5
Huntsville CSA	1,652	44,013	11.4	12,462	9.4	7.9	10.6	22.5	17.7	19.5	36.3	37.6	36.9	31.9	36.7	32.5	0.0	0.0	0.5
Montgomery CSA	1,408	44,428	9.7	10,127	7.3	6.5	6.6	19.2	14.1	17.5	38.8	36.7	36.3	31.5	40.9	36.1	3.2	1.8	3.5
Tuscaloosa MSA	625	12,608	4.3	5,364	2.3	2.1	2.2	30.0	26.6	29.4	36.2	31.2	34.8	29.3	38.9	32.3	2.4	1.3	1.3
Alabama Combined Non-MSA	751	19,227	5.2	4,322	0.0	0.0	0.0	13.8	13.7	11.5	49.6	50.9	49.5	36.6	35.4	36.9	0.0	0.0	2.0
Total	14,518	382,211	100.0	91,367	6.0	5.0	5.8	20.4	16.6	18.4	39.3	38.0	37.8	33.4	40.0	36.7	0.9	0.4	1.3
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Birmingham CSA	5,271	143,463	36.3	29,508	83.3	62.2	41.5	5.3	6.2	11.3	31.6
Mobile CSA	3,261	70,642	22.5	19,665	84.1	66.4	38.2	4.7	7.7	11.2	26.0
Anniston MSA	218	7,580	1.5	1,444	79.4	66.1	37.7	5.4	8.7	15.2	25.2
Dothan CSA	839	21,103	5.8	3,999	81.2	65.8	36.7	5.4	8.1	13.4	26.1
Florence MSA	227	10,102	1.6	2,744	82.0	61.7	56.8	5.1	7.5	12.9	30.8
Gadsden MSA	266	9,045	1.8	1,732	81.5	62.8	35.4	5.2	8.3	13.3	28.9
Huntsville CSA	1,652	44,013	11.4	12,462	83.7	65.4	46.3	4.5	6.0	11.8	28.6
Montgomery CSA	1,408	44,428	9.7	10,127	81.1	68.7	35.1	4.8	7.5	14.1	23.9
Tuscaloosa MSA	625	12,608	4.3	5,364	82.6	65.3	43.9	5.1	5.3	12.4	29.4
Alabama Combined Non-MSA	751	19,227	5.2	4,322	80.6	65.2	38.0	5.1	4.0	14.3	30.8
Total	14,518	382,211	100.0	91,367	82.8	64.7	40.8	5.0	6.7	12.2	28.6
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Birmingham CSA	173	5,307	25.7	303	2.5	0.0	0.8	18.0	24.9	30.1	41.0	52.6	42.8	38.1	22.5	25.8	0.4	0.0	0.4
Mobile CSA	50	3,326	7.4	224	1.9	0.0	1.5	14.3	8.0	16.2	54.4	74.0	52.0	29.5	18.0	28.9	0.0	0.0	1.5
Anniston MSA	13	859	1.9	15	1.7	0.0	0.0	17.9	15.4	0.0	69.8	69.2	70.0	10.1	15.4	20.0	0.6	0.0	10.0
Dothan CSA	112	9,621	16.7	308	0.8	0.0	0.4	12.3	9.8	8.8	56.9	62.5	60.9	29.9	27.7	29.9	0.0	0.0	0.0
Florence MSA	23	427	3.4	94	4.4	0.0	1.2	8.8	0.0	9.8	66.9	69.6	64.6	19.9	30.4	24.4	0.0	0.0	0.0
Gadsden MSA	18	319	2.7	39	1.1	5.6	5.7	15.0	16.7	14.3	49.4	61.1	74.3	34.4	16.7	5.7	0.0	0.0	0.0
Huntsville CSA	79	1,954	11.8	329	4.8	0.0	2.0	20.8	22.8	27.9	47.3	63.3	59.9	27.1	13.9	9.8	0.0	0.0	0.3
Montgomery CSA	42	2,222	6.3	230	3.8	4.8	2.3	19.2	14.3	29.1	44.4	57.1	45.1	32.2	23.8	21.6	0.4	0.0	1.9
Tuscaloosa MSA	65	5,017	9.7	174	2.3	4.6	7.8	32.8	36.9	51.0	32.4	32.3	31.4	32.4	26.2	7.8	0.2	0.0	2.0
Alabama Combined Non-MSA	97	2,565	14.4	298	0.0	0.0	0.0	9.8	6.2	12.2	56.6	60.8	62.4	33.5	33.0	25.5	0.0	0.0	0.0
Total	672	31,617	100.0	2,014	2.6	0.9	1.8	17.4	17.4	22.5	48.2	57.7	53.5	31.6	24.0	21.5	0.2	0.0	0.7
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues**2019-21**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Birmingham CSA	173	5,307	25.7	303	95.9	7.5	39.4	2.3	0.0	1.9	92.5
Mobile CSA	50	3,326	7.4	224	95.2	14.0	51.0	3.0	8.0	1.8	78.0
Anniston MSA	13	859	1.9	15	97.8	15.4	40.0	1.1	0.0	1.1	84.6
Dothan CSA	112	9,621	16.7	308	97.5	44.6	39.4	0.8	6.3	1.7	49.1
Florence MSA	23	427	3.4	94	98.6	21.7	42.7	1.4	0.0	0.0	78.3
Gadsden MSA	18	319	2.7	39	98.3	27.8	20.0	0.0	0.0	1.7	72.2
Huntsville CSA	79	1,954	11.8	329	96.0	5.1	44.4	2.3	1.3	1.7	93.7
Montgomery CSA	42	2,222	6.3	230	95.1	7.1	34.3	2.4	2.4	2.4	90.5
Tuscaloosa MSA	65	5,017	9.7	174	97.2	13.8	60.1	1.7	0.0	1.1	86.2
Alabama Combined Non-MSA	97	2,565	14.4	298	97.6	33.0	36.9	1.5	0.0	0.9	67.0
Total	672	31,617	100.0	2,014	96.3	19.3	42.2	2.1	1.9	1.7	78.7

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2019-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Alaska Combined Non-MSA	1,723	439,746,078	19.1	6,456	2.3	0.0	0.1	13.9	3.3	4.9	57.3	64.1	64.7	26.5	32.6	30.4	0.0	0.0	0.0
Anchorage MSA	6,656	1,899,824,296	73.7	23,899	1.0	1.0	0.7	15.9	12.9	14.0	55.1	52.8	57.8	27.9	33.3	27.5	0.0	0.0	0.0
Fairbanks MSA	656	148,849,894	7.3	3,974	0.0	0.0	0.0	6.3	5.2	6.7	61.0	66.3	69.1	32.7	28.5	24.2	0.0	0.0	0.0
Total	9,035	2,488,420,268	100.0	34,329	1.3	0.8	0.5	14.0	10.5	11.4	56.6	55.9	60.4	28.2	32.8	27.6	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2019-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Alaska Combined Non-MSA	1,723	439,746,078	19.1	6,456	20.9	3.6	4.4	16.2	12.1	14.6	21.2	21.9	24.2	41.7	41.9	38.2	0.0	20.5	18.7
Anchorage MSA	6,656	1,899,824,296	73.7	23,899	19.8	4.5	6.8	18.0	15.7	19.7	22.5	18.9	21.8	39.7	30.6	23.7	0.0	30.2	28.1
Fairbanks MSA	656	148,849,894	7.3	3,974	18.4	3.2	4.0	18.0	13.7	20.0	23.8	18.0	26.4	39.8	25.0	24.5	0.0	40.1	25.1
Total	9,035	2,488,420,268	100.0	34,329	20.0	4.3	6.0	17.5	14.9	18.8	22.3	19.4	22.8	40.3	32.4	26.5	0.0	29.1	26.0

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2019-21**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Alaska Combined Non-MSA	2,569	98,314	36.2	6,159	0.7	0.4	0.2	6.3	5.3	5.5	65.7	69.4	65.5	27.1	24.8	27.7	0.2	0.1	1.1
Anchorage MSA	4,005	164,989	56.5	11,686	3.1	2.6	3.4	25.8	24.0	22.6	49.1	52.0	52.9	22.1	21.3	20.8	0.0	0.0	0.3
Fairbanks MSA	514	16,451	7.3	2,053	0.0	0.0	0.0	20.2	14.8	16.3	48.5	54.1	48.5	31.3	31.1	34.7	0.0	0.0	0.5
Total	7,088	279,754	100.0	19,898	2.0	1.6	2.0	20.0	16.6	16.6	53.4	58.5	56.4	24.5	23.3	24.4	0.1	0.0	0.5

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2019-21**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Alaska Combined Non-MSA	2,569	98,314	36.2	6,159	82.1	64.2	44.3	4.0	10.6	14.0	25.1
Anchorage MSA	4,005	164,989	56.5	11,686	88.0	64.8	42.7	4.4	11.9	7.6	23.3
Fairbanks MSA	514	16,451	7.3	2,053	85.9	66.1	44.7	4.1	5.6	10.0	28.2
Total	7,088	279,754	100.0	19,898	86.2	64.7	43.4	4.2	11.0	9.6	24.4

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2019-21**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Alaska Combined Non-MSA	71	4,413	50.7	1,003	0.0	0.0	0.0	4.6	7.0	2.6	66.0	64.8	47.5	29.5	28.2	49.9	0.0	0.0	0.0
Anchorage MSA	65	1,831	46.4	144	1.2	0.0	1.5	15.9	15.4	5.3	60.6	63.1	64.1	22.3	21.5	29.0	0.0	0.0	0.0
Fairbanks MSA	4	110	2.9	29	0.0	0.0	0.0	8.4	0.0	7.1	49.4	100.0	25.0	42.2	0.0	67.9	0.0	0.0	0.0
Total	140	6,354	100.0	1,176	0.6	0.0	0.2	11.0	10.7	3.0	60.9	65.0	48.8	27.5	24.3	48.0	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2019-21**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Alaska Combined Non-MSA	71	4,413	50.7	1,003	95.0	67.6	83.7	3.0	4.2	2.0	28.2
Anchorage MSA	65	1,831	46.4	144	96.9	41.5	68.7	1.5	1.5	1.6	56.9
Fairbanks MSA	4	110	2.9	29	98.9	25.0	78.6	1.1	0.0	0.0	75.0
Total	140	6,354	100.0	1,176	96.5	54.3	81.8	2.0	2.9	1.5	42.9

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Phoenix CSA	46,147	13,234,994,483	71.9	421,091	4.4	2.9	3.3	19.4	13.2	14.5	37.7	37.8	39.6	38.5	45.7	42.1	0.0	0.4	0.5
Tucson CSA	10,056	2,354,344,379	15.7	73,381	4.5	2.7	3.1	21.6	15.0	15.5	34.1	32.7	33.2	39.7	49.6	48.2	0.0	0.0	0.0
Flagstaff MSA	1,092	332,757,119	1.7	8,625	3.5	0.0	0.0	18.2	8.8	11.7	35.6	33.6	34.9	42.7	57.5	53.1	0.0	0.1	0.3
Lake Havasu City MSA	2,032	392,796,665	3.2	17,046	0.0	0.0	0.0	9.2	2.7	3.0	72.3	73.5	72.2	18.5	23.8	24.8	0.0	0.0	0.0
Prescott Valley MSA	1,960	482,113,188	3.1	19,350	0.0	0.0	0.0	18.7	14.2	16.5	61.2	66.1	64.7	20.1	19.7	18.8	0.0	0.0	0.0
Sierra Vista MSA	977	158,622,971	1.5	6,952	2.3	1.6	1.9	26.6	22.8	24.1	44.2	32.0	36.8	26.9	43.5	37.3	0.0	0.0	0.0
Yuma MSA	1,168	206,830,586	1.8	11,919	0.0	0.0	0.0	25.7	15.8	15.6	47.0	40.7	40.7	27.3	43.6	43.7	0.0	0.0	0.0
Arizona Combined Non-MSA	795	159,748,444	1.2	8,368	1.0	0.0	0.0	37.7	13.6	12.2	34.8	42.5	40.7	26.5	43.9	47.1	0.0	0.0	0.0
Total	64,227	17,322,207,833	100.0	566,732	3.7	2.5	2.9	20.4	13.3	14.4	39.6	38.9	40.6	36.2	44.9	41.8	0.0	0.3	0.4
Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Phoenix CSA	46,147	13,234,994,483	71.9	421,091	21.9	6.4	5.2	17.3	19.3	16.5	19.5	19.5	20.5	41.3	40.0	38.6	0.0	14.9	19.3
Tucson CSA	10,056	2,354,344,378	15.7	73,381	22.2	6.5	4.9	17.4	18.4	13.9	19.1	19.3	19.3	41.3	37.8	36.1	0.0	18.1	25.8
Flagstaff MSA	1,092	332,757,119	1.7	8,625	24.0	2.2	3.0	15.6	14.1	11.2	17.2	20.1	18.4	43.2	56.0	48.6	0.0	7.5	18.8
Lake Havasu City MSA	2,032	392,796,665	3.2	17,046	18.5	5.0	4.0	19.3	14.0	11.5	22.2	20.8	16.8	40.0	49.5	46.4	0.0	10.8	21.2
Prescott Valley MSA	1,960	482,113,188	3.1	19,350	18.8	5.2	4.3	19.3	14.7	14.1	22.4	21.9	18.8	39.6	47.5	42.6	0.0	10.7	20.3
Sierra Vista MSA	977	158,622,971	1.5	6,952	23.1	6.2	6.9	16.0	13.1	13.7	19.9	16.1	15.5	41.1	34.2	27.2	0.0	30.4	36.7
Yuma MSA	1,168	206,830,586	1.8	11,919	20.0	2.0	1.9	19.1	11.6	11.0	19.6	17.4	18.1	41.3	37.3	39.2	0.0	31.7	29.8
Arizona Combined Non-MSA	795	159,748,444	1.2	8,368	25.6	1.4	1.8	16.6	7.3	8.0	17.9	14.3	15.4	39.9	63.9	53.6	0.0	13.1	21.2
Total	64,227	17,322,207,833	100.0	566,732	21.8	6.1	5.0	17.4	18.4	15.5	19.6	19.4	19.9	41.2	40.6	38.9	0.0	15.5	20.7
Source: 2015 ACS: 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Phoenix CSA	47,085	1,385,184	73.6	140,245	6.8	5.3	6.5	15.4	14.5	16.7	31.2	28.8	29.4	46.1	50.8	46.5	0.5	0.5	1.0
Tucson CSA	8,996	275,832	14.1	21,981	5.8	6.6	6.6	22.8	23.5	25.5	29.3	31.1	29.8	41.1	38.2	36.6	1.0	0.6	1.6
Flagstaff MSA	1,286	39,539	2.0	3,316	0.1	0.2	0.1	17.7	22.2	22.5	32.3	30.1	31.1	48.6	46.6	44.2	1.4	0.9	2.1
Lake Havasu City MSA	1,729	35,963	2.7	4,347	0.0	0.0	0.0	4.1	5.1	4.1	71.6	71.1	73.4	24.3	23.8	21.8	0.0	0.0	0.8
Prescott Valley MSA	2,316	46,577	3.6	6,471	0.0	0.0	0.0	21.2	20.9	22.7	51.5	53.5	51.0	27.3	25.6	24.5	0.0	0.0	1.7
Sierra Vista MSA	817	19,751	1.3	1,831	3.9	5.6	3.8	29.2	26.3	32.2	41.8	29.1	39.2	25.2	38.9	23.2	0.0	0.0	1.6
Yuma MSA	1,123	31,366	1.8	2,836	0.0	0.0	0.0	27.8	22.8	32.1	38.7	40.1	37.1	33.5	37.1	29.9	0.0	0.0	0.9
Arizona Combined Non-MSA	609	15,607	1.0	2,171	0.0	0.8	0.1	16.7	22.3	15.8	40.8	44.0	35.5	42.5	32.8	44.3	0.0	0.0	4.2
Total	63,961	1,849,819	100.0	183,198	6.1	4.9	5.8	16.6	16.3	18.1	32.6	31.6	31.5	44.1	46.8	43.4	0.5	0.5	1.1
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Phoenix CSA	47,085	1,385,184	73.6	140,245	92.1	68.0	46.3	1.8	10.3	6.1	21.7
Tucson CSA	8,996	275,832	14.1	21,981	90.0	69.3	45.6	2.3	10.0	7.6	20.8
Flagstaff MSA	1,286	39,539	2.0	3,316	88.4	69.4	47.9	2.7	9.2	8.9	21.5
Lake Havasu City MSA	1,729	35,963	2.7	4,347	90.1	72.1	46.5	2.5	8.0	7.4	19.9
Prescott Valley MSA	2,316	46,577	3.6	6,471	91.8	72.0	52.3	1.9	6.5	6.3	21.5
Sierra Vista MSA	817	19,751	1.3	1,831	87.3	73.8	49.8	2.2	7.3	10.6	18.8
Yuma MSA	1,123	31,366	1.8	2,836	86.1	65.0	44.2	3.2	9.4	10.7	25.6
Arizona Combined Non-MSA	609	15,607	1.0	2,171	82.4	73.1	48.3	3.4	5.3	14.3	21.7
Total	63,961	1,849,819	100.0	183,198	91.5	68.6	46.5	1.9	9.9	6.6	21.5
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2019-21**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Phoenix CSA	507	15,283	45.9	668	7.0	1.6	2.8	19.4	20.3	21.0	31.8	34.1	32.6	41.6	44.0	40.6	0.3	0.0	3.0
Tucson CSA	110	2,630	10.0	112	5.6	0.9	0.0	21.3	8.2	8.8	33.6	43.6	42.6	39.2	47.3	47.1	0.3	0.0	1.5
Flagstaff MSA	16	508	1.4	20	0.0	0.0	0.0	13.9	18.8	0.0	29.4	37.5	40.0	56.1	43.8	60.0	0.6	0.0	0.0
Lake Havasu City MSA	63	1,245	5.7	34	0.0	0.0	0.0	4.9	14.3	13.3	79.7	74.6	80.0	15.4	11.1	0.0	0.0	0.0	6.7
Prescott Valley MSA	88	1,468	8.0	88	0.0	0.0	0.0	20.7	15.9	25.4	55.1	55.7	28.8	24.2	28.4	28.8	0.0	0.0	16.9
Sierra Vista MSA	186	5,296	16.8	138	1.8	1.1	0.0	12.4	9.1	10.1	71.9	74.2	82.6	14.0	15.6	4.3	0.0	0.0	2.9
Yuma MSA	64	6,362	5.8	87	0.0	0.0	0.0	21.1	29.7	20.0	48.8	35.9	45.7	30.1	34.4	34.3	0.0	0.0	0.0
Arizona Combined Non-MSA	70	2,358	6.3	73	0.0	0.0	0.0	10.1	10.0	17.0	40.6	37.1	26.4	49.3	52.9	52.8	0.0	0.0	3.8
Total	1,104	35,150	100.0	1,220	5.7	1.0	1.6	19.0	16.4	18.5	35.9	46.2	39.2	39.2	36.4	37.1	0.2	0.0	3.7

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues**2019-21**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Phoenix CSA	507	15,283	45.9	668	96.7	40.4	51.6	2.0	10.1	1.3	49.5
Tucson CSA	110	2,630	10.0	112	97.1	30.9	60.3	1.8	2.7	1.1	66.4
Flagstaff MSA	16	508	1.4	20	96.4	56.3	53.3	1.8	0.0	1.8	43.8
Lake Havasu City MSA	63	1,245	5.7	34	98.4	22.2	60.0	0.9	6.3	0.7	71.4
Prescott Valley MSA	88	1,468	8.0	88	97.7	26.1	59.3	1.5	0.0	0.8	73.9
Sierra Vista MSA	186	5,296	16.8	138	97.7	5.4	55.1	1.1	0.0	1.3	94.6
Yuma MSA	64	6,362	5.8	87	86.5	53.1	34.3	8.5	21.9	5.0	25.0
Arizona Combined Non-MSA	70	2,358	6.3	73	96.8	37.1	47.2	1.8	2.9	1.4	60.0
Total	1,104	35,150	100.0	1,220	96.6	32.2	51.6	2.1	6.7	1.4	61.1

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Fresno CSA	7,897	2,023,721,125	2.6	60,060	2.6	1.8	1.8	22.7	15.9	16.5	23.8	22.2	21.7	50.9	60.1	60.0	0.0	0.0	0.0
Los Angeles CSA	111,058	64,641,377,197	37.0	990,764	2.6	1.6	2.3	18.6	12.6	16.7	30.8	26.8	30.6	47.9	58.5	50.1	0.1	0.5	0.3
San Diego MSA	24,748	16,774,121,003	8.2	209,488	2.8	2.0	2.9	15.1	10.0	14.3	35.5	28.5	34.2	46.6	59.5	48.6	0.0	0.0	0.0
San Jose CSA	111,115	83,685,428,801	37.0	582,217	3.7	2.5	3.7	17.2	12.2	16.6	37.6	33.8	37.0	41.4	51.3	42.6	0.1	0.1	0.1
Bakersfield MSA	4,153	875,566,735	1.4	42,947	5.6	2.7	3.3	15.8	9.5	9.8	32.3	29.2	29.0	46.2	58.3	57.1	0.1	0.3	0.8
Chico MSA	1,001	252,949,607	0.3	9,926	0.9	1.2	1.4	20.3	16.5	17.7	51.6	41.6	42.1	27.2	40.8	38.8	0.0	0.0	0.0
El Centro MSA	773	135,096,561	0.3	5,815	0.0	0.0	0.0	33.5	20.7	21.7	25.5	22.0	20.0	40.8	57.3	58.3	0.1	0.0	0.1
Redding CSA	1,135	260,373,119	0.4	14,341	0.0	0.0	0.0	20.9	17.3	18.9	58.4	53.0	56.6	20.7	29.8	24.5	0.0	0.0	0.0
Sacramento CSA	22,560	8,276,636,976	7.5	190,834	4.1	4.4	4.7	17.5	13.5	16.1	34.3	30.1	31.5	44.0	51.9	47.6	0.0	0.0	0.0
Salinas MSA	3,304	1,755,979,609	1.1	17,469	0.6	0.5	0.7	15.3	13.8	14.6	33.9	29.4	35.3	50.2	56.3	49.3	0.0	0.0	0.0
San Luis Obispo MSA	3,282	1,464,672,294	1.1	19,656	0.0	0.0	0.0	9.3	8.7	10.6	71.7	70.4	71.3	18.5	20.6	17.9	0.5	0.3	0.2
Santa Maria MSA	3,412	1,995,342,669	1.1	21,793	3.1	3.6	3.5	15.6	20.8	17.1	34.1	30.6	33.9	47.2	45.0	45.5	0.0	0.0	0.0
Visalia MSA	2,621	558,572,097	0.9	19,957	1.3	0.7	0.4	23.6	14.2	14.3	31.8	27.7	28.1	43.3	57.3	57.2	0.0	0.0	0.0
California Combined Non-MSA	3,109	919,995,546	1.0	26,606	1.7	0.9	1.2	16.3	8.7	11.0	54.9	48.2	53.0	27.1	41.1	34.0	0.1	1.1	0.9
Total	300,168	183,619,833,338	100.0	2,211,873	3.0	2.2	2.9	17.9	12.5	16.1	34.3	30.6	33.3	44.8	54.5	47.5	0.1	0.2	0.2
Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Fresno CSA	7,897	2,023,721,125	2.6	60,060	24.7	1.9	2.0	16.2	9.0	9.0	16.8	18.7	19.2	42.3	52.9	48.9	0.0	17.6	21.0
Los Angeles CSA	111,058	64,641,377,197	37.0	990,764	23.9	1.7	3.1	16.5	7.8	8.5	17.6	15.1	17.9	42.0	65.2	51.3	0.0	10.2	19.2
San Diego MSA	24,748	16,774,121,003	8.2	209,488	23.6	1.8	3.1	16.9	8.2	9.4	17.8	15.1	18.5	41.7	64.1	49.5	0.0	10.9	19.5
San Jose CSA	111,115	83,685,428,801	37.0	582,217	23.8	2.4	4.7	16.3	8.5	12.4	18.4	14.9	20.9	41.5	67.7	49.3	0.0	6.6	12.8
Bakersfield MSA	4,153	875,566,735	1.4	42,947	24.8	1.8	1.8	16.4	7.4	8.5	16.1	14.1	19.3	42.7	50.4	49.2	0.0	26.2	21.3
Chico MSA	1,001	252,949,607	0.3	9,926	22.9	3.4	3.1	16.7	12.0	11.6	19.0	20.2	21.0	41.4	53.5	49.1	0.0	10.9	15.2
El Centro MSA	773	135,096,561	0.3	5,815	24.1	1.4	1.3	17.0	8.9	6.5	15.7	15.7	17.9	43.2	42.8	51.6	0.0	31.2	22.8
Redding CSA	1,135	260,373,119	0.4	14,341	22.5	4.4	4.2	18.8	12.9	14.6	19.6	22.0	22.7	39.2	47.4	40.1	0.0	13.3	18.5
Sacramento CSA	22,560	8,276,636,976	7.5	190,834	23.3	3.4	3.9	16.2	13.9	13.1	18.3	20.7	22.4	42.2	51.2	45.1	0.0	10.7	15.5
Salinas MSA	3,304	1,755,979,609	1.1	17,469	21.6	1.5	2.3	17.9	7.4	8.0	18.7	16.4	18.6	41.9	65.6	55.4	0.0	9.0	15.8
San Luis Obispo MSA	3,282	1,464,672,294	1.1	19,656	21.0	2.5	3.9	18.2	11.5	12.8	20.2	22.3	22.1	40.6	57.1	45.2	0.0	6.6	16.0
Santa Maria MSA	3,412	1,995,342,669	1.1	21,793	23.4	2.7	3.3	16.8	10.4	10.8	18.2	16.9	18.7	41.6	59.2	49.8	0.0	10.7	17.4
Visalia MSA	2,621	558,572,097	0.9	19,957	23.3	1.6	1.5	17.6	9.0	8.6	16.8	17.2	17.0	42.3	54.6	47.1	0.0	17.6	25.8
California Combined Non-MSA	3,109	919,995,547	1.0	26,606	21.8	2.3	3.0	17.8	9.8	10.7	19.7	16.8	19.5	40.7	57.7	50.7	0.0	13.3	16.1
Total	300,168	183,619,833,338	100.0	2,211,873	23.8	2.1	3.5	16.5	8.7	10.1	17.9	15.7	19.3	41.8	64.0	49.8	0.0	9.5	17.2
Source: 2015 ACS: 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Fresno CSA	9,082	389,838	2.1	29,297	5.3	4.0	4.0	26.7	21.3	22.7	22.3	23.2	24.6	44.6	51.0	47.5	1.1	0.6	1.2
Los Angeles CSA	214,832	6,477,044	49.1	765,991	4.8	4.0	4.6	20.2	19.1	20.7	26.9	27.1	27.6	46.6	48.9	45.6	1.5	0.9	1.5
San Diego MSA	39,180	1,229,942	8.9	118,477	5.6	5.0	5.2	14.7	14.0	14.3	34.7	32.8	34.6	44.9	48.1	45.4	0.1	0.1	0.4
San Jose CSA	120,049	4,276,449	27.4	319,975	8.5	7.3	8.1	19.1	17.9	19.5	32.9	34.1	34.0	39.1	40.3	37.8	0.5	0.4	0.7
Bakersfield MSA	6,421	208,773	1.5	19,566	5.4	5.2	4.3	19.7	18.1	17.2	26.7	22.1	25.8	47.4	54.1	51.4	0.8	0.5	1.4
Chico MSA	1,368	41,477	0.3	4,759	1.5	0.8	1.1	27.4	20.8	25.9	43.6	46.2	38.8	27.4	32.2	33.5	0.0	0.0	0.7
El Centro MSA	1,029	38,445	0.2	3,001	0.0	0.0	0.0	40.0	36.0	35.5	27.7	32.8	27.2	32.0	31.3	36.3	0.2	0.0	0.9
Redding CSA	1,173	33,061	0.3	5,337	0.0	0.0	0.0	23.5	22.8	20.5	61.2	61.5	61.2	15.3	15.7	17.4	0.0	0.0	0.9
Sacramento CSA	29,622	877,744	6.8	77,767	8.5	7.1	7.8	22.5	18.3	19.8	29.6	29.5	29.4	37.8	44.4	41.5	1.6	0.8	1.5
Salinas MSA	4,091	109,702	0.9	9,126	3.7	1.4	3.0	13.3	11.7	13.1	31.7	29.3	32.8	50.7	57.2	49.3	0.5	0.3	1.8
San Luis Obispo MSA	2,530	69,186	0.6	10,600	0.0	0.0	0.0	20.4	20.8	18.8	58.9	58.2	60.1	19.8	20.6	19.5	0.8	0.4	1.5
Santa Maria MSA	3,398	101,450	0.8	14,074	5.1	5.0	3.6	28.9	28.6	29.5	25.0	24.5	25.5	40.5	41.7	40.2	0.5	0.2	1.2
Visalia MSA	2,251	102,631	0.5	8,273	1.0	0.8	1.0	28.3	28.7	26.7	29.2	25.8	29.8	41.5	44.7	42.0	0.0	0.0	0.5
California Combined Non-MSA	2,916	84,864	0.7	10,481	1.8	1.6	2.1	22.0	18.1	17.2	52.6	54.3	51.9	23.4	25.9	26.5	0.2	0.1	2.2
Total	437,942	14,040,606	100.0	1,396,724	5.8	5.1	5.5	19.9	18.4	19.9	29.9	30.0	30.3	43.3	45.8	43.1	1.1	0.6	1.2
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Fresno CSA	9,082	389,838	2.1	29,297	87.3	63.2	39.1	3.9	14.2	8.8	22.6
Los Angeles CSA	214,832	6,477,044	49.1	765,991	90.3	66.3	43.9	3.8	12.1	6.0	21.6
San Diego MSA	39,180	1,229,942	8.9	118,477	90.1	65.7	45.0	3.7	12.1	6.3	22.1
San Jose CSA	120,049	4,276,449	27.4	319,975	88.6	66.4	46.0	4.2	12.5	7.2	21.1
Bakersfield MSA	6,421	208,773	1.5	19,566	87.6	67.8	37.8	3.6	11.4	8.8	20.8
Chico MSA	1,368	41,477	0.3	4,759	87.2	63.7	48.5	3.8	8.3	9.1	28.0
El Centro MSA	1,029	38,445	0.2	3,001	79.1	61.9	38.2	5.0	13.1	15.9	25.0
Redding CSA	1,173	33,061	0.3	5,337	87.6	59.7	51.3	3.6	8.1	8.8	32.2
Sacramento CSA	29,622	877,744	6.8	77,767	88.9	67.3	46.2	3.3	10.9	7.8	21.8
Salinas MSA	4,091	109,702	0.9	9,126	87.4	67.3	44.4	4.0	11.1	8.6	21.6
San Luis Obispo MSA	2,530	69,186	0.6	10,600	89.1	67.4	40.3	3.6	10.9	7.3	21.8
Santa Maria MSA	3,398	101,450	0.8	14,074	87.7	67.9	42.3	4.3	9.5	8.1	22.6
Visalia MSA	2,251	102,631	0.5	8,273	84.5	64.6	45.2	4.4	13.6	11.1	21.7
California Combined Non-MSA	2,916	84,864	0.7	10,481	85.3	69.4	46.5	4.1	8.6	10.5	21.9
Total	437,942	14,040,606	100.0	1,396,724	89.5	66.3	44.4	3.9	12.1	6.7	21.6
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Fresno CSA	517	23,666	10.9	961	3.1	2.5	1.6	23.2	18.6	20.7	30.2	25.3	38.7	43.3	53.6	37.3	0.1	0.0	1.7
Los Angeles CSA	728	19,575	15.3	1,350	3.8	3.2	3.4	20.4	19.6	18.4	31.1	32.3	31.1	44.0	44.2	45.4	0.6	0.7	1.7
San Diego MSA	220	4,039	4.6	385	4.1	2.3	1.3	17.2	16.8	13.0	37.6	32.3	37.8	41.1	48.6	46.0	0.0	0.0	1.9
San Jose CSA	1,158	40,164	24.4	2,643	4.4	2.2	1.6	17.6	18.0	12.9	39.9	36.7	41.9	38.0	43.1	41.9	0.1	0.0	1.7
Bakersfield MSA	235	15,901	4.9	250	4.2	6.0	2.1	20.1	23.4	14.9	33.0	37.0	35.4	40.9	32.8	42.1	2.0	0.9	5.6
Chico MSA	169	4,414	3.6	212	0.8	0.0	1.2	17.9	13.0	21.4	40.3	50.9	45.2	40.9	36.1	31.0	0.0	0.0	1.2
El Centro MSA	50	5,378	1.1	95	0.0	0.0	0.0	23.6	30.0	25.8	26.5	22.0	22.6	49.2	46.0	45.2	0.7	2.0	6.5
Redding CSA	134	4,112	2.8	157	0.0	0.0	0.0	24.4	21.6	29.9	64.5	64.9	62.2	11.1	13.4	6.3	0.0	0.0	1.6
Sacramento CSA	626	17,244	13.2	867	4.3	1.6	1.2	16.4	8.1	7.2	34.0	32.9	37.6	44.9	56.9	50.2	0.4	0.5	3.9
Salinas MSA	179	12,287	3.8	186	1.8	1.1	1.4	16.4	10.1	13.8	41.3	49.7	46.9	40.1	39.1	29.7	0.4	0.0	8.3
San Luis Obispo MSA	127	2,956	2.7	233	0.0	0.0	0.0	9.5	3.9	3.1	70.7	72.4	69.9	18.4	23.6	22.3	1.4	0.0	4.7
Santa Maria MSA	114	5,547	2.4	214	4.2	14.9	5.7	18.1	19.3	10.8	25.0	32.5	44.9	52.4	33.3	36.9	0.3	0.0	1.7
Visalia MSA	278	18,613	5.8	439	0.9	1.8	1.8	36.0	42.1	31.8	27.0	21.6	30.3	36.1	34.5	35.0	0.0	0.0	1.1
California Combined Non-MSA	220	10,259	4.6	490	0.7	0.5	0.2	21.6	9.1	12.4	58.9	68.2	62.7	18.7	22.3	17.8	0.1	0.0	6.9
Total	4,755	184,155	100.0	8,482	3.6	2.4	1.7	19.4	17.6	15.5	36.6	37.2	40.9	40.1	42.5	39.3	0.4	0.2	2.6
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues**2019-21**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Fresno CSA	517	23,666	10.9	961	91.1	53.2	50.8	6.9	17.0	2.0	29.8
Los Angeles CSA	728	19,575	15.3	1,350	94.6	58.4	57.6	3.1	13.3	2.4	28.3
San Diego MSA	220	4,039	4.6	385	95.4	65.0	67.6	2.8	7.7	1.8	27.3
San Jose CSA	1,158	40,164	24.4	2,643	93.9	65.2	55.0	4.1	11.8	2.0	23.0
Bakersfield MSA	235	15,901	4.9	250	89.1	51.1	39.0	8.0	32.3	2.9	16.6
Chico MSA	169	4,414	3.6	212	94.6	28.4	59.5	4.3	6.5	1.1	65.1
El Centro MSA	50	5,378	1.1	95	81.0	26.0	26.9	15.9	50.0	3.2	24.0
Redding CSA	134	4,112	2.8	157	95.3	11.2	65.4	2.3	1.5	2.4	87.3
Sacramento CSA	626	17,244	13.2	867	95.2	35.3	66.3	3.0	5.8	1.9	58.9
Salinas MSA	179	12,287	3.8	186	85.9	53.6	42.1	9.9	29.6	4.2	16.8
San Luis Obispo MSA	127	2,956	2.7	233	95.6	60.6	56.5	2.8	5.5	1.6	33.9
Santa Maria MSA	114	5,547	2.4	214	92.5	54.4	36.4	5.2	33.3	2.3	12.3
Visalia MSA	278	18,613	5.8	439	88.1	49.3	47.9	9.8	29.9	2.1	20.9
California Combined Non-MSA	220	10,259	4.6	490	96.1	46.4	62.2	2.3	9.5	1.6	44.1
Total	4,755	184,155	100.0	8,482	93.8	52.3	55.4	4.1	14.5	2.1	33.1

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Denver CSA	31,152	12,271,910,109	65.9	333,603	4.3	3.3	4.0	18.7	15.0	17.3	36.0	32.4	34.8	40.9	49.2	43.9	0.0	0.0	0.0
Colorado Springs MSA	5,346	1,496,622,780	11.3	72,842	3.2	2.1	2.2	19.8	16.0	16.8	42.1	39.9	43.6	34.9	42.0	37.4	0.0	0.0	0.0
Fort Collins MSA	2,943	929,418,216	6.2	31,764	1.5	0.8	1.9	20.5	18.0	20.1	52.7	47.1	46.7	25.2	34.1	31.4	0.0	0.0	0.0
Grand Junction MSA	1,741	400,290,135	3.7	13,304	0.0	0.0	0.0	19.1	15.6	18.5	58.3	60.8	60.9	22.7	23.7	20.6	0.0	0.0	0.0
Pueblo CSA	875	162,262,899	1.9	14,252	2.7	1.8	2.0	29.4	26.9	27.6	35.1	33.1	29.6	32.8	38.2	40.8	0.0	0.0	0.0
Colorado Combined Non-MSA	5,198	2,648,225,477	11.0	36,418	0.0	0.0	0.0	7.8	4.0	4.9	44.7	33.0	38.3	47.5	63.0	56.8	0.0	0.0	0.0
Total	47,255	17,908,729,616	100.0	502,183	3.4	2.5	3.2	18.5	14.4	16.8	39.3	35.3	37.6	38.7	47.8	42.4	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2019-21**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Denver CSA	31,152	12,271,910,109	65.9	333,603	21.3	6.2	7.6	17.5	18.9	18.4	20.5	21.1	22.6	40.7	43.6	33.8	0.0	10.2	17.6
Colorado Springs MSA	5,346	1,496,622,780	11.3	72,842	20.2	4.1	4.2	18.5	14.5	14.6	20.3	21.1	20.8	41.0	35.7	32.9	0.0	24.5	27.6
Fort Collins MSA	2,943	929,418,216	6.2	31,764	20.5	6.0	6.5	17.2	18.3	17.7	22.6	24.4	22.5	39.6	43.9	34.7	0.0	7.3	18.6
Grand Junction MSA	1,741	400,290,135	3.7	13,304	21.6	5.5	6.9	18.0	18.6	19.6	19.9	20.3	21.4	40.5	38.5	31.9	0.0	17.1	20.2
Pueblo CSA	875	162,262,899	1.9	14,252	23.4	6.5	5.7	18.7	17.0	17.2	19.2	18.3	23.2	38.7	32.8	35.4	0.0	25.4	18.5
Colorado Combined Non-MSA	5,198	2,648,225,477	11.0	36,418	16.9	2.1	3.4	17.2	8.9	10.6	19.5	15.2	16.8	46.3	64.5	53.1	0.0	9.3	16.1
Total	47,255	17,908,729,616	100.0	502,183	20.9	5.5	6.6	17.7	17.3	17.3	20.4	20.6	21.9	41.0	44.6	35.1	0.0	12.1	19.1

Source: 2015 ACS: 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2019-21																			
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Denver CSA	50,237	1,357,580	72.8	127,385	6.4	5.5	7.1	19.7	18.0	19.6	33.2	32.6	32.6	40.5	43.7	40.1	0.3	0.2	0.6
Colorado Springs MSA	5,799	176,659	8.4	18,323	6.6	6.4	7.2	22.4	20.3	21.9	34.4	31.7	33.0	36.4	41.6	37.3	0.1	0.0	0.6
Fort Collins MSA	3,848	102,071	5.6	12,421	3.1	3.6	4.9	26.8	22.0	27.0	42.2	43.1	39.1	27.9	31.3	28.1	0.0	0.0	0.8
Grand Junction MSA	1,736	58,623	2.5	4,391	0.0	0.0	0.0	17.5	15.6	16.6	56.2	54.6	57.8	26.3	29.8	24.7	0.0	0.0	0.9
Pueblo CSA	830	26,491	1.2	3,495	2.4	1.1	1.9	32.3	29.4	29.7	32.4	35.3	32.2	32.5	34.2	35.8	0.3	0.0	0.4
Colorado Combined Non-MSA	6,559	187,346	9.5	20,368	0.0	0.0	0.0	6.9	4.7	5.3	41.5	38.4	37.9	51.6	56.8	53.8	0.0	0.0	2.9
Total	69,009	1,908,770	100.0	186,383	5.5	4.7	5.9	19.8	17.2	18.8	35.1	34.3	34.2	39.5	43.6	40.1	0.2	0.1	0.9

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%
Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2019-21											
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Denver CSA	50,237	1,357,580	72.8	127,385	92.5	61.7	46.7	2.4	8.6	5.2	29.8
Colorado Springs MSA	5,799	176,659	8.4	18,323	92.7	61.4	54.6	1.9	7.4	5.4	31.2
Fort Collins MSA	3,848	102,071	5.6	12,421	92.6	61.6	46.9	2.0	6.7	5.4	31.7
Grand Junction MSA	1,736	58,623	2.5	4,391	90.6	57.8	54.0	2.5	10.1	6.9	32.1
Pueblo CSA	830	26,491	1.2	3,495	89.7	59.8	53.9	2.5	10.5	7.8	29.8
Colorado Combined Non-MSA	6,559	187,346	9.5	20,368	90.4	65.3	47.2	3.0	7.2	6.6	27.5
Total	69,009	1,908,770	100.0	186,383	92.2	61.9	47.9	2.3	8.3	5.4	29.9

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%
Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2019-21**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Denver CSA	407	9,050	45.2	1,064	6.3	1.5	1.8	19.1	8.4	8.2	36.4	39.1	54.9	37.9	51.1	34.3	0.2	0.0	0.7
Colorado Springs MSA	60	1,349	6.7	110	6.5	0.0	3.3	19.8	6.7	6.7	42.4	55.0	48.9	31.3	38.3	41.1	0.0	0.0	0.0
Fort Collins MSA	78	2,058	8.7	160	4.1	0.0	1.5	18.8	14.1	10.2	46.0	43.6	51.8	31.1	42.3	36.5	0.1	0.0	0.0
Grand Junction MSA	63	626	7.0	209	0.0	0.0	0.0	11.7	7.9	2.7	45.6	39.7	49.5	42.8	52.4	47.3	0.0	0.0	0.5
Pueblo CSA	52	952	5.8	74	2.0	0.0	0.0	21.2	11.5	3.4	43.3	73.1	71.2	33.3	15.4	23.7	0.1	0.0	1.7
Colorado Combined Non-MSA	241	13,750	26.7	1,198	0.0	0.0	0.0	6.6	2.9	7.3	55.4	74.3	73.6	37.9	22.8	18.4	0.0	0.0	0.8
Total	901	27,785	100.0	2,815	4.8	0.7	0.9	17.2	7.4	7.3	41.2	51.9	62.8	36.6	40.0	28.2	0.1	0.0	0.7

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2019-21**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Denver CSA	407	9,050	45.2	1,064	96.6	54.3	59.0	1.7	3.2	1.6	42.5
Colorado Springs MSA	60	1,349	6.7	110	97.4	35.0	67.8	1.2	0.0	1.4	65.0
Fort Collins MSA	78	2,058	8.7	160	97.5	57.7	56.2	1.3	1.3	1.2	41.0
Grand Junction MSA	63	626	7.0	209	98.8	73.0	81.4	0.7	0.0	0.5	27.0
Pueblo CSA	52	952	5.8	74	97.6	32.7	59.3	1.3	0.0	1.1	67.3
Colorado Combined Non-MSA	241	13,750	26.7	1,198	97.0	54.8	51.8	2.0	6.2	1.1	39.0
Total	901	27,785	100.0	2,815	97.0	53.5	57.6	1.6	3.2	1.4	43.3

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Hartford MSA	6,143	1,355,601,143	100.0	57,872	3.7	3.9	4.1	10.9	10.3	10.2	42.5	42.2	41.0	42.8	43.6	44.7	0.0	0.0	0.0
Total	6,143	1,355,601,143	100.0	57,872	3.7	3.9	4.1	10.9	10.3	10.2	42.5	42.2	41.0	42.8	43.6	44.7	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Hartford MSA	6,143	1,355,601,143	100.0	57,872	22.3	6.2	9.9	16.5	17.9	22.7	20.7	18.2	22.4	40.5	29.5	29.4	0.0	28.2	15.6
Total	6,143	1,355,601,143	100.0	57,872	22.3	6.2	9.9	16.5	17.9	22.7	20.7	18.2	22.4	40.5	29.5	29.4	0.0	28.2	15.6
Source: 2015 ACS: 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Hartford MSA	1,860	75,458	100.0	37,798	10.7	5.4	9.2	12.9	9.3	12.9	39.8	45.5	41.0	36.2	39.7	36.2	0.3	0.1	0.7
Total	1,860	75,458	100.0	37,798	10.7	5.4	9.2	12.9	9.3	12.9	39.8	45.5	41.0	36.2	39.7	36.2	0.3	0.1	0.7
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Hartford MSA	1,860	75,458	100.0	37,798	87.9	46.6	45.0	3.7	7.9	8.3	45.5
Total	1,860	75,458	100.0	37,798	87.9	46.6	45.0	3.7	7.9	8.3	45.5

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Hartford MSA	27	721	100.0	156	3.9	0.0	1.3	8.9	0.0	3.3	41.1	29.6	31.3	46.1	70.4	63.3	0.0	0.0	0.7
Total	27	721	100.0	156	3.9	0.0	1.3	8.9	0.0	3.3	41.1	29.6	31.3	46.1	70.4	63.3	0.0	0.0	0.7

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Hartford MSA	27	721	100.0	156	96.9	11.1	62.0	1.7	0.0	1.3	88.9
Total	27	721	100.0	156	96.9	11.1	62.0	1.7	0.0	1.3	88.9
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Salisbury MSA	3,754	1,161,360,946	100.0	21,685	0.0	0.0	0.0	6.5	2.3	3.7	77.0	63.1	69.7	16.4	34.6	26.6	0.0	0.0	0.0
Total	3,754	1,161,360,946	100.0	21,685	0.0	0.0	0.0	6.5	2.3	3.7	77.0	63.1	69.7	16.4	34.6	26.6	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Salisbury MSA	3,754	1,161,360,947	100.0	21,685	20.1	2.8	3.9	18.2	9.8	12.2	21.2	15.2	16.8	40.4	63.4	49.4	0.0	8.8	17.7
Total	3,754	1,161,360,947	100.0	21,685	20.1	2.8	3.9	18.2	9.8	12.2	21.2	15.2	16.8	40.4	63.4	49.4	0.0	8.8	17.7

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Salisbury MSA	740	22,289	100.0	6,124	0.0	0.0	0.0	8.4	2.2	6.1	71.0	66.8	72.1	20.6	31.1	21.2	0.0	0.0	0.6
Total	740	22,289	100.0	6,124	0.0	0.0	0.0	8.4	2.2	6.1	71.0	66.8	72.1	20.6	31.1	21.2	0.0	0.0	0.6

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Salisbury MSA	740	22,289	100.0	6,124	86.6	60.3	46.7	3.8	8.4	9.6	31.4
Total	740	22,289	100.0	6,124	86.6	60.3	46.7	3.8	8.4	9.6	31.4
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Salisbury MSA	17	287	100.0	127	0.0	0.0	0.0	7.3	0.0	6.5	82.6	70.6	91.1	10.1	29.4	2.4	0.0	0.0	0.0
Total	17	287	100.0	127	0.0	0.0	0.0	7.3	0.0	6.5	82.6	70.6	91.1	10.1	29.4	2.4	0.0	0.0	0.0
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Salisbury MSA	17	287	100.0	127	95.8	52.9	62.6	2.2	0.0	2.1	47.1
Total	17	287	100.0	127	95.8	52.9	62.6	2.2	0.0	2.1	47.1
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2019-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Jacksonville FL MSA	11,636	3,815,939,332	8.2	100,094	3.4	1.0	1.6	19.7	11.7	14.4	41.3	37.2	40.1	35.6	50.2	43.9	0.0	0.0	0.0
Miami CSA	39,484	14,635,007,858	27.7	298,795	2.4	1.3	1.9	21.7	15.3	17.6	35.1	35.5	35.8	40.6	47.6	44.3	0.1	0.2	0.3
Orlando CSA	29,549	7,499,989,462	20.7	236,898	1.0	0.7	0.7	18.8	12.8	15.4	49.2	46.9	50.0	31.1	39.6	33.9	0.0	0.0	0.0
Cape Coral CSA	10,336	3,555,327,625	7.3	79,282	2.1	1.0	1.4	17.8	15.1	17.9	43.2	42.7	44.0	36.9	41.2	36.7	0.0	0.0	0.0
Crestview MSA	3,741	1,199,229,709	2.6	25,587	0.0	0.0	0.0	12.2	4.7	5.5	62.3	59.3	59.4	25.5	36.0	35.0	0.0	0.0	0.0
Gainesville MSA	1,627	351,123,881	1.1	12,619	1.8	2.5	2.1	27.1	14.9	18.2	37.1	37.8	39.4	33.6	43.9	39.5	0.5	0.9	0.8
Homosassa Springs MSA	697	119,552,307	0.5	9,032	0.0	0.0	0.0	20.1	17.5	17.9	62.7	60.1	59.6	17.3	22.4	22.5	0.0	0.0	0.0
North Port CSA	8,788	2,373,981,800	6.2	72,829	1.0	0.3	0.4	17.6	10.3	13.4	54.6	46.6	49.2	26.8	42.9	37.1	0.0	0.0	0.0
Ocala MSA	2,218	621,210,428	1.6	20,622	0.6	0.1	0.1	14.5	9.2	10.9	69.6	71.1	70.6	15.3	19.6	18.4	0.0	0.0	0.0
Palm Bay MSA	5,122	1,207,550,507	3.6	38,530	1.6	0.7	1.0	21.1	15.7	20.6	43.5	41.0	42.5	33.8	42.6	35.9	0.0	0.0	0.0
Panama City MSA	1,197	297,180,634	0.8	12,473	2.5	0.9	1.1	13.3	6.7	7.1	52.4	55.1	57.6	31.8	37.3	34.2	0.0	0.0	0.0
Pensacola MSA	3,308	718,098,512	2.3	30,817	1.6	0.5	0.4	15.2	8.3	9.0	54.7	48.3	51.0	28.5	43.0	39.7	0.0	0.0	0.0
Sebring MSA	350	52,084,500	0.2	4,653	0.0	0.0	0.0	4.5	2.3	2.9	76.6	73.1	73.8	18.9	24.6	23.3	0.0	0.0	0.0
Tallahassee MSA	2,298	486,343,748	1.6	14,944	4.9	3.0	3.6	18.0	9.4	12.8	41.9	41.9	42.5	34.7	45.0	40.2	0.6	0.7	0.9
Tampa MSA	21,831	5,790,006,523	15.3	183,309	1.9	1.2	1.8	21.9	13.6	17.6	39.7	36.2	37.5	36.5	48.9	42.9	0.1	0.1	0.0
Florida Combined Non-MSA	250	35,545,471	0.2	2,835	0.0	0.0	0.0	7.1	4.4	3.9	86.0	89.6	87.3	6.9	6.0	8.8	0.0	0.0	0.0
Total	142,432	42,758,172,295	100.0	1,143,319	1.9	1.0	1.3	19.8	13.2	15.8	43.6	41.6	43.4	34.6	44.1	39.3	0.1	0.1	0.1

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Jacksonville FL MSA	11,636	3,815,939,332	8.2	100,094	21.8	4.1	4.4	17.4	14.0	13.7	20.0	18.0	19.5	40.9	44.4	39.4	0.0	19.5	23.1
Miami CSA	39,484	14,635,007,857	27.7	298,795	22.7	2.3	2.6	17.1	10.6	10.4	17.9	17.1	18.2	42.3	54.2	50.3	0.0	15.8	18.5
Orlando CSA	29,549	7,499,989,462	20.7	236,898	20.7	3.3	3.8	18.4	13.8	13.8	20.1	19.8	20.8	40.8	49.2	41.0	0.0	14.0	20.5
Cape Coral CSA	10,336	3,555,327,625	7.3	79,282	20.8	3.0	3.6	18.2	13.0	14.4	19.5	18.9	19.1	41.5	55.1	47.0	0.0	10.0	15.9
Crestview MSA	3,741	1,199,229,709	2.6	25,587	20.3	2.9	3.6	17.9	12.1	12.5	21.5	18.0	15.8	40.3	48.2	41.0	0.0	18.9	27.1
Gainesville MSA	1,627	351,123,881	1.1	12,619	23.6	3.1	5.0	16.2	14.3	14.2	19.1	20.3	20.5	41.1	48.1	43.9	0.0	14.2	16.4
Homosassa Springs MSA	697	119,552,307	0.5	9,032	18.2	3.9	4.4	19.4	12.2	14.0	22.5	21.4	19.6	39.9	51.2	42.3	0.0	11.3	19.7
North Port CSA	8,788	2,373,981,799	6.2	72,829	19.3	3.8	4.7	19.4	14.2	14.9	21.2	21.4	20.2	40.2	52.1	45.0	0.0	8.4	15.2
Ocala MSA	2,218	621,210,428	1.6	20,622	19.3	4.0	3.7	19.5	13.3	14.8	21.6	21.2	21.5	39.7	47.1	38.7	0.0	14.3	21.3
Palm Bay MSA	5,122	1,207,550,507	3.6	38,530	20.2	4.9	6.6	18.6	14.1	17.2	20.6	20.2	20.0	40.6	48.3	35.4	0.0	12.5	20.8
Panama City MSA	1,197	297,180,634	0.8	12,473	21.1	2.4	3.2	17.7	11.5	11.2	19.9	19.2	17.3	41.3	49.3	43.9	0.0	17.5	24.3
Pensacola MSA	3,308	718,098,511	2.3	30,817	18.6	3.7	4.6	19.1	13.7	14.8	22.7	20.3	19.8	39.7	43.3	32.9	0.0	19.0	27.9
Sebring MSA	350	52,084,500	0.2	4,653	16.6	4.0	3.7	20.3	14.3	13.2	21.6	19.7	20.8	41.4	45.7	40.8	0.0	16.3	21.5
Tallahassee MSA	2,298	486,343,748	1.6	14,944	23.4	4.1	6.5	16.7	17.6	18.3	19.6	19.7	21.2	40.2	42.1	37.1	0.0	16.5	16.9
Tampa MSA	21,831	5,790,006,523	15.3	183,309	21.6	3.8	4.7	17.9	14.6	15.2	19.1	18.5	20.1	41.4	48.9	41.2	0.0	14.2	18.8
Florida Combined Non-MSA	250	35,545,471	0.2	2,835	23.4	7.2	3.2	18.8	8.4	13.6	19.7	18.8	23.1	38.1	45.2	40.5	0.0	20.4	19.6
Total	142,432	42,758,172,295	100.0	1,143,319	21.5	3.3	3.9	17.9	13.0	13.4	19.4	18.7	19.6	41.3	50.4	43.6	0.0	14.6	19.6
Source: 2015 ACS: 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Jacksonville FL MSA	12,246	370,275	6.2	47,171	4.3	4.6	4.2	21.8	20.6	21.5	34.9	33.4	33.6	39.0	41.5	40.5	0.0	0.0	0.2	
Miami CSA	95,429	2,003,689	48.6	423,861	4.1	4.0	4.4	21.7	22.2	23.0	29.4	29.8	29.3	43.7	43.2	42.1	1.1	0.9	1.2	
Orlando CSA	29,642	647,302	15.1	140,979	2.0	1.8	2.1	24.3	23.0	23.7	40.8	40.6	40.6	32.8	34.6	33.2	0.0	0.0	0.3	
Cape Coral CSA	11,522	257,871	5.9	45,191	2.9	2.2	2.8	19.6	19.6	19.3	39.8	42.6	40.0	37.7	35.5	37.6	0.1	0.0	0.2	
Crestview MSA	1,839	38,910	0.9	10,454	0.0	0.0	0.0	10.1	5.7	9.3	53.2	47.4	49.0	36.7	46.9	41.4	0.0	0.0	0.3	
Gainesville MSA	1,507	34,638	0.8	7,728	6.1	6.0	6.6	24.1	23.0	22.4	35.3	31.0	35.2	33.6	39.2	34.7	0.9	0.8	1.1	
Homosassa Springs MSA	438	8,163	0.2	3,365	0.0	0.0	0.0	16.8	12.3	14.4	62.2	63.0	62.9	21.0	24.7	22.3	0.0	0.0	0.4	
North Port CSA	8,564	175,243	4.4	37,479	1.3	1.0	1.2	19.3	17.0	17.9	47.2	48.7	46.1	32.1	33.3	34.5	0.0	0.0	0.3	
Ocala MSA	2,088	40,802	1.1	9,210	1.8	2.1	1.6	16.6	14.7	16.3	63.4	65.6	65.5	18.2	17.6	16.2	0.0	0.0	0.4	
Palm Bay MSA	4,213	113,732	2.1	16,731	2.7	1.8	2.5	23.2	19.8	23.7	39.0	38.1	38.5	35.0	40.3	35.1	0.1	0.0	0.3	
Panama City MSA	971	17,602	0.5	5,980	3.2	2.3	2.6	16.8	10.7	15.8	54.0	56.1	53.3	25.9	30.9	27.9	0.0	0.0	0.3	
Pensacola MSA	1,626	43,622	0.8	11,796	2.3	2.7	2.3	19.5	17.2	19.1	50.9	47.5	49.7	27.3	32.7	28.6	0.0	0.0	0.4	
Sebring MSA	409	8,237	0.2	1,905	0.0	0.0	0.0	7.8	9.3	9.7	75.2	71.6	72.6	16.6	18.8	16.7	0.5	0.2	1.0	
Tallahassee MSA	1,210	23,549	0.6	9,594	8.5	7.2	7.6	21.0	18.4	22.6	40.4	38.3	41.2	28.7	35.1	27.4	1.5	0.9	1.1	
Tampa MSA	24,303	528,651	12.4	111,679	4.2	3.5	4.6	20.7	19.1	20.6	34.1	35.4	34.4	40.7	41.9	40.0	0.3	0.1	0.5	
Florida Combined Non-MSA	519	12,171	0.3	2,091	0.0	0.0	0.0	9.4	8.9	8.6	83.1	83.8	83.5	7.5	7.3	6.9	0.0	0.0	1.0	
Total	196,526	4,324,457	100.0	885,214	3.5	3.3	3.7	21.5	21.0	21.9	35.7	35.3	35.0	38.8	40.0	38.6	0.6	0.4	0.8	
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																				

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2019-21**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Jacksonville FL MSA	12,246	370,275	6.2	47,171	92.2	63.6	42.2	2.2	10.7	5.6	25.6
Miami CSA	95,429	2,003,689	48.6	423,861	94.3	68.2	41.4	1.9	9.1	3.8	22.7
Orlando CSA	29,642	647,302	15.1	140,979	93.3	66.7	44.9	1.9	8.3	4.9	25.1
Cape Coral CSA	11,522	257,871	5.9	45,191	93.3	65.4	45.2	2.0	9.4	4.7	25.2
Crestview MSA	1,839	38,910	0.9	10,454	92.4	67.2	42.0	1.8	6.2	5.8	26.6
Gainesville MSA	1,507	34,638	0.8	7,728	90.6	69.3	43.2	2.4	6.3	7.1	24.4
Homosassa Springs MSA	438	8,163	0.2	3,365	92.8	70.8	51.8	1.8	6.6	5.4	22.6
North Port CSA	8,564	175,243	4.4	37,479	93.1	67.6	49.0	2.1	8.4	4.8	23.9
Ocala MSA	2,088	40,802	1.1	9,210	92.6	71.3	45.5	2.1	6.8	5.3	21.9
Palm Bay MSA	4,213	113,732	2.1	16,731	92.1	66.7	46.7	2.2	8.3	5.7	25.0
Panama City MSA	971	17,602	0.5	5,980	91.5	63.6	39.8	2.1	6.3	6.4	30.1
Pensacola MSA	1,626	43,622	0.8	11,796	92.0	63.2	43.8	2.1	6.8	5.9	30.0
Sebring MSA	409	8,237	0.2	1,905	93.1	73.8	48.4	1.9	5.9	5.1	20.3
Tallahassee MSA	1,210	23,549	0.6	9,594	91.0	66.2	45.4	2.2	5.0	6.8	28.8
Tampa MSA	24,303	528,651	12.4	111,679	92.9	66.8	45.9	2.1	8.6	4.9	24.6
Florida Combined Non-MSA	519	12,171	0.3	2,091	88.6	68.0	44.4	2.4	4.4	9.0	27.6
Total	196,526	4,324,457	100.0	885,214	93.4	67.3	43.4	2.0	8.8	4.6	23.9

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Jacksonville FL MSA	95	3,044	7.1	146	3.4	1.1	0.0	21.2	11.6	24.8	44.2	52.6	52.3	31.2	34.7	22.9	0.0	0.0	0.0
Miami CSA	431	8,748	32.2	1,072	4.7	1.4	2.7	24.8	14.6	11.3	32.2	31.8	31.3	38.0	52.2	53.6	0.4	0.0	1.1
Orlando CSA	242	5,411	18.1	513	1.5	0.8	0.5	23.0	17.8	15.8	48.3	52.9	50.3	27.1	28.5	31.8	0.1	0.0	1.6
Cape Coral CSA	50	939	3.7	163	4.0	2.0	3.6	24.8	30.0	20.7	45.2	34.0	44.3	25.9	34.0	29.3	0.0	0.0	2.1
Crestview MSA	13	183	1.0	77	0.0	0.0	0.0	15.2	30.8	22.2	62.7	46.2	47.2	22.1	23.1	30.6	0.0	0.0	0.0
Gainesville MSA	45	1,849	3.4	172	2.7	0.0	0.0	25.3	37.8	44.7	48.7	51.1	44.7	23.0	11.1	10.0	0.2	0.0	0.7
Homosassa Springs MSA	8	102	0.6	13	0.0	0.0	0.0	19.0	0.0	0.0	62.9	100.0	100.0	18.1	0.0	0.0	0.0	0.0	0.0
North Port CSA	77	2,597	5.8	165	1.9	1.3	0.0	22.1	22.1	17.4	48.4	33.8	35.5	27.5	42.9	46.4	0.0	0.0	0.7
Ocala MSA	66	767	4.9	151	1.0	0.0	0.8	17.8	13.6	12.0	67.7	77.3	72.8	13.5	9.1	13.6	0.0	0.0	0.8
Palm Bay MSA	31	256	2.3	54	3.6	0.0	0.0	25.5	6.5	17.1	42.8	12.9	58.5	28.1	80.6	22.0	0.0	0.0	2.4
Panama City MSA	7	601	0.5	32	2.8	0.0	0.0	13.4	0.0	0.0	56.3	71.4	80.8	27.5	28.6	19.2	0.0	0.0	0.0
Pensacola MSA	22	1,211	1.6	73	1.9	0.0	0.0	14.6	0.0	6.3	59.9	72.7	82.8	23.6	27.3	10.9	0.0	0.0	0.0
Sebring MSA	23	1,232	1.7	49	0.0	0.0	0.0	3.9	13.0	5.0	72.7	43.5	77.5	22.5	43.5	17.5	0.9	0.0	0.0
Tallahassee MSA	20	1,301	1.5	80	4.7	0.0	5.1	16.7	25.0	20.3	48.4	50.0	51.9	29.6	25.0	13.9	0.5	0.0	8.9
Tampa MSA	127	2,493	9.5	294	3.1	1.6	1.9	24.8	22.0	22.9	38.9	41.7	37.6	33.1	34.6	36.8	0.1	0.0	0.8
Florida Combined Non-MSA	81	6,027	6.1	158	0.0	0.0	0.0	6.2	0.0	3.3	87.2	98.8	92.5	6.6	1.2	4.2	0.0	0.0	0.0
Total	1,338	36,761	100.0	3,212	3.0	1.0	1.5	22.7	16.2	16.3	43.8	46.6	46.0	30.3	36.2	34.9	0.2	0.0	1.2
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues**2019-21**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Jacksonville FL MSA	95	3,044	7.1	146	98.0	57.9	52.3	1.1	6.3	0.9	35.8
Miami CSA	431	8,748	32.2	1,072	97.4	63.3	68.4	1.6	9.7	1.0	26.9
Orlando CSA	242	5,411	18.1	513	97.3	50.0	66.8	1.6	5.4	1.1	44.6
Cape Coral CSA	50	939	3.7	163	97.2	58.0	67.1	1.7	4.0	1.1	38.0
Crestview MSA	13	183	1.0	77	97.8	46.2	43.1	1.1	0.0	1.2	53.8
Gainesville MSA	45	1,849	3.4	172	96.6	15.6	57.3	1.9	4.4	1.5	80.0
Homosassa Springs MSA	8	102	0.6	13	99.3	75.0	54.5	0.3	0.0	0.4	25.0
North Port CSA	77	2,597	5.8	165	97.0	61.0	69.6	1.7	9.1	1.3	29.9
Ocala MSA	66	767	4.9	151	98.3	59.1	68.8	1.1	3.0	0.6	37.9
Palm Bay MSA	31	256	2.3	54	98.4	61.3	65.9	1.0	6.5	0.6	32.3
Panama City MSA	7	601	0.5	32	98.2	14.3	38.5	0.9	0.0	1.0	85.7
Pensacola MSA	22	1,211	1.6	73	98.8	36.4	40.6	0.5	0.0	0.7	63.6
Sebring MSA	23	1,232	1.7	49	93.5	26.1	55.0	4.6	0.0	2.0	73.9
Tallahassee MSA	20	1,301	1.5	80	97.8	35.0	69.6	1.3	15.0	0.9	50.0
Tampa MSA	127	2,493	9.5	294	97.6	53.5	63.9	1.4	7.1	1.1	39.4
Florida Combined Non-MSA	81	6,027	6.1	158	98.4	30.9	44.2	0.9	1.2	0.8	67.9
Total	1,338	36,761	100.0	3,212	97.5	53.6	63.6	1.5	6.7	1.0	39.8

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2019-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Atlanta CSA	54,980	14,946,623,081	87.0	399,218	3.2	2.6	2.8	20.1	16.6	17.1	37.5	36.9	36.3	39.2	43.8	43.7	0.0	0.0	0.0
Chattanooga CSA	1,525	231,258,773	2.4	13,925	0.0	0.0	0.0	21.5	15.9	17.6	55.6	55.0	56.3	22.9	29.1	26.1	0.0	0.0	0.0
Brunswick MSA	581	155,249,570	0.9	5,774	1.3	0.2	0.5	19.6	9.6	9.5	42.2	31.5	33.5	36.8	58.7	56.6	0.0	0.0	0.0
Macon CSA	1,886	362,125,044	3.0	16,809	5.9	1.5	1.5	17.0	11.8	10.7	39.0	36.9	38.7	38.2	49.8	49.0	0.0	0.0	0.0
Savannah CSA	3,496	715,108,234	5.5	31,025	3.1	1.7	1.5	13.7	10.2	9.2	46.4	42.0	46.0	36.7	46.0	43.3	0.0	0.1	0.0
Georgia Combined Non-MSA	735	175,810,072	1.2	6,708	0.8	0.4	0.5	18.7	11.8	11.0	60.5	46.8	50.5	19.9	41.0	38.0	0.0	0.0	0.0
Total	63,203	16,586,174,774	100.0	473,459	3.0	2.5	2.6	19.6	16.0	16.2	39.9	37.6	37.8	37.5	43.9	43.4	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Atlanta CSA	54,980	14,946,623,081	87.0	399,218	22.9	5.6	6.2	16.8	15.9	16.4	18.3	18.0	19.3	42.0	38.5	37.5	0.0	22.0	20.5
Chattanooga CSA	1,525	231,258,773	2.4	13,925	21.3	4.0	6.0	18.7	19.1	20.3	21.4	19.6	21.8	38.7	35.1	31.6	0.0	22.2	20.3
Brunswick MSA	581	155,249,570	0.9	5,774	22.5	3.3	4.6	16.0	9.3	13.1	19.6	17.6	18.1	41.8	47.8	44.6	0.0	22.0	19.5
Macon CSA	1,886	362,125,044	3.0	16,809	24.8	1.6	4.1	15.0	8.1	13.3	18.6	15.3	20.3	41.6	31.1	36.0	0.0	43.9	26.3
Savannah CSA	3,496	715,108,234	5.5	31,025	22.2	3.3	3.7	16.7	10.9	13.8	20.1	15.9	21.0	41.0	34.8	32.9	0.0	35.1	28.6
Georgia Combined Non-MSA	735	175,810,072	1.2	6,708	24.7	1.1	2.8	16.5	5.0	9.6	17.9	15.1	17.0	40.8	57.1	50.0	0.0	21.6	20.7
Total	63,203	16,586,174,774	100.0	473,459	22.9	5.2	5.9	16.7	15.2	16.1	18.6	17.8	19.5	41.7	38.3	37.3	0.0	23.4	21.2
Source: 2015 ACS: 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2019-21**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Atlanta CSA	73,917	1,676,910	92.0	264,746	6.3	4.6	5.6	23.3	18.5	22.8	31.4	30.6	31.9	38.6	46.0	39.2	0.4	0.2	0.5
Chattanooga CSA	938	23,269	1.2	4,779	0.0	0.0	0.0	20.9	16.3	19.1	57.1	56.9	57.6	22.0	26.8	22.1	0.0	0.0	1.2
Brunswick MSA	301	8,032	0.4	2,857	6.1	4.0	5.1	26.1	17.9	22.3	25.4	19.6	25.6	42.4	58.5	46.7	0.0	0.0	0.3
Macon CSA	974	26,936	1.2	8,985	10.3	12.1	8.6	17.9	13.7	18.2	37.0	34.4	37.3	34.8	39.8	35.5	0.0	0.0	0.4
Savannah CSA	3,541	90,113	4.4	14,573	6.7	5.5	6.6	18.5	19.3	17.3	39.7	36.3	39.1	35.0	38.8	36.3	0.2	0.1	0.5
Georgia Combined Non-MSA	678	23,365	0.8	4,642	2.6	1.9	2.0	20.0	13.1	20.2	57.3	56.3	57.2	20.1	28.6	19.5	0.0	0.0	1.1
Total	80,349	1,848,625	100.0	300,582	6.3	4.7	5.6	22.8	18.4	22.3	32.9	31.4	33.2	37.7	45.3	38.4	0.4	0.2	0.5

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2019-21**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Atlanta CSA	73,917	1,676,910	92.0	264,746	92.8	63.5	40.8	2.2	8.1	5.0	28.4
Chattanooga CSA	938	23,269	1.2	4,779	85.6	55.9	47.7	4.0	7.1	10.5	37.0
Brunswick MSA	301	8,032	0.4	2,857	89.0	58.5	42.3	2.8	10.0	8.2	31.6
Macon CSA	974	26,936	1.2	8,985	89.0	64.0	39.0	2.7	4.5	8.4	31.5
Savannah CSA	3,541	90,113	4.4	14,573	89.5	64.5	41.6	2.7	6.1	7.8	29.3
Georgia Combined Non-MSA	678	23,365	0.8	4,642	87.4	57.7	39.7	3.1	7.7	9.5	34.7
Total	80,349	1,848,625	100.0	300,582	92.2	63.4	40.9	2.3	8.0	5.5	28.6

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2019-21**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Atlanta CSA	572	11,728	62.4	868	4.1	0.4	1.2	22.1	22.0	25.4	39.2	43.0	44.8	34.6	34.6	28.2	0.1	0.0	0.4
Chattanooga CSA	177	3,207	19.3	130	0.0	0.0	0.0	14.1	14.1	11.5	65.1	65.5	81.3	20.8	20.3	4.2	0.0	0.0	3.1
Brunswick MSA	15	671	1.6	24	2.8	0.0	0.0	18.5	13.3	13.3	36.8	40.0	60.0	41.9	46.7	26.7	0.0	0.0	0.0
Macon CSA	47	1,633	5.1	120	4.0	0.0	0.0	19.1	4.3	11.1	41.7	70.2	43.4	35.1	25.5	44.4	0.0	0.0	1.0
Savannah CSA	56	2,531	6.1	151	2.7	1.8	0.0	12.7	1.8	5.0	45.0	46.4	55.4	39.6	50.0	39.7	0.0	0.0	0.0
Georgia Combined Non-MSA	49	4,588	5.3	331	1.2	2.0	0.6	18.0	22.4	13.4	59.1	63.3	61.7	21.6	12.2	23.3	0.0	0.0	1.0
Total	916	24,358	100.0	1,624	3.7	0.4	0.8	20.8	18.2	18.5	41.6	50.0	52.5	33.9	31.3	27.5	0.1	0.0	0.8

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2019-21**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Atlanta CSA	572	11,728	62.4	868	97.4	32.2	59.6	1.4	1.6	1.3	66.3
Chattanooga CSA	177	3,207	19.3	130	96.6	19.8	60.4	1.7	0.0	1.6	80.2
Brunswick MSA	15	671	1.6	24	98.0	20.0	53.3	1.0	0.0	1.0	80.0
Macon CSA	47	1,633	5.1	120	97.5	6.4	49.5	1.2	0.0	1.3	93.6
Savannah CSA	56	2,531	6.1	151	97.8	12.5	64.5	1.1	1.8	1.1	85.7
Georgia Combined Non-MSA	49	4,588	5.3	331	97.6	8.2	54.0	1.5	0.0	0.9	91.8
Total	916	24,358	100.0	1,624	97.4	25.8	57.9	1.4	1.1	1.2	73.1

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Boise City CSA	5,247	1,498,919,668	43.7	71,496	1.4	0.8	1.4	23.6	15.1	20.3	47.9	47.7	49.2	27.1	36.3	29.1	0.0	0.0	0.0
Coeur d’Alene MSA	2,132	610,888,889	17.8	16,302	0.0	0.0	0.0	12.8	15.9	15.1	72.0	69.9	72.0	15.3	14.3	12.9	0.0	0.0	0.0
Idaho Falls CSA	1,694	390,369,704	14.1	17,078	2.6	2.0	3.0	8.1	8.0	8.7	66.8	59.2	62.7	22.6	30.9	25.6	0.0	0.0	0.0
Lewiston MSA	348	64,157,644	2.9	2,002	0.0	0.0	0.0	0.0	0.0	0.0	74.5	75.6	72.8	25.5	24.4	27.2	0.0	0.0	0.0
Pocatello MSA	294	57,417,076	2.4	5,965	1.6	2.4	2.9	14.7	14.3	14.9	53.5	45.6	46.7	30.1	37.8	35.5	0.0	0.0	0.0
Twin Falls MSA	280	51,073,963	2.3	7,278	0.0	0.0	0.0	2.1	0.7	2.3	87.8	92.5	88.7	10.1	6.8	9.0	0.0	0.0	0.0
Idaho Combined Non-MSA	2,014	618,952,937	16.8	17,372	0.0	0.0	0.0	6.3	4.2	5.0	78.2	68.6	73.7	15.5	27.2	21.2	0.0	0.0	0.0
Total	12,009	3,291,779,881	100.0	137,493	1.0	0.7	1.2	14.5	11.6	14.8	62.3	58.6	59.0	22.1	29.1	24.9	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Boise City CSA	5,247	1,498,919,668	43.7	71,496	19.5	4.5	5.0	18.7	15.0	15.1	21.7	22.0	23.7	40.0	48.9	43.9	0.0	9.7	12.4
Coeur d’Alene MSA	2,132	610,888,889	17.8	16,302	18.0	3.7	2.7	20.3	13.7	10.5	22.7	22.9	20.4	39.0	50.3	50.4	0.0	9.4	16.0
Idaho Falls CSA	1,694	390,369,704	14.1	17,078	20.8	5.4	4.2	18.3	14.5	15.3	20.3	21.5	23.4	40.7	49.2	43.9	0.0	9.4	13.3
Lewiston MSA	348	64,157,644	2.9	2,002	18.0	3.7	4.6	19.3	15.5	17.5	22.3	31.6	26.9	40.3	27.3	35.1	0.0	21.8	15.9
Pocatello MSA	294	57,417,076	2.4	5,965	20.9	1.4	5.6	19.5	13.9	16.3	20.0	18.4	23.2	39.6	51.4	42.1	0.0	15.0	12.8
Twin Falls MSA	280	51,073,963	2.3	7,278	18.8	5.4	4.8	19.3	17.5	18.8	22.3	18.6	24.2	39.5	36.1	39.4	0.0	22.5	12.8
Idaho Combined Non-MSA	2,014	618,952,937	16.8	17,372	18.9	3.2	3.1	18.5	10.2	12.3	21.6	16.7	20.4	40.9	58.3	50.8	0.0	11.6	13.3
Total	12,009	3,291,779,881	100.0	137,493	19.4	4.2	4.4	18.9	13.9	14.5	21.5	21.3	22.9	40.1	49.9	45.1	0.0	10.7	13.1
Source: 2015 ACS: 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Boise City CSA	5,737	176,371	50.2	19,058	7.7	7.1	9.3	22.8	20.2	22.2	40.5	39.6	38.9	29.0	33.0	29.1	0.0	0.0	0.5
Coeur d'Alene MSA	1,324	41,052	11.6	4,828	0.0	0.0	0.0	20.7	16.6	18.7	65.8	70.8	68.4	13.5	12.5	12.2	0.0	0.0	0.7
Idaho Falls CSA	1,110	38,368	9.7	7,031	6.1	5.9	4.7	12.4	10.6	9.7	55.9	56.6	60.7	25.6	26.9	24.1	0.0	0.0	0.8
Lewiston MSA	122	7,169	1.1	708	0.0	0.0	0.0	0.0	0.0	0.0	80.7	82.8	78.1	19.3	17.2	21.8	0.0	0.0	0.2
Pocatello MSA	263	13,056	2.3	1,664	3.8	5.3	3.3	20.6	12.5	21.5	48.8	54.8	50.9	26.8	27.4	23.3	0.0	0.0	1.1
Twin Falls MSA	520	17,348	4.6	2,416	0.0	0.0	0.0	7.3	9.8	7.5	80.8	78.7	79.1	12.0	11.5	12.3	0.0	0.0	1.1
Idaho Combined Non-MSA	2,344	83,894	20.5	8,229	0.0	0.0	0.0	5.6	5.1	4.8	78.0	74.1	69.4	16.4	20.8	24.4	0.0	0.0	1.4
Total	11,420	377,258	100.0	43,934	4.7	4.3	4.9	17.2	14.9	15.2	54.4	54.6	54.9	23.7	26.3	24.3	0.0	0.0	0.8
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2019-21											
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Boise City CSA	5,737	176,371	50.2	19,058	91.5	66.9	50.8	2.4	8.2	6.1	24.9
Coeur d'Alene MSA	1,324	41,052	11.6	4,828	92.3	72.6	53.5	2.5	10.0	5.2	17.4
Idaho Falls CSA	1,110	38,368	9.7	7,031	89.0	70.0	54.1	3.0	8.9	8.0	21.1
Lewiston MSA	122	7,169	1.1	708	83.6	62.3	52.6	4.4	11.5	12.0	26.2
Pocatello MSA	263	13,056	2.3	1,664	87.2	65.0	52.8	3.0	10.6	9.8	24.3
Twin Falls MSA	520	17,348	4.6	2,416	87.5	68.3	52.6	3.0	8.1	9.4	23.7
Idaho Combined Non-MSA	2,344	83,894	20.5	8,229	88.3	69.8	55.6	3.1	7.4	8.6	22.8
Total	11,420	377,258	100.0	43,934	90.2	68.4	52.7	2.7	8.4	7.1	23.2
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2019-21
--

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Boise City CSA	175	11,090	20.9	573	3.4	0.6	1.3	27.1	19.4	37.5	46.9	55.4	46.5	22.6	24.6	13.2	0.0	0.0	1.5
Coeur d'Alene MSA	42	1,739	5.0	65	0.0	0.0	0.0	16.5	9.5	9.8	69.7	81.0	84.3	13.8	9.5	5.9	0.0	0.0	0.0
Idaho Falls CSA	156	6,819	18.6	930	2.2	0.6	0.2	3.6	0.0	0.5	74.0	73.1	84.2	20.2	26.3	15.0	0.0	0.0	0.1
Lewiston MSA	12	349	1.4	75	0.0	0.0	0.0	0.0	0.0	0.0	78.7	75.0	73.0	21.3	25.0	25.7	0.0	0.0	1.4
Pocatello MSA	37	933	4.4	116	1.1	0.0	0.0	10.9	0.0	1.0	65.9	67.6	90.7	22.0	32.4	7.2	0.0	0.0	1.0
Twin Falls MSA	59	2,525	7.0	337	0.0	0.0	0.0	1.6	0.0	0.3	88.9	94.9	91.0	9.5	5.1	8.1	0.0	0.0	0.6
Idaho Combined Non-MSA	356	24,277	42.5	1,477	0.0	0.0	0.0	4.2	4.8	2.9	81.8	89.0	82.7	13.9	6.2	14.0	0.0	0.0	0.4
Total	837	47,732	100.0	3,573	1.6	0.2	0.3	13.1	6.6	7.6	67.2	77.9	78.1	18.1	15.3	13.5	0.0	0.0	0.6

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2019-21

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Boise City CSA	175	11,090	20.9	573	96.5	49.1	58.6	2.3	9.7	1.1	41.1
Coeur d'Alene MSA	42	1,739	5.0	65	98.4	38.1	74.5	0.9	2.4	0.7	59.5
Idaho Falls CSA	156	6,819	18.6	930	96.3	26.3	55.8	3.1	7.1	0.6	66.7
Lewiston MSA	12	349	1.4	75	96.1	33.3	68.9	2.5	41.7	1.4	25.0
Pocatello MSA	37	933	4.4	116	96.4	32.4	57.7	2.3	5.4	1.4	62.2
Twin Falls MSA	59	2,525	7.0	337	93.7	32.2	43.8	4.9	28.8	1.5	39.0
Idaho Combined Non-MSA	356	24,277	42.5	1,477	95.9	44.1	52.4	2.9	11.0	1.3	44.9
Total	837	47,732	100.0	3,573	96.2	40.0	54.3	2.7	11.0	1.1	49.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Chicago CSA	68,116	20,153,588,410	97.3	405,426	4.5	2.0	3.3	18.0	10.8	13.9	35.2	32.1	33.3	42.2	55.0	49.4	0.1	0.1	0.1
Peoria MSA	1,525	213,033,221	2.2	16,143	3.2	1.8	1.2	14.8	11.8	13.0	54.0	51.5	51.8	28.0	34.9	34.0	0.0	0.0	0.0
Illinois Combined Non-MSA	356	36,859,376	0.5	3,274	3.0	4.5	3.1	20.9	18.3	15.7	63.9	62.9	69.0	12.1	14.3	12.3	0.0	0.0	0.0
Total	69,997	20,403,481,007	100.0	424,843	4.4	2.0	3.3	17.8	10.8	13.8	36.9	32.7	34.3	40.8	54.3	48.5	0.1	0.1	0.1
Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Chicago CSA	68,116	20,153,588,410	97.3	405,426	23.6	3.9	6.1	16.3	15.1	16.2	18.6	19.9	21.1	41.5	47.6	39.9	0.0	13.5	16.8
Peoria MSA	1,525	213,033,221	2.2	16,143	20.6	6.1	12.0	18.1	13.3	18.8	21.5	18.9	19.5	39.8	29.0	28.6	0.0	32.7	21.1
Illinois Combined Non-MSA	356	36,859,376	0.5	3,274	20.4	8.1	10.6	20.1	12.1	18.9	21.6	17.4	20.1	37.8	25.8	31.3	0.0	36.5	19.2
Total	69,997	20,403,481,007	100.0	424,843	23.4	4.0	6.3	16.5	15.1	16.3	18.8	19.8	21.0	41.3	47.0	39.4	0.0	14.1	16.9
Source: 2015 ACS: 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Chicago CSA	5,391	326,946	94.4	275,763	6.4	4.9	7.3	17.2	16.2	19.4	28.5	33.5	30.2	47.4	45.2	42.6	0.5	0.3	0.5
Peoria MSA	159	14,625	2.8	7,065	10.0	3.8	9.6	13.8	20.1	11.3	47.2	42.8	47.6	29.0	33.3	31.2	0.0	0.0	0.3
Illinois Combined Non-MSA	163	5,343	2.9	1,249	10.1	13.5	8.8	16.9	17.8	16.1	61.5	54.6	61.0	11.5	14.1	13.2	0.0	0.0	0.8
Total	5,713	346,914	100.0	284,077	6.6	5.1	7.4	17.1	16.3	19.2	29.4	34.4	30.7	46.5	44.0	42.2	0.5	0.2	0.5
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2019-21											
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Chicago CSA	5,391	326,946	94.4	275,763	86.8	40.8	43.2	5.0	9.4	8.2	49.7
Peoria MSA	159	14,625	2.8	7,065	80.0	34.0	51.1	5.7	13.8	14.3	52.2
Illinois Combined Non-MSA	163	5,343	2.9	1,249	77.2	61.4	56.6	5.4	3.7	17.4	35.0
Total	5,713	346,914	100.0	284,077	86.4	41.2	43.4	5.0	9.4	8.5	49.4
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Chicago CSA	31	1,022	32.3	1,227	3.7	0.0	1.2	15.2	6.5	5.7	40.5	51.6	70.7	40.5	41.9	22.0	0.1	0.0	0.3
Peoria MSA	24	881	25.0	1,336	1.6	0.0	0.3	8.9	12.5	2.2	61.5	75.0	76.8	28.0	12.5	20.7	0.0	0.0	0.0
Illinois Combined Non-MSA	41	3,447	42.7	285	0.8	0.0	0.0	6.3	0.0	1.1	77.3	78.0	84.4	15.6	22.0	14.5	0.0	0.0	0.0
Total	96	5,350	100.0	2,848	3.3	0.0	0.7	13.9	5.2	3.6	45.3	68.8	75.0	37.4	26.0	20.6	0.1	0.0	0.1
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Chicago CSA	31	1,022	32.3	1,227	94.9	19.4	61.2	2.8	0.0	2.3	80.6
Peoria MSA	24	881	25.0	1,336	97.7	0.0	78.1	1.2	0.0	1.1	100.0
Illinois Combined Non-MSA	41	3,447	42.7	285	97.9	14.6	61.3	0.8	14.6	1.3	70.7
Total	96	5,350	100.0	2,848	95.4	12.5	69.2	2.5	6.3	2.1	81.3
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Des Moines CSA	9,257	1,793,866,455	70.8	54,242	2.1	1.0	1.4	16.9	11.1	12.7	51.9	47.1	47.4	29.1	40.8	38.5	0.0	0.0	0.0
Iowa Combined Non-MSA	1,439	175,368,744	11.0	7,019	0.0	0.0	0.0	15.7	13.0	16.5	74.2	72.1	65.6	10.1	14.9	17.8	0.0	0.0	0.0
Cedar Rapids CSA	1,392	236,191,333	10.6	31,438	0.5	0.8	0.7	18.4	16.2	16.2	60.5	58.8	57.5	20.5	24.1	25.6	0.1	0.1	0.1
Sioux City MSA	740	98,453,234	5.7	3,233	1.6	0.8	1.7	17.8	16.1	12.4	33.8	34.1	34.4	46.8	49.1	51.5	0.0	0.0	0.0
Waterloo MSA	251	33,721,694	1.9	9,773	2.3	0.8	1.1	12.5	13.1	10.2	57.8	53.4	54.6	27.1	32.7	33.9	0.1	0.0	0.2
Total	13,079	2,337,601,459	100.0	105,705	1.4	0.8	1.1	16.7	12.2	13.7	57.3	50.5	51.9	24.6	36.5	33.3	0.0	0.0	0.1
Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Des Moines CSA	9,257	1,793,866,455	70.8	54,242	19.6	6.6	8.1	17.5	17.1	18.8	22.5	19.1	20.8	40.4	29.0	32.4	0.0	28.3	19.9
Iowa Combined Non-MSA	1,439	175,368,744	11.0	7,019	20.9	8.6	9.8	19.9	24.1	23.9	22.8	22.2	21.0	36.4	27.7	29.0	0.0	17.4	16.3
Cedar Rapids CSA	1,392	236,191,333	10.6	31,438	19.1	10.1	10.6	18.0	19.8	19.7	24.3	19.5	20.1	38.6	25.1	25.2	0.0	25.4	24.5
Sioux City MSA	740	98,453,234	5.7	3,233	22.1	6.4	7.7	18.7	24.2	23.1	22.7	25.7	22.8	36.6	26.1	30.1	0.0	17.7	16.3
Waterloo MSA	251	33,721,694	1.9	9,773	19.0	8.4	10.3	18.3	16.3	23.0	23.5	18.3	21.9	39.2	30.3	27.9	0.0	26.7	16.8
Total	13,079	2,337,601,459	100.0	105,705	19.8	7.2	9.1	18.2	18.5	19.9	23.1	19.8	20.8	39.0	28.3	29.5	0.0	26.1	20.6
Source: 2015 ACS: 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Des Moines CSA	5,021	144,162	66.7	16,712	3.8	2.6	3.3	13.5	12.2	11.8	52.1	47.7	51.1	30.4	37.4	33.4	0.2	0.0	0.4
Iowa Combined Non-MSA	710	25,175	9.4	4,078	0.0	0.0	0.0	22.1	23.5	17.7	69.1	67.5	73.0	8.8	9.0	8.4	0.0	0.0	0.9
Cedar Rapids CSA	1,100	51,924	14.6	9,287	3.9	4.2	4.6	20.6	21.9	18.0	52.6	47.0	56.2	20.4	25.1	18.9	2.5	1.8	2.3
Sioux City MSA	397	11,508	5.3	1,532	21.4	16.6	16.0	13.8	15.9	13.1	23.8	24.7	30.0	41.0	42.8	40.1	0.0	0.0	0.9
Waterloo MSA	297	11,743	3.9	2,433	6.3	5.7	4.9	12.7	24.9	10.5	48.9	34.3	47.8	31.3	34.7	35.9	0.7	0.3	0.8
Total	7,525	244,512	100.0	34,042	4.4	3.5	3.9	16.3	15.4	14.3	52.8	47.7	54.0	25.8	33.1	26.7	0.8	0.3	1.0
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues	2019-21
---	---------

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Des Moines CSA	5,021	144,162	66.7	16,712	87.3	66.4	49.0	3.8	7.6	8.9	26.0
Iowa Combined Non-MSA	710	25,175	9.4	4,078	82.2	62.8	58.5	4.4	7.5	13.3	29.7
Cedar Rapids CSA	1,100	51,924	14.6	9,287	87.0	51.5	44.7	3.8	9.0	9.2	39.5
Sioux City MSA	397	11,508	5.3	1,532	82.6	70.3	51.8	5.1	5.3	12.2	24.4
Waterloo MSA	297	11,743	3.9	2,433	84.1	58.2	52.5	4.6	11.1	11.3	30.6
Total	7,525	244,512	100.0	34,042	86.1	63.8	49.3	4.0	7.8	9.9	28.4
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Des Moines CSA	171	11,671	38.3	1,229	1.2	0.6	0.2	9.4	2.9	10.3	64.7	70.2	71.2	24.7	26.3	18.3	0.0	0.0	0.1
Iowa Combined Non-MSA	194	23,295	43.5	2,110	0.0	0.0	0.0	4.4	3.1	1.7	86.7	91.2	93.1	8.9	5.7	5.1	0.0	0.0	0.0
Cedar Rapids CSA	42	3,801	9.4	1,478	0.6	2.4	0.1	8.5	9.5	2.7	75.1	83.3	93.3	15.6	4.8	3.9	0.2	0.0	0.1
Sioux City MSA	20	3,116	4.5	324	3.6	10.0	0.0	6.2	0.0	0.3	31.8	15.0	49.4	58.5	75.0	50.3	0.0	0.0	0.0
Waterloo MSA	19	1,147	4.3	682	2.1	0.0	0.3	2.3	0.0	1.2	64.3	68.4	68.4	31.1	31.6	30.1	0.2	0.0	0.0
Total	446	43,030	100.0	5,823	0.9	0.9	0.1	7.0	3.4	3.6	71.5	78.0	83.3	20.4	17.7	13.0	0.1	0.0	0.0
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues**2019-21**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Des Moines CSA	171	11,671	38.3	1,229	97.5	56.7	62.9	1.4	7.0	1.1	36.3
Iowa Combined Non-MSA	194	23,295	43.5	2,110	98.5	57.7	65.8	0.6	12.4	0.9	29.9
Cedar Rapids CSA	42	3,801	9.4	1,478	98.1	54.8	57.5	1.1	2.4	0.8	42.9
Sioux City MSA	20	3,116	4.5	324	96.8	45.0	69.9	1.9	10.0	1.3	45.0
Waterloo MSA	19	1,147	4.3	682	98.6	63.2	62.4	0.9	0.0	0.6	36.8
Total	446	43,030	100.0	5,823	98.0	56.7	62.9	1.1	8.7	0.9	34.5

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Kansas City CSA	9,585	2,435,830,016	78.1	52,011	4.4	1.3	1.9	11.1	6.2	8.1	35.5	30.3	33.5	48.8	62.2	56.4	0.1	0.0	0.0
Wichita MSA	2,683	443,910,705	21.9	28,452	4.5	2.5	2.5	16.6	11.9	13.1	37.7	30.9	34.4	41.2	54.7	50.0	0.0	0.0	0.0
Total	12,268	2,879,740,721	100.0	80,463	4.4	1.6	2.1	13.4	7.4	9.9	36.4	30.5	33.9	45.7	60.5	54.2	0.1	0.0	0.0
Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Kansas City CSA	9,585	2,435,830,016	78.1	52,011	17.4	3.9	5.6	15.7	14.5	14.9	19.8	21.9	20.0	47.2	48.6	41.4	0.0	11.2	18.1
Wichita MSA	2,683	443,910,705	21.9	28,452	20.5	4.6	6.9	17.9	13.6	17.0	21.4	16.9	19.4	40.2	33.5	30.1	0.0	31.4	26.7
Total	12,268	2,879,740,721	100.0	80,463	18.7	4.0	6.1	16.6	14.3	15.7	20.4	20.8	19.8	44.3	45.3	37.4	0.0	15.6	21.1
Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Kansas City CSA	1,055	47,060	66.3	23,004	5.2	3.8	4.9	10.1	13.7	10.8	29.2	32.6	26.8	52.3	47.7	53.6	3.2	2.2	4.0
Wichita MSA	537	30,396	33.7	11,588	4.9	4.5	5.0	24.1	27.4	24.1	32.6	28.5	31.0	38.5	39.7	39.5	0.0	0.0	0.4
Total	1,592	77,456	100.0	34,592	5.1	4.0	5.0	15.1	18.3	15.2	30.4	31.2	28.2	47.4	45.0	48.8	2.1	1.4	2.8
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Kanas City CSA	1,055	47,060	66.3	23,004	85.0	48.1	47.5	5.1	7.3	9.9	44.6
Wichita MSA	537	30,396	33.7	11,588	83.2	42.1	53.1	5.6	6.7	11.3	51.2
Total	1,592	77,456	100.0	34,592	84.3	46.0	49.4	5.3	7.1	10.4	46.9
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Kansas City CSA	42	2,775	64.6	376	3.1	2.4	1.1	11.1	11.9	11.7	40.0	52.4	52.2	45.2	33.3	34.6	0.6	0.0	0.3
Wichita MSA	23	633	35.4	516	2.4	13.0	1.0	9.8	0.0	2.7	43.0	17.4	60.5	44.8	69.6	35.8	0.0	0.0	0.0
Total	65	3,408	100.0	892	2.8	6.2	1.0	10.5	7.7	6.4	41.3	40.0	57.1	45.0	46.2	35.3	0.3	0.0	0.1
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues**2019-21**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Kansas City CSA	42	2,775	64.6	376	95.4	11.9	58.7	2.4	2.4	2.1	85.7
Wichita MSA	23	633	35.4	516	97.8	21.7	62.2	1.5	0.0	0.7	78.3
Total	65	3,408	100.0	892	96.5	15.4	60.8	2.0	1.5	1.5	83.1

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Minnesota Combined Non-MSA	4,143	777,324,545	42.6	26,603	0.0	0.0	0.0	14.4	13.3	12.9	76.0	77.4	76.6	9.6	9.2	10.5	0.0	0.0	0.0
Rochester CSA	2,281	436,097,538	23.4	13,095	0.0	0.0	0.0	19.8	18.9	18.2	50.6	46.0	48.3	29.6	35.2	33.5	0.0	0.0	0.0
Duluth MSA	1,946	330,250,162	20.0	10,829	1.7	1.9	2.9	13.5	13.5	11.6	60.5	55.7	56.7	24.3	29.0	28.8	0.0	0.0	0.0
Mankato CSA	1,364	252,005,670	14.0	5,065	0.0	0.0	0.0	5.8	5.9	6.8	86.1	86.2	86.2	8.1	7.8	7.0	0.0	0.0	0.0
Total	9,734	1,795,677,915	100.0	55,592	0.3	0.4	0.6	14.5	13.6	13.4	68.6	66.9	66.9	16.5	19.1	19.2	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Minnesota Combined Non-MSA	4,143	777,324,545	42.6	26,603	19.6	6.7	7.0	18.9	16.2	17.3	23.5	20.3	21.0	38.0	41.5	37.9	0.0	15.3	16.8
Rochester CSA	2,281	436,097,538	23.4	13,095	18.9	11.3	12.7	18.7	22.9	24.5	23.4	21.4	20.5	39.0	29.4	29.0	0.0	15.0	13.3
Duluth MSA	1,946	330,250,162	20.0	10,829	19.4	6.7	8.0	17.5	17.4	16.8	23.1	24.7	22.4	40.0	36.2	34.6	0.0	15.0	18.1
Mankato CSA	1,364	252,005,670	14.0	5,065	18.8	6.0	8.6	17.9	20.6	24.5	23.7	28.2	23.4	39.6	32.5	28.6	0.0	12.8	14.9
Total	9,734	1,795,677,915	100.0	55,592	19.4	7.7	8.7	18.5	18.6	19.6	23.4	22.5	21.4	38.8	36.4	34.3	0.0	14.8	16.0
Source: 2015 ACS: 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2019-21**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Minnesota Combined Non-MSA	2,564	74,615	42.0	10,460	0.0	0.0	0.0	17.8	15.7	16.0	74.1	74.5	71.8	8.1	9.8	11.3	0.0	0.0	1.0
Rochester CSA	1,264	39,445	20.7	4,461	0.0	0.0	0.0	24.2	19.9	24.5	48.2	47.0	46.6	27.5	33.1	28.6	0.0	0.0	0.4
Duluth MSA	1,604	38,954	26.3	4,126	6.4	3.6	6.8	21.1	18.4	20.8	50.1	50.2	46.7	22.4	27.8	24.9	0.0	0.0	0.8
Mankato CSA	674	21,725	11.0	2,005	0.0	0.0	0.0	14.9	14.4	17.2	79.4	78.2	77.4	5.6	7.4	4.7	0.0	0.0	0.6
Total	6,106	174,739	100.0	21,052	1.3	0.9	1.3	19.4	17.1	18.8	64.8	62.8	62.2	14.5	19.1	16.9	0.0	0.0	0.8

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2019-21**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Minnesota Combined Non-MSA	2,564	74,615	42.0	10,460	84.4	63.2	48.0	4.6	6.2	11.0	30.6
Rochester CSA	1,264	39,445	20.7	4,461	85.5	67.4	56.2	4.1	6.6	10.4	25.9
Duluth MSA	1,604	38,954	26.3	4,126	82.9	75.0	51.1	4.5	6.5	12.6	18.5
Mankato CSA	674	21,725	11.0	2,005	82.4	71.1	48.8	5.4	7.9	12.1	21.1
Total	6,106	174,739	100.0	21,052	84.1	68.0	50.4	4.5	6.6	11.3	25.4

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2019-21**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Minnesota Combined Non-MSA	318	28,950	69.0	2,526	0.0	0.0	0.0	8.1	4.1	4.4	78.7	68.6	75.7	13.2	27.4	19.9	0.0	0.0	0.0
Rochester CSA	85	7,682	18.4	1,000	0.0	0.0	0.0	16.8	9.4	21.0	62.5	74.1	69.0	20.7	16.5	9.9	0.0	0.0	0.1
Duluth MSA	39	460	8.5	85	3.4	0.0	0.0	9.4	10.3	6.9	61.2	71.8	69.4	25.9	17.9	20.8	0.0	0.0	2.8
Mankato CSA	19	1,504	4.1	403	0.0	0.0	0.0	1.8	0.0	0.3	89.8	73.7	90.8	8.5	26.3	8.8	0.0	0.0	0.3
Total	461	38,596	100.0	4,014	0.2	0.0	0.0	9.1	5.4	8.2	75.7	70.1	75.4	15.0	24.5	16.3	0.0	0.0	0.1

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2019-21**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Minnesota Combined Non-MSA	318	28,950	69.0	2,526	97.7	55.3	67.6	1.3	7.5	1.0	37.1
Rochester CSA	85	7,682	18.4	1,000	98.0	50.6	64.8	1.2	10.6	0.8	38.8
Duluth MSA	39	460	8.5	85	97.8	64.1	77.8	1.0	0.0	1.2	35.9
Mankato CSA	19	1,504	4.1	403	97.5	42.1	42.0	1.6	15.8	0.9	42.1
Total	461	38,596	100.0	4,014	97.7	54.7	64.4	1.3	7.8	0.9	37.5

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2019-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Gulfport MSA	1,529	258,155,801	25.2	16,283	3.4	1.2	1.7	10.9	9.7	8.6	59.5	52.2	53.6	26.1	36.9	36.1	0.0	0.0	0.0
Jackson MSA	3,740	819,827,122	61.7	22,517	6.8	0.7	1.4	23.0	6.5	9.3	30.3	25.3	26.6	40.0	67.5	62.8	0.0	0.0	0.0
Hattiesburg MSA	795	164,918,923	13.1	6,095	3.4	1.3	1.4	19.7	6.2	9.5	46.5	38.5	43.2	30.4	54.1	45.9	0.0	0.0	0.0
Total	6,064	1,242,901,846	100.0	44,895	5.1	0.9	1.5	18.4	7.3	9.1	42.7	33.8	38.6	33.8	58.0	50.8	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2019-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Gulfport MSA	1,529	258,155,801	25.2	16,283	22.7	2.6	3.2	16.3	6.9	11.6	19.6	15.3	19.4	41.5	43.2	40.8	0.0	32.0	25.1
Jackson MSA	3,740	819,827,122	61.7	22,517	24.1	1.9	4.6	17.1	6.8	13.9	17.6	13.8	18.8	41.3	52.5	40.0	0.0	25.0	22.7
Hattiesburg MSA	795	164,918,922	13.1	6,095	24.7	1.3	3.5	15.1	11.7	13.6	18.9	16.4	18.0	41.3	49.2	43.5	0.0	21.5	21.4
Total	6,064	1,242,901,845	100.0	44,895	23.7	2.0	3.9	16.5	7.5	13.0	18.5	14.5	18.9	41.3	49.7	40.8	0.0	26.3	23.4

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Gulfport MSA	842	21,471	37.5	10,299	7.2	6.4	6.7	14.0	13.5	12.6	55.9	48.6	55.0	22.6	31.2	25.0	0.3	0.2	0.7
Jackson MSA	1,051	32,601	46.8	17,839	7.6	7.4	6.8	22.4	16.4	19.6	29.2	34.9	29.2	40.8	41.3	43.7	0.1	0.0	0.7
Hattiesburg MSA	354	9,904	15.8	4,293	9.4	16.7	7.6	15.3	13.6	12.8	48.1	42.9	47.0	27.2	26.8	31.9	0.0	0.0	0.7
Total	2,247	63,976	100.0	32,431	7.7	8.5	6.9	19.0	14.9	16.5	39.6	41.3	39.7	33.6	35.2	36.3	0.1	0.1	0.7
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Gulfport MSA	842	21,471	37.5	10,299	85.5	64.4	41.7	3.0	5.3	11.4	30.3
Jackson MSA	1,051	32,601	46.8	17,839	86.5	56.0	35.8	3.7	3.3	9.7	40.6
Hattiesburg MSA	354	9,904	15.8	4,293	84.5	51.4	40.7	3.8	2.8	11.7	45.8
Total	2,247	63,976	100.0	32,431	86.0	58.4	38.3	3.5	4.0	10.5	37.6
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2019-21**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Gulfport MSA	22	1,288	13.7	190	2.9	0.0	8.7	7.4	0.0	7.1	62.5	86.4	59.0	27.3	13.6	23.5	0.0	0.0	1.6
Jackson MSA	93	3,168	57.8	652	4.5	3.2	10.4	18.5	38.7	35.2	32.1	29.0	29.4	44.9	29.0	25.0	0.1	0.0	0.0
Hattiesburg MSA	46	3,160	28.6	136	1.4	0.0	0.0	19.5	37.0	28.1	46.4	50.0	47.9	32.7	13.0	23.1	0.0	0.0	0.8
Total	161	7,616	100.0	978	3.7	1.9	8.7	16.2	32.9	28.7	40.9	42.9	37.6	39.2	22.4	24.5	0.0	0.0	0.4

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2019-21**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Gulfport MSA	22	1,288	13.7	190	97.7	18.2	53.0	0.5	0.0	1.8	81.8
Jackson MSA	93	3,168	57.8	652	97.1	3.2	58.4	1.4	0.0	1.5	96.8
Hattiesburg MSA	46	3,160	28.6	136	96.2	2.2	58.7	2.2	0.0	1.7	97.8
Total	161	7,616	100.0	978	97.1	5.0	57.4	1.3	0.0	1.6	95.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2019-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Missoula MSA	791	210,103,171	10.3	6,446	0.5	0.6	0.4	12.6	14.7	13.9	67.3	63.2	66.0	19.6	21.5	19.7	0.0	0.0	0.0
Montana Combined Non-MSA	4,861	1,534,199,805	63.5	27,794	1.5	0.8	0.5	10.3	8.8	8.6	59.8	50.0	55.2	28.4	40.4	35.8	0.0	0.0	0.0
Billings MSA	1,537	349,530,495	20.1	10,836	1.1	0.2	1.2	17.4	10.4	12.8	62.6	64.3	64.9	19.0	25.1	21.1	0.0	0.0	0.0
Great Falls MSA	461	81,349,175	6.0	4,321	0.0	0.0	0.0	12.0	11.7	14.1	56.5	47.7	50.5	31.5	40.6	35.4	0.0	0.0	0.0
Total	7,650	2,175,182,646	100.0	49,397	1.1	0.6	0.6	12.3	9.9	10.7	61.0	54.1	58.3	25.6	35.4	30.4	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2019-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Missoula MSA	791	210,103,171	10.3	6,446	21.0	4.0	2.9	18.2	16.2	11.6	20.8	25.3	22.9	39.9	45.1	49.2	0.0	9.4	13.3
Montana Combined Non-MSA	4,861	1,534,199,805	63.5	27,794	18.6	2.8	3.1	17.8	11.5	11.4	21.7	20.8	19.3	41.9	55.5	47.6	0.0	9.4	18.7
Billings MSA	1,537	349,530,495	20.1	10,836	19.4	4.6	5.9	18.2	14.9	17.1	21.8	20.2	22.3	40.7	43.3	35.9	0.0	17.0	18.8
Great Falls MSA	461	81,349,175	6.0	4,321	19.8	5.2	3.8	18.5	14.8	14.5	22.1	18.7	21.6	39.6	38.0	32.4	0.0	23.4	27.7
Total	7,650	2,175,182,646	100.0	49,397	19.2	3.4	3.7	18.0	12.9	13.0	21.7	21.0	20.6	41.1	50.9	43.9	0.0	11.8	18.8

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Missoula MSA	645	11,376	10.7	4,321	9.8	6.5	11.4	18.2	18.3	19.0	55.8	62.9	56.9	16.3	12.2	12.1	0.0	0.0	0.6
Montana Combined Non-MSA	3,816	105,638	63.4	18,538	1.8	1.3	1.2	10.7	7.5	9.3	56.4	52.8	56.8	31.1	38.5	31.8	0.0	0.0	0.9
Billings MSA	1,053	28,951	17.5	5,506	2.0	1.1	1.8	25.9	20.8	23.7	56.2	57.6	59.6	15.9	20.4	14.2	0.0	0.0	0.6
Great Falls MSA	506	11,555	8.4	2,004	0.0	0.0	0.0	25.1	18.2	24.6	49.0	51.0	52.7	25.9	30.8	22.6	0.0	0.0	0.1
Total	6,020	157,520	100.0	30,369	2.9	1.7	2.7	15.5	11.9	14.3	55.7	54.6	57.1	25.8	31.9	25.2	0.0	0.0	0.8
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2019-21											
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Missoula MSA	645	11,376	10.7	4,321	88.9	66.0	55.6	3.4	2.5	7.7	31.5
Montana Combined Non-MSA	3,816	105,638	63.4	18,538	89.0	56.3	55.7	3.1	5.8	7.8	37.9
Billings MSA	1,053	28,951	17.5	5,506	87.0	65.7	52.7	4.0	5.7	9.0	28.6
Great Falls MSA	506	11,555	8.4	2,004	84.9	68.2	50.3	4.5	6.3	10.6	25.5
Total	6,020	157,520	100.0	30,369	88.4	60.0	54.8	3.4	5.4	8.2	34.5
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2019-21**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Missoula MSA	29	738	6.5	46	2.7	3.4	0.0	13.5	0.0	2.7	68.6	96.6	81.1	15.3	0.0	8.1	0.0	0.0	8.1
Montana Combined Non-MSA	339	23,553	76.5	2,085	0.2	0.3	0.1	6.8	4.1	2.6	70.2	79.1	85.0	22.8	16.5	11.7	0.0	0.0	0.6
Billings MSA	43	2,860	9.7	457	1.1	0.0	0.2	14.1	7.0	14.1	66.0	69.8	70.3	18.9	23.3	15.2	0.0	0.0	0.2
Great Falls MSA	32	699	7.2	298	0.0	0.0	0.0	7.5	3.1	2.8	77.5	87.5	88.2	15.0	9.4	9.0	0.0	0.0	0.0
Total	443	27,850	100.0	2,886	0.5	0.5	0.1	8.6	4.1	4.4	69.9	79.9	82.9	21.0	15.6	12.0	0.0	0.0	0.6

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2019-21**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Missoula MSA	29	738	6.5	46	98.6	10.3	67.6	0.8	0.0	0.6	89.7
Montana Combined Non-MSA	339	23,553	76.5	2,085	98.2	49.9	77.4	0.8	3.0	1.0	47.2
Billings MSA	43	2,860	9.7	457	97.2	60.5	81.3	1.6	0.0	1.2	39.5
Great Falls MSA	32	699	7.2	298	97.1	65.6	88.9	1.7	18.8	1.2	15.6
Total	443	27,850	100.0	2,886	98.0	49.4	79.1	1.0	3.6	1.0	47.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Grand Island MSA	417	59,608,789	8.5	3,045	0.0	0.0	0.0	22.2	28.5	23.2	42.4	36.0	40.7	35.4	35.5	36.2	0.0	0.0	0.0
Lincoln MSA	3,250	652,891,625	66.5	19,149	1.5	0.9	1.9	18.3	13.4	16.3	40.4	35.9	37.1	39.6	49.8	44.6	0.1	0.1	0.2
Nebraska Combined Non-MSA	1,219	179,281,019	24.9	6,834	0.0	0.0	0.0	10.1	10.5	10.2	67.2	60.4	61.0	22.7	29.1	28.8	0.0	0.0	0.0
Total	4,886	891,781,434	100.0	29,028	0.7	0.6	1.2	15.6	14.0	15.6	51.0	42.0	43.1	32.6	43.4	40.0	0.1	0.0	0.1
Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Grand Island MSA	417	59,608,789	8.5	3,045	19.0	5.3	5.2	18.8	22.1	17.7	24.1	22.3	20.1	38.2	31.9	31.7	0.0	18.5	25.3
Lincoln MSA	3,250	652,891,625	66.5	19,149	21.0	8.0	7.7	17.1	19.0	19.8	21.4	24.1	22.2	40.5	37.6	29.9	0.0	11.3	20.3
Nebraska Combined Non-MSA	1,219	179,281,019	24.9	6,834	17.3	4.9	5.8	17.6	18.5	17.0	22.9	23.1	21.4	42.2	39.5	32.8	0.0	14.0	23.0
Total	4,886	891,781,434	100.0	29,028	19.4	7.0	7.0	17.5	19.2	18.9	22.3	23.7	21.8	40.8	37.6	30.8	0.0	12.6	21.5
Source: 2015 ACS: 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2019-21**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Grand Island MSA	417	59,608,789	8.5	3,045	19.0	5.3	5.2	18.8	22.1	17.7	24.1	22.3	20.1	38.2	31.9	31.7	0.0	18.5	25.3
Lincoln MSA	3,250	652,891,625	66.5	19,149	21.0	8.0	7.7	17.1	19.0	19.8	21.4	24.1	22.2	40.5	37.6	29.9	0.0	11.3	20.3
Nebraska Combined Non-MSA	1,219	179,281,019	24.9	6,834	17.3	4.9	5.8	17.6	18.5	17.0	22.9	23.1	21.4	42.2	39.5	32.8	0.0	14.0	23.0
Total	4,886	891,781,434	100.0	29,028	19.4	7.0	7.0	17.5	19.2	18.9	22.3	23.7	21.8	40.8	37.6	30.8	0.0	12.6	21.5

Source: 2015 ACS: 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2019-21**

	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Grand Island MSA	243	6,318	10.5	1,437	79.8	65.8	55.5	5.7	2.5	14.5	31.7
Lincoln MSA	1,492	31,771	64.6	6,910	83.5	66.8	59.2	5.2	5.1	11.3	28.2
Nebraska Combined Non-MSA	576	29,232	24.9	3,930	80.3	64.8	58.9	5.2	6.9	14.5	28.3
Total	2,311	67,321	100.0	12,277	81.9	66.2	58.7	5.3	5.3	12.8	28.6

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2019-21**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Grand Island MSA	21	1,106	7.8	689	0.0	0.0	0.0	6.6	0.0	0.6	43.9	47.6	59.0	49.4	52.4	40.4	0.0	0.0	0.0
Lincoln MSA	13	619	4.9	562	1.1	0.0	0.0	9.8	0.0	3.0	29.8	23.1	23.7	59.2	76.9	73.3	0.1	0.0	0.0
Nebraska Combined Non-MSA	234	30,198	87.3	1,978	0.0	0.0	0.0	3.0	0.4	1.6	79.4	88.0	86.8	17.7	11.5	11.4	0.0	0.0	0.3
Total	268	31,923	100.0	3,229	0.3	0.0	0.0	5.3	0.4	1.6	61.3	81.7	69.8	33.1	17.9	28.4	0.0	0.0	0.2

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2019-21**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Grand Island MSA	21	1,106	7.8	689	96.8	52.4	66.4	2.4	9.5	0.8	38.1
Lincoln MSA	13	619	4.9	562	98.1	38.5	71.0	1.3	15.4	0.6	46.2
Nebraska Combined Non-MSA	234	30,198	87.3	1,978	97.3	57.7	64.9	1.6	12.0	1.1	30.3
Total	268	31,923	100.0	3,229	97.4	56.3	66.3	1.6	11.9	1.0	31.7

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Las Vegas CSA	22,466	6,183,054,629	75.4	152,941	1.8	1.2	1.2	18.0	12.3	12.8	41.7	42.8	43.0	38.5	43.7	42.9	0.0	0.0	0.0
Reno CSA	6,586	2,432,254,924	22.1	47,813	1.9	1.7	1.6	14.4	10.1	11.1	46.7	43.0	48.7	36.8	44.9	38.4	0.3	0.2	0.2
Nevada Combined Non-MSA	736	138,450,464	2.5	5,763	0.0	0.0	0.0	12.3	10.3	12.0	33.4	27.7	26.0	54.3	62.0	62.0	0.0	0.0	0.0
Total	29,788	8,753,760,017	100.0	206,517	1.8	1.3	1.3	16.8	11.8	12.4	42.5	42.5	43.9	38.9	44.4	42.4	0.1	0.1	0.1
Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Las Vegas CSA	22,466	6,183,054,629	75.4	152,941	20.8	5.4	5.0	18.5	17.6	14.2	20.6	20.7	20.4	40.2	39.8	37.2	0.0	16.5	23.1
Reno CSA	6,586	2,432,254,924	22.1	47,813	21.0	6.3	5.2	17.7	17.1	16.8	20.9	22.1	22.9	40.4	45.3	38.1	0.0	9.2	17.0
Nevada Combined Non-MSA	736	138,450,464	2.5	5,763	17.1	4.9	4.4	16.4	12.1	15.3	18.6	24.3	27.6	47.9	37.2	29.3	0.0	21.5	23.4
Total	29,788	8,753,760,017	100.0	206,517	20.7	5.6	5.0	18.2	17.4	14.8	20.5	21.1	21.2	40.6	40.9	37.2	0.0	15.0	21.7
Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Las Vegas CSA	25,294	656,056	73.1	74,198	3.8	2.5	3.1	21.2	16.7	19.2	38.8	37.6	39.0	35.6	42.9	38.3	0.6	0.3	0.5
Reno CSA	8,430	267,898	24.4	18,239	6.5	6.0	6.8	22.6	20.3	20.0	31.9	33.0	31.9	35.2	37.9	37.3	3.9	2.8	3.9
Nevada Combined Non-MSA	889	23,298	2.6	1,822	0.0	0.0	0.0	21.9	22.7	19.9	36.5	38.2	38.4	41.6	39.0	40.0	0.0	0.0	1.6
Total	34,613	947,252	100.0	94,259	4.2	3.3	3.7	21.6	17.8	19.3	37.2	36.5	37.6	35.7	41.6	38.1	1.3	0.9	1.2
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Las Vegas CSA	25,294	656,056	73.1	74,198	86.8	65.5	41.8	4.3	10.8	8.9	23.7
Reno CSA	8,430	267,898	24.4	18,239	82.4	68.4	48.5	5.8	11.4	11.8	20.2
Nevada Combined Non-MSA	889	23,298	2.6	1,822	75.1	71.0	44.8	5.2	11.5	19.7	17.5
Total	34,613	947,252	100.0	94,259	85.4	66.4	43.1	4.7	10.9	9.9	22.7
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2019-21**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Las Vegas CSA	88	2,334	27.3	109	2.0	0.0	0.0	20.6	13.6	13.3	40.1	43.2	48.2	37.1	43.2	36.1	0.2	0.0	2.4
Reno CSA	105	1,472	32.6	100	4.3	5.7	1.4	16.8	17.1	13.0	44.2	45.7	33.3	33.9	31.4	46.4	0.9	0.0	5.8
Nevada Combined Non-MSA	129	4,084	40.1	161	0.0	0.0	0.0	13.6	6.2	8.0	54.1	45.0	58.4	32.2	48.8	28.5	0.0	0.0	5.1
Total	322	7,890	100.0	370	2.4	1.9	0.3	18.5	11.8	10.7	43.3	44.7	49.5	35.4	41.6	34.9	0.4	0.0	4.5

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2019-21**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Las Vegas CSA	88	2,334	27.3	109	94.3	59.1	67.5	3.4	11.4	2.2	29.5
Reno CSA	105	1,472	32.6	100	94.0	64.8	62.3	3.8	5.7	2.2	29.5
Nevada Combined Non-MSA	129	4,084	40.1	161	94.0	53.5	52.6	5.0	11.6	1.0	34.9
Total	322	7,890	100.0	370	94.2	58.7	59.2	3.8	9.6	2.0	31.7

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2019-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Albuquerque CSA	6,218	1,415,734,389	65.8	58,351	2.4	1.4	1.6	25.0	16.3	17.5	37.7	35.2	36.1	34.8	47.1	44.8	0.1	0.1	0.1
New Mexico Combined Non-MSA	1,968	323,742,969	20.8	13,389	1.9	0.4	0.8	28.3	14.0	11.7	41.7	43.4	43.5	28.0	42.1	44.1	0.0	0.0	0.0
Farmington MSA	335	53,097,791	3.5	3,101	3.8	0.0	0.0	20.2	9.9	8.7	44.0	42.1	44.1	32.0	48.1	47.2	0.0	0.0	0.0
Las Cruces MSA	933	171,931,492	9.9	9,188	3.6	2.0	2.2	34.5	11.0	12.8	24.8	29.6	30.6	37.1	57.3	54.4	0.0	0.0	0.0
Total	9,454	1,964,506,642	100.0	84,029	2.5	1.2	1.4	26.5	15.1	15.7	37.8	36.6	37.0	33.1	47.1	45.8	0.1	0.1	0.1

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2019-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Albuquerque CSA	6,218	1,415,734,389	65.8	58,351	23.8	4.0	4.0	15.9	13.6	14.1	18.5	17.4	20.5	41.8	43.9	41.9	0.0	21.2	19.4
New Mexico Combined Non-MSA	1,968	323,742,969	20.8	13,389	23.4	2.5	3.0	16.8	7.0	9.8	17.8	13.2	18.2	42.0	44.6	44.6	0.0	32.8	24.3
Farmington MSA	335	53,097,792	3.5	3,101	24.5	1.2	2.8	16.3	9.3	11.7	17.5	18.5	19.9	41.8	31.9	41.1	0.0	39.1	24.5
Las Cruces MSA	933	171,931,493	9.9	9,188	25.1	1.5	1.3	15.6	6.2	8.5	16.9	15.1	17.3	42.4	50.2	52.6	0.0	27.0	20.4
Total	9,454	1,964,506,642	100.0	84,029	23.9	3.3	3.5	16.1	11.4	12.7	18.1	16.3	19.8	42.0	44.2	43.5	0.0	24.8	20.5

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography**2019-21**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Albuquerque CSA	8,349	300,976	63.4	22,810	7.3	7.0	8.7	21.4	22.4	23.5	33.9	35.3	31.7	36.9	34.9	34.8	0.5	0.4	1.3
New Mexico Combined Non-MSA	2,894	92,440	22.0	6,675	1.9	1.9	2.3	22.7	22.6	20.9	43.8	39.6	42.2	31.6	35.9	32.5	0.0	0.0	2.1
Farmington MSA	500	16,080	3.8	1,369	0.2	0.4	0.4	24.3	19.6	20.7	41.4	41.6	46.4	34.1	38.4	30.6	0.0	0.0	1.9
Las Cruces MSA	1,426	31,506	10.8	3,114	6.7	3.8	4.5	31.3	30.2	35.0	25.3	28.3	25.6	36.7	37.7	33.8	0.0	0.0	1.2
Total	13,169	441,002	100.0	33,968	5.9	5.3	6.8	22.6	23.2	23.9	35.5	35.7	33.8	35.7	35.5	34.1	0.4	0.3	1.5
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Albuquerque CSA	8,349	300,976	63.4	22,810	88.5	67.4	47.3	3.1	10.7	8.4	21.9
New Mexico Combined Non-MSA	2,894	92,440	22.0	6,675	81.0	68.8	38.6	4.2	7.9	14.9	23.3
Farmington MSA	500	16,080	3.8	1,369	81.1	68.6	40.0	4.7	11.6	14.2	19.8
Las Cruces MSA	1,426	31,506	10.8	3,114	85.5	72.9	44.3	3.3	8.2	11.2	18.9
Total	13,169	441,002	100.0	33,968	86.4	68.3	45.1	3.4	9.9	10.2	21.8
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2019-21**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Albuquerque CSA	109	2,030	35.4	147	3.7	1.8	0.9	24.1	30.3	33.3	37.2	43.1	42.7	34.8	24.8	20.5	0.1	0.0	2.6
New Mexico Combined Non-MSA	152	3,062	49.4	353	1.0	2.0	0.0	17.2	23.7	14.5	48.9	48.7	60.1	32.9	25.7	22.8	0.0	0.0	2.6
Farmington MSA	8	113	2.6	31	0.0	0.0	12.9	11.3	12.5	41.9	45.3	37.5	25.8	43.4	50.0	16.1	0.0	0.0	3.2
Las Cruces MSA	39	1,126	12.7	56	2.7	0.0	0.0	33.0	41.0	31.3	32.8	35.9	29.2	31.6	23.1	33.3	0.0	0.0	6.3
Total	308	6,331	100.0	587	2.6	1.6	1.0	22.3	27.9	22.1	41.0	44.8	51.1	34.1	25.6	22.9	0.0	0.0	3.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2019-21**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Albuquerque CSA	109	2,030	35.4	147	97.0	63.3	59.8	1.6	2.8	1.3	33.9
New Mexico Combined Non-MSA	152	3,062	49.4	353	95.0	50.7	49.5	4.2	6.6	0.8	42.8
Farmington MSA	8	113	2.6	31	98.1	87.5	29.0	1.3	0.0	0.6	12.5
Las Cruces MSA	39	1,126	12.7	56	92.4	46.2	45.8	5.5	12.8	2.1	41.0
Total	308	6,331	100.0	587	95.9	55.5	50.3	2.9	5.8	1.2	38.6

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Asheville CSA	4,194	1,137,839,396	6.6	30,250	1.1	0.9	1.3	10.6	9.0	10.4	67.1	61.5	64.5	21.2	28.6	23.8	0.0	0.0	0.0
Greensboro CSA	11,969	2,273,279,861	18.8	74,790	2.6	1.4	1.7	17.4	12.5	13.5	46.6	40.5	43.5	33.4	45.5	41.3	0.0	0.1	0.0
Raleigh CSA	25,638	7,493,513,420	40.2	144,526	3.0	2.0	2.4	24.4	17.1	20.0	36.3	36.9	37.5	36.4	44.0	40.1	0.0	0.0	0.0
Fayetteville CSA	6,046	1,110,100,700	9.5	42,441	1.1	0.2	0.2	18.2	8.5	8.6	54.1	52.4	52.0	26.5	38.9	39.2	0.0	0.0	0.0
Goldsboro MSA	1,167	199,460,562	1.8	4,124	0.0	0.0	0.0	26.7	15.3	19.7	56.0	56.4	55.8	17.3	28.4	24.5	0.0	0.0	0.0
Greenville NC CSA	1,436	254,388,645	2.3	10,350	2.8	4.4	4.1	16.9	8.8	10.8	45.8	47.7	45.5	34.5	39.1	39.6	0.0	0.0	0.0
Hickory MSA	1,912	345,796,584	3.0	15,947	0.0	0.0	0.0	10.5	8.4	9.5	67.5	58.2	61.2	22.0	33.4	29.3	0.0	0.0	0.0
Jacksonville NC MSA	1,629	283,928,575	2.6	14,916	0.0	0.0	0.0	3.8	2.5	2.7	76.3	80.2	79.4	19.9	17.3	17.9	0.0	0.0	0.0
New Bern CSA	1,716	381,778,839	2.7	12,719	1.3	1.6	1.3	10.1	6.4	6.4	47.6	35.2	37.8	41.0	56.9	54.5	0.0	0.0	0.0
Rocky Mount CSA	929	127,045,064	1.5	7,488	0.4	0.5	0.3	14.1	7.5	7.1	54.7	50.9	52.3	30.8	41.0	40.3	0.0	0.0	0.0
Wilmington MSA	3,088	1,112,805,925	4.8	22,055	4.9	4.1	4.4	14.4	6.2	7.9	44.4	43.4	47.3	36.3	46.3	40.5	0.0	0.0	0.0
North Carolina Combined Non-MSA	3,977	1,012,985,158	6.2	26,086	0.1	0.1	0.1	9.5	3.7	5.0	72.6	42.7	55.0	17.8	53.6	39.9	0.0	0.0	0.0
Total	63,701	15,732,922,728	100.0	405,692	1.9	1.5	1.7	17.0	12.2	13.3	51.0	43.9	46.9	30.1	42.4	38.1	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Asheville CSA	4,194	1,137,839,396	6.6	30,250	20.0	4.7	5.6	18.7	14.3	16.4	20.7	20.9	21.6	40.6	49.3	43.1	0.0	10.8	13.4
Greensboro CSA	11,969	2,273,279,860	18.8	74,790	22.0	4.8	5.5	18.0	13.5	17.2	18.6	16.6	21.2	41.4	38.3	41.1	0.0	26.7	15.0
Raleigh CSA	25,638	7,493,513,420	40.2	144,526	22.4	5.8	5.9	17.1	17.6	16.5	18.7	20.6	20.3	41.8	44.0	42.0	0.0	11.9	15.4
Fayetteville CSA	6,046	1,110,100,700	9.5	42,441	22.2	2.0	2.0	17.0	7.4	9.3	18.4	13.1	16.6	42.4	32.2	36.9	0.0	45.3	35.2
Goldsboro MSA	1,167	199,460,562	1.8	4,124	22.8	1.6	1.6	17.9	6.5	8.7	19.4	20.5	19.2	39.9	35.9	45.2	0.0	35.5	25.3
Greenville NC CSA	1,436	254,388,645	2.3	10,350	23.0	2.6	2.5	17.1	11.5	11.8	18.3	17.2	19.3	41.6	42.8	48.2	0.0	25.9	18.1
Hickory MSA	1,912	345,796,585	3.0	15,947	20.8	3.6	5.2	17.8	13.2	17.4	21.1	18.9	20.4	40.3	38.6	41.0	0.0	25.7	16.1
Jacksonville NC MSA	1,629	283,928,576	2.6	14,916	18.2	1.3	2.0	18.6	7.8	9.9	23.9	13.3	19.6	39.3	23.9	30.3	0.0	53.7	38.1
New Bern CSA	1,716	381,778,839	2.7	12,719	18.9	2.3	2.6	17.2	8.3	9.5	18.5	16.0	16.9	45.4	52.6	50.4	0.0	20.7	20.6
Rocky Mount CSA	929	127,045,064	1.5	7,488	22.2	3.2	3.9	16.8	11.2	15.1	19.5	16.9	22.9	41.4	34.9	39.1	0.0	33.8	19.0
Wilmington MSA	3,088	1,112,805,925	4.8	22,055	22.7	3.8	3.9	17.6	14.7	14.0	18.4	18.3	18.0	41.3	48.0	46.1	0.0	15.2	18.0
North Carolina Combined Non-MSA	3,977	1,012,985,158	6.2	26,086	21.4	1.8	2.1	17.9	7.2	9.5	20.0	12.6	15.6	40.6	61.6	57.1	0.0	16.8	15.6
Total	63,701	15,732,922,728	100.0	405,692	21.8	4.4	4.6	17.6	13.8	14.6	19.2	18.1	19.6	41.5	42.7	42.5	0.0	21.0	18.7
Source: 2015 ACS: 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Asheville CSA	4,570	150,130	10.0	15,588	2.6	2.4	2.6	14.1	13.3	15.1	56.8	59.6	56.2	26.5	24.7	25.6	0.0	0.0	0.5
Greensboro CSA	9,014	304,150	19.8	40,528	4.3	3.6	4.1	20.2	18.1	20.5	38.9	38.7	40.5	36.3	39.5	34.3	0.3	0.2	0.6
Raleigh CSA	18,150	457,373	39.8	61,714	5.0	4.1	4.6	22.3	18.5	22.3	33.5	32.7	35.2	38.7	44.5	37.4	0.5	0.2	0.5
Fayetteville CSA	2,477	74,190	5.4	15,110	2.4	2.5	1.9	20.0	14.5	18.1	50.0	47.4	50.1	27.6	35.6	29.4	0.1	0.0	0.4
Goldsboro MSA	421	12,263	0.9	1,910	0.0	0.0	0.0	35.3	40.1	30.3	53.0	51.5	54.8	11.8	8.3	14.5	0.0	0.0	0.4
Greenville NC CSA	1,185	58,066	2.6	5,808	10.8	7.6	8.5	19.1	21.4	18.5	40.4	41.4	41.7	29.7	29.5	30.9	0.0	0.0	0.4
Hickory MSA	1,652	57,300	3.6	7,039	0.0	0.0	0.0	14.4	13.7	15.1	58.2	59.7	57.1	27.4	26.5	27.1	0.0	0.0	0.7
Jacksonville NC MSA	531	17,331	1.2	3,010	0.0	0.0	0.0	11.1	14.1	8.3	68.7	66.3	71.6	19.5	19.2	19.5	0.7	0.4	0.6
New Bern CSA	1,355	34,111	3.0	4,822	4.5	2.4	3.9	12.1	18.5	10.6	42.6	41.3	42.8	40.8	37.9	42.4	0.0	0.0	0.4
Rocky Mount CSA	779	51,862	1.7	4,182	2.2	1.2	1.5	14.9	11.0	15.8	56.6	44.3	54.6	26.3	43.5	27.5	0.0	0.0	0.6
Wilmington MSA	2,428	60,282	5.3	11,214	12.2	9.0	11.5	11.1	9.6	11.5	34.9	37.6	38.3	41.6	43.6	37.8	0.3	0.2	0.8
North Carolina Combined Non-MSA	2,997	84,345	6.6	13,480	0.5	0.2	0.3	9.4	10.1	8.2	62.3	59.9	59.2	27.7	29.8	31.3	0.0	0.0	1.0
Total	45,559	1,361,403	100.0	184,405	4.3	3.5	3.9	18.6	16.6	18.2	43.0	41.6	43.8	33.9	38.1	33.4	0.3	0.1	0.6
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Asheville CSA	4,570	150,130	10.0	15,588	89.6	62.6	49.4	3.1	8.1	7.3	29.3
Greensboro CSA	9,014	304,150	19.8	40,528	87.0	64.0	48.5	4.0	8.8	9.0	27.2
Raleigh CSA	18,150	457,373	39.8	61,714	89.3	65.9	45.9	3.0	8.3	7.7	25.8
Fayetteville CSA	2,477	74,190	5.4	15,110	87.5	63.6	48.4	3.1	7.2	9.4	29.2
Goldsboro MSA	421	12,263	0.9	1,910	84.9	56.5	46.4	3.9	7.4	11.2	36.1
Greenville NC CSA	1,185	58,066	2.6	5,808	85.7	60.1	49.9	3.9	13.3	10.4	26.6
Hickory MSA	1,652	57,300	3.6	7,039	84.5	62.2	47.8	4.9	10.4	10.6	27.4
Jacksonville NC MSA	531	17,331	1.2	3,010	87.6	63.7	51.6	2.5	7.0	9.9	29.4
New Bern CSA	1,355	34,111	3.0	4,822	87.0	59.4	55.3	3.4	9.2	9.6	31.4
Rocky Mount CSA	779	51,862	1.7	4,182	84.5	58.2	42.8	4.4	9.9	11.1	32.0
Wilmington MSA	2,428	60,282	5.3	11,214	88.7	66.9	45.9	3.3	7.1	8.0	26.0
North Carolina Combined Non-MSA	2,997	84,345	6.6	13,480	85.6	63.6	53.1	3.7	7.1	10.7	29.3
Total	45,559	1,361,403	100.0	184,405	87.8	64.2	48.0	3.5	8.4	8.8	27.4
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2019-21**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Asheville CSA	72	1,938	6.5	143	1.1	0.0	0.9	14.2	11.1	20.2	65.4	77.8	64.9	19.4	11.1	14.0	0.0	0.0	0.0
Greensboro CSA	144	2,844	13.1	704	1.8	0.7	0.5	15.2	18.1	19.0	51.2	49.3	66.5	31.7	31.9	14.0	0.1	0.0	0.0
Raleigh CSA	190	6,378	17.3	601	4.0	1.6	6.0	25.7	34.2	40.2	43.1	42.1	39.4	27.1	22.1	14.3	0.1	0.0	0.2
Fayetteville CSA	88	4,957	8.0	360	0.8	0.0	0.3	16.2	25.0	23.4	56.1	55.7	59.5	26.9	19.3	16.8	0.0	0.0	0.0
Goldsboro MSA	13	689	1.2	162	0.0	0.0	0.0	17.0	38.5	10.3	64.9	61.5	75.0	18.1	0.0	14.7	0.0	0.0	0.0
Greenville NC CSA	99	5,862	9.0	318	2.5	0.0	0.7	13.4	6.1	11.5	55.4	78.8	66.2	28.7	15.2	19.9	0.0	0.0	1.7
Hickory MSA	96	1,619	8.7	134	0.0	0.0	0.0	10.0	8.3	11.1	68.0	78.1	77.8	22.0	13.5	11.1	0.0	0.0	0.0
Jacksonville NC MSA	26	625	2.4	48	0.0	0.0	0.0	6.2	0.0	0.0	76.8	100.0	100.0	16.9	0.0	0.0	0.0	0.0	0.0
New Bern CSA	49	2,749	4.5	127	1.3	0.0	0.0	13.8	32.7	20.5	48.2	44.9	65.0	36.8	22.4	14.5	0.0	0.0	0.0
Rocky Mount CSA	24	1,104	2.2	193	0.1	0.0	0.0	6.9	4.2	3.3	62.1	66.7	68.0	30.8	29.2	28.7	0.0	0.0	0.0
Wilmington MSA	106	2,100	9.6	105	8.3	3.8	14.7	22.9	42.5	45.6	38.5	33.0	20.6	30.2	20.8	19.1	0.1	0.0	0.0
North Carolina Combined Non-MSA	194	8,140	17.6	1,055	0.1	0.0	0.0	10.1	14.9	12.0	73.5	79.4	78.2	16.4	5.7	9.4	0.0	0.0	0.3
Total	1,101	39,005	100.0	3,950	2.0	0.7	1.4	16.7	21.0	19.0	55.1	60.9	65.2	26.1	17.4	14.2	0.0	0.0	0.3

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2019-21**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Asheville CSA	72	1,938	6.5	143	97.9	27.8	57.0	1.1	0.0	1.0	72.2
Greensboro CSA	144	2,844	13.1	704	97.9	50.0	58.3	1.2	2.1	0.9	47.9
Raleigh CSA	190	6,378	17.3	601	96.5	55.3	53.1	2.0	4.7	1.5	40.0
Fayetteville CSA	88	4,957	8.0	360	97.0	34.1	63.1	1.4	8.0	1.6	58.0
Goldsboro MSA	13	689	1.2	162	96.2	30.8	37.2	3.2	0.0	0.7	69.2
Greenville NC CSA	99	5,862	9.0	318	95.8	60.6	32.1	2.6	12.1	1.6	27.3
Hickory MSA	96	1,619	8.7	134	97.7	40.6	53.7	1.3	0.0	1.1	59.4
Jacksonville NC MSA	26	625	2.4	48	96.7	0.0	61.8	1.8	0.0	1.6	100.0
New Bern CSA	49	2,749	4.5	127	96.6	28.6	47.0	1.7	10.2	1.7	61.2
Rocky Mount CSA	24	1,104	2.2	193	93.9	25.0	36.5	4.4	4.2	1.8	70.8
Wilmington MSA	106	2,100	9.6	105	95.8	12.3	66.2	2.4	0.0	1.8	87.7
North Carolina Combined Non-MSA	194	8,140	17.6	1,055	96.4	34.5	46.2	1.7	8.8	2.0	56.7
Total	1,101	39,005	100.0	3,950	96.8	39.1	50.1	1.8	4.9	1.4	56.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Bismarck MSA	538	124,075,344	46.6	7,030	0.0	0.0	0.0	12.0	6.7	8.0	79.7	73.4	76.6	8.3	19.9	15.4	0.0	0.0	0.0
North Dakota Combined Non-MSA	617	151,575,615	53.4	8,252	0.0	0.0	0.0	3.8	2.4	2.2	66.1	48.1	59.7	30.1	49.4	38.2	0.0	0.0	0.0
Total	1,155	275,650,959	100.0	15,282	0.0	0.0	0.0	7.2	4.4	4.8	71.7	59.9	67.5	21.1	35.7	27.7	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Bismarck MSA	538	124,075,344	46.6	7,030	18.0	6.7	8.5	18.9	14.1	21.0	25.0	20.6	23.1	38.2	40.5	29.9	0.0	18.0	17.4
North Dakota Combined Non-MSA	617	151,575,616	53.4	8,252	17.2	3.9	5.6	17.2	12.3	18.3	22.2	17.8	22.3	43.4	38.9	27.3	0.0	27.1	26.5
Total	1,155	275,650,959	100.0	15,282	17.5	5.2	6.9	17.9	13.2	19.6	23.3	19.1	22.7	41.3	39.7	28.5	0.0	22.9	22.3
Source: 2015 ACS: 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Bismarck MSA	388	15,404	34.0	3,462	0.0	0.0	0.0	18.8	21.6	19.7	72.0	64.7	69.2	9.2	13.7	10.3	0.0	0.0	0.7
North Dakota Combined Non-MSA	753	40,914	66.0	5,692	0.0	0.0	0.0	3.8	3.6	4.7	61.2	60.0	53.9	34.9	36.4	40.8	0.0	0.0	0.6
Total	1,141	56,318	100.0	9,154	0.0	0.0	0.0	9.6	9.7	10.4	65.4	61.6	59.7	25.0	28.7	29.2	0.0	0.0	0.6
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Bismarck MSA	388	15,404	34.0	3,462	84.8	67.5	46.3	4.2	11.3	10.9	21.1
North Dakota Combined Non-MSA	753	40,914	66.0	5,692	83.6	55.6	46.7	4.2	10.2	12.2	34.1
Total	1,141	56,318	100.0	9,154	84.1	59.7	46.6	4.2	10.6	11.7	29.7
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Bismarck MSA	46	2,278	15.9	535	0.0	0.0	0.0	14.6	10.9	9.7	76.0	80.4	87.0	9.3	8.7	3.2	0.0	0.0	0.0
North Dakota Combined Non-MSA	244	25,338	84.1	2,189	0.0	0.0	0.0	2.1	0.0	2.2	71.5	56.1	64.8	26.4	43.9	32.8	0.0	0.0	0.2
Total	290	27,616	100.0	2,724	0.0	0.0	0.0	5.5	1.7	3.7	72.7	60.0	69.1	21.8	38.3	27.0	0.0	0.0	0.2
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Bismarck MSA	46	2,278	15.9	535	98.1	8.7	68.1	1.0	2.2	0.9	89.1
North Dakota Combined Non-MSA	244	25,338	84.1	2,189	97.9	50.4	64.1	1.4	14.3	0.7	35.2
Total	290	27,616	100.0	2,724	97.9	43.8	64.9	1.3	12.4	0.8	43.8
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2019-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Bend CSA	2,173	913,781,531	30.9	21,414	0.0	0.0	0.0	16.7	12.1	16.9	64.3	58.8	64.1	19.0	29.1	19.1	0.0	0.0	0.0
Eugene MSA	1,256	414,600,226	17.8	21,816	0.9	0.7	1.1	16.9	14.5	17.1	57.2	57.5	57.8	25.0	27.3	24.0	0.0	0.0	0.0
Oregon Combined Non-MSA	2,133	497,816,913	30.3	30,690	0.4	0.3	0.3	7.3	5.0	6.7	75.9	75.2	75.1	16.5	19.5	17.9	0.0	0.0	0.0
Medford CSA	1,475	388,517,055	21.0	18,537	0.1	0.2	0.1	10.6	10.6	12.2	61.2	54.2	57.3	28.1	35.0	30.3	0.0	0.0	0.0
Total	7,037	2,214,715,725	100.0	92,457	0.4	0.3	0.4	11.6	10.1	12.6	66.7	62.6	64.9	21.3	27.1	22.1	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2019-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Bend CSA	2,173	913,781,531	30.9	21,414	21.5	3.0	4.1	18.9	9.6	13.3	20.0	18.2	21.5	39.6	62.3	46.6	0.0	6.9	14.5
Eugene MSA	1,256	414,600,226	17.8	21,816	21.4	3.0	4.2	17.8	15.0	15.0	20.5	19.1	24.3	40.3	45.0	42.7	0.0	17.8	13.7
Oregon Combined Non-MSA	2,133	497,816,913	30.3	30,690	20.5	2.8	3.9	17.8	9.8	14.8	20.5	17.9	21.8	41.2	48.3	41.5	0.0	21.2	17.9
Medford CSA	1,475	388,517,055	21.0	18,537	20.6	3.5	4.4	18.5	15.3	15.1	19.6	18.4	23.4	41.2	50.2	40.4	0.0	12.5	16.8
Total	7,037	2,214,715,725	100.0	92,457	20.9	3.1	4.1	18.1	11.8	14.6	20.3	18.3	22.6	40.8	52.4	42.8	0.0	14.4	15.9

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2019-21**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Bend CSA	2,226	60,442	31.4	7,853	0.0	0.0	0.0	27.1	23.1	26.9	49.4	51.6	47.2	23.5	25.2	25.4	0.0	0.0	0.6
Eugene MSA	1,175	44,662	16.6	7,209	5.1	5.3	5.2	23.0	23.5	24.9	48.6	52.9	47.0	23.3	18.4	22.0	0.0	0.0	0.9
Oregon Combined Non-MSA	1,959	70,860	27.6	11,443	0.6	0.6	0.5	9.2	8.7	8.8	73.8	71.4	73.8	16.4	19.3	15.8	0.0	0.0	1.1
Medford CSA	1,737	55,794	24.5	7,007	3.9	3.0	4.1	15.9	11.5	15.3	56.5	58.7	54.8	23.7	26.8	24.3	0.0	0.0	1.4
Total	7,097	231,758	100.0	33,512	2.2	1.8	2.2	17.4	16.3	17.8	59.3	59.0	57.9	21.0	22.9	21.1	0.0	0.0	1.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2019-21**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Bend CSA	2,226	60,442	31.4	7,853	92.2	59.8	52.7	2.5	8.2	5.3	32.0
Eugene MSA	1,175	44,662	16.6	7,209	89.3	63.3	52.3	3.5	10.7	7.3	26.0
Oregon Combined Non-MSA	1,959	70,860	27.6	11,443	87.9	64.6	54.7	3.0	8.1	9.1	27.4
Medford CSA	1,737	55,794	24.5	7,007	91.0	66.6	48.6	2.8	9.3	6.2	24.1
Total	7,097	231,758	100.0	33,512	89.8	63.4	52.4	3.0	8.9	7.3	27.8

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2019-21**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Bend CSA	108	2,196	21.0	181	0.0	0.0	0.0	15.4	13.0	6.8	69.6	80.6	80.8	15.0	6.5	12.3	0.0	0.0	0.0
Eugene MSA	60	3,334	11.7	176	1.2	1.7	0.6	15.6	5.0	13.5	53.7	60.0	55.0	29.5	33.3	28.1	0.0	0.0	2.9
Oregon Combined Non-MSA	283	12,607	55.0	1,332	0.1	0.0	0.0	4.5	2.8	2.1	74.3	80.2	77.5	21.1	17.0	19.7	0.0	0.0	0.7
Medford CSA	64	1,307	12.4	229	1.2	0.0	2.8	9.1	9.4	7.0	66.5	53.1	67.1	23.3	37.5	22.5	0.0	0.0	0.5
Total	515	19,444	100.0	1,918	0.5	0.2	0.4	8.8	6.0	4.2	68.6	74.6	74.4	22.1	19.2	20.2	0.0	0.0	0.8

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2019-21**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Bend CSA	108	2,196	21.0	181	98.7	38.0	75.3	1.0	1.9	0.3	60.2
Eugene MSA	60	3,334	11.7	176	97.1	43.3	64.3	1.7	6.7	1.2	50.0
Oregon Combined Non-MSA	283	12,607	55.0	1,332	95.9	34.6	64.1	2.7	6.0	1.4	59.4
Medford CSA	64	1,307	12.4	229	97.6	46.9	62.4	1.3	12.5	1.1	40.6
Total	515	19,444	100.0	1,918	96.9	37.9	64.9	2.0	6.0	1.1	56.1

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2019-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Harrisburg CSA	8,839	1,715,266,156	54.0	58,751	2.8	1.9	2.7	9.8	7.9	8.9	64.5	59.0	61.6	22.9	31.2	26.9	0.0	0.0	0.0
Lancaster MSA	3,992	782,577,920	24.4	23,335	1.6	1.7	2.2	8.8	10.0	10.5	76.1	72.0	72.5	13.5	16.4	14.8	0.0	0.0	0.0
Scranton MSA	2,293	339,083,273	14.0	18,582	1.6	1.3	1.5	14.2	13.1	13.7	56.5	49.5	51.8	27.6	36.2	32.9	0.0	0.0	0.1
Pennsylvania Combined Non-MSA	1,249	177,195,365	7.6	8,311	0.0	0.0	0.0	11.7	8.3	7.4	70.1	67.9	72.4	18.2	23.8	20.3	0.0	0.0	0.0
Total	16,373	3,014,122,714	100.0	108,979	1.9	1.6	2.2	10.8	9.2	9.9	65.7	61.5	63.1	21.5	27.7	24.8	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2019-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Harrisburg CSA	8,839	1,715,266,156	54.0	58,751	19.4	5.6	7.9	18.4	16.8	19.4	22.5	21.9	22.0	39.7	36.3	32.2	0.0	19.4	18.5
Lancaster MSA	3,992	782,577,920	24.4	23,335	18.3	4.5	7.1	19.2	17.6	21.1	23.1	24.1	23.8	39.4	35.3	33.5	0.0	18.6	14.4
Scranton MSA	2,293	339,083,273	14.0	18,582	21.3	5.7	8.2	17.6	11.5	18.2	20.5	17.9	20.4	40.6	35.8	34.0	0.0	29.1	19.2
Pennsylvania Combined Non-MSA	1,249	177,195,365	7.6	8,311	18.5	3.6	5.7	18.7	11.4	16.5	21.3	14.7	21.2	41.6	42.6	39.4	0.0	27.6	17.4
Total	16,373	3,014,122,714	100.0	108,979	19.5	5.2	7.6	18.5	15.8	19.3	22.0	21.3	22.1	40.0	36.5	33.3	0.0	21.2	17.6

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2019-21**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Harrisburg CSA	2,430	73,845	37.0	22,018	6.7	5.4	5.4	14.5	10.7	12.2	58.0	60.8	60.5	20.8	23.1	21.7	0.0	0.0	0.2
Lancaster MSA	1,908	50,839	29.1	13,518	4.1	5.0	3.5	11.0	13.1	9.8	72.4	66.7	73.8	12.4	15.2	12.6	0.0	0.0	0.3
Scranton MSA	1,638	57,665	25.0	11,665	2.8	1.6	2.3	19.4	15.6	16.9	51.2	55.1	52.2	24.6	26.4	26.6	2.1	1.3	2.0
Pennsylvania Combined Non-MSA	589	18,428	9.0	4,396	0.0	0.0	0.0	16.5	17.1	12.2	65.1	53.0	64.9	18.4	29.9	22.2	0.0	0.0	0.7
Total	6,565	200,777	100.0	51,597	4.6	3.8	3.7	15.0	13.2	12.6	60.3	60.4	62.5	19.6	22.2	20.5	0.5	0.3	0.7

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2019-21**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Harrisburg CSA	2,430	73,845	37.0	22,018	86.3	53.7	45.0	3.9	6.0	9.7	40.2
Lancaster MSA	1,908	50,839	29.1	13,518	88.1	60.8	50.5	4.5	6.0	7.4	33.2
Scranton MSA	1,638	57,665	25.0	11,665	86.5	59.3	39.6	4.0	8.4	9.6	32.4
Pennsylvania Combined Non-MSA	589	18,428	9.0	4,396	85.9	56.2	45.9	4.0	7.0	10.1	36.8
Total	6,565	200,777	100.0	51,597	86.7	57.4	45.3	4.1	6.7	9.2	35.9

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2019-21**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Harrisburg CSA	78	3,708	46.7	672	1.3	2.6	0.3	6.1	5.1	3.2	72.4	80.8	86.0	20.1	11.5	10.1	0.0	0.0	0.3
Lancaster MSA	42	1,331	25.2	1,231	0.8	0.0	0.0	3.2	0.0	0.2	86.5	97.6	94.8	9.5	2.4	4.8	0.0	0.0	0.1
Scranton MSA	27	854	16.2	54	1.8	0.0	0.0	10.4	7.4	4.2	54.1	48.1	68.8	33.5	44.4	25.0	0.3	0.0	2.1
Pennsylvania Combined Non-MSA	20	766	12.0	172	0.0	0.0	0.0	2.8	0.0	0.6	68.9	70.0	59.9	28.3	30.0	38.9	0.0	0.0	0.6
Total	167	6,659	100.0	2,129	1.1	1.2	0.1	5.5	3.6	1.3	73.4	78.4	88.7	20.0	16.8	9.7	0.0	0.0	0.2

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2019-21**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Harrisburg CSA	78	3,708	46.7	672	97.7	6.4	67.7	1.2	3.8	1.1	89.7
Lancaster MSA	42	1,331	25.1	1,231	96.7	19.0	81.1	2.4	2.4	1.0	78.6
Scranton MSA	27	854	16.2	54	97.4	44.4	64.6	1.9	0.0	0.8	55.6
Pennsylvania Combined Non-MSA	20	766	12.0	172	97.1	10.0	61.1	2.0	0.0	1.0	90.0
Total	167	6,659	100.0	2,129	97.3	16.2	75.0	1.7	2.4	1.0	81.4

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Charleston MSA	7,478	2,514,007,495	28.2	62,565	3.3	2.0	2.3	19.1	9.9	11.2	42.4	41.5	45.2	34.9	46.1	41.0	0.3	0.4	0.4
Columbia CSA	5,654	1,002,133,434	21.3	47,351	2.3	1.8	1.5	22.9	12.1	13.7	39.7	33.2	33.7	35.1	53.0	51.1	0.0	0.0	0.0
Greenville SC CSA	9,524	1,885,957,525	35.9	74,705	2.6	1.7	2.1	18.2	11.5	12.3	46.0	41.4	41.9	33.3	45.4	43.7	0.0	0.0	0.0
Florence MSA	726	108,095,117	2.7	6,126	1.3	0.0	0.3	16.5	7.4	9.7	51.9	45.7	44.2	30.3	46.8	45.7	0.0	0.0	0.0
Hilton Head Island MSA	2,435	764,066,449	9.2	17,813	0.0	0.0	0.0	27.1	16.3	18.4	45.1	51.8	52.5	27.8	31.9	29.1	0.0	0.0	0.0
Sumter MSA	427	61,624,383	1.6	4,939	0.0	0.0	0.0	16.8	6.8	6.8	53.8	46.1	44.5	29.4	47.1	48.6	0.0	0.0	0.0
South Carolina Combined Non-MSA	315	50,165,544	1.2	3,463	0.0	0.0	0.0	29.3	20.0	21.0	63.7	70.2	67.1	7.0	9.8	12.0	0.0	0.0	0.0
Total	26,559	6,386,049,946	100.0	216,962	2.2	1.6	1.7	20.4	11.5	12.7	45.3	41.2	42.4	32.0	45.6	43.0	0.1	0.1	0.1
Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Charleston MSA	7,478	2,514,007,494	28.2	62,565	22.6	4.5	5.2	16.7	15.4	16.5	19.9	17.8	19.6	40.8	43.1	37.3	0.0	19.3	21.4
Columbia CSA	5,654	1,002,133,435	21.3	47,351	22.9	4.5	5.2	16.8	15.0	16.7	19.3	15.7	19.7	41.0	29.4	34.8	0.0	35.4	23.5
Greenville SC CSA	9,524	1,885,957,525	35.9	74,705	22.3	5.1	6.0	17.1	16.8	18.2	18.7	19.5	20.8	42.0	37.5	36.3	0.0	21.1	18.6
Florence MSA	726	108,095,117	2.7	6,126	23.5	2.2	4.8	16.2	11.0	15.8	19.9	15.3	19.2	40.4	37.6	37.2	0.0	33.9	23.0
Hilton Head Island MSA	2,435	764,066,449	9.2	17,813	20.1	2.7	2.7	19.5	11.3	10.9	20.0	17.9	17.5	40.4	52.0	52.0	0.0	16.1	16.9
Sumter MSA	427	61,624,383	1.6	4,939	21.7	2.6	2.4	19.0	7.3	11.6	19.2	12.4	20.2	40.1	34.7	37.2	0.0	43.1	28.6
South Carolina Combined Non-MSA	315	50,165,544	1.2	3,463	26.6	3.2	3.9	19.3	8.3	14.2	17.9	15.2	20.3	36.2	35.2	42.1	0.0	38.1	19.4
Total	26,559	6,386,049,946	100.0	216,962	22.6	4.4	5.2	17.2	15.1	16.5	19.2	17.8	19.9	41.0	38.6	37.7	0.0	24.1	20.7
Source: 2015 ACS: 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Charleston MSA	6,969	217,984	28.4	25,339	7.6	5.5	7.3	18.6	12.8	16.4	34.6	36.9	33.4	37.6	43.6	41.0	1.5	1.3	2.0
Columbia CSA	5,295	171,550	21.6	21,180	7.6	5.4	5.6	23.2	17.6	20.8	35.3	34.1	35.8	33.3	42.7	37.3	0.6	0.2	0.6
Greenville SC CSA	8,448	257,262	34.5	33,174	4.7	3.4	4.2	18.0	15.4	15.5	40.5	41.9	40.0	36.8	39.4	39.8	0.0	0.0	0.5
Florence MSA	975	25,263	4.0	3,280	3.6	2.3	2.5	24.3	15.4	19.4	40.3	46.1	43.8	31.7	36.3	33.6	0.1	0.0	0.6
Hilton Head Island MSA	1,723	42,063	7.0	7,138	0.0	0.0	0.0	25.6	19.3	26.5	48.2	51.2	45.7	26.2	29.5	27.3	0.0	0.0	0.5
Sumter MSA	558	15,084	2.3	2,183	0.0	0.0	0.0	34.2	30.5	36.9	45.0	47.3	42.6	20.8	22.2	19.8	0.0	0.0	0.6
South Carolina Combined Non-MSA	544	18,241	2.2	2,205	0.0	0.0	0.0	25.8	23.9	26.9	68.0	68.4	65.6	6.3	7.7	6.9	0.0	0.0	0.6
Total	24,512	747,447	100.0	94,499	5.4	4.0	4.7	21.0	15.9	18.7	39.5	40.3	38.5	33.6	39.4	37.2	0.5	0.4	0.9
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Charleston MSA	6,969	217,984	28.4	25,339	85.5	64.8	43.9	4.2	7.8	10.4	27.4
Columbia CSA	5,295	171,550	21.6	21,180	83.5	63.5	46.5	4.4	8.8	12.1	27.7
Greenville SC CSA	8,448	257,262	34.5	33,174	83.1	62.7	46.9	5.0	7.9	11.9	29.4
Florence MSA	975	25,263	4.0	3,280	81.5	64.9	42.0	4.9	7.1	13.6	28.0
Hilton Head Island MSA	1,723	42,063	7.0	7,138	87.0	65.1	43.3	4.1	7.0	8.9	27.9
Sumter MSA	558	15,084	2.3	2,183	84.7	59.3	44.6	3.6	8.1	11.7	32.6
South Carolina Combined Non-MSA	544	18,241	2.2	2,205	80.7	60.8	46.5	4.0	7.9	15.3	31.3
Total	24,512	747,447	100.0	94,499	83.9	63.6	45.5	4.5	8.0	11.6	28.4

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Charleston MSA	26	497	5.2	90	3.4	0.0	1.2	18.8	11.5	14.8	44.9	57.7	48.1	32.4	30.8	35.8	0.5	0.0	0.0
Columbia CSA	189	9,459	38.1	344	2.0	0.0	0.4	24.8	32.3	27.6	43.3	54.5	52.8	29.9	13.2	18.9	0.1	0.0	0.4
Greenville SC CSA	182	4,723	36.7	260	2.0	0.5	0.5	17.1	17.6	21.1	50.0	63.7	51.6	30.9	18.1	25.3	0.0	0.0	1.6
Florence MSA	24	1,251	4.8	108	0.2	0.0	2.0	15.8	0.0	15.0	57.3	83.3	50.0	26.7	16.7	33.0	0.0	0.0	0.0
Hilton Head Island MSA	7	66	1.4	31	0.0	0.0	0.0	36.4	28.6	40.0	46.6	57.1	43.3	17.0	14.3	13.3	0.0	0.0	3.3
Sumter MSA	20	2,043	4.0	108	0.0	0.0	0.0	18.0	0.0	14.0	70.4	100.0	81.0	11.6	0.0	5.0	0.0	0.0	0.0
South Carolina Combined Non-MSA	48	4,313	9.7	163	0.0	0.0	0.0	22.1	20.8	25.7	67.4	75.0	69.7	10.5	4.2	3.9	0.0	0.0	0.7
Total	496	22,352	100.0	1,104	1.8	0.2	0.5	20.9	21.8	22.5	49.5	63.3	57.3	27.6	14.7	19.1	0.1	0.0	0.6

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues**2019-21**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Charleston MSA	26	497	5.2	90	94.0	73.1	55.6	3.2	0.0	2.8	26.9
Columbia CSA	189	9,459	38.1	344	96.2	19.6	49.0	2.4	2.6	1.3	77.8
Greenville SC CSA	182	4,723	36.7	260	97.2	20.9	55.8	1.2	0.0	1.5	79.1
Florence MSA	24	1,251	4.8	108	98.0	45.8	33.0	1.0	0.0	1.0	54.2
Hilton Head Island MSA	7	66	1.4	31	93.8	42.9	80.0	3.9	0.0	2.2	57.1
Sumter MSA	20	2,043	4.0	108	98.2	45.0	34.0	1.3	15.0	0.5	40.0
South Carolina Combined Non-MSA	48	4,313	9.7	163	95.5	16.7	48.7	2.9	4.2	1.7	79.2
Total	496	22,352	100.0	1,104	96.2	25.2	48.6	2.2	2.0	1.7	72.8

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Rapid City CSA	1,031	205,468,298	17.1	9,156	0.1	0.2	0.4	10.7	8.0	9.0	63.3	65.5	66.9	25.9	26.4	23.7	0.0	0.0	0.0
South Dakota Combined Non-MSA	1,346	224,531,480	22.3	10,216	0.6	0.0	0.0	6.1	4.6	4.6	67.7	61.0	66.1	25.6	34.4	29.3	0.0	0.0	0.0
Sioux Falls MSA	3,659	781,049,355	60.6	17,010	0.0	0.0	0.0	20.0	12.2	15.1	55.3	51.0	52.4	24.8	36.8	32.5	0.0	0.0	0.0
Total	6,036	1,211,049,133	100.0	36,382	0.3	0.0	0.1	11.9	9.8	10.6	62.4	55.7	59.9	25.4	34.5	29.4	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Rapid City CSA	1,031	205,468,298	17.1	9,156	18.9	3.3	3.7	19.3	14.3	15.1	21.7	21.2	20.2	40.2	41.4	34.2	0.0	19.8	26.8
South Dakota Combined Non-MSA	1,346	224,531,480	22.3	10,216	19.0	5.2	5.0	17.0	16.7	18.6	22.4	23.6	19.8	41.7	41.5	35.7	0.0	13.0	20.9
Sioux Falls MSA	3,659	781,049,355	60.6	17,010	19.0	6.3	7.1	18.1	21.2	20.2	24.4	23.6	20.6	38.5	33.5	33.1	0.0	15.4	18.9
Total	6,036	1,211,049,133	100.0	36,382	18.9	5.6	5.7	17.9	19.0	18.5	22.9	23.2	20.3	40.2	36.6	34.1	0.0	15.6	21.4
Source: 2015 ACS: 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2019-21**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Rapid City CSA	1,183	41,729	26.4	3,554	0.5	0.4	0.3	16.1	10.0	13.5	61.6	67.1	64.2	21.8	22.5	21.0	0.0	0.0	1.0
South Dakota Combined Non-MSA	1,433	65,875	32.0	8,635	0.2	0.2	0.1	11.3	10.7	8.6	66.8	68.8	68.9	21.7	20.3	21.9	0.0	0.0	0.6
Sioux Falls MSA	1,863	54,230	41.6	8,462	0.0	0.0	0.0	35.1	23.9	30.3	38.1	39.9	40.8	26.7	36.1	28.5	0.0	0.0	0.4
Total	4,479	161,834	100.0	20,651	0.2	0.2	0.1	21.5	16.0	18.2	54.7	56.4	56.7	23.6	27.5	24.4	0.0	0.0	0.6

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2019-21**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Rapid City CSA	1,183	41,729	26.4	3,554	87.5	67.5	49.2	3.8	8.1	8.7	24.3
South Dakota Combined Non-MSA	1,433	65,875	32.0	8,635	82.2	69.9	59.6	4.6	10.0	13.3	20.1
Sioux Falls MSA	1,863	54,230	41.6	8,462	87.0	64.1	52.7	4.1	5.5	8.9	30.4
Total	4,479	161,834	100.0	20,651	85.3	66.9	55.1	4.2	7.6	10.5	25.5

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2019-21																			
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Rapid City CSA	58	6,824	7.8	300	0.1	0.0	0.0	5.7	1.7	1.0	73.2	60.3	88.3	21.0	37.9	10.7	0.0	0.0	0.0
South Dakota Combined Non-MSA	601	90,342	80.6	4,998	0.0	0.5	0.2	2.2	2.7	1.3	67.4	67.4	66.7	30.4	29.5	31.7	0.0	0.0	0.1
Sioux Falls MSA	87	6,877	11.7	1,364	0.0	0.0	0.0	8.6	1.1	0.7	69.0	63.2	82.0	22.4	35.6	17.3	0.0	0.0	0.0
Total	746	104,043	100.0	6,662	0.0	0.4	0.1	4.3	2.4	1.2	68.5	66.4	70.8	27.2	30.8	27.8	0.0	0.0	0.1
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2019-21											
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Rapid City CSA	58	6,824	7.8	300	98.6	41.4	77.3	0.7	24.1	0.7	34.5
South Dakota Combined Non-MSA	601	90,342	80.6	4,998	97.4	63.9	69.4	1.8	11.6	0.8	24.5
Sioux Falls MSA	87	6,877	11.7	1,364	98.0	69.0	76.2	1.3	5.7	0.7	25.3
Total	746	104,043	100.0	6,662	97.7	62.7	71.1	1.5	11.9	0.8	25.3
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Nashville MSA	15,178	4,610,292,274	100.0	144,224	3.4	4.6	4.2	19.5	13.6	15.7	43.7	40.8	42.1	33.3	41.0	38.0	0.1	0.0	0.1
Total	15,178	4,610,292,274	100.0	144,224	3.4	4.6	4.2	19.5	13.6	15.7	43.7	40.8	42.1	33.3	41.0	38.0	0.1	0.0	0.1

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Nashville MSA	15,178	4,610,292,274	100.0	144,224	20.7	4.2	5.0	17.7	16.6	16.2	20.4	19.9	19.5	41.1	47.0	39.6	0.0	12.3	19.6
Total	15,178	4,610,292,274	100.0	144,224	20.7	4.2	5.0	17.7	16.6	16.2	20.4	19.9	19.5	41.1	47.0	39.6	0.0	12.3	19.6

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Nashville MSA	3,390	119,910	100.0	58,456	7.6	6.2	7.6	20.3	16.2	19.9	31.1	30.1	31.8	40.2	47.1	39.6	0.8	0.4	1.1
Total	3,390	119,910	100.0	58,456	7.6	6.2	7.6	20.3	16.2	19.9	31.1	30.1	31.8	40.2	47.1	39.6	0.8	0.4	1.1

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2019-21**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Nashville MSA	3,390	119,910	100.0	58,456	7.6	6.2	7.6	20.3	16.2	19.9	31.1	30.1	31.8	40.2	47.1	39.6	0.8	0.4	1.1
Total	3,390	119,910	100.0	58,456	7.6	6.2	7.6	20.3	16.2	19.9	31.1	30.1	31.8	40.2	47.1	39.6	0.8	0.4	1.1

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2019-21**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Nashville MSA	165	3,864	100.0	972	3.5	0.6	1.3	18.9	38.2	24.8	45.2	44.8	61.3	32.1	16.4	12.4	0.4	0.0	0.2
Total	165	3,864	100.0	972	3.5	0.6	1.3	18.9	38.2	24.8	45.2	44.8	61.3	32.1	16.4	12.4	0.4	0.0	0.2

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2019-21**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Nashville MSA	165	3,864	100.0	972	96.7	7.3	69.7	1.5	0.0	1.8	92.7
Total	165	3,864	100.0	972	96.7	7.3	69.7	1.5	0.0	1.8	92.7

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2019-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Austin MSA	22,619	7,543,888,291	13.1	152,645	3.8	3.6	3.5	18.1	13.7	13.9	40.3	41.5	43.4	37.6	40.9	39.1	0.2	0.2	0.2
Dallas MSA	61,494	16,937,061,663	35.7	377,844	5.1	2.2	2.7	19.3	11.4	11.4	32.4	32.7	33.7	43.2	53.5	52.1	0.1	0.2	0.1
El Paso MSA	4,083	676,830,265	2.4	25,064	1.8	0.1	0.5	25.1	10.3	12.4	33.1	29.5	27.8	40.0	60.0	59.3	0.0	0.0	0.0
Houston CSA	44,001	11,204,622,959	25.5	300,357	5.1	1.9	2.6	21.1	11.9	12.6	29.8	27.0	26.8	43.9	59.2	57.9	0.1	0.0	0.1
Amarillo CSA	881	164,384,351	0.5	12,480	0.9	0.1	0.2	20.2	9.1	9.3	33.5	27.9	32.6	45.4	62.9	57.8	0.0	0.0	0.0
Beaumont MSA	1,232	209,368,921	0.7	11,011	3.5	1.4	1.3	19.8	9.3	8.2	42.2	43.2	43.0	34.5	46.2	47.5	0.0	0.0	0.0
Brownsville CSA	1,500	203,143,028	0.9	8,031	1.4	0.3	0.3	31.3	15.9	14.2	28.4	23.2	24.6	38.9	60.6	60.9	0.0	0.0	0.0
College Station MSA	1,405	306,965,114	0.8	9,639	2.4	2.6	4.0	21.4	17.0	20.5	36.8	25.3	30.9	39.3	55.0	44.6	0.0	0.0	0.0
Corpus Christi CSA	2,298	480,962,246	1.3	16,934	2.7	0.2	0.4	26.4	12.7	12.2	39.9	37.0	37.1	30.9	50.1	50.2	0.0	0.0	0.0
Killeen MSA	3,109	493,614,232	1.8	23,440	0.7	0.1	0.3	8.7	5.8	5.2	58.0	56.3	56.4	32.6	37.7	38.0	0.0	0.1	0.0
Laredo MSA	1,131	159,208,044	0.7	5,947	1.1	0.0	0.2	33.8	15.5	16.8	31.7	30.2	26.8	33.3	54.4	56.2	0.0	0.0	0.0
Lubbock CSA	2,971	532,757,272	1.7	15,517	2.2	0.6	1.4	20.8	9.8	9.6	37.7	38.7	43.2	39.3	50.9	45.8	0.0	0.0	0.0
McAllen MSA	2,162	302,471,148	1.3	15,218	1.4	0.4	0.3	24.6	10.5	12.8	42.3	36.4	37.5	31.5	52.6	49.3	0.2	0.0	0.2
Midland CSA	2,979	731,179,633	1.7	13,953	2.2	0.8	1.1	17.0	4.9	7.1	43.2	29.9	32.0	37.6	64.5	59.8	0.0	0.0	0.0
San Angelo MSA	675	109,639,891	0.4	4,533	1.4	0.0	0.8	24.5	16.3	14.2	49.1	51.0	55.0	25.0	32.7	30.0	0.0	0.0	0.0
San Antonio MSA	15,492	3,687,062,219	9.0	126,197	4.1	1.3	1.4	22.3	12.3	11.3	31.9	30.0	31.9	41.6	56.3	55.3	0.0	0.0	0.0
Victoria CSA	576	126,103,554	0.3	3,253	1.6	0.9	0.9	22.8	17.7	16.4	29.7	24.5	30.2	46.0	56.9	52.5	0.0	0.0	0.0
Waco MSA	1,401	274,987,666	0.8	9,661	4.2	2.8	4.7	22.5	11.4	15.8	29.1	20.4	20.9	44.2	65.4	58.6	0.0	0.0	0.0
Wichita Falls MSA	606	75,035,539	0.4	5,017	5.0	1.8	1.5	19.6	18.8	15.4	36.8	33.2	31.3	38.7	46.2	51.9	0.0	0.0	0.0
Texas Combined Non-MSA	1,800	407,050,908	1.0	13,829	0.3	0.1	0.0	10.6	11.8	10.1	57.0	48.7	53.9	32.1	39.4	36.0	0.0	0.0	0.0
Total	172,415	44,626,336,939	100.0	1,150,570	4.1	2.0	2.3	20.6	11.8	12.0	34.3	32.7	33.7	41.0	53.4	51.8	0.1	0.1	0.1

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2019-21**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Austin MSA	22,619	7,543,888,291	13.1	152,645	22.5	3.1	3.3	16.9	16.7	12.7	19.8	20.7	18.3	40.8	46.8	44.7	0.0	12.8	21.0
Dallas MSA	61,494	16,937,061,663	35.7	377,844	23.3	2.6	3.3	16.6	12.7	12.8	18.2	18.3	18.7	41.9	46.0	42.3	0.0	20.4	22.9
El Paso MSA	4,083	676,830,265	2.4	25,064	22.4	1.0	1.5	17.4	3.7	7.6	19.1	9.1	17.8	41.1	38.6	45.5	0.0	47.5	27.7
Houston CSA	44,001	11,204,622,959	25.5	300,357	24.3	1.9	2.6	16.1	10.3	12.0	17.1	16.0	18.6	42.5	45.5	44.0	0.0	26.4	22.8
Amarillo CSA	881	164,384,351	0.5	12,480	21.6	1.8	4.1	16.6	12.3	13.3	19.7	16.2	17.4	42.1	42.2	32.5	0.0	27.5	32.7
Beaumont MSA	1,232	209,368,921	0.7	11,011	22.4	1.2	2.1	17.0	6.0	10.6	19.0	15.6	18.0	41.6	45.6	44.5	0.0	31.6	24.8
Brownsville CSA	1,500	203,143,027	0.9	8,031	25.5	0.6	0.6	16.7	5.8	5.1	15.7	9.9	13.3	42.1	39.3	52.9	0.0	44.4	28.0
College Station MSA	1,405	306,965,113	0.8	9,639	24.3	2.7	2.4	16.3	12.2	12.0	17.7	17.9	17.9	41.8	54.0	45.7	0.0	13.2	22.0
Corpus Christi CSA	2,298	480,962,246	1.3	16,934	23.5	1.4	2.2	17.2	5.9	9.4	17.8	12.4	17.0	41.4	43.9	43.7	0.0	36.4	27.7
Killeen MSA	3,109	493,614,232	1.8	23,440	19.9	1.4	1.8	18.6	6.6	10.5	21.2	12.1	18.8	40.3	31.2	32.5	0.0	48.7	36.5
Laredo MSA	1,131	159,208,044	0.7	5,947	25.6	0.8	1.4	15.4	2.5	9.2	16.8	5.8	19.5	42.3	26.9	39.7	0.0	64.0	30.3
Lubbock CSA	2,971	532,757,272	1.7	15,517	22.6	1.5	3.2	17.0	8.2	12.5	19.9	16.0	16.0	40.6	48.4	37.4	0.0	25.9	30.9
McAllen MSA	2,162	302,471,148	1.3	15,218	25.1	0.1	0.6	16.3	2.0	4.2	15.4	7.6	11.8	43.2	38.7	50.8	0.0	51.6	32.5
Midland CSA	2,979	731,179,633	1.7	13,953	21.9	1.1	4.9	17.4	8.4	18.0	20.3	19.3	20.3	40.4	48.8	26.9	0.0	22.4	30.0
San Angelo MSA	675	109,639,891	0.4	4,533	21.4	3.0	3.8	18.1	9.6	12.2	20.7	18.7	19.6	39.8	36.4	33.8	0.0	32.3	30.5
San Antonio MSA	15,492	3,687,062,219	9.0	126,197	22.3	1.9	2.6	17.3	9.3	11.6	19.2	15.3	18.5	41.2	35.8	35.8	0.0	37.7	31.5
Victoria CSA	576	126,103,554	0.3	3,253	22.1	2.1	3.4	16.6	9.7	12.1	17.8	17.4	18.7	43.5	43.2	38.8	0.0	27.6	26.9
Waco MSA	1,401	274,987,666	0.8	9,661	22.6	1.1	1.8	17.8	6.9	9.5	18.0	18.8	18.0	41.5	51.7	46.3	0.0	21.4	24.4
Wichita Falls MSA	606	75,035,539	0.4	5,017	21.5	4.3	4.1	16.8	7.1	15.1	20.5	17.5	19.8	41.3	28.9	34.6	0.0	42.2	26.3
Texas Combined Non-MSA	1,800	407,050,908	1.0	13,829	19.4	1.6	1.8	16.1	6.2	8.7	19.0	13.9	15.9	45.5	59.1	51.3	0.0	19.2	22.3
Total	172,415	44,626,336,939	100.0	1,150,570	23.3	2.2	2.9	16.6	11.3	12.0	18.2	16.9	18.3	41.9	44.5	42.2	0.0	25.1	24.6

Source: 2015 ACS: 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography**2019-21**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Austin MSA	20,251	559,580	13.6	73,528	6.2	6.0	6.8	13.0	13.5	14.4	34.0	35.2	35.2	45.6	44.5	42.4	1.2	0.8	1.3
Dallas MSA	45,295	1,157,360	30.3	239,107	6.8	5.6	7.0	17.9	16.3	18.5	27.9	29.2	27.1	46.8	48.4	46.4	0.6	0.5	1.0
El Paso MSA	5,897	159,090	3.9	16,694	6.6	6.1	6.3	26.3	24.5	28.1	29.8	28.6	28.9	36.5	40.4	36.2	0.7	0.3	0.6
Houston CSA	47,776	1,298,493	32.0	238,877	9.0	8.1	9.3	17.9	16.4	18.7	23.4	25.1	24.5	49.6	50.2	47.0	0.2	0.2	0.5
Amarillo CSA	677	30,536	0.5	7,287	5.1	3.7	4.4	23.0	19.1	19.3	30.0	31.5	27.9	41.8	45.8	47.0	0.2	0.0	1.4
Beaumont MSA	1,219	29,927	0.8	7,841	4.4	3.9	4.7	20.8	17.0	19.3	45.1	48.2	43.2	29.6	30.9	32.0	0.1	0.0	0.8
Brownsville CSA	1,856	47,711	1.2	9,036	0.8	0.4	0.6	31.3	33.8	30.6	26.9	23.4	28.7	40.7	42.4	39.5	0.3	0.0	0.7
College Station MSA	940	28,194	0.6	5,864	6.8	5.6	4.3	22.2	18.9	23.7	33.0	36.2	31.3	37.7	39.3	39.7	0.3	0.0	1.0
Corpus Christi CSA	2,141	73,887	1.4	10,499	2.5	1.2	1.7	27.1	21.5	25.7	37.8	40.3	40.1	32.4	36.9	31.4	0.2	0.0	1.1
Killeen MSA	619	18,921	0.4	6,744	3.8	3.7	3.4	13.2	8.4	10.8	53.5	41.0	53.7	29.1	46.9	31.4	0.4	0.0	0.8
Laredo MSA	1,053	32,549	0.7	8,127	0.9	0.1	0.7	31.7	31.5	29.1	17.3	15.7	15.2	49.8	52.0	54.4	0.4	0.7	0.5
Lubbock CSA	1,276	28,254	0.9	8,580	3.2	2.4	2.5	16.7	15.0	14.9	36.4	36.6	36.3	43.8	46.0	45.1	0.1	0.0	1.1
McAllen MSA	2,435	62,259	1.6	17,577	0.5	0.8	0.6	18.9	18.7	19.1	34.2	35.1	35.2	46.2	45.1	44.2	0.2	0.2	0.9
Midland CSA	2,259	58,017	1.5	11,070	1.4	1.6	1.8	21.6	15.4	18.9	35.0	34.3	37.4	41.6	48.7	40.3	0.3	0.0	1.6
San Angelo MSA	523	13,859	0.4	2,038	10.8	11.7	6.9	20.2	19.3	20.4	44.1	47.4	43.9	24.6	21.6	27.2	0.3	0.0	1.5
San Antonio MSA	10,841	362,398	7.3	55,074	4.0	3.6	3.7	19.0	16.6	18.7	30.6	34.7	29.2	46.2	45.0	47.8	0.2	0.1	0.6
Victoria CSA	655	33,368	0.4	2,494	1.8	2.1	2.1	28.9	26.1	28.5	27.9	28.1	28.6	41.3	43.7	39.6	0.1	0.0	1.2
Waco MSA	693	16,036	0.5	4,323	4.9	4.8	4.2	30.4	31.7	26.1	26.0	25.1	28.2	38.1	38.2	39.7	0.5	0.1	1.8
Wichita Falls MSA	504	18,370	0.3	2,011	3.9	0.6	3.5	28.0	23.4	24.6	24.4	26.0	27.3	43.5	50.0	43.4	0.1	0.0	1.2
Texas Combined Non-MSA	2,392	72,413	1.6	9,414	0.7	1.6	0.4	12.6	14.0	10.7	57.3	53.1	54.5	29.4	31.3	32.5	0.0	0.0	2.0
Total	149,302	4,101,222	100.0	736,185	6.5	5.9	6.7	18.2	16.8	18.7	29.0	30.0	28.6	45.8	47.0	45.1	0.5	0.3	0.9
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2019-21**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Austin MSA	20,251	559,580	13.6	73,528	89.4	61.8	44.2	3.0	9.3	7.6	28.9
Dallas MSA	45,295	1,157,360	30.3	239,107	88.5	62.1	42.3	3.5	8.5	8.0	29.5
El Paso MSA	5,897	159,090	3.9	16,694	84.9	64.7	40.6	3.9	10.2	11.2	25.1
Houston CSA	47,776	1,298,493	32.0	238,877	88.2	62.2	41.3	4.0	9.1	7.8	28.7
Amarillo CSA	677	30,536	0.5	7,287	83.5	61.4	44.2	4.3	9.3	12.2	29.2
Beaumont MSA	1,219	29,927	0.8	7,841	83.6	64.2	38.9	4.1	11.1	12.3	24.8
Brownsville CSA	1,856	47,711	1.2	9,036	83.9	64.0	36.4	3.7	6.3	12.5	29.7
College Station MSA	940	28,194	0.6	5,864	83.4	60.5	45.6	3.8	5.5	12.8	33.9
Corpus Christi CSA	2,141	73,887	1.4	10,499	83.3	57.1	39.6	3.9	9.9	12.9	32.9
Killeen MSA	619	18,921	0.4	6,744	86.7	53.5	46.1	2.6	5.2	10.7	41.4
Laredo MSA	1,053	32,549	0.7	8,127	84.1	61.7	43.1	5.2	7.4	10.7	30.9
Lubbock CSA	1,276	28,254	0.9	8,580	85.6	67.4	40.4	3.7	5.2	10.8	27.4
McAllen MSA	2,435	62,259	1.6	17,577	87.0	63.4	37.1	3.3	7.8	9.8	28.9
Midland CSA	2,259	58,017	1.5	11,070	83.9	56.2	35.1	5.1	7.2	11.0	36.6
San Angelo MSA	523	13,859	0.4	2,038	82.4	72.5	43.0	4.6	5.4	13.1	22.2
San Antonio MSA	10,841	362,398	7.3	55,074	87.4	56.3	43.2	3.4	8.6	9.2	35.1
Victoria CSA	655	33,368	0.4	2,494	81.8	58.2	41.9	4.5	10.7	13.6	31.1
Waco MSA	693	16,036	0.5	4,323	84.2	60.0	40.8	4.5	5.2	11.3	34.8
Wichita Falls MSA	504	18,370	0.3	2,011	82.6	63.1	45.7	4.5	8.7	12.9	28.2
Texas Combined Non-MSA	2,392	72,413	1.6	9,414	85.0	60.7	42.5	3.7	8.4	11.3	31.0
Total	149,302	4,101,222	100.0	736,185	87.7	61.6	41.9	3.7	8.8	8.6	29.6

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2019-21**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Austin MSA	201	5,229	8.1	434	4.5	1.5	1.4	16.3	27.4	23.6	39.4	43.3	45.4	39.4	27.9	28.5	0.4	0.0	1.1
Dallas MSA	531	10,639	21.4	1,464	4.3	1.1	1.2	15.8	10.7	13.8	33.9	46.1	44.2	45.6	42.0	40.1	0.4	0.0	0.7
El Paso MSA	35	915	1.4	51	2.7	0.0	0.0	32.6	34.3	47.6	26.1	5.7	9.5	38.2	60.0	26.2	0.3	0.0	16.7
Houston CSA	498	11,997	20.1	1,297	4.9	2.4	2.1	15.9	14.3	16.6	31.4	47.8	42.2	47.8	35.5	37.9	0.1	0.0	1.1
Amarillo CSA	77	7,043	3.1	655	2.0	0.0	0.3	10.2	7.8	1.4	28.8	32.5	18.6	59.0	59.7	79.0	0.0	0.0	0.6
Beaumont MSA	28	1,457	1.1	96	2.7	0.0	0.0	12.2	10.7	5.6	42.4	50.0	27.0	42.7	39.3	66.3	0.0	0.0	1.1
Brownsville CSA	16	151	0.6	127	0.8	0.0	4.7	31.8	43.8	33.1	28.7	18.8	29.9	38.5	37.5	29.9	0.2	0.0	2.4
College Station MSA	59	859	2.4	217	3.7	0.0	5.1	13.6	8.5	6.6	43.3	50.8	54.8	39.5	40.7	31.0	0.0	0.0	2.5
Corpus Christi CSA	35	973	1.4	224	1.8	0.0	0.0	20.7	8.6	41.8	37.1	57.1	30.5	40.4	34.3	25.8	0.1	0.0	1.9
Killeen MSA	35	680	1.4	360	2.4	0.0	0.0	8.0	2.9	2.6	55.6	62.9	75.4	34.0	34.3	21.4	0.0	0.0	0.6
Laredo MSA	5	83	0.2	73	0.4	0.0	0.0	31.4	20.0	49.3	19.1	0.0	5.6	48.7	80.0	43.7	0.4	0.0	1.4
Lubbock CSA	54	1,312	2.2	979	0.9	0.0	0.5	17.7	11.1	19.4	38.1	46.3	40.2	43.3	42.6	38.5	0.0	0.0	1.3
McAllen MSA	45	985	1.8	151	0.8	4.4	1.5	18.4	13.3	20.0	38.1	57.8	45.9	41.7	20.0	28.9	1.0	4.4	3.7
Midland CSA	29	601	1.2	102	0.6	0.0	1.0	14.9	3.4	6.0	37.0	41.4	58.0	47.3	55.2	31.0	0.3	0.0	4.0
San Angelo MSA	23	748	0.9	111	5.4	13.0	0.0	8.7	8.7	1.8	33.3	13.0	35.8	52.7	65.2	57.8	0.0	0.0	4.6
San Antonio MSA	324	7,452	13.1	496	1.8	0.0	0.5	12.8	9.0	10.0	35.2	48.8	37.4	50.3	42.3	50.0	0.0	0.0	2.1
Victoria CSA	29	1,430	1.2	167	0.6	0.0	0.0	12.2	13.8	15.3	37.8	41.4	44.6	49.4	44.8	38.2	0.0	0.0	1.9
Waco MSA	51	1,188	2.1	189	2.1	0.0	0.0	13.5	2.0	5.0	42.1	43.1	61.1	42.3	54.9	33.9	0.0	0.0	0.0
Wichita Falls MSA	35	1,108	1.4	93	2.5	0.0	3.6	13.5	0.0	3.6	47.3	37.1	61.9	36.8	62.9	31.0	0.0	0.0	0.0
Texas Combined Non-MSA	366	10,720	14.8	959	0.1	0.0	0.0	6.6	4.6	3.7	55.4	61.2	53.5	38.0	34.2	41.3	0.0	0.0	1.4
Total	2,476	65,570	100.0	8,245	3.4	1.1	1.0	15.3	11.6	13.4	36.1	47.7	43.0	45.0	39.6	41.2	0.2	0.1	1.4

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues**2019-21**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Austin MSA	201	5,229	8.1	434	97.1	35.3	58.2	1.6	3.5	1.3	61.2
Dallas MSA	531	10,639	21.4	1,464	96.3	35.4	58.6	1.9	1.5	1.8	63.1
El Paso MSA	35	915	1.4	51	93.8	65.7	21.4	3.9	8.6	2.3	25.7
Houston CSA	498	11,997	20.1	1,297	95.7	29.3	60.0	2.2	2.8	2.1	67.9
Amarillo CSA	77	7,043	3.1	655	95.0	32.5	62.5	3.6	5.2	1.4	62.3
Beaumont MSA	28	1,457	1.1	96	97.9	21.4	68.5	0.8	7.1	1.2	71.4
Brownsville CSA	16	151	0.6	127	95.1	68.8	39.4	2.9	6.3	2.0	25.0
College Station MSA	59	859	2.4	217	96.6	42.4	61.9	1.0	5.1	2.4	52.5
Corpus Christi CSA	35	973	1.4	224	96.1	42.9	27.2	1.7	5.7	2.2	51.4
Killeen MSA	35	680	1.4	360	98.0	17.1	45.4	1.1	0.0	1.0	82.9
Laredo MSA	5	83	0.2	73	96.2	60.0	78.9	2.5	0.0	1.3	40.0
Lubbock CSA	54	1,312	2.2	979	96.2	18.5	47.5	2.9	0.0	1.0	81.5
McAllen MSA	45	985	1.8	151	93.2	20.0	39.3	4.0	8.9	2.7	71.1
Midland CSA	29	601	1.2	102	98.3	27.6	48.0	0.8	3.4	0.8	69.0
San Angelo MSA	23	748	0.9	111	96.1	34.8	50.5	2.1	4.3	1.9	60.9
San Antonio MSA	324	7,452	13.1	496	96.6	25.6	64.9	1.6	0.9	1.7	73.5
Victoria CSA	29	1,430	1.2	167	97.9	31.0	69.4	0.9	0.0	1.2	69.0
Waco MSA	51	1,188	2.1	189	97.8	9.8	37.8	1.0	5.9	1.2	84.3
Wichita Falls MSA	35	1,108	1.4	93	97.1	60.0	56.0	2.0	5.7	0.9	34.3
Texas Combined Non-MSA	366	10,720	14.8	959	97.4	42.9	55.0	1.3	7.7	1.3	49.5
Total	2,476	65,570	100.0	8,245	96.4	33.5	55.0	1.9	3.5	1.7	63.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Salt Lake City CSA	22,982	7,524,183,554	87.6	232,394	1.2	0.9	1.2	15.6	12.3	13.1	48.2	48.4	51.1	34.8	38.2	34.4	0.2	0.2	0.2
St George MSA	2,180	607,489,375	8.3	19,798	0.0	0.0	0.0	5.5	2.6	4.0	82.1	86.6	84.8	12.4	10.9	11.2	0.0	0.0	0.0
Utah Combined Non-MSA	1,068	203,151,537	4.1	14,280	1.0	0.0	0.0	17.7	19.9	17.8	76.3	72.9	76.9	5.1	7.1	5.3	0.0	0.0	0.0
Total	26,230	8,334,824,466	100.0	266,472	1.1	0.8	1.0	15.2	11.8	12.7	52.5	52.6	55.0	31.0	34.7	31.1	0.2	0.2	0.2
Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Salt Lake City CSA	22,982	7,524,183,554	87.6	232,394	18.8	5.6	5.9	18.1	21.8	20.3	22.6	24.7	25.1	40.5	37.4	34.0	0.0	10.5	14.7
St George MSA	2,180	607,489,375	8.3	19,798	17.7	3.2	3.3	19.6	16.7	12.1	23.3	24.7	19.9	39.3	48.4	43.5	0.0	7.0	21.2
Utah Combined Non-MSA	1,068	203,151,537	4.1	14,280	23.0	6.9	8.1	18.9	17.4	21.4	23.4	22.2	24.8	34.7	33.0	28.4	0.0	20.5	17.3
Total	26,230	8,334,824,465	100.0	266,472	19.1	5.5	5.8	18.2	21.2	19.8	22.7	24.6	24.7	39.9	38.2	34.4	0.0	10.6	15.3
Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Salt Lake City CSA	19,297	666,324	86.5	66,598	3.4	3.0	3.2	16.5	14.0	16.1	41.6	39.9	43.0	38.0	42.6	36.7	0.4	0.4	1.0
St George MSA	1,620	51,826	7.3	6,158	0.0	0.0	0.0	6.5	3.6	5.1	82.0	84.2	83.3	11.6	12.2	10.9	0.0	0.0	0.7
Utah Combined Non-MSA	1,395	42,191	6.3	4,960	0.1	0.0	0.2	24.5	25.4	19.9	70.3	68.5	74.2	5.2	6.1	4.2	0.0	0.0	1.6
Total	22,312	760,341	100.0	77,716	3.0	2.6	2.7	16.3	14.0	15.5	46.1	44.9	48.2	34.2	38.1	32.5	0.4	0.3	1.0
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Salt Lake City CSA	19,297	666,324	86.5	66,598	88.8	64.1	43.7	3.3	10.0	7.9	25.9
St George MSA	1,620	51,826	7.3	6,158	89.6	65.1	50.8	2.4	8.5	8.0	26.4
Utah Combined Non-MSA	1,395	42,191	6.3	4,960	83.5	69.2	49.7	3.9	8.0	12.6	22.8
Total	22,312	760,341	100.0	77,716	88.5	64.5	44.7	3.3	9.7	8.2	25.8
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2019-21**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Salt Lake City CSA	259	5,051	65.9	689	2.1	0.0	1.0	13.7	6.6	11.1	48.4	56.0	68.5	35.6	37.5	17.9	0.2	0.0	1.5
St George MSA	16	1,011	4.1	41	0.0	0.0	0.0	9.5	0.0	2.5	78.2	75.0	77.5	12.3	25.0	17.5	0.0	0.0	2.5
Utah Combined Non-MSA	118	3,479	30.0	417	0.0	0.0	0.0	14.5	6.8	5.7	82.3	88.1	90.5	3.1	5.1	1.8	0.0	0.0	2.1
Total	393	9,541	100.0	1,147	1.7	0.0	0.6	13.5	6.4	8.7	55.2	66.4	77.0	29.5	27.2	11.9	0.1	0.0	1.7

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2019-21**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Salt Lake City CSA	259	5,051	65.9	689	97.2	44.4	62.6	1.7	4.2	1.1	51.4
St George MSA	16	1,011	4.1	41	98.1	31.3	57.5	1.1	18.8	0.8	50.0
Utah Combined Non-MSA	118	3,479	30.0	417	96.7	55.1	76.3	2.2	6.8	1.1	38.1
Total	393	9,541	100.0	1,147	97.2	47.1	67.5	1.7	5.6	1.1	47.3

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (10000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Lynchburg MSA	1,471	319,706,200	3.1	12,190	1.5	0.9	1.1	12.2	13.5	14.3	65.1	59.3	58.4	21.2	26.2	26.2	0.0	0.0	0.0
Richmond MSA	18,744	4,862,029,355	39.5	87,042	4.5	3.2	3.9	17.9	11.9	15.3	41.6	37.0	39.1	35.9	47.8	41.6	0.2	0.0	0.1
Virginia Beach MSA	17,278	4,561,360,803	36.4	118,052	2.5	2.0	2.4	18.1	15.8	18.0	38.7	36.3	37.3	40.5	45.6	42.1	0.2	0.3	0.3
Blacksburg MSA	1,020	205,130,797	2.2	5,883	0.0	0.0	0.0	1.1	2.3	2.8	76.7	59.8	67.6	21.6	37.3	28.7	0.6	0.7	0.8
Charlottesville MSA	2,017	612,701,641	4.3	12,651	2.7	3.5	3.0	16.9	11.0	12.6	54.5	54.4	54.5	26.0	31.1	29.8	0.0	0.0	0.0
Harrisonburg CSA	1,677	369,828,206	3.5	12,138	0.3	0.3	0.8	9.6	10.5	11.3	80.3	74.2	75.5	9.9	15.0	12.4	0.0	0.0	0.0
Kingsport MSA	215	34,793,879	0.5	2,665	0.0	0.0	0.0	5.6	7.9	8.6	75.3	63.7	67.2	19.1	28.4	24.2	0.0	0.0	0.0
Roanoke MSA	2,566	562,597,835	5.4	15,039	1.4	0.9	1.2	18.4	12.2	13.8	47.5	45.2	47.4	32.7	41.7	37.7	0.0	0.0	0.0
Virginia Combined Non-MSA	2,454	452,471,015	5.2	19,123	0.3	0.2	0.1	22.6	13.6	14.1	60.7	49.9	51.7	16.3	36.2	34.0	0.0	0.0	0.0
Total	47,442	11,980,619,730	100.0	284,783	2.3	2.2	2.5	17.1	13.2	15.6	49.7	41.2	43.6	30.8	43.2	38.2	0.1	0.1	0.2
Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Lynchburg MSA	1,471	319,706,200	3.1	12,190	20.8	7.0	8.4	17.5	18.2	20.7	21.6	19.4	20.9	40.0	37.0	31.5	0.0	18.4	18.6
Richmond MSA	18,744	4,862,029,355	39.5	87,042	21.0	6.1	7.2	18.0	19.6	19.5	20.1	20.6	20.3	40.9	39.5	32.3	0.0	14.2	20.6
Virginia Beach MSA	17,278	4,561,360,803	36.4	118,052	21.4	3.2	4.5	17.6	14.1	16.3	20.2	17.5	18.9	40.9	32.8	27.3	0.0	32.5	33.1
Blacksburg MSA	1,020	205,130,797	2.2	5,883	18.4	3.6	6.7	18.1	12.9	17.9	21.7	20.9	19.6	41.9	46.2	36.8	0.0	16.4	19.1
Charlottesville MSA	2,017	612,701,641	4.3	12,651	19.8	5.4	6.5	16.8	15.4	16.8	21.0	20.7	19.4	42.4	48.7	39.1	0.0	9.9	18.2
Harrisonburg CSA	1,677	369,828,206	3.5	12,138	19.2	6.1	6.0	18.9	18.0	19.9	22.7	24.3	22.6	39.2	39.4	31.9	0.0	12.2	19.5
Kingsport MSA	215	34,793,879	0.5	2,665	21.5	1.9	6.6	17.4	7.9	18.2	20.0	16.7	21.4	41.1	45.1	39.4	0.0	28.4	14.5
Roanoke MSA	2,566	562,597,835	5.4	15,039	19.9	6.4	8.8	17.5	17.1	20.9	22.4	17.5	19.9	40.2	36.7	31.7	0.0	22.3	18.7
Virginia Combined Non-MSA	2,454	452,471,015	5.2	19,123	22.8	4.2	4.8	17.8	10.5	14.8	20.4	18.7	19.7	38.9	41.9	39.8	0.0	24.8	20.9
Total	47,442	11,980,619,730	100.0	284,783	21.1	4.9	5.9	17.7	16.5	17.8	20.7	19.3	19.7	40.5	37.5	31.1	0.0	21.8	25.4
Source: 2015 ACS: 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2019-21**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Lynchburg MSA	1,329	34,872	4.9	4,860	1.2	0.4	1.2	19.3	14.1	18.8	55.6	57.6	55.0	23.9	27.9	24.5	0.0	0.0	0.5
Richmond MSA	11,528	339,554	42.4	33,879	6.7	5.0	5.4	22.2	16.2	20.2	34.2	34.8	35.3	36.5	43.6	38.5	0.5	0.4	0.6
Virginia Beach MSA	8,923	224,904	32.8	35,306	4.4	2.9	3.8	23.3	18.7	21.7	35.8	34.4	35.9	35.4	43.3	36.8	1.1	0.7	1.7
Blacksburg MSA	489	11,504	1.8	2,134	0.0	0.0	0.0	1.8	2.7	1.2	69.9	55.2	73.4	26.6	40.1	23.3	1.8	2.0	2.2
Charlottesville MSA	1,443	41,019	5.3	5,702	3.8	3.0	4.6	17.4	14.4	17.5	42.6	45.8	43.1	36.2	36.8	34.2	0.1	0.0	0.5
Harrisonburg CSA	544	19,557	2.0	4,489	2.9	3.5	2.5	13.2	15.3	12.3	71.8	67.1	74.2	12.0	14.2	10.5	0.0	0.0	0.4
Kingsport MSA	205	7,499	0.8	1,836	0.0	0.0	0.0	10.5	14.6	8.5	63.5	51.2	65.3	26.0	34.1	25.6	0.0	0.0	0.7
Roanoke MSA	1,287	42,869	4.7	6,673	2.8	3.6	3.4	15.0	12.7	15.1	49.7	48.7	49.0	32.6	35.0	32.1	0.0	0.0	0.3
Virginia Combined Non-MSA	1,423	31,540	5.2	8,770	0.3	0.1	0.3	20.0	15.5	19.7	60.1	53.2	59.0	19.4	31.2	20.0	0.1	0.0	1.0
Total	27,171	753,318	100.0	103,649	4.3	3.5	3.7	20.5	16.3	19.2	42.3	39.1	42.9	32.3	40.6	33.2	0.6	0.4	1.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues**2019-21**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Lynchburg MSA	1,329	34,872	4.9	4,860	87.4	66.5	52.1	3.3	5.6	9.3	27.9
Richmond MSA	11,528	339,554	42.4	33,879	89.0	66.4	48.1	3.1	8.1	7.9	25.6
Virginia Beach MSA	8,923	224,904	32.8	35,306	89.0	68.4	44.7	2.9	7.8	8.2	23.8
Blacksburg MSA	489	11,504	1.8	2,134	84.3	64.6	53.4	3.7	3.9	12.0	31.5
Charlottesville MSA	1,443	41,019	5.3	5,702	88.3	65.4	53.4	3.4	6.5	8.3	28.1
Harrisonburg CSA	544	19,557	2.0	4,489	86.7	60.8	53.8	3.6	6.4	9.7	32.7
Kingsport MSA	205	7,499	0.8	1,836	83.4	60.5	43.3	3.8	4.9	12.8	34.6
Roanoke MSA	1,287	42,869	4.7	6,673	86.2	63.7	49.2	3.7	8.0	10.0	28.3
Virginia Combined Non-MSA	1,423	31,540	5.2	8,770	84.5	61.6	52.8	3.8	6.7	11.8	31.6
Total	27,171	753,318	100.0	103,649	88.0	66.4	48.2	3.2	7.6	8.8	26.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Lynchburg MSA	70	3,038	13.1	349	0.7	0.0	0.0	8.7	8.6	1.2	69.9	82.9	93.1	20.8	8.6	5.3	0.0	0.0	0.3
Richmond MSA	102	3,291	19.1	309	2.8	0.0	0.0	17.6	4.9	21.3	44.9	56.9	55.2	34.6	38.2	23.5	0.1	0.0	0.0
Virginia Beach MSA	73	1,062	13.7	289	2.2	0.0	0.4	17.2	9.6	15.9	38.1	15.1	52.7	42.1	75.3	31.1	0.4	0.0	0.0
Blacksburg MSA	12	130	2.2	173	0.0	0.0	0.0	0.4	0.0	0.0	72.3	41.7	87.5	26.2	58.3	11.9	1.1	0.0	0.6
Charlottesville MSA	43	884	8.1	108	1.4	0.0	0.0	18.1	16.3	33.3	57.0	69.8	49.5	23.5	14.0	16.1	0.0	0.0	1.1
Harrisonburg CSA	72	1,900	13.5	517	0.4	0.0	0.0	4.6	1.4	7.0	85.5	87.5	84.9	9.6	11.1	7.8	0.0	0.0	0.2
Kingsport MSA	17	338	3.2	352	0.0	0.0	0.0	3.4	0.0	0.6	73.4	94.1	83.0	23.3	5.9	16.4	0.0	0.0	0.0
Roanoke MSA	20	574	3.7	170	1.8	0.0	0.0	17.6	10.0	31.9	48.1	65.0	53.4	32.5	25.0	14.7	0.0	0.0	0.0
Virginia Combined Non-MSA	125	4,677	23.4	953	0.0	0.0	0.0	13.8	5.6	16.0	63.0	68.0	74.1	23.2	26.4	9.7	0.0	0.0	0.2
Total	534	15,894	100.0	3,220	1.5	0.0	0.0	14.2	6.6	12.2	54.1	63.5	74.2	30.0	30.0	13.4	0.2	0.0	0.2
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues**2019-21**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Lynchburg MSA	70	3,038	13.1	349	98.3	38.6	31.5	0.8	2.9	0.9	58.6
Richmond MSA	102	3,291	19.1	309	97.3	57.8	45.1	1.5	0.0	1.3	42.2
Virginia Beach MSA	73	1,062	13.7	289	97.1	57.5	34.5	1.6	2.7	1.3	39.7
Blacksburg MSA	12	130	2.2	173	97.7	50.0	29.8	1.3	0.0	1.1	50.0
Charlottesville MSA	43	884	8.1	108	98.1	62.8	52.7	1.2	0.0	0.7	37.2
Harrisonburg CSA	72	1,900	13.5	517	98.0	40.3	41.9	1.3	4.2	0.7	55.6
Kingsport MSA	17	338	3.2	352	97.1	23.5	49.9	1.2	0.0	1.7	76.5
Roanoke MSA	20	574	3.7	170	97.3	25.0	33.1	1.9	0.0	0.8	75.0
Virginia Combined Non-MSA	125	4,677	23.4	953	98.1	27.2	53.1	0.9	1.6	1.1	71.2
Total	534	15,894	100.0	3,220	97.5	43.6	43.9	1.4	1.7	1.1	54.7

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Seattle CSA	44,840	23,076,241,196	82.9	356,894	2.2	1.5	2.0	16.8	13.0	17.1	48.2	43.7	48.6	32.7	41.9	32.3	0.0	0.0	0.0
Spokane MSA	3,560	939,493,734	6.6	39,971	0.1	0.1	0.1	20.7	21.3	22.3	47.5	42.8	44.3	31.4	35.4	32.9	0.3	0.4	0.4
Bellingham MSA	1,533	488,640,594	2.8	14,443	1.0	1.4	1.2	4.1	4.0	4.5	77.8	79.3	80.4	17.0	15.1	13.8	0.1	0.2	0.2
Kennewick MSA	1,486	381,194,398	2.7	18,818	1.3	1.5	1.2	25.1	23.6	21.0	35.0	32.9	33.5	38.7	42.0	44.3	0.0	0.0	0.0
Wenatchee MSA	770	217,306,217	1.4	7,356	0.0	0.0	0.0	12.3	13.9	13.0	78.4	76.8	78.8	9.3	9.4	8.2	0.0	0.0	0.0
Yakima MSA	773	166,141,917	1.4	9,729	0.0	0.0	0.0	17.6	14.0	12.7	41.2	41.1	40.2	41.3	44.9	47.2	0.0	0.0	0.0
Washington Combined Non-MSA	1,100	383,614,046	2.0	12,445	0.0	0.0	0.0	10.8	6.6	6.0	70.5	67.2	72.0	18.7	26.1	22.0	0.0	0.1	0.0
Total	54,062	25,652,632,102	100.0	459,656	1.7	1.3	1.7	16.8	13.4	16.8	49.9	45.3	49.6	31.5	39.9	31.9	0.0	0.0	0.1
Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Seattle CSA	44,840	23,076,241,196	82.9	356,894	20.8	3.5	4.6	17.7	13.4	15.3	21.1	20.0	23.2	40.4	53.7	41.5	0.0	9.4	15.4
Spokane MSA	3,560	939,493,734	6.6	39,971	20.7	5.0	4.7	17.1	15.6	15.7	22.1	22.2	22.7	40.1	42.2	40.2	0.0	15.0	16.7
Bellingham MSA	1,533	488,640,594	2.8	14,443	20.8	3.4	3.3	17.1	15.6	13.3	22.5	23.1	22.8	39.6	47.4	47.7	0.0	10.5	12.9
Kennewick MSA	1,486	381,194,398	2.7	18,818	21.6	5.7	4.9	17.7	14.1	15.7	19.5	20.5	24.7	41.3	36.9	39.9	0.0	22.7	14.9
Wenatchee MSA	770	217,306,217	1.4	7,356	19.1	3.0	2.7	19.1	10.5	10.0	22.3	20.5	21.2	39.6	51.9	53.2	0.0	14.0	13.0
Yakima MSA	773	166,141,917	1.4	9,729	20.2	1.4	3.0	18.1	9.6	12.7	20.6	20.1	23.1	41.1	41.8	46.1	0.0	27.2	15.0
Washington Combined Non-MSA	1,100	383,614,046	2.0	12,445	18.2	1.4	3.1	18.3	8.2	10.4	22.7	15.6	19.9	40.8	63.6	53.5	0.0	11.2	13.2
Total	54,062	25,652,632,102	100.0	459,656	20.7	3.5	4.5	17.7	13.4	15.0	21.2	20.2	23.1	40.4	52.3	42.2	0.0	10.6	15.3
Source: 2015 ACS: 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Seattle CSA	25,289	915,155	83.2	129,328	4.9	4.7	5.5	18.1	17.8	19.6	40.9	39.8	41.3	35.5	37.4	32.9	0.6	0.2	0.7
Spokane MSA	1,451	75,333	4.8	11,623	2.8	1.5	2.4	34.9	25.0	31.3	36.8	43.0	40.1	24.7	30.3	25.1	0.9	0.2	1.1
Bellingham MSA	1,053	45,733	3.5	6,187	1.7	1.1	1.3	5.3	4.7	5.8	72.3	77.4	73.8	15.3	14.9	13.5	5.4	1.8	5.6
Kennewick MSA	372	14,911	1.2	5,085	1.2	1.3	0.9	27.7	24.7	28.1	36.6	32.8	36.3	34.2	41.1	34.1	0.4	0.0	0.6
Wenatchee MSA	506	14,516	1.7	3,290	0.0	0.0	0.0	19.7	11.5	17.8	70.5	83.2	74.2	9.9	5.3	7.5	0.0	0.0	0.5
Yakima MSA	546	27,699	1.8	3,974	0.0	0.0	0.0	27.0	26.4	25.3	39.4	30.2	41.8	33.6	43.4	32.5	0.0	0.0	0.5
Washington Combined Non-MSA	1,191	36,313	3.9	4,878	0.0	0.0	0.0	12.7	10.8	12.1	70.6	71.4	71.4	16.7	17.8	15.1	0.0	0.0	1.4
Total	30,408	1,129,660	100.0	164,365	4.1	4.0	4.6	19.3	17.6	20.1	43.2	43.0	43.9	32.6	35.1	30.6	0.8	0.3	0.9
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Seattle CSA	25,289	915,155	83.2	129,328	89.8	64.4	48.2	3.3	10.5	7.0	25.1
Spokane MSA	1,451	75,333	4.8	11,623	88.3	62.9	51.5	3.5	11.5	8.2	25.6
Bellingham MSA	1,053	45,733	3.5	6,187	90.1	57.2	44.5	3.5	8.8	6.4	34.0
Kennewick MSA	372	14,911	1.2	5,085	87.0	50.0	47.9	3.3	9.7	9.6	40.3
Wenatchee MSA	506	14,516	1.7	3,290	87.7	66.6	43.2	3.4	5.9	9.0	27.5
Yakima MSA	546	27,699	1.8	3,974	84.1	64.3	51.4	4.6	11.9	11.3	23.8
Washington Combined Non-MSA	1,191	36,313	3.9	4,878	89.9	69.4	50.1	2.7	6.5	7.5	24.1
Total	30,408	1,129,660	100.0	164,365	89.4	64.2	48.4	3.3	10.3	7.3	25.6
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Seattle CSA	353	14,014	42.3	922	2.8	1.1	1.2	16.3	9.1	12.4	48.1	60.6	46.1	32.0	29.2	39.2	0.9	0.0	1.1
Spokane MSA	113	5,264	13.5	277	1.0	0.0	0.0	20.4	22.1	13.4	47.1	58.4	51.9	31.4	19.5	34.2	0.1	0.0	0.4
Bellingham MSA	24	1,081	2.9	216	1.0	0.0	1.5	2.3	0.0	0.0	81.1	95.8	77.5	15.0	4.2	21.1	0.5	0.0	0.0
Kennewick MSA	110	3,355	13.2	350	0.9	0.0	0.0	24.7	12.7	23.2	53.1	54.5	61.3	21.1	32.7	15.2	0.2	0.0	0.3
Wenatchee MSA	38	2,557	4.6	205	0.0	0.0	0.0	14.1	18.4	6.5	76.3	81.6	89.6	9.6	0.0	2.5	0.0	0.0	1.5
Yakima MSA	52	5,300	6.2	451	0.0	0.0	0.0	8.7	7.7	2.5	56.0	69.2	68.4	35.2	23.1	29.1	0.0	0.0	0.0
Washington Combined Non-MSA	144	10,180	17.3	349	0.0	0.0	0.0	11.3	18.8	15.4	71.8	66.7	71.2	16.9	14.6	12.7	0.0	0.0	0.7
Total	834	41,751	100.0	2,770	1.8	0.5	0.5	15.4	13.1	11.0	54.0	63.1	61.5	28.2	23.4	26.4	0.6	0.0	0.6
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2019-21**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Seattle CSA	353	14,014	42.3	922	2.8	1.1	1.2	16.3	9.1	12.4	48.1	60.6	46.1	32.0	29.2	39.2	0.9	0.0	1.1
Spokane MSA	113	5,264	13.5	277	1.0	0.0	0.0	20.4	22.1	13.4	47.1	58.4	51.9	31.4	19.5	34.2	0.1	0.0	0.4
Bellingham MSA	24	1,081	2.9	216	1.0	0.0	1.5	2.3	0.0	0.0	81.1	95.8	77.5	15.0	4.2	21.1	0.5	0.0	0.0
Kennewick MSA	110	3,355	13.2	350	0.9	0.0	0.0	24.7	12.7	23.2	53.1	54.5	61.3	21.1	32.7	15.2	0.2	0.0	0.3
Wenatchee MSA	38	2,557	4.6	205	0.0	0.0	0.0	14.1	18.4	6.5	76.3	81.6	89.6	9.6	0.0	2.5	0.0	0.0	1.5
Yakima MSA	52	5,300	6.2	451	0.0	0.0	0.0	8.7	7.7	2.5	56.0	69.2	68.4	35.2	23.1	29.1	0.0	0.0	0.0
Washington Combined Non-MSA	144	10,180	17.3	349	0.0	0.0	0.0	11.3	18.8	15.4	71.8	66.7	71.2	16.9	14.6	12.7	0.0	0.0	0.7
Total	834	41,751	100.0	2,770	1.8	0.5	0.5	15.4	13.1	11.0	54.0	63.1	61.5	28.2	23.4	26.4	0.6	0.0	0.6

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Madison CSA	2,423	607,562,024	10.4	47,663	0.6	0.5	0.6	13.3	8.3	11.2	62.7	61.7	60.2	23.5	29.4	28.0	0.0	0.0	0.1
Milwaukee CSA	14,471	3,412,947,378	62.0	100,249	6.8	1.9	3.5	12.4	7.3	10.7	38.8	35.4	38.3	42.0	55.3	47.4	0.0	0.0	0.0
Appleton CSA	2,322	427,231,120	9.9	22,957	0.0	0.0	0.0	9.4	7.7	9.0	73.7	70.2	72.9	16.8	22.1	18.1	0.0	0.0	0.0
Eau Claire MSA	573	104,213,869	2.5	8,710	0.0	0.0	0.0	11.4	7.9	11.4	77.3	78.2	76.2	11.3	14.0	12.4	0.0	0.0	0.0
Fond du Lac MSA	334	54,517,608	1.4	5,412	1.2	0.9	1.6	2.5	3.6	2.0	87.1	87.7	85.4	9.2	7.8	11.0	0.0	0.0	0.0
Green Bay MSA	1,707	305,366,206	7.3	18,063	0.9	0.7	1.0	19.8	17.3	17.9	54.7	46.2	50.9	24.6	35.8	30.2	0.0	0.0	0.0
La Crosse MSA	263	52,477,934	1.1	6,125	0.4	1.1	1.0	7.8	6.5	8.4	68.2	65.0	68.4	23.2	26.6	21.6	0.4	0.8	0.5
Sheboygan MSA	643	104,934,161	2.8	5,993	0.0	0.0	0.0	7.7	6.7	6.8	76.3	73.9	75.5	15.9	19.4	17.7	0.0	0.0	0.0
Wausau MSA	347	57,682,283	1.5	8,051	0.7	0.6	0.9	9.3	10.1	9.3	73.2	67.4	71.4	16.9	21.9	18.4	0.0	0.0	0.0
Wisconsin Combined Non-MSA	262	35,683,774	1.1	3,954	0.0	0.0	0.0	20.7	21.4	17.4	57.7	61.1	58.4	21.6	17.6	24.2	0.0	0.0	0.0
Total	23,345	5,162,616,356	100.0	227,177	3.1	1.3	1.9	12.3	8.3	10.9	55.4	46.4	53.3	29.1	44.0	33.9	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Madison CSA	2,423	607,562,024	10.4	47,663	19.6	5.5	7.8	17.7	17.7	20.7	23.4	24.0	24.9	39.3	38.3	37.5	0.0	14.5	9.1
Milwaukee CSA	14,471	3,412,947,378	62.0	100,249	23.1	3.9	6.6	16.4	16.0	18.1	19.7	23.2	22.5	40.9	47.2	39.0	0.0	9.6	13.7
Appleton CSA	2,322	427,231,120	9.9	22,957	18.3	6.2	9.1	18.5	21.9	21.8	24.5	23.1	23.6	38.6	34.9	32.3	0.0	13.9	13.3
Eau Claire MSA	573	104,213,869	2.5	8,710	18.6	5.4	9.0	18.5	18.2	22.0	24.2	19.9	25.2	38.7	32.3	31.7	0.0	24.3	12.1
Fond du Lac MSA	334	54,517,608	1.4	5,412	17.0	5.1	6.5	18.4	21.0	21.2	25.2	18.6	24.6	39.4	36.5	36.3	0.0	18.9	11.3
Green Bay MSA	1,707	305,366,205	7.3	18,063	19.8	7.6	9.0	18.4	20.5	21.1	22.0	23.5	22.8	39.8	34.3	34.6	0.0	14.2	12.5
La Crosse MSA	263	52,477,934	1.1	6,125	18.3	5.3	9.5	18.9	17.9	20.4	22.1	19.4	23.7	40.6	35.4	32.5	0.0	22.1	13.9
Sheboygan MSA	643	104,934,161	2.8	5,993	17.7	6.8	8.2	18.4	19.4	22.0	25.6	26.0	22.7	38.3	35.8	33.5	0.0	12.0	13.6
Wausau MSA	347	57,682,283	1.5	8,051	18.1	4.0	9.1	18.8	17.0	21.0	23.3	19.0	23.7	39.8	34.9	31.9	0.0	25.1	14.3
Wisconsin Combined Non-MSA	262	35,683,774	1.1	3,954	17.2	5.7	7.5	21.1	14.5	21.7	22.9	24.0	23.4	38.9	33.2	36.0	0.0	22.5	11.4
Total	23,345	5,162,616,356	100.0	227,177	20.7	4.8	7.6	17.5	17.4	19.8	21.9	23.1	23.4	40.0	42.8	36.7	0.0	12.0	12.5
Source: 2015 ACS: 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Madison CSA	1,321	50,414	19.4	13,195	1.9	0.8	1.4	16.7	10.9	15.0	53.4	59.4	54.4	26.2	27.9	27.4	1.7	0.9	1.8
Milwaukee CSA	3,112	103,506	45.8	39,951	11.0	10.3	10.1	12.7	14.1	11.4	36.4	34.4	34.9	39.5	41.1	42.7	0.3	0.1	0.8
Appleton CSA	523	18,133	7.7	6,823	0.0	0.0	0.0	13.4	11.1	12.4	71.5	64.6	70.2	15.1	24.3	16.9	0.0	0.0	0.4
Eau Claire MSA	312	17,057	4.6	2,426	0.0	0.0	0.0	18.4	21.2	15.3	70.7	67.9	70.2	10.9	10.9	14.0	0.0	0.0	0.4
Fond du Lac MSA	58	2,473	0.9	1,806	9.0	5.2	6.5	5.2	1.7	2.9	78.2	75.9	81.2	7.6	17.2	8.7	0.0	0.0	0.7
Green Bay MSA	647	27,281	9.5	6,504	2.7	2.9	2.6	25.1	29.2	25.0	49.4	40.3	45.8	22.8	27.5	26.0	0.0	0.0	0.6
La Crosse MSA	267	11,016	3.9	1,387	12.0	13.5	9.1	16.7	15.0	12.8	56.5	45.7	56.8	13.8	25.1	19.7	1.1	0.7	1.5
Sheboygan MSA	300	8,577	4.4	1,944	0.0	0.0	0.0	16.2	19.3	16.0	68.4	61.3	66.8	15.4	19.3	16.5	0.0	0.0	0.8
Wausau MSA	114	6,724	1.7	2,811	5.4	0.0	4.2	10.4	14.0	8.5	68.8	71.9	72.8	15.4	14.0	13.9	0.0	0.0	0.6
Wisconsin Combined Non-MSA	148	4,128	2.2	1,338	0.0	0.0	0.0	22.6	21.6	20.0	58.2	59.5	56.3	19.1	18.9	22.8	0.0	0.0	0.8
Total	6,802	249,309	100.0	78,185	6.2	5.7	6.1	15.0	15.3	13.3	49.7	46.9	47.2	28.5	31.8	32.4	0.6	0.3	0.9
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2019-21**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Madison CSA	1,321	50,414	19.4	13,195	81.6	52.8	51.7	6.1	5.3	12.2	41.9
Milwaukee CSA	3,112	103,506	45.8	39,951	80.9	62.2	51.5	7.7	9.2	11.4	28.6
Appleton CSA	523	18,133	7.7	6,823	77.3	56.4	53.5	7.4	9.4	15.3	34.2
Eau Claire MSA	312	17,057	4.6	2,426	80.1	55.4	47.3	6.0	15.1	13.9	29.5
Fond du Lac MSA	58	2,473	0.9	1,806	78.9	41.4	60.9	6.8	0.0	14.4	58.6
Green Bay MSA	647	27,281	9.5	6,504	78.8	58.6	54.4	7.6	10.0	13.5	31.4
La Crosse MSA	267	11,016	3.9	1,387	76.5	62.2	45.5	7.7	8.6	15.8	29.2
Sheboygan MSA	300	8,577	4.4	1,944	78.6	64.3	57.0	7.6	9.0	13.8	26.7
Wausau MSA	114	6,724	1.7	2,811	78.1	30.7	57.1	7.3	7.0	14.6	62.3
Wisconsin Combined Non-MSA	148	4,128	2.2	1,338	78.2	54.1	57.3	7.0	10.8	14.8	35.1
Total	6,802	249,309	100.0	78,185	80.1	58.5	52.4	7.2	8.7	12.6	32.8

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Madison CSA	68	1,899	15.8	836	0.4	0.0	0.5	13.5	10.3	16.9	65.3	80.9	67.3	20.6	8.8	14.9	0.2	0.0	0.4
Milwaukee CSA	59	1,097	13.7	310	5.6	0.0	3.1	7.3	3.4	3.8	39.9	35.6	34.4	47.2	61.0	57.3	0.0	0.0	1.4
Appleton CSA	50	1,411	11.6	352	0.0	0.0	0.0	7.7	6.0	3.9	78.8	82.0	88.0	13.6	12.0	6.9	0.0	0.0	1.2
Eau Claire MSA	15	211	3.5	129	0.0	0.0	0.0	13.0	6.7	14.6	78.1	60.0	75.6	8.9	33.3	9.8	0.0	0.0	0.0
Fond du Lac MSA	16	394	3.7	179	0.7	0.0	0.0	0.9	0.0	0.0	87.7	100.0	85.8	10.7	0.0	13.1	0.0	0.0	1.1
Green Bay MSA	135	2,898	31.3	309	0.5	0.7	0.0	15.1	14.8	9.9	57.4	51.1	67.6	27.0	33.3	22.1	0.0	0.0	0.4
La Crosse MSA	6	113	1.4	30	1.2	0.0	0.0	4.2	33.3	3.4	74.6	50.0	86.2	19.2	16.7	10.3	0.8	0.0	0.0
Sheboygan MSA	8	54	1.9	124	0.0	0.0	0.0	3.3	25.0	0.8	73.1	50.0	75.2	23.7	25.0	24.0	0.0	0.0	0.0
Wausau MSA	56	1,150	13.0	316	0.2	0.0	0.0	3.3	1.8	0.3	83.9	89.3	89.3	12.6	8.9	10.3	0.0	0.0	0.0
Wisconsin Combined Non-MSA	18	521	4.2	135	0.0	0.0	0.0	15.1	22.2	11.0	61.8	55.6	61.4	23.1	22.2	27.6	0.0	0.0	0.0
Total	431	9,748	100.0	2,720	1.6	0.2	0.5	9.9	9.7	8.6	63.0	64.5	70.9	25.4	25.5	19.5	0.1	0.0	0.5
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues**2019-21**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Madison CSA	68	1,899	15.8	836	96.5	26.5	50.2	2.0	0.0	1.5	73.5
Milwaukee CSA	59	1,097	13.7	310	93.9	13.6	66.3	4.2	0.0	1.8	86.4
Appleton CSA	50	1,411	11.6	352	95.9	0.0	65.2	2.9	0.0	1.2	100.0
Eau Claire MSA	15	211	3.5	129	96.7	46.7	39.0	2.6	0.0	0.7	53.3
Fond du Lac MSA	16	394	3.7	179	94.4	31.3	68.8	4.9	0.0	0.7	68.8
Green Bay MSA	135	2,898	31.3	309	93.9	3.7	58.4	4.9	1.5	1.2	94.8
La Crosse MSA	6	113	1.4	30	94.6	0.0	44.8	2.3	0.0	3.1	100.0
Sheboygan MSA	8	54	1.9	124	92.8	87.5	55.4	6.3	0.0	0.9	12.5
Wausau MSA	56	1,150	13.0	316	96.4	14.3	69.7	3.0	0.0	0.6	85.7
Wisconsin Combined Non-MSA	18	521	4.2	135	94.4	16.7	48.0	4.5	11.1	1.1	72.2
Total	431	9,748	100.0	2,720	95.2	14.2	57.9	3.4	0.9	1.4	84.9

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2019-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Cheyenne MSA	541	125,864,216	19.5	7,922	0.0	0.0	0.0	22.8	12.0	18.2	50.7	55.8	56.6	26.5	32.2	25.2	0.0	0.0	0.0
Wyoming Combined Non-MSA	1,831	617,563,428	65.9	16,387	0.3	0.2	0.4	9.3	9.6	7.9	68.5	62.1	66.8	22.0	28.2	25.0	0.0	0.0	0.0
Casper MSA	408	85,465,906	14.7	4,945	4.0	1.7	2.1	10.2	8.1	10.3	68.1	71.1	73.1	17.7	19.1	14.5	0.0	0.0	0.0
Total	2,780	828,893,551	100.0	29,254	0.8	0.4	0.6	12.0	9.8	11.1	65.0	62.2	65.1	22.1	27.6	23.3	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2019-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Cheyenne MSA	541	125,864,216	19.5	7,922	19.5	4.6	7.5	18.2	18.5	20.0	23.1	20.9	20.4	39.3	33.1	25.7	0.0	22.9	26.5
Wyoming Combined Non-MSA	1,831	617,563,428	65.9	16,387	19.5	4.7	6.0	17.6	15.0	15.6	22.1	19.5	21.4	40.8	40.3	33.3	0.0	20.5	23.7
Casper MSA	408	85,465,907	14.7	4,945	21.1	5.9	8.2	16.4	14.5	20.7	21.7	17.6	21.5	40.7	28.7	24.8	0.0	33.3	24.8
Total	2,780	828,893,551	100.0	29,254	19.7	4.9	6.8	17.5	15.6	17.7	22.2	19.5	21.1	40.5	37.2	29.8	0.0	22.9	24.6

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Cheyenne MSA	1,124	25,089	26.4	3,161	0.0	0.0	0.0	14.5	8.2	10.1	68.3	81.9	77.3	16.8	10.0	11.9	0.4	0.0	0.7
Wyoming Combined Non-MSA	2,656	79,965	62.5	10,730	1.2	0.2	0.6	8.8	6.5	7.5	74.0	74.2	74.5	15.9	19.1	15.4	0.0	0.0	2.0
Casper MSA	470	17,372	11.1	2,633	18.3	16.6	16.4	8.3	12.3	10.0	48.9	49.6	45.8	24.5	21.5	27.0	0.0	0.0	0.8
Total	4,250	122,426	100.0	16,524	3.6	2.0	3.0	9.9	7.6	8.4	69.0	73.5	70.4	17.4	16.9	16.7	0.1	0.0	1.6
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Cheyenne MSA	1,124	25,089	26.4	3,161	83.3	56.8	53.0	3.8	6.5	12.9	36.7
Wyoming Combined Non-MSA	2,656	79,965	62.5	10,730	83.1	58.8	50.6	4.5	7.3	12.3	33.9
Casper MSA	470	17,372	11.1	2,633	81.6	66.4	52.2	5.6	9.8	12.9	23.8
Total	4,250	122,426	100.0	16,524	82.9	59.1	51.3	4.5	7.3	12.5	33.6
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Cheyenne MSA	10	296	6.7	86	0.0	0.0	0.0	7.1	0.0	4.6	70.0	80.0	88.5	22.9	20.0	5.7	0.0	0.0	1.1
Wyoming Combined Non-MSA	134	5,224	89.3	941	0.5	0.0	0.0	10.5	8.2	21.3	73.8	76.9	70.8	15.3	14.9	7.1	0.0	0.0	0.8
Casper MSA	6	153	4.0	100	8.7	0.0	4.0	11.4	16.7	3.0	49.8	33.3	21.0	30.1	50.0	72.0	0.0	0.0	0.0
Total	150	5,673	100.0	1,127	1.3	0.0	0.4	10.0	8.0	18.3	70.6	75.3	67.6	18.2	16.7	13.0	0.0	0.0	0.7
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2019-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Cheyenne MSA	10	296	6.7	86	97.7	20.0	59.8	1.1	0.0	1.1	80.0
Wyoming Combined Non-MSA	134	5,224	89.3	941	97.5	42.5	81.5	1.0	4.5	1.5	53.0
Casper MSA	6	153	4.0	100	98.2	33.3	82.0	0.9	0.0	0.9	66.7
Total	150	5,673	100.0	1,127	97.6	40.7	79.8	1.0	4.0	1.4	55.3
Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Wells Fargo Bank N.A. (100000000001), Wells Fargo Bank NA (90000451965) excluded from Aggregate											