



**Comptroller of the Currency
Administrator of National Banks**

250 E Street, SW
Washington, D.C. 20219

**Corporate Decision #97-85
October 1997**

August 22, 1997

Ms. Janet Aceves
Vice President, Supermarket Banking
Wells Fargo Bank, N.A.
1200 Concord Avenue, Suite 355
Concord, California 94520

Dear Ms. Aceves:

This is to advise you that the Office of the Comptroller of the Currency ("OCC") has approved the Bank's applications for permission to establish branches at the following locations:

2328 East Van Buren, Suite, 104, Phoenix, Arizona
801 South Rancho, Suite C-3, Las Vegas, Nevada
Vicinity of Highway 50 and Elks Point Road, Lake Tahoe, Nevada
17555 Ivy Street, Junction City, Oregon
339 East Brown Road, Mesa, Arizona
7920 East Chaparral Road, Scottsdale, Arizona
7110 North Oracle Road, Tucson, Arizona
11275 East Via Linda, Scottsdale, Arizona
SEC 16th & Camelback, Phoenix, Arizona
2190 East Fry Boulevard, Sierra Vista, Arizona
7900 White Lane, Bakersfield, California
1000 North Azusa Avenue, Covina, California
4100 California Oaks Road, Murrieta, California
2090 Harbison Drive, Vacaville, California
28850 North The Old Road, Valencia, California
1401 NE McWilliams Road, Bremerton, Washington
630 228th Avenue NE, Redmond, Washington
4300 NE 4th Street, Renton, Washington

If the branches are not opened within eighteen months from this date, the approval will automatically terminate unless the OCC grants an extension. The Bank must advise this Office in writing at least ten days before the proposed branch opening date so that we may issue the

Ms. Janet Aceves
Wells Fargo Bank, N.A.
Page 2

necessary authorization letters. In no event should the branches be opened for business until the OCC has issued the necessary letters of authority.

As we advised you earlier, the OCC removed all pending applications from our expedited review procedures in light of adverse comments we received from three members of the public. We subsequently performed a targeted investigation of your bank's corporate policy on branch closings and record of opening and closing branches subsequent to the acquisition of the various First Interstate Banks on April 1, 1996. Please note that the remaining 19 applications removed from expedited processing have not yet been decided as their public comment periods have not yet expired.

Based upon our examiners' review, we concluded that the Bank's policy and record of opening and closing branches has not, in the aggregate, had a negative impact on the Bank's performance under the Community Reinvestment Act, particularly with regard to low- and moderate-income areas. Our letters to the persons filing the adverse comments, which describe in more detail the results of the targeted review, are incorporated herein by reference and copies are attached for your convenience.

Please direct all correspondence on this application or any other licensing matters to: Licensing Manager, Bank Organization and Structure, Mail Stop 3-8 at the above address.

Sincerely,

/s/

Troy L. Dixon
Director for Corporate Activity

Enclosures

Application Control Numbers: 97-ML-05-0372 and 97-ML-05-0377 thru 0393



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August 22, 1997

Mr. Daniel Cummings
1655 Waller Street, 4
San Francisco, California 94117-2811

Dear Mr. Cummings:

As we advised you earlier, the OCC removed pending branch applications by Wells Fargo Bank, N.A. ("Wells") from our expedited review procedures in light of adverse comments we received from you and two other members of the public. Your comments were prompted by Wells' closing of its Haight branch in San Francisco, California.

In response to your comments, our national bank examiners performed a targeted investigation of Wells' branch closing policy and record of opening and closing branches subsequent to the acquisition of the various First Interstate Banks on April 1, 1996. Our examiners reviewed Wells' corporate policy and the documentation used by bank management to support their decisions.

The purpose of our examiners' review was to determine the adequacy of Wells' corporate policy and whether that bank's practices in closing branches are consistent with that policy. Toward those ends, our examiners reviewed the bank's record of consolidating branches into other branches and of relocating branches to determine their impact on census tracts of various income levels.

We found that Wells' corporate policy for branch closings addresses regulatory requirements. We also found that the bank's practices comply with its policies. Additionally, our review disclosed that during the period of April 1, 1996 to July 31, 1997, Wells opened 321 new branches, closed 172, relocated 155, and consolidated 120 into other branches. Of the 172 branch closures, 43 were in low- or moderate-income areas. These 43 branches do not include the Haight branch as it is located in a middle-income census tract.

With respect to the branches that were relocated or consolidated into other branches, 12 involved moves out of low- or moderate-income areas, while 23 involved moves into low- or moderate-income areas. In addition, 58 of the bank's new branches are in low- or moderate-

Mr. Daniel Cummings

Page 2

income areas. Immediately prior to today's decision, Wells had applications pending before the OCC for 60 additional branches, 13 of which are in low- or moderate-income areas.

Based on this review, we concluded that Wells' branch closing policy and its record of opening and closing branches has not, in the aggregate, had a negative impact on its performance under the Community Reinvestment Act (CRA), particularly with regard to low- and moderate-income areas. Under the CRA, FDIC-insured depository institutions have a continuing and affirmative obligation to help meet the credit needs of the local communities in which they are chartered.

Our most recent, full-scope CRA examination of Wells was dated March 31, 1996. At that time, we determined that the bank had an outstanding record of performance. We are not aware of any other more recent information, including the results of the latest review of branch closings, that would suggest that Wells' record does not support our approval of the pending branch applications. Accordingly, today we approved 18 Wells branch applications.

In the event of questions, please contact Ms. Cindy L. Hausch-Booth at (202) 874-5060.

Sincerely,

/s/

Troy L. Dixon
Director for Corporate Activity

