

COMMISSIONER OF BANKING
STATE OF WEST VIRGINIA

In the Matter of:

**REQUEST FOR AUTHORIZATION TO
ENGAGE IN OTHER BUSINESS ACTIVITY BY
A REGULATED CONSUMER LENDER
filed on behalf of
BANC ONE FINANCIAL SERVICES
(Re: Distribution of education loan brochures)**

DECISION ON AUTHORIZATION REQUEST

By letter dated August 3, 1998 Banc One Financial Services, ("BOFS"), a licensed Regulated Consumer Lender, requested of the West Virginia Commissioner of Banking a DECISION ON AUTHORIZATION pursuant to W. Va. Code §46A-4-110 in regards to distributing brochures to its customers detailing an educational loan program offered by its affiliated national banking association, Bank One, NA, Columbus, Ohio. BOFS requests to distribute the brochures from the same office, room, and place of business in which it conducts the business of making regulated consumer loans under its current regulated consumer lender license.

Upon review of this request, the Commissioner of Banking has determined that as to distributing such brochures, such activity is sufficiently related to the business of a financial institution; that the nature and character of the activity will not per se facilitate evasions or contradictions of Article 4, Chapter 46A of the West Virginia Code or the rules issued thereunder; and that the distribution of such brochures will not be detrimental to the consumers of this state provided that the brochure is distributed only and BOFS employees do not take applications, nor will any employee of Bank One, NA, conduct any business from the licensed location of BOFS.

Decision on Authorization
Banc One Financial Services

Based upon these determinations and findings the Commissioner of Banking IS OF THE OPINION that a regulated consumer lender licensee may distribute educational loan brochures of its affiliate national banking association in the same office, room or place of business in which it makes regulated consumer loans. AUTHORIZATION TO DO SO IS HEREBY GRANTED. Any deviation from the above-stated guidelines will result in the revocation of this written authorization.

Sharon G. Bias
Commissioner of Banking

Date: _____