



CITY OF MILWAUKEE

Annual Review of Lending Practices of Financial Institutions

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City Comptroller

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REVIEW OF LENDING PRACTICES OF FINANCIAL INSTITUTIONS

I. INTRODUCTION

- A. Common Council Resolution (#890493) created the City of Milwaukee's socially responsible investment program. The resolution directed the Comptroller to annually prepare a Financial Institution Lending Report. The resolution also directed that data on lending activities should be requested from each financial institution as these activities relate to the lending goals adopted by the Common Council. This is the twelfth such lending report issued by the Comptroller.

This Report focuses on lending in the City's Targeted Single Family Loan Program Area (TA). This area was chosen as a target because it has lower property values, houses lower income families, has less homeowners and a higher vacancy rate than the City as a whole.

This Report is based on the following data:

- 1994 through 2003 Home Mortgage Disclosure Act (HMDA) data
- 2000 census data
- 1996 through 2003 data from the Wisconsin Housing and Economic Development Authority (WHEDA)
- 2002 and 2003 Community Reinvestment Act small business lending data.
- 2003 Fannie Mae National Housing Survey
- 1996 through 2002 Lending Report

B. Data Limitations:

1. Information in the Report is often shown on a per household basis. This information is calculated using 2000 Census statistics for the Milwaukee Metro Area.
2. Residential Lending - Another major limitation is the timeliness of HMDA data. HMDA data for 2003 was not available until August of 2004. HMDA data also excludes information on pooled funds established by multiple financial institutions or other special programs aimed at increasing TA, low income and minority lending. (Example: WHEDA Programs) However, State WHEDA data is presented in select graphs and tables within the report.
3. This Report includes non-refinancing residential loans originated where no race was indicated. In 2002 and 2003, no race was reported for 3,338 (10.8% of Metro Area loans) and 2,645 (8.1% of Metro Area loans) HMDA residential loans, respectively. This may affect the minority and white percentage increases in lending shown in this Report. The high number of home improvement loans where race is not available may have resulted from mail and phone applications for home improvement loans.
4. The Target Area (TA) has not been refined or updated since originated. This allows for consistency in reporting from year to year, but doesn't take into consideration changes in demographic that may have occurred as a result of this report. For example, the housing makeup of the downtown and Third Ward has changed significantly since 1992 and continues to improve.

C. Refinancing Loan Data Excluded

This report excludes refinancing loans. This was done to prevent refinancing activity, which is driven by decreases in interest rate, from distorting the trends in new home ownership and home improvement loan activity. Within the Milwaukee Metropolitan Area, financial institutions originated 75,149 refinancing loans in 2002. Refinancing loans increased by approximately 33.4% to 100,252 in 2003. TA refinancing increased by 49.1%, from 1,394 in 2002 to 2,079 in 2003. TA refinancing totaled 1.9% of the total Metro Area refinancing loans in 2002 and 2.1% of refinancing loans in 2003. The City of Milwaukee, excluding the TA, made up 18.2% of refinancing loans in 2002 and 18.9% in 2003.

D. Wisconsin Housing & Economic Development Authority (WHEDA)

WHEDA provided data on the HOME program, Home Improvement Loans program and Home Plus Program. In 2002, WHEDA stopped offering the Easy Closing EZ Program. Like FHA and VA home improvement loans, WHEDA home improvement loans are not reported separately in this report. Within the Milwaukee Metro Area, WHEDA made 26 home improvement loans in 2002 and 13 in 2003. Data on the Home Plus Program is shown on pages 20 and 21.

E. Definition of Income Areas

Low to Moderate Income Areas are defined as those census tracts in which median family income is less than 80% of the median family income of the Metropolitan Area. Middle Income Areas are those census tracts in which median family income is between 80% to 120% of the median family income of the metropolitan area, and Upper Income Areas include only census tracts with median family income exceeding 120% of the metropolitan area's median family income. Median family income for the Milwaukee Metro Area was \$62,600 in 2003.

II. CONCLUSIONS –

In almost every respect, 2003 was an active and successful year for America's housing market. Nationally, housing sales were at all-time highs. Mortgage interest rates dropped to their lowest levels since the late 1960s. Nationally, mortgage originations were up more than 40% from the year before, coming in at a remarkable \$3.7 trillion, as consumers bought homes or refinanced their existing mortgages.¹

This Lending Report shows improvement in the Target Area, the City of Milwaukee, and in minority lending in the Metro Area. Steps have been taken by area lenders to make the lending process more inclusive and to make the American dream of home ownership real for persons of all ethnicities.

For the period of time covered by this report, the rate of growth for residential lending in the Target Area is out-pacing the growth of the Metro Area as a whole. Each year since 1996 the number of loans originated in the TA has grown. Assessed values are increasing in the TA, which indicates that home equity is building. Business loans to TA business are at their highest rates since the inception of this report.

These are positive signs. It's also important to remember that this report is more than numbers, graphs and statistics, because behind every number, graph and statistic are individuals seeking home ownership.

But this report also illustrates that there is work left to be done to close Milwaukee's racial lending gap. Residential loan denial disparity for minorities compared to whites in the Milwaukee Metro Area is still the highest in the nation. While Metro Area loan denial rates for minority home applicants are declining and keeping pace with the nation as a whole, metro denial rates for whites are near all-time lows, keeping Milwaukee's disparity rate the highest of the fifty largest metro areas.

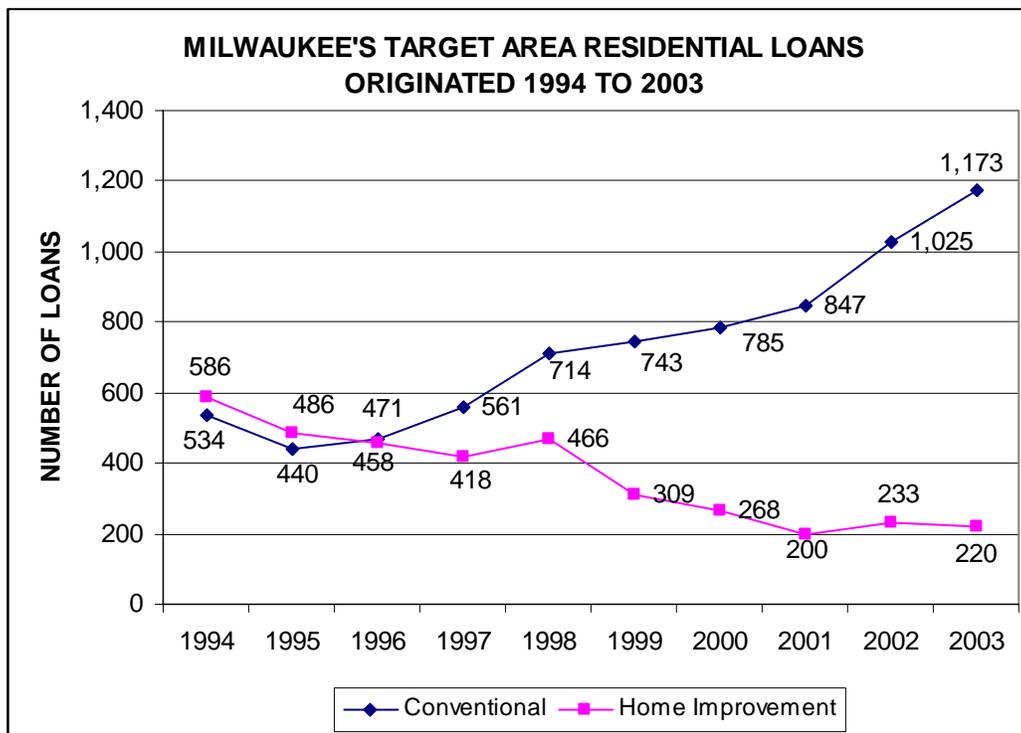
This 12th version of the Comptroller's Lending Report also contains information from Fannie Mae's most recent National Housing Survey.

1. **Target Area Conventional Loans Have Substantially Out-Paced the City as a Whole, While the Number of Home Improvement Loans in the TA Continues to Decline.**

Since 1994, total annual conventional loans originated in the TA have increased by almost 120% (534 to 1,173) with large increases in loan activity occurring in the TA in both 2002 and 2003. Over the same period of time, conventional loans in the Metro Area excluding the TA have increased by 34% (17,808 to 23,931). This marks a substantial improvement in TA home purchase lending.

For home improvement loans, the number of loans in the TA dropped by 62% (586 to 220) between 1994 and 2003, whereas home improvement loans for the Metro Area outside the TA dropped 45% (8,792 to 4,837).

¹ Fannie Mae 2003 National Housing Survey



One possible explanation for the decline of home improvement loans could be the popularity of home equity loans and home equity lines of credit. Many home owners now rely upon home equity to finance many home repairs. As many of these home equity lines of credit are granted along with a new mortgage, lenders have no idea what equity loan funds are used for, thus they cannot report these loans as “home improvement” loans.

If home equity lending is part of the explanation for the decline in home improvement loans, this may be a sign of a strengthening housing market and increasing values within the TA.

LOANS ORIGINATED

Year	Conventional Loans Number of Loans		Home Improvement Loans Number of Loans		FHA, VA and Multi-Family Loans Number of Loans	
	Metro Area		Metro Area		Metro Area	
	TA	Less TA	TA	Less TA	TA	Less TA
1994	534	17,808	586	8,792	86	1,378
1995	440	15,000	486	7,693	83	1,388
1996	471	17,739	458	8,158	102	1,687
1997	561	17,646	418	6,143	152	2,010
1998	714	21,068	466	5,407	139	2,210
1999	743	20,834	309	5,449	120	2,272
2000	785	19,370	268	4,837	132	2,070
2001	847	21,018	200	4,115	172	2,623
2002	1,025	22,789	233	4,433	173	2,278
2003	1,173	23,931	220	5,036	185	2,153

With more favorable interest rates, TA outreach, and loan counseling efforts, conventional loan applications increased by 169% between 1994 and 2003 (751 to 2,017). As the table on the previous page illustrates, a substantial *increase* in conventional loan activity has occurred in the TA since 1994.

2. Milwaukee Continues to Lead the US with the Highest Racial Denial Rate Disparity.

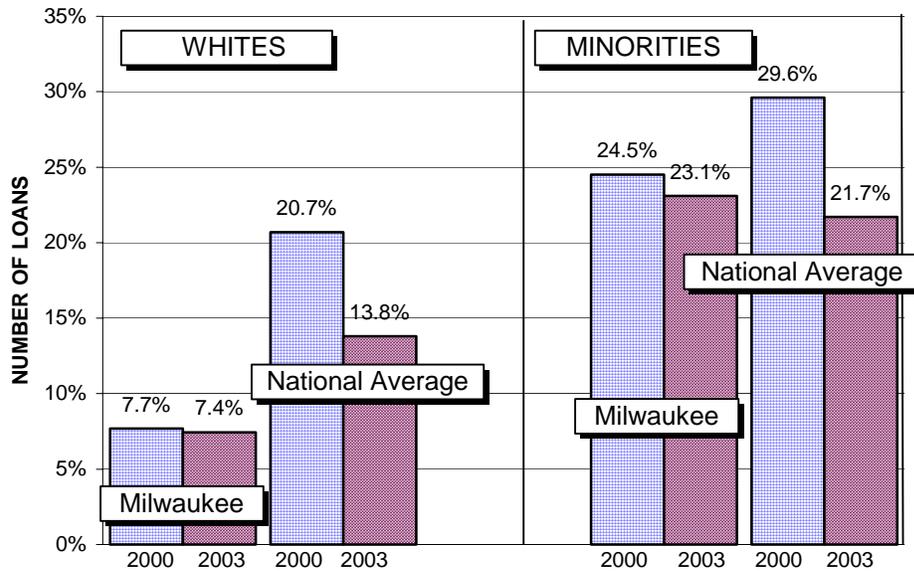
Milwaukee leads the US with the highest racial denial rate disparity of the 50 largest metropolitan areas. This racial disparity in loan denial rates in Milwaukee decreased from 3.2 in 2000 (last year this report was issued) to 3.1 in 2003. This means that minorities are three times more likely to be denied than white loan applicants.

In the Milwaukee Metro Area, the white loan denial rate decreased slightly from 7.7% to 7.4% between 2000 and 2003. The minority loan denial rate decreased from 24.5% in 2000 to 23.1% in 2003. Still, almost one in four minority loans is denied.

Nationally, the 2003 minority loan denial rate is 21.7%. While Milwaukee ranks 18th of the fifty largest metro areas when it comes to minority denial rates, it ranks 49th in white denial rates, with the second lowest white denial rate of the fifty largest metro areas.

Denial rate disparity in Milwaukee between minorities and whites remains an item for continued scrutiny.

**NATIONAL AGGREGATE RESIDENTIAL LENDING
PERCENTAGE OF LOANS DENIED
MILWAUKEE METRO AREA VS. NATIONAL AVERAGE
FOR 2000 AND 2003**



HMDA loans excluding refinancing loans

See Appendix A for a ranking of the minorities/white loan denial rate disparity of the fifty largest metropolitan areas in the county.

3. Since 1994, TA Denial Rates for Home Improvement Loans Have Remained at Around 50%, While Those for Conventional Loans Have Increased.

Denial rates for home improvement loans in the TA have remained around 50% since 1994, while TA conventional loan denial rates increased from 16.4% in 1994 to 20% in 2003. The continuation of extremely high home improvement denial rates could be limiting the extent of home improvement activity in the TA. It may also be that, because of the home equity situation discussed in point two above, the only individuals who are applying for home improvement loans may be those without significant equity in their property or those who have used that equity for other purposes and now find themselves in a situation where a home repair is urgently required.

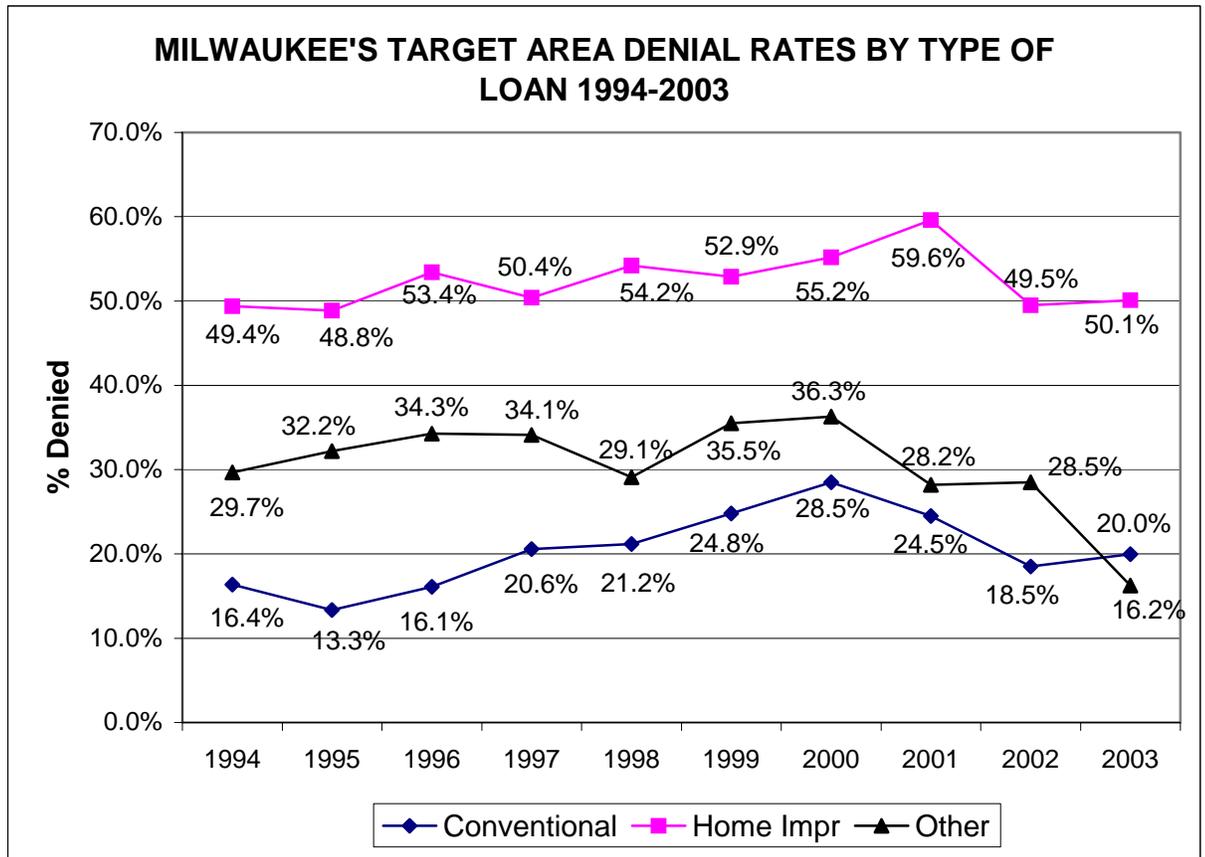
**CONVENTIONAL LOAN
APPLICATIONS, DENIALS AND DENIAL RATES
1994 AND 2003**

	1994 <u>Applications</u>	2003 <u>Applications</u>	1994 <u>Denials</u>	2003 <u>Denials</u>	1994 Denial Rate	2003 Denial Rate
TA	751	2,017	123	403	16.4%	20.0%
Metro Less TA	19,593	30,736	1,034	2,421	5.3%	7.9%
National	4,186,275	7,134,326	758,839	988,081	18.1%	13.8%

**HOME IMPROVEMENT LOAN
APPLICATIONS, DENIALS AND DENIAL RATES
1994 AND 2003**

	1994 <u>Applications</u>	2003 <u>Applications</u>	1994 <u>Denials</u>	2003 <u>Denials</u>	1994 Denial Rate	2003 Denial Rate
TA	1,490	540	736	272	49.4%	50.4%
Metro Less TA	13,005	7,650	2,593	1,813	19.9%	23.7%
National	1,693,358	1,510,269	445,449	552,541	26.3%	36.6%

As the graph on the following page illustrates, while conventional denial rates were higher in 2003 than in 1994, denials have recently been declining in the TA, from a high of 28.5% in 2000, to a rate of 20% in 2003. Denial rates have also declined in the TA for multi-family properties, WHEDA loans, as well as FHA and VA loans (“Other” category).



Other includes FHA, VA, WHEDA, MULTI-FAMILY

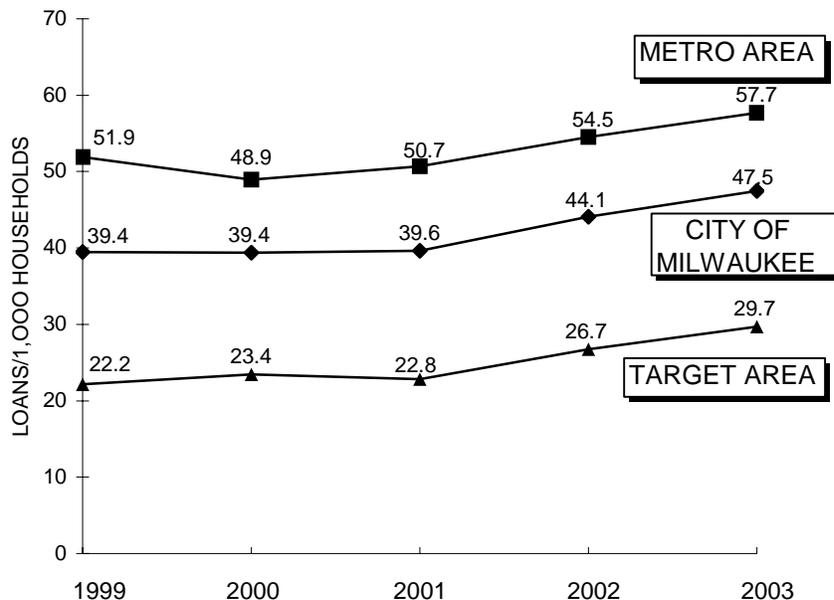
4. Residential Lending per Thousand Households Increased from 1999 to 2003 for the TA, City of Milwaukee, and the Metro Area.

Target Area residential lending per 1,000 households increased by about 34% from 1999 to 2003, to almost 30 loans per 1,000 households. Metro Area lending per 1,000 households increased by 12% (from 52 in 1999 to 58 in 2003), while per 1,000 households lending in the City of Milwaukee increased 21% (39 in 1999 to 47 in 2003).

While all three areas experienced healthy growth in lending from 1999 to 2003, growth in residential lending in the TA has outpaced rates in the rest of the City of Milwaukee and the Metro Area as a whole. This could be an indication that programs initiated to target lending practices in the TA are having a positive impact on the properties and residents of the area.

The findings discussed in point four are illustrated by the graph on the following page.

**MILWAUKEE METRO AREA
RESIDENTIAL LOANS ORIGINATED PER 1,000 HOUSEHOLDS
1999 - 2003**



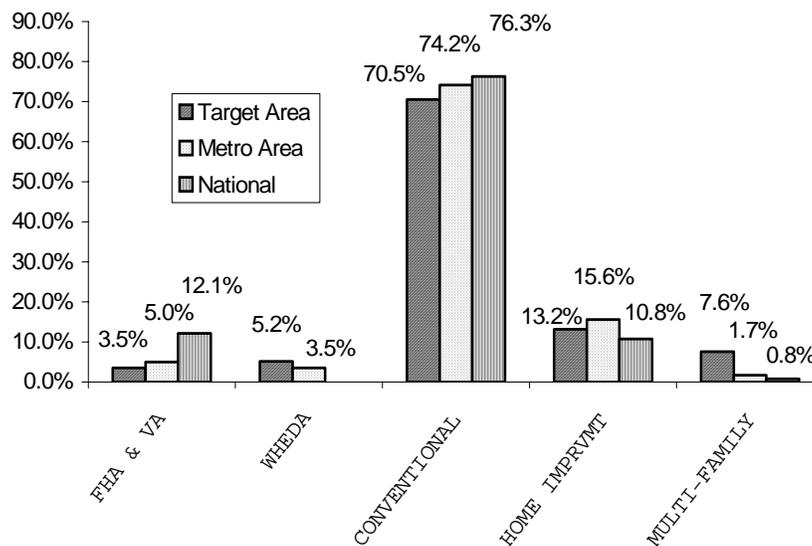
5. Conventional Home Loans Account for 70% of Total TA Loans, An Increase of 17% from 1999, the Last Time This Information was Updated.

Home ownership contributes to building healthy neighborhoods and communities. Conventional home loans are the primary method of financing home ownership in the TA, Metro Area and the Nation. Conventional home loans accounted for only 60% of TA lending in 1999 compared to 71% in the Metropolitan Area and 65% Nationwide.

In 2003, conventional home lending has grown to 70% of all TA lending, now comparable to that of the Metro Area (74%) and Nation (76%).

RESIDENTIAL LENDING TYPE	TARGET AREA 2003		METRO AREA 2003		NATIONAL TOTAL 2003	
		PERCENT OF TOTAL		PERCENT OF TOTAL		PERCENT OF TOTAL
FHA & VA	59	3.5%	1,605	5.0%	763,645	12.1%
WHEDA HOME PROGRAM	86	5.2%	1,145	3.5%		
CONVENTIONAL	1,173	70.5%	23,931	74.2%	4,811,096	76.3%
HOME IMPROVEMENT	220	13.2%	5,036	15.6%	679,463	10.8%
MULTI-FAMILY	126	7.6%	548	1.7%	48,379	0.8%
TOTAL LENDING	1,664	100.0%	32,265	100.0%	6,302,583	100.0%

PERCENTAGE OF RESIDENTIAL LOANS ORIGINATED IN 2003



WHEDA Home Loan Program provides low down payments and below-market interest rates to first-time or WHEDA Target Area homebuyers. This program makes up about 5% of total TA lending and 3.5% of Metro Area lending. In 1999, WHEDA HOME loans made up a similar percentage of TA lending.

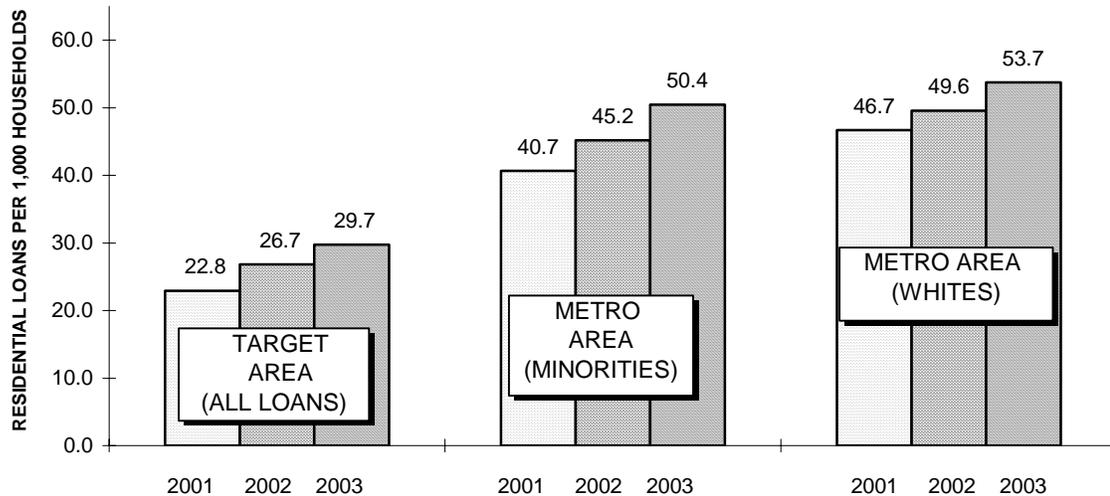
The biggest area of change for TA lending is the change between home improvement loans and conventional loans. In 1999, almost 25% of TA lending related to home improvement loans, and only 60% was related to conventional new mortgage lending. By 2003, conventional lending has increased to 70.5% of all TA lending, and improvement loans had fallen to 13.2%. The increase in conventional loan lending could be indicative of several important improvements to the housing stock in the TA including rising property values, increasing equity, and growth in individual home ownership. All three of these items are important to developing stable, healthy neighborhoods.

6. **Residential Lending Per Thousand Households Increased for Metro Area White Residents and Metro Area Minorities.**

The biggest gains in residential lending from 2001 to 2003 were in the Target Area and for Metro Area minorities. Residential lending per 1,000 households increased by 30% (23 per thousand in 2001; 30 per thousand in 2003) for TA residents and lending to minorities increased by almost 22% (41 per thousand in 2001; 50 loans per thousand in 2003). Residential lending to Metro Area whites increased by 15% (47 per thousand in 2001; 54 per thousand in 2003) during the same time period.

The residential real estate market continues to be strong in metro Milwaukee, with the TA, City, and Metro Area all seeing steady growth. This is also evident in increasing assessed values within the City especially.

**MILWAUKEE'S TARGET AREA
AND METRO AREA
RESIDENTIAL LOANS ORIGINATED
PER 1,000 HOUSEHOLDS
2001 TO 2003**



HMDA and WHEDA loans excluding refinancing loans
Figures based on 2000 Census households data

While residential lending in the TA is improving (29.7 loans per 1,000 residents), it continues to occur at a rate of almost one half of the metro wide lending rate of 57.7 loans per thousand (see chart on page 8). The disparity in loan originations seems to correlate more strongly to location (TA vs. Metro Area) than to the race of the applicant. However, there remains significant racial disparity in loan denial rates. Denial rates are discussed in point 8 of this report.

7. TA Lending per Thousand Households Has Improved When Compared to Lending in Upper Income Census Tracts.

Another way to look at lending is by the income characteristics of residents living in an area. In fact, the Community Reinvestment Act focuses on areas by requiring lenders to attempt to meet the financial needs of residents living in low and moderate income census tracts.*

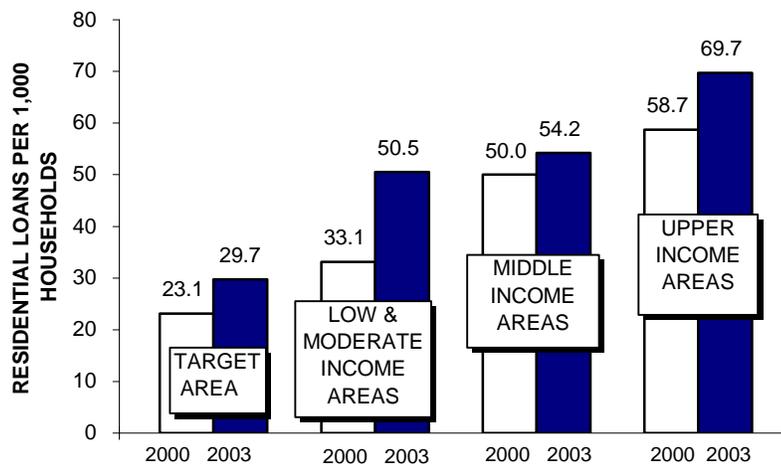
In 2000, the last data published in the Comptroller's Lending Report, TA lending per thousand households was about 39% of lending in upper income areas (23.1 per thousand in TA, 58.7 per thousand in upper income areas). In 2003, TA lending was about 43% of lending in upper income areas (29.7 per thousand in TA, 69.7 per thousand in upper income areas), an improvement of 10%.

For 2003, lending in low and moderate income census tracts totals about 50 loans per thousand households compared to 70 loans per thousand households in upper income census tracts.

- The income characteristics of an area may not have any correlation to the income of any specific loan applicant living within that area. (Example: Upper and middle income applicants reside and apply for loans in low income areas.)

Although most of the TA is within a low and moderate income area, TA per 1,000 household lending in 2003 represents 60% of lending to all low and moderate income areas (30 per thousand loans in TA; 50 per thousand loans in Milwaukee Metro Area low and moderate income census tracts). But 2003 saw a surge in loans located in low and moderate income census tracts across the Milwaukee Metro Area, up from 32 loans per thousand households in 2000 (last year published by the Comptroller's Lending Report) to almost 51 loans per thousand in 2003, up over 59%.

**MILWAUKEE'S TARGET AREA
AND METRO AREA
RESIDENTIAL LOANS ORIGINATED
PER 1,000 HOUSEHOLDS
2000 AND 2003**

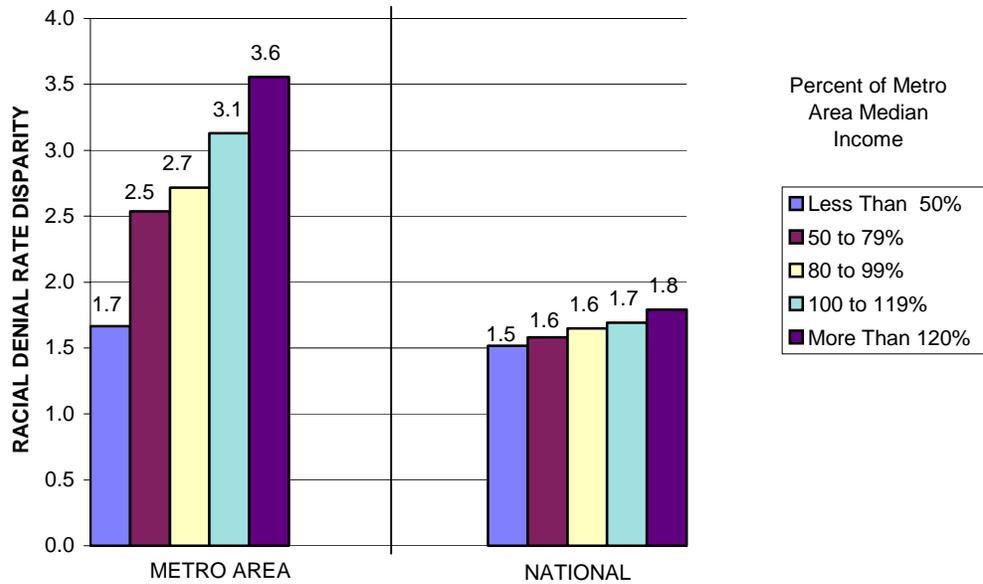


HMDA and WHEDA loans excluding refinancing loans

8. In the Milwaukee Metro Area, the Racial Denial Rate Disparity for Residential Mortgage Loans Generally Increases as Incomes Rise. This is also True for the US as a Whole.

In the Milwaukee Metro Area, the racial denial rate disparity between minority and white applicants rises from 1.7 for applicants with incomes under 50% of Metro Area median income to 3.6 for applicants with incomes over 120% of Metro Area median income. At each income level, minority loan denial rates decline as incomes rise. However, for white applicants, loan denial rates decline at a faster rate than for minority applicants, thereby increasing the racial denial rate disparity.

**MILWAUKEE METRO AREA VS. NATIONAL AVERAGE
2003 MINORITY/WHITE LOAN DENIAL RATIOS
BY INCOME GROUP**



HMDA loans excluding refinancing loans
2003 Estimated Average Household Income of Milwaukee Metropolitan Area is \$62,600

As illustrated in the table below, and on the following page, minority applicants with earnings over 120% of Metro Area median income are more likely to be denied a loan (16.5% denial rate) than white applicants with incomes of 50% to 80% of the Metro Area median income (9.4% denial rate). Minorities with less than 50% of the Metro Area median income have a 31% loan denial rate compared to a 19% denial rate for whites within the same income group.

**MILWAUKEE METRO AREA
2003 HMDA MINORITY/WHITE LOAN DENIAL RATIOS
BY MEDIAN INCOME OF METRO AREAS'
LOAN APPLICANT**

% of Metro Median Income	(Excludes refinancing Loans)				
	Less Than 50%	50% to 80%	80% to 100%	100% to 120%	More than 120%
Minority	31.1%	23.8%	21.0%	20.0%	16.5%
White	18.6%	9.4%	7.7%	6.4%	4.6%

**NATIONAL TOTALS
2003 HMDA MINORITY/WHITE LOAN DENIAL RATIOS
BY MEDIAN INCOME OF LOAN APPLICANT**

(Excludes refinancing Loans)

% of Metro Median Income	Less Than 50%	50% to 80%	80% to 100%	100% to 120%	More than 120%
Minority	37.9%	23.7%	20.0%	18.3%	16.0%
White	25.0%	15.0%	12.1%	10.8%	8.9%

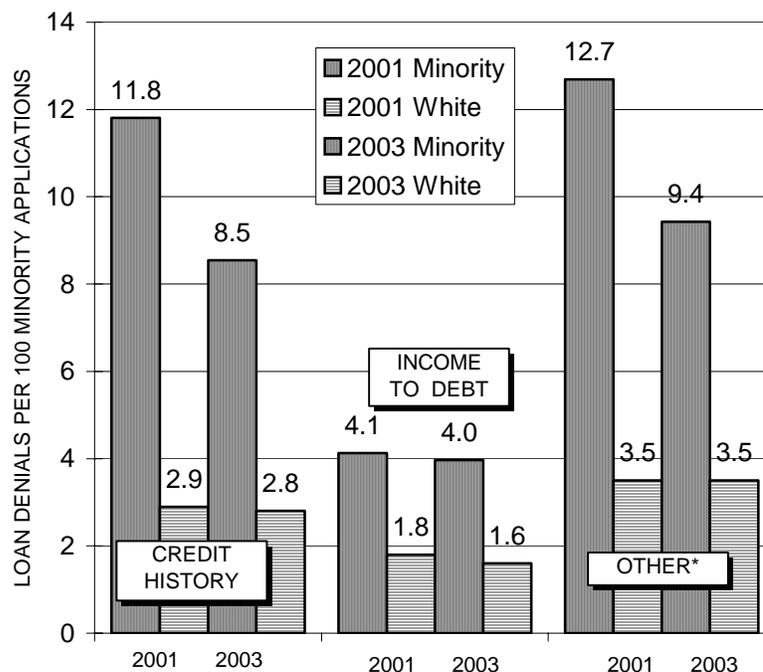
Even though loan denial rates decline as incomes rise for both minority and white applicants, the denial rate declines faster for white applicants, increasing the minority-to-white denial ratio.

When compared to national statistics, minority denials in Milwaukee are close to national averages. But Milwaukee is markedly different than national averages when it comes to white denial rates. Milwaukee's white denial rates continue to be among the lowest in the nation.

9. Credit History Remains the Primary Reported Reason for Loan Denials.

Poor credit history is the major stated reason for many loan denials. Credit History does not necessarily mean bad credit. It could be a lack of credit history that prevents loan applicants from receiving mortgage loans.

**MILWAUKEE METRO AREA
REPORTED REASONS FOR MINORITY LOAN DENIALS
PER 100 LOAN APPLICATIONS**



HMDA loans excluding refinancing loans

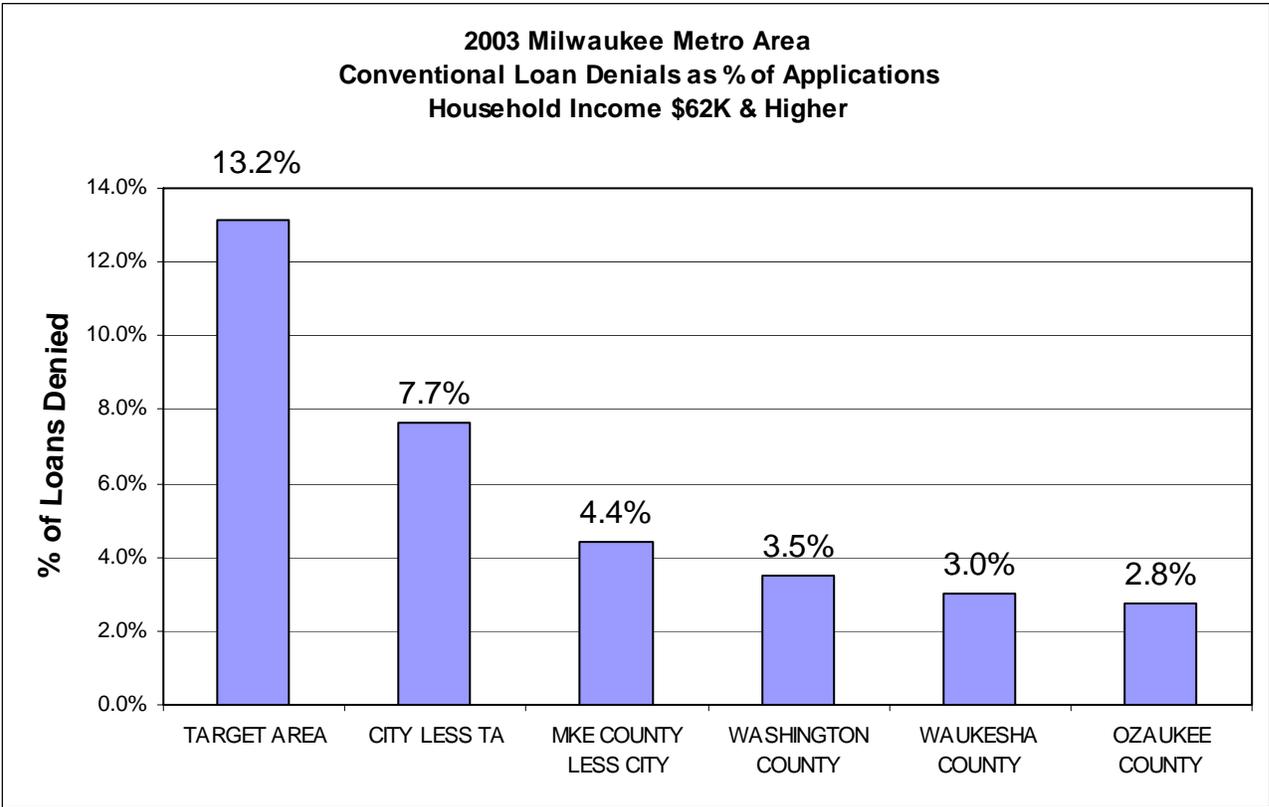
* "Other" includes "employment history", "incomplete application" and "unreported reason" for minority loan denials.

In 2003, about 35% of white loan denials and 39% of minority loan denials were due to credit history. However, the percentage of reported minority applications denied because of credit history has declined markedly since 2001. Per the graphic on the previous page, loan denials per hundred loan applications stood at 11.8 in 2001 for minority applicants. By 2003 that rate has been reduced one-fourth to 8.5 per hundred applications. Twice as many minority loans are rejected for Credit History than for the next closest category (Credit History-39%; Debt to Income-18%).

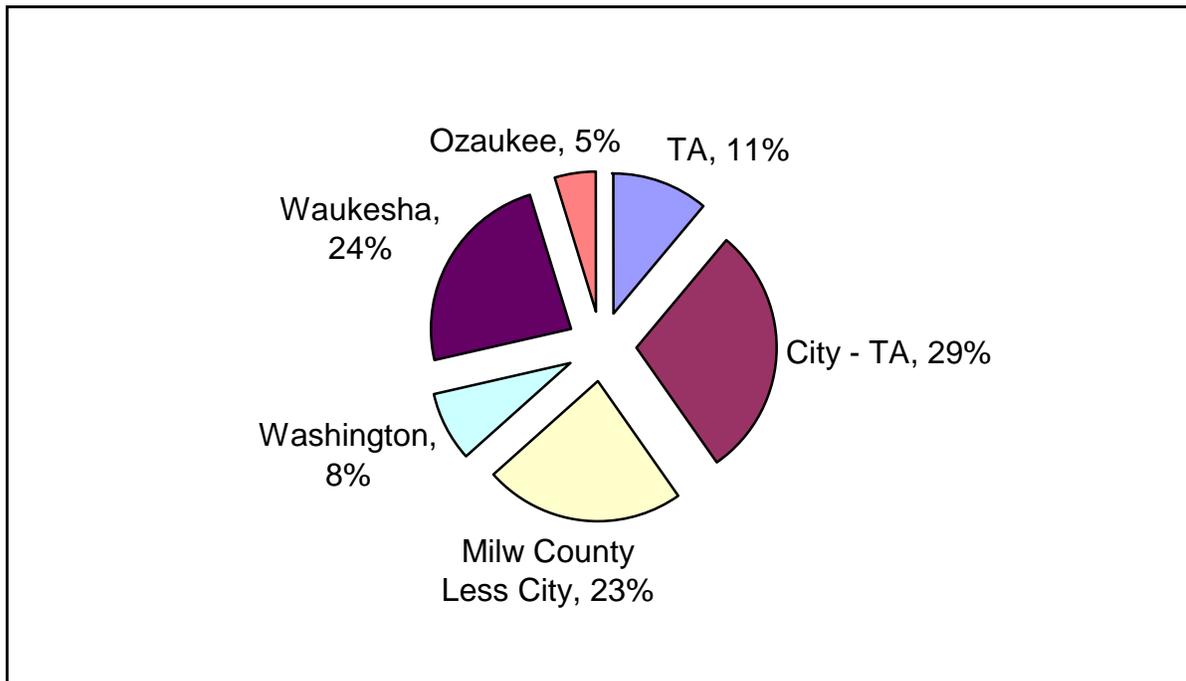
The 2001 percentage of minority loan applications denied due to credit history was four times higher for minorities than for whites (2.9 per hundred for whites; 11.8 per hundred for minorities). By the year 2003 the disparity had fallen to three times higher (2.8 per hundred for whites; 8.5 per hundred for minorities), with the white rate decreasing slightly and the minority rate decreasing 28%.

10. In 2003 Conventional Loan Denial Rates For Those With Household Incomes at or Above The Median Income Were Lower Outside the City of Milwaukee.

For 2003, the estimated median household income for the Milwaukee Metro Area was \$62,600 per the Department of Housing and Urban Development (HUD). **For conventional loan applicants whose income was at or above this income level, denial rates were lower outside the City of Milwaukee than inside the City.** This was true for the rest of Milwaukee County as well as the out-lying counties. Excluding applications within the City of Milwaukee, Milwaukee County’s denial rate of 4.4% to this higher income subgroup, approached that of Washington (3.5%), Waukesha (3%), and Ozaukee Counties (2.8%).



2003 Milwaukee Metro Area Conventional Loan Denials
% of Total Loans Denied
Household Income \$62K & Higher



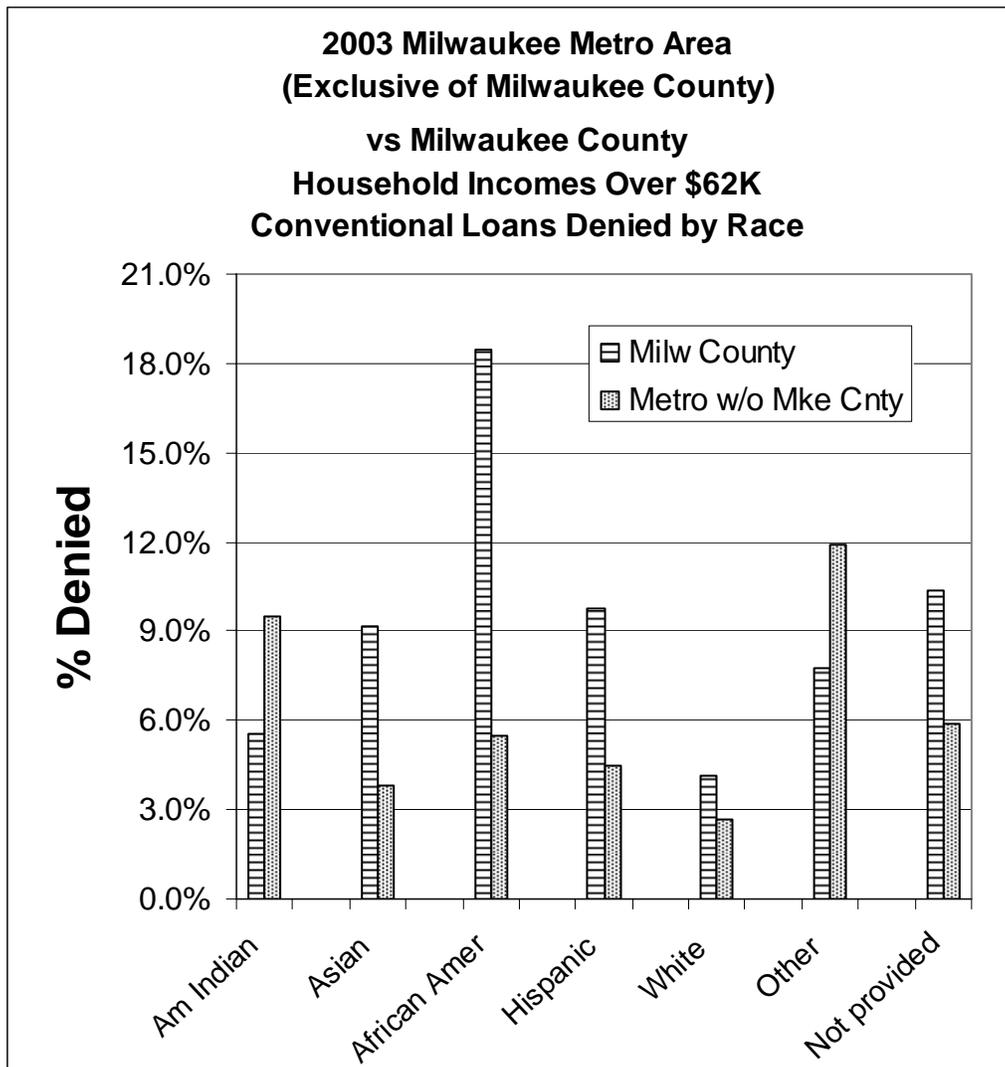
11. Generally Speaking, In 2003 Minority Applicants With Household Incomes at or Above Median Income Experienced Lower Denial Rates Outside Milwaukee County.

With the exception of American Indian and Other, conventional loan denial rates for various minority groups were lower outside Milwaukee County. Inside Milwaukee County 18% of conventional loan applicants at or above the median income were non-white. For the remainder of the Metro Area, 6% of conventional loan applicants were non-white. Milwaukee County had three times as many non-white conventional loan applicants as the rest of the Metro Area.

In the Metro Area counties outside Milwaukee County, denial rates dropped significantly for non-whites as compared to those inside Milwaukee County. The denial rate for Hispanics dropped 54% from 9.8% inside Milwaukee County, down to 4.5% outside Milwaukee county. For Asians the rate decreased by 58%, from 9.1% in Milwaukee County, to 3.8% outside. For African Americans, the rate decreased by 70%, from 18.4% inside Milwaukee County to 5.5% outside Milwaukee County.

Only American Indians and Other saw an increase of denial rates outside Milwaukee County. However, the number of applications was relatively low both inside and outside Milwaukee County, when compared to other ethnic groups. Small changes in the number of denials for American Indians will dramatically affect the percentage of loans denied.

In Milwaukee County, Whites experienced the lowest rate of denial at 4.1%, followed by American Indian (5.6%), Other (7.8%), and Asian (9.1%).



Per the chart above, African Americans inside Milwaukee County with an income at or above the median income were denied at a rate three times higher than that of African Americans in the Metro Area, exclusive of Milwaukee County.

12. Certain Financial Institutions Consistently Provide More Loans to TA Residents than Others.

The percentage of Metro Area lending to the Targeted Area (TA) increased slightly from 4.3% to 4.6% between 2000 and 2003. The following two tables show 2002 and 2003 HMDA data for financial institutions with the five highest “Percentage-of-Lending” totals in the TA. A ranking of all financial institutions with more than twenty-five loans originated in the Metro Area is shown in Appendix B.

**MILWAUKEE METROPOLITAN AREA
PERCENTAGE OF RESIDENTIAL LENDING
TO THE TARGET AREA
RANKED BY PERCENTAGE OF 2003 LENDING IN THE TA**

**Over \$15 Million in Residential Loans
(Excludes Refinancing Loans)**

FINANCIAL INSTITUTION	2002 Total Loans	2003 Total Loans	2002 Target Area	2003 Target Area
STATE FINANCIAL BANK, NA	175	99	28.0%	34.3%
ARGENT MORTGAGE COMPANY	N/A	164	0.0%	22.6%
WAUWATOSA SAVINGS BANK	782	995	16.5%	17.8%
WORLD SAVINGS BANK	229	196	0.9%	10.2%
FRANKLIN FINANCIAL GROUP	N/A	148	0.0%	10.1%

HMDA loans excluding refinancing loans

**MILWAUKEE METROPOLITAN AREA
PERCENTAGE OF RESIDENTIAL LENDING
TO THE TARGET AREA
RANKED BY PERCENTAGE OF 2003 LENDING IN THE TA**

Under \$15 Million in Residential Loans with 25 or More Loans

FINANCIAL INSTITUTION	2002 Total Loans	2003 Total Loans	2002 Target Area	2003 Target Area
LEGACY BANK	89	111	36.0%	38.7%
BNC MORTGAGE *	31	62	22.6%	29.0%
MITCHELL BANK	23	39	21.7%	25.6%
FINANCE AMERICA, LLC *	51	65	7.8%	21.5%
UNIVERSAL MORTGAGE CORPORATION	25	25	4.0%	20.0%
Total Metro Area	30,905	32,685	4.6%	4.8%

HMDA loans excluding refinancing loans

*HUD Identified Subprime Lender

Appendix B is available to assist in implementation of Common Council resolution #980598. This resolution requires potential public depositories place within the top half of the financial institutions ranking for TA residential lending in the Comptroller's Annual Lending Report.

A note on sub-prime lending. Typically, subprime loans are for persons with blemished credit or limited credit histories. Understandably, these loans carry a higher rate of interest than prime loans to compensate for increased credit risk. For such borrowers, subprime lenders play an important and positive role in the residential lending market.

But not all subprime loans are simply lenders offering the opportunity of a mortgage to persons with blemished or limited credit. A few of these lenders target credit worthy borrowers who are not as informed about the mortgage lending marketplace and may be susceptible to what have been described as "predatory" lending practices, such as charging excessive interest rates and other terms unfavorable to the borrower who might otherwise receive a prime market loan.

Home refinance loans account for a higher share of subprime lenders' total origination than prime lenders. Subprime lenders originate a larger percentage of their total originations in predominately lower income census tracts than prime lenders. Subprime lenders are also more likely to have terms like "consumer," "finance," and "acceptance" in their lender names.

Many have questioned why minorities appear to be over-represented in the subprime lending market. A study by the Department of Housing and Urban Development entitled "Unequal Burden: Income and Racial Disparities in Subprime Lending in America" (April 2002) revealed that even in upper-income African-American neighborhoods one is one-and-a-half times more likely to have a subprime mortgage loan than persons in low-income white neighborhoods. In neighborhoods where Hispanics comprise at least eighty percent of the population, they were 1.5 times more likely than the nation as a whole to have a subprime mortgage loan.

The HUD study had four major findings:

1. From 1993 to 1998, the number of subprime refinance loans increased ten-fold
2. Subprime loans are three times more likely in low-income neighborhoods than in high-income neighborhoods
3. Subprime loans are five times more likely in African American neighborhoods than in white neighborhoods
4. Homeowners in high-income African American neighborhoods are twice as likely as homeowners in low-income white neighborhoods to have subprime loans

HUD's analysis clearly demonstrates the exponential growth in subprime lending and its disproportionate impact on low-income and, particularly, minority homeowners and communities throughout the nation. This concentration of subprime activity leaves these homeowners with significant costs of subprime loans. These borrowers may also be vulnerable to predatory lending practices.

As a part of this report, any lender identified by HUD as "subprime" will be so noted.

13. NOHIM Disbands.

New Opportunities for Homeownership in Milwaukee (NOHIM) disbanded in May of 2003, after 12 years of operation and 4,653 loans. NOHIM was a 50-member lending coalition dedicated to improving central-city mortgage lending. In its tenure, NOHIM originated \$263 million in mortgage loans, primarily to first-time buyers with modest incomes. Annually, up to 80% of these loans were to ethnic minorities.

NOHIM was organized by Mayor John O. Norquist and area banks after nationwide reports, including this lending report, demonstrated that the Milwaukee Metro Area has the highest racial disparity in the nation.

"We have done what we set out to do," board Chairman Don Cohen was quoted as saying in the June 3, 2003 edition of The Milwaukee Journal Sentinel.

What NOHIM set out to do was end “redlining” in Milwaukee neighborhoods. Through partnerships with home-buyer counseling agencies lenders learned how to help people of lower incomes or blemished credit obtain mortgage loans.

While NOHIM disbanded, area banks are considering forming a new coalition with updated objectives. Lenders are considering whether to continue banding together in some new way to further the accomplishments of NOHIM.²

14. The City and WHEDA Continue To Offer Programs Aimed at Low Income and Central City Residents.

CITY OF MILWAUKEE PROGRAMS

The Department of Neighborhood Services (DNS) offers home repair and home rehabilitation loans to City of Milwaukee homeowners, as well as investor-owners. The purpose of the loan programs is to assist citizens in obtaining money necessary to repair or rehabilitate existing housing stock.

Accordingly, the Home Rehabilitation Program offered by DNS is designed to make low-interest loans to assist homeowners in making improvements on their homes. In addition, technical assistance is provided to help homeowners with this process. In 2003, homeowners with incomes below 80% of the median income accounted for the majority of loans originated under these programs.

**LENDING ACTIVITY FOR SELECTED
DEPARTMENT OF NEIGHBORHOOD SERVICES (DNS)
LENDING PROGRAMS**

	2001		2002		2003	
	Number of Loans	Amount of Loans	Number of Loans	Amount of Loans	Number of Loans	Amount of Loans
OWNER-OCCUPIED LENDING						
Home Rehabilitation Loan	158	\$2,359,606	127	\$1,984,272	89	\$1,899,411
	158	\$2,359,606	127	\$1,984,272	89	\$1,899,411

DNS also has home rehabilitation as well as financing programs for the “owner-investor”. The Rental Rehabilitation Program makes forgivable matching loans to responsible landlords who, in turn, must agree to keep rents affordable to low and moderate income families. The “Buy in

² Information for this section was obtained from an article in the June 3, 2003 edition of The Milwaukee Journal Sentinel, written by Michele Derus.

Your Neighborhood Program” works with local lenders to help homeowners invest in their neighborhoods by providing financing for investment properties near their homes.

**LENDING ACTIVITY FOR SELECTED
DEPARTMENT OF NEIGHBORHOOD SERVICES (DNS)
LENDING PROGRAMS**

	2001		2002		2003	
	Number of Loans	Amount of Loans	Number of Loans	Amount of Loans	Number of Loans	Amount of Loans
INVESTOR-OWNER LENDING						
Rental Rehabilitation	42	\$909,889	41	\$752,744	61	\$1,170,048
Buy In Your Neighborhood	1	\$24,180	5	\$52,500	1	\$24,955
	43	\$934,069	46	\$805,244	62	\$1,195,003
TOTAL DNS PROGRAMS	201	\$3,293,675	173	\$2,789,516	151	\$3,094,414

Source: DNS - Neighborhood Improvement Development Corporation (NIDC)

In total, participation by Milwaukee residents in the DNS programs showed a decrease between 2001 and 2003, although DNS lending dollars remained fairly level over the period. Part of the reason for the decrease in the number of loans to home owners may be the historic low interest rates commonly available in the consumer market during the period. The decrease in “Buy-In Your Neighborhood” reflects a decreased emphasis on this Program.

But because these programs target households which meet Department of Housing and Urban Development (HUD) income criteria and/or reside within an area that includes the TA, programs offered by DNS are vital to sustained improvement of Milwaukee’s Neighborhoods.

WHEDA “EZ CLOSING” PROGRAM ENDS, HOME PLUS PROGRAM BEGINS

The Wisconsin Housing and Economic Development Authority (WHEDA) began a new supplemental home mortgage package aimed at low and middle income homebuyers. Home mortgage borrowers who qualify for an existing WHEDA HOME mortgage loan now also may qualify for an accompanying HOME Plus loan, an immediate second mortgage. HOME Plus provides borrowers with a line of credit at purchase.

A portion of the HOME Plus loan may be drawn at closing and put toward down payment and closing costs. The balance of the line of credit can be used for home improvements and repairs during the first two years of ownership.

These loans are based on affordability and no home equity is required. The loans are offered at low, fixed-rate interest in amounts up to ten thousand dollars for a fifteen year term.

In another move, meant to simplify its financial products, WHEDA is incorporating the stand-alone Home Improvement Loan program into the HOME mortgage loan program. The change means that all HOME lenders in Wisconsin are now eligible to originate improvement loans.

**MILWAUKEE METRO AREA
WHEDA HOME PLUS PROGRAM**

	<u>2001</u>	<u>2002 *</u>	<u>2003 *</u>
Total WHEDA Loans	59	42	125
% to TA	27.1%	2.4%	3.2%

* In 2002 the EZ Loan program was discontinued

The total number of WHEDA loans in the Metro Area has more than doubled since 2001, yet as a percentage of total lending to the TA, WHEDA loans have decreased substantially.

15. As is True for Residential Lending, Significant Differences Exist Among Lenders in Their Portion of Business Loans in Low and Moderate Income Areas.

In 2003, 36,277 business loans were issued in the Milwaukee Metro Area. Of this total, 5,697 or almost 16%, were issued in the low-to-moderate income areas. TA business loans comprise 6.6% of Metro Area business loans. This compares favorably to TA residential lending of 4.8% of Metro Area loans.

**MILWAUKEE METRO AREA
PERCENTAGE OF BUSINESS LOANS ORIGINATED
BY INCOME OF AREA**

	<u>2001</u>	<u>2002</u>	<u>2003</u>	<u>2003 PERCENT OF TOTAL</u>
LOW & MODERATE INCOME AREAS	4,791	4,656	5,697	15.7%
MIDDLE INCOME AREAS	14,666	16,636	15,642	43.1%
UPPER INCOME AREAS	11,487	12,348	13,499	37.2%
TOTAL BUSINESS LENDING*	<u>31,976</u>	<u>35,679</u>	<u>36,277</u>	
TA BUSINESS LOANS	<u>2,793</u>	<u>2,416</u>	<u>2,381</u>	6.6%

*Income Area not available for 1439 loans (4%) in 2003

Between 2000 and 2003, total business loans increased by almost 44%. Business lending to low and moderate income areas increased by about 57%, out-pacing the rate of increase for total business loans made within the Milwaukee Metro Area.

**MILWAUKEE METROPOLITAN AREA
PERCENTAGE OF BUSINESS LENDING TO LOW & MODERATE INCOME AREAS**

(Over \$4 million in 2003 Business Loans)

Ranked by LMI % 2003 Lending

<u>Institution</u>			2002	2003	# 2003
	<u>Total</u>	<u>Total</u>	Low & Moderate <u>Income Areas</u>	Low & Moderate <u>Income Areas</u>	LMI <u>Loans</u>
FIRST NATIONAL BANK	8	20	25.0%	95.0%	19
TCF NATIONAL BANK	103	89	27.2%	33.7%	30
PYRAMAX BANK	18	81	0.0%	30.9%	25
STATE FINANCIAL BANK, NA	838	602	20.0%	28.1%	169
NORTH SHORE BANK, FSB	42	61	40.5%	27.9%	17
COMMUNITY BANK TRUST	25	40	80.0%	25.0%	10
LASALLE BANK	11	13	18.2%	23.1%	3
US BANK, N.A.	3,198	1,041	19.5%	22.1%	230
PARK BANK	382	435	18.8%	21.6%	94
THE PITNEY BOWES BANK	-	805	0.0%	20.5%	165
US BANK NORTH DAKOTA	150	1,799	0.0%	20.2%	363
TRI CITY NATIONAL BANK	549	628	14.9%	19.7%	124
GE CAPITAL FINANCIAL INC.	2,277	1,920	17.7%	19.6%	377
JOHNSON BANK	816	298	3.8%	19.5%	58
WELLS FARGO BANK WISCONSIN, NA	844	966	13.7%	18.8%	182
MARINE BANK WISCONSIN	206	162	10.2%	18.5%	30
MI MARSHALL ILSLEY BANK	3,307	3,802	11.8%	18.1%	688
MID AMERICA BANK, FSB *	380	421	9.5%	17.6%	74
FM BANK - WISCONSIN	76	65	18.4%	16.9%	11
AMERICAN EXPRESS CENTURION BNK	984	526	11.1%	16.3%	86
ANCHORBANK FSB	117	118	4.3%	16.1%	19
CITIBANK USA, NA	3,850	3,939	13.4%	16.0%	630
CAPITAL ONE, F.S.B.	7,358	7,198	14.4%	15.1%	1,086
BANK ONE, NA	263	227	14.1%	14.1%	32
ASSOCIATED BANK, N.A.	879	799	5.7%	13.9%	111
FIRST FEDERAL CAPITAL BANK	12	15	0.0%	13.3%	2
CHASE MANHATTAN BANK USA, N.A.	354	481	10.2%	13.3%	64
ADVANTA BANK	2,042	1,683	11.0%	12.4%	208
BANK ONE, NA, ILLINOIS	1,657	2,131	10.7%	12.3%	263
MBNA AMERICA (DELAWARE), N.A.	1,902	2,864	11.0%	12.1%	347
FIRST BANKING CENTER	53	42	34.0%	11.9%	5
BANK MUTUAL	38	39	10.5%	10.3%	4
WAUKESHA STATE BANK	252	678	25.0%	6.2%	42
OZAUKEE BANK	329	292	4.9%	5.5%	16
NATIONAL EXCHANGE BANK	155	140	0.0%	4.3%	6
CITIZENS BANK OF MUKWONAGO	440	403	3.6%	3.0%	12
FIRST BANK FINANCIAL CENTRE	312	363	1.0%	1.9%	7
WEST BEND SAVINGS BANK	204	269	0.5%	0.4%	1
HORICON STATE BANK	61	50	0.0%	0.0%	0

*Formerly St Francis Bank

III. THE 2003 FANNIE MAE NATIONAL HOUSING SURVEY

The Federal National Mortgage Association (called Fannie Mae) engaged the research firm of Penn, Schoen & Berland Associates to conduct the 2003 Fannie Mae national Housing Survey. The national representative sample was comprised of 715 adults, age 18 or older. Three additional subsamples were also conducted of minorities including 259 African American adults, 236 English-language dominant Hispanic adults, and 235 Spanish-language dominant Hispanic adults. The interviews took place between December 17, 2003 and January 6, 2004.

THE 2003 HOUSING SURVEY

What follows is selected information gleaned from the Housing Survey. For a complete transcript of the survey, visit <http://www.fanniemae.com>, click “media,” then click “National Housing Survey.”

In summary, here are some of the survey’s key insights:

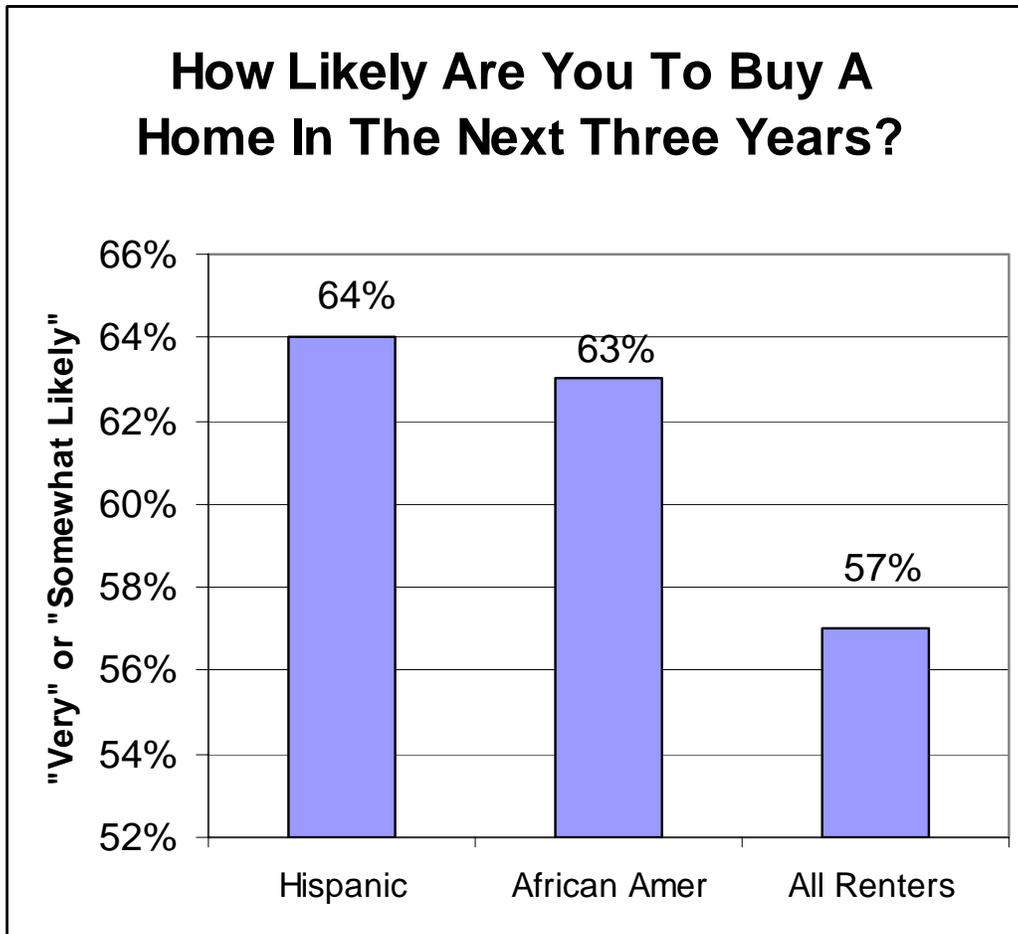
1. Despite the initiatives of recent years, there remains a sizable **information gap** between the general public and minority communities regarding homeownership and the home-buying process.
2. **Affordability gaps** are also formidable for the group termed as “seekers”, those who began the home-buying process but did not take it to completion. This segment represents nearly 10% of all households, and over one-third of all renters.
3. There is still a perceived **credit gap**, as many minority respondents believe they cannot access the credit needed to buy a home when, in fact, they may easily qualify for a low-cost loan.
4. The survey found that there is a **confidence gap** that must be bridged if we are to increase minority homeownership rates. Many potential minority homeowners still believe the process of finding a home, applying for a mortgage and getting a home loan involves obstacles that place homeownership beyond their reach. Or they may feel they don’t have individuals or institutions they can turn to and trust to help them through the process.

1. Two-thirds of Americans Believe Now is a Good Time to Buy a Home.

While only 47% of Americans are optimistic about the economy as a whole, upbeat feelings about the housing market are widely shared by Americans of all races and circumstances.

When asked, “Do you believe it is a good time to get into the housing market,” respondents replied as follows:

African Americans	Yes-57%
Hispanic	Yes-69%
All Respondents	Yes-66%



Fueling this optimism is the belief that homeownership is one of the best investments an individual can make. 84% of homeowners say a major reason to own a home is that it is a good long-term investment.

2. Information About the Home-Buying Process Varies Among Groups.

Both the general public and minorities have varying levels of accurate information on key issues of the home-buying process. However, on nearly all issues, minority communities, particularly Spanish Hispanics (those Hispanics who primarily speak Spanish at home), continue to trail the general public in having accurate information about homeownership and the home-buying process.

In general 69% of the general population has accurate information about the home-buying process. African Americans, at 60%, and English-speaking Hispanics, at 65% tend to have somewhat less information than the general public regarding the home-buying process. It is clear that, while outreach programs are helpful, there is still work to be done in getting home-buying information out to minority communities.

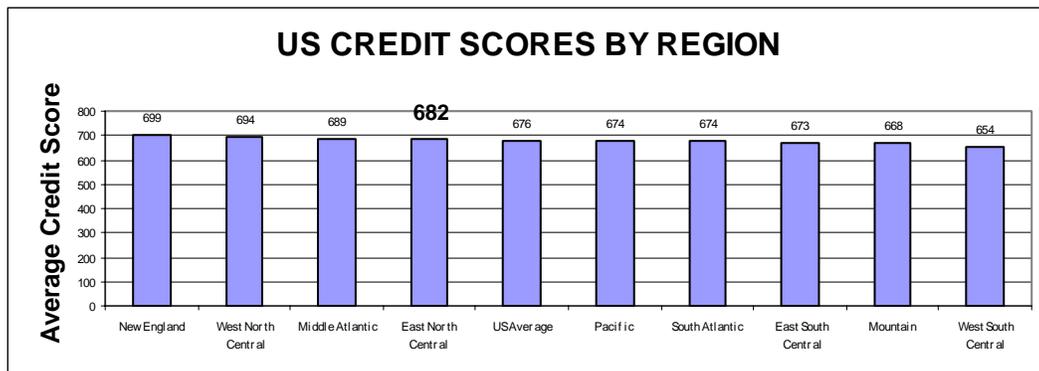
3. Many Americans are Concerned They are Not Credit-Worth Enough To Buy A Home.

Many Americans continue to be concerned that their credit histories will make it difficult for them to secure a mortgage. Per the survey, 39% of renters consider credit to be a major reason why they have not yet purchased a home.

Credit is an even bigger concern for minority households. Members of these groups most frequently cite credit concerns as the major reason they have not yet bought a home, rating it an even bigger obstacle than affordability. Credit is also a major concern of renters under the age of 35 and Americans living in the Midwest.

Different segments of the population have significantly different levels of experience with credit and debt. Again, as the graph below illustrates, different groups of people have varying levels of knowledge when it comes to issues of credit.

On a scale of 330 being the lowest and 830 being the best possible credit score, the average national credit score is 676. The average credit score for the Milwaukee Metro Area is 681, slightly better than the national average. As depicted on the following graph, the Milwaukee Metro Area is within the East North Central Region, which has a credit score of 682, putting it in the upper half of all U.S. regions. What this means is that, by and large, persons in the Metro Area might be more credit worthy than they may think.



4. Fears That They Cannot Afford the Purchase or Upkeep of a Home is the Number One Reason Renters Do Not Buy Homes.

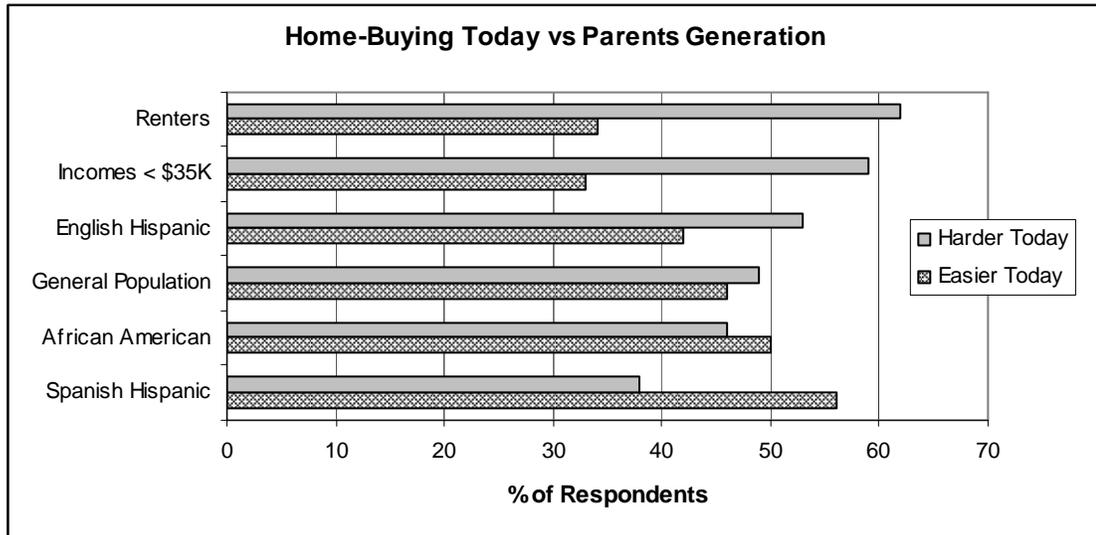
Renters and those making less than \$35,000 per year are significantly less confident than the general public that they can afford a home. The most significant affordability concerns for renters in the general public are the ability to make a down payment and closing costs.

The top reasons for renters not entering the home-buying market are:

1. Cannot afford purchase or upkeep
2. Do not have good enough credit
3. Will not be in area for extended period of time
4. The home-buying process seems too complicated.

5. **Americans Are Split on Whether it is Easier or Harder To Buy a Home Today Than in Their Parents' Generation.**

Forty-six percent of respondents felt it is easier to day than in their parents' generation to buy a home. But forty-nine percent felt it was more difficult today to purchase a home than in their parents' day.



The perception that it is more difficult to purchase a home today than in the past may be affected by rising home prices. Sixty-four percent of all Americans believe home prices will go up over the next year.

Certainly, the City of Milwaukee has seen growth in the sales prices, as well as the assessed values, in homes throughout the City for the period covered by this report. The concern is that rising values, while demonstrating a healthy over-all housing market, may make home-buying seem out of reach for those on the lower end of the economic strata.

NOTES

1. The Common Council goals for the City of Milwaukee's Socially Responsible Investment Program.
 - A. Liquidity, safety and competitive returns on investments.
 - B. Increasing the amount and percentage of home mortgages made by financial institutions to City minority residents.
 - C. Increasing the amount and percentage of home mortgages made by financial institutions to City residents in census tracts identified as eligible for the Targeted Area Single Family Mortgage Loan Program.
 - D. Increasing employment opportunities for minority residents.
 - E. Increasing the amount of money available for small business loans in the Targeted Area Single Family Mortgage Loan Program area.
 - F. Increasing the amount of money available for student loans to residents of the Targeted Area Single Family Mortgage Loan Program area.
 - G. Increasing commitment by financial institutions to provide free technical assistance to potential home buyers and small business owners through existing home buying clinics and business incubators.

2. The TA used in this Report was the City's Targeted Single Family Loan Program area and includes census tracts which meet each of the following four criteria: (See list of census tracts on page 42 and map on page 43).
 - A. The median assessed property value of one- and 2-family dwellings in the area is less than or equal to 80% of the median assessed property value of one- and 2-family dwellings in the City of Milwaukee.
 - B. The median family income of the area is less than or equal to 80% of the median family income of the City of Milwaukee.
 - C. The proportion of owner-occupied dwellings in the area are less than or equal to 80% of the proportion of owner-occupied dwellings in the City of Milwaukee.
 - D. The vacancy rate of dwellings in the area is greater than or equal to 120% of the vacancy rate of dwellings in the City of Milwaukee.

APPENDIX A

FIFTY LARGEST METROPOLITAN AREAS % OF LOANS DENIED

	2003 DENIAL RATE DISPARITY	2003 White Denial Rates	2003 Minority Denial Rates	2000 DENIAL RATE DISPARITY	2000 White Denial Rates	2000 Minority Denial Rates
1 MILWAUKEE, WI	3.1	7.4%	23.1%	3.2	7.7%	24.5%
2 RALEIGH-DURHAM-CHAPEL HILL, NC	2.5	8.0%	20.3%	2.3	13.6%	31.0%
3 BUFFALO	2.5	12.6%	31.4%	2.5	13.2%	33.1%
4 PHILADELPHIA, PA-NJ	2.5	11.7%	28.9%	2.3	10.6%	24.1%
5 CLEVELAND, OH	2.3	11.5%	26.9%	2.4	13.3%	31.8%
6 RICHMOND-PETERSBURG, VA	2.3	8.4%	19.2%	2.0	10.9%	21.4%
7 CHICAGO, IL	2.2	9.3%	20.1%	2.5	8.8%	21.7%
8 ST. LOUIS, MO-IL	2.1	11.8%	25.2%	1.9	15.4%	29.2%
9 NORFOLK-VIRGINIA BEACH-NEWPORT NEWS, VA	2.1	9.1%	18.8%	1.7	12.6%	20.9%
10 ATLANTA	2.0	9.4%	19.1%	1.7	12.9%	21.6%
11 KANSAS CITY, MO-KS	2.0	10.8%	22.0%	2.0	11.4%	22.4%
12 WASHINGTON, DC-MD-VA	2.0	7.0%	14.0%	2.0	7.8%	15.3%
13 NEW ORLEANS, LA	2.0	13.8%	27.6%	2.0	14.4%	28.5%
14 PITTSBURGH, PA	2.0	16.0%	31.8%	1.7	15.4%	25.9%
15 BOSTON	2.0	10.5%	20.9%	1.9	10.3%	19.3%
16 CINCINNATI, OH-KY-IN	2.0	13.4%	26.5%	1.5	18.8%	27.6%
17 MEMPHIS, TN-AR-MS	2.0	11.8%	23.2%	2.0	13.5%	27.6%
18 DETROIT, MI	2.0	18.7%	36.7%	1.7	20.9%	35.0%
19 HARTFORD, CT	2.0	10.4%	20.4%	2.0	9.8%	19.7%
20 MINNEAPOLIS-ST. PAUL, MN-WI	2.0	9.3%	18.1%	2.0	9.2%	18.6%
21 GRAND RAPIDS-MUSKEGON-HOLLAND, MI	1.9	13.8%	26.7%	1.6	22.1%	36.0%
22 AUSTIN-SAN MARCOS, TX	1.9	12.2%	23.5%	1.9	14.9%	28.6%
23 PROVIDENCE-FALL RIVER-WARWICK, RI-MA	1.9	12.9%	24.6%	2.1	13.4%	27.8%
24 ROCHESTER, NY	1.9	13.2%	24.7%	1.6	15.9%	25.7%
25 COLUMBUS, OH	1.8	11.4%	21.0%	1.5	15.8%	22.9%
26 SAN ANTONIO, TX	1.8	14.1%	25.6%	1.5	19.2%	28.9%
27 DENVER, CO	1.8	11.5%	20.7%	1.6	11.5%	18.8%
28 LOUISVILLE, KY-IN	1.8	13.8%	24.7%	1.4	17.8%	25.7%
29 INDIANAPOLIS, IN	1.8	12.4%	22.1%	1.7	15.3%	25.5%
30 CHARLOTTE	1.8	12.0%	21.2%	1.6	18.6%	29.9%
31 GREENSBORO--WINSTON-SALEM--HIGH POINT, NC	1.7	15.5%	26.7%	1.5	24.1%	37.0%
32 NASHVILLE, TN	1.7	14.0%	23.1%	1.4	17.7%	25.0%
33 SAN FRANCISCO, CA	1.6	9.9%	16.3%	1.5	10.6%	15.7%
34 JACKSONVILLE, FL	1.6	13.1%	21.4%	1.3	19.9%	25.8%
35 DALLAS, TX	1.6	12.9%	21.2%	1.3	16.3%	21.9%
36 PHOENIX, AZ	1.6	12.4%	20.3%	1.6	15.1%	24.4%
37 HOUSTON, TX	1.6	14.2%	22.9%	1.5	17.5%	25.5%
38 SALT LAKE CITY-OGDEN, UT	1.6	13.3%	21.0%	1.2	16.3%	20.4%
39 OKLAHOMA CITY, OK	1.6	14.3%	22.5%	1.3	18.3%	24.5%
40 NEW YORK, NY	1.6	13.3%	20.7%	1.6	14.1%	22.6%
41 ORLANDO, FL	1.5	11.6%	17.9%	1.5	13.8%	20.4%
42 WEST PALM BEACH-BOCA RATON, FL	1.5	11.4%	17.3%	1.6	12.9%	21.3%
43 LOS ANGELES-LONG BEACH, CA	1.5	12.4%	18.5%	1.3	14.8%	19.4%
44 TAMPA-ST. PETERSBURG-CLEARWATER, FL	1.5	13.3%	19.5%	1.5	15.6%	23.0%
45 SEATTLE, WA	1.5	10.4%	15.2%	1.3	12.6%	16.3%
46 LAS VEGAS, NV-AZ	1.5	13.1%	19.2%	1.2	17.0%	20.7%
47 SAN DIEGO, CA	1.4	11.6%	16.1%	1.4	12.4%	17.1%
48 PORTLAND, OR	1.3	12.7%	17.1%	1.2	14.8%	18.3%
49 SACRAMENTO, CA	1.3	11.9%	15.7%	1.2	11.7%	14.5%
50 MIAMI-HIALEAH, FL	1.3	14.7%	18.8%	1.3	15.1%	19.5%
50 LARGEST METRO AREA AVG.	1.7	11.9%	20.7%	1.6	14.1%	22.6%
NATIONAL AGGREGATES	1.6	13.8%	21.7%	1.4	20.7%	29.6%

APPENDIX B

The percentage of lending to the TA includes only non-refinancing loans report by HMDA. This table ranks financial institutions for the Socially Responsible Investment program. Common council file # 980598 requires public depositories place in the top half of institutions from the Comptroller's Annual Lending Report.

MILWAUKEE METROPOLITAN AREA
HMDA DATA ONLY
PERCENTAGE OF RESIDENTIAL LENDING TO TARGET AREA
RANKED BY PERCENTAGE OF 2003 LENDING TO TARGET AREA
(MINIMUM 25 LOANS)

<u>Rank</u>	<u>Lending Institution</u>	<u>Loans To TA</u>	<u>Total Loans Originated</u>	<u>% To TA</u>	
1	LEGACY BANK	43	111	38.7%	
2	STATE FINANCIAL BANK, NA	34	99	34.3%	
3	BNC MORTGAGE	18	62	29.0%	**
4	MITCHELL BANK	10	39	25.6%	
5	ARGENT MORTGAGE COMPANY	37	164	22.6%	
6	FINANCE AMERICA, LLC	14	65	21.5%	**
7	UNIVERSAL MORTGAGE CORPORATION	5	25	20.0%	
8	WAUWATOSA SAVINGS BANK	177	995	17.8%	
9	PROVIDENT BANK	5	29	17.2%	**
10	LINCOLN STATE BANK	9	63	14.3%	
11	TCF MORTGAGE CORPORATION	9	67	13.4%	
12	BENEFICIAL	12	100	12.0%	**
13	FIRST FEDERAL CAPITAL BANK	5	42	11.9%	
14	MILWAUKEE METROPOLITAN C U	6	53	11.3%	
15	UNIVERSITY OF WISCONSIN CREDIT	8	73	11.0%	
16	WORLD SAVINGS BANK	20	196	10.2%	
17	FRANKLIN FINANCIAL GROUP	15	148	10.1%	
18	CHASE MANHATTAN MORTGAGE CORP	21	230	9.1%	
19	REGIONS BANK	2	25	8.0%	
20	TCF NATIONAL BANK	24	306	7.8%	
21	US BANK NORTH DAKOTA	23	297	7.7%	
22	WACHOVIA BANK	5	66	7.6%	
22	MARITIME SAVINGS BANK	14	185	7.6%	
24	NEW CENTURY MORTGAGE CORP.	7	95	7.4%	**
25	CONTINENTAL SAVINGS BANK, FSB	8	109	7.3%	
26	TOWN BANK	2	28	7.1%	
27	MLWAUKEE WESTERN BANK	3	43	7.0%	
27	A-B CREDIT UNION	3	43	7.0%	
27	FIRST FRANKLIN FINANCIAL CORP.	22	316	7.0%	**
30	CTX MORTGAGE COMPANY, LLC	24	348	6.9%	
31	DOMESTIC BANK	3	44	6.8%	
32	BANK ONE, NA	18	275	6.5%	
32	MORTGAGE SERVICES, INC.	4	62	6.5%	
34	LONG BEACH MORTGAGE CO.	3	48	6.3%	**

APPENDIX B

MILWAUKEE METROPOLITAN AREA
HMDA DATA ONLY
PERCENTAGE OF RESIDENTIAL LENDING TO TARGET AREA
RANKED BY PERCENTAGE OF 2003 LENDING TO TARGET AREA
(MINIMUM 25 LOANS)

<u>Rank</u>	<u>Lending Institution</u>	<u>Loans To TA</u>	<u>Total Loans Originated</u>	<u>% To TA</u>	
35	FRANKLIN AMERICAN MORTGAGE CO	5	82	6.1%	
36	OPTION ONE MORTGAGE CORP.	10	167	6.0%	**
36	COUNTRYWIDE HOME LOANS	71	1190	6.0%	
38	DECISION ONE MORTGAGE	4	68	5.9%	
39	US BANK, N.A.	64	1106	5.8%	
39	ASSOCIATED BANK, N.A.	47	813	5.8%	
39	WELLS FARGO BANK WISCONSIN, NA	3	52	5.8%	
42	M&I MARSHALL & ILSLEY BANK	56	1008	5.6%	
43	WELLS FARGO BANK, NA	8	145	5.5%	
44	HORICON STATE BANK	2	39	5.1%	
45	USAA FEDERAL SAVINGS BANK	2	40	5.0%	
46	PARAGON HOME LENDING, LLC	84	1707	4.9%	
47	BANK MUTUAL	17	358	4.7%	
48	EDUCATORS CREDIT UNION	2	44	4.5%	
48	WASHINGTON MUTUAL BANK, FA	13	290	4.5%	
48	UNIVERSAL HOME LENDING	29	649	4.5%	
51	CENDANT MORTGAGE	15	338	4.4%	
52	BANK OF AMERICA, N.A.	16	402	4.0%	
53	FLAGSTAR BANK	9	237	3.8%	
53	WELLS FARGO HOME MORTGAGE	69	1830	3.8%	
53	SHELTER MORTGAGE COMPANY, LLC	15	399	3.8%	
56	TRI CITY NATIONAL BANK	12	325	3.7%	
57	ABN AMRO MORTGAGE GROUP, INC.	14	395	3.5%	
58	NATIONAL CITY MORTGAGE CORPORA	10	296	3.4%	
59	SIRVA MORTGAGE, INC.	1	30	3.3%	
59	MIDAMERICA BANK	43	1315	3.3%	
59	STATE CENTRAL CREDIT UNION	3	92	3.3%	
62	INDYMAC BANK, F.S.B.	1	31	3.2%	
62	MERRILL LYNCH CREDIT CORP.	1	31	3.2%	
62	SUMMIT MORTGAGE CORPORATION	3	93	3.2%	
62	ASSOCIATED MORTGAGE CO, INC	9	279	3.2%	
62	GB HOME EQUITY, LLC	11	343	3.2%	
67	CITIMORTGAGE, INC	2	64	3.1%	
67	GREAT MIDWEST BANK, S.S.B.	10	322	3.1%	
69	PRINCIPAL RESIDENTIAL MTG, INC	8	264	3.0%	
70	WMC MORTGAGE CORP.	1	35	2.9%	**
71	RBMG, INC.	1	36	2.8%	
72	M&I MORTGAGE CORP	13	490	2.7%	
73	THE EQUITABLE BANK, S.S.B.	22	848	2.6%	
73	JOHNSON BANK	5	195	2.6%	
75	SIB MORTGAGE CORP.	9	355	2.5%	
75	GMAC MORTGAGE CORPORATION	3	120	2.5%	

APPENDIX B

MILWAUKEE METROPOLITAN AREA
HMDA DATA ONLY
PERCENTAGE OF RESIDENTIAL LENDING TO TARGET AREA
RANKED BY PERCENTAGE OF 2003 LENDING TO TARGET AREA
(MINIMUM 25 LOANS)

<u>Rank</u>	<u>Lending Institution</u>	<u>Loans To TA</u>	<u>Total Loans Originated</u>	<u>% To TA</u>	
77	OZAUKEE BANK	12	495	2.4%	
77	MILA, INC.	1	42	2.4%	**
79	PYRAMAX BANK	13	566	2.3%	
80	OHIO SAVINGS BANK	7	312	2.2%	
80	KEYBANK USA, N.A.	3	138	2.2%	**
80	GUARDIAN CREDIT UNION	8	372	2.2%	
83	WISCONSIN MORTGAGE CORPORATION	29	1351	2.1%	
83	NATIONAL EXCHANGE BANK	1	47	2.1%	
83	ANCHORBANK FSB	6	283	2.1%	
83	WELLS FARGO FUNDING	10	483	2.1%	
87	FREMONT INVESTMENT & LOAN	2	107	1.9%	**
88	F&M BANK - WISCONSIN	2	114	1.8%	
89	ENTERPRISE CREDIT UNION	1	63	1.6%	
90	SUNSET BANK & SAVINGS	2	131	1.5%	
91	SOUTH CENTRAL BANK	1	72	1.4%	
91	PORT WASHINGTON STATE BANK	2	145	1.4%	
93	PARISH NATIONAL BANK	6	454	1.3%	
94	LANDMARK CREDIT UNION	28	2244	1.2%	
94	MORTGAGEIT INC	1	81	1.2%	
94	NORTH SHORE BANK, FSB	5	426	1.2%	
94	SUNTRUST MORTGAGE, INC	1	86	1.2%	
98	WEST BEND SAVINGS BANK	2	235	0.9%	
99	WAUKESHA STATE BANK	2	276	0.7%	
100	FIRST FEDERAL SAVINGS BK OF WI	0	44	0.0%	
100	GRAFTON STATE BANK	0	27	0.0%	
100	THE HUNTINGTON NATIONAL BANK	0	196	0.0%	
100	FIRST NATIONAL BANK-HARTFORD	0	27	0.0%	
100	FIRST BANK FINANCIAL CENTRE	0	86	0.0%	
100	CITIZENS BANK OF MUKWONGO	0	147	0.0%	
100	HARTFORD SAVINGS BANK	0	82	0.0%	
100	COMMUNITY BANK OF GRAFTON	0	32	0.0%	
100	INVESTORSBANK	0	25	0.0%	
100	ALLCO CREDIT UNION	0	25	0.0%	
100	GLACIER HILLS CREDIT UNION	0	60	0.0%	
100	IRWIN MORTGAGE CORP	0	88	0.0%	
100	RBC MORTGAGE COMPANY	0	25	0.0%	
100	CBG MORTGAGE INC	0	60	0.0%	
100	HOMEOWNERS MORTGAGE CORP	0	29	0.0%	
100	MORTGAGE LENDERS NETWORK USA	0	27	0.0%	**
100	FIRST CONTINENTAL MORTGAGE LTD	0	48	0.0%	
100	SEBRING CAPITAL PARTNERS, L.P.	0	32	0.0%	**

Lenders denoted with the symbol ** meet the criteria of Subprime Lender, as established by the Department of Housing and Urban Development.

APPENDIX C

HMDA residential lending includes loans originated in the Target Area (TA). The percentages excludes all refinancing loans. Appendix C includes all lenders who made residential loans in the Metro Area, and business lenders who made more than 20 business loans.

	# of Non-Refi To TA	(\$000's) \$ of Non-Refi To TA	% Non-Refi To TA	% Non-Refi To Minorities	Total Non-Refi Loans Originated	(\$000's) Total Non-Refi Loans Originated	Minorities Non-Refi Loans Originated	White Non-Refi Loans Originated	Race NA Non-Refi Loans Originated	Sub-Prime Lender?	Number Business Loans	(\$000's) Business Loans
1ST ADVANTAGE MORTGAGE, LLC	-	\$0	0.0%	0.0%	2	\$ 341	-	2	-	No		
21ST MORTGAGE CORP.	-	\$0	0.0%	0.0%	3	\$ 155	-	1	2	No		
AAMES FUNDING CORPORATION	2	\$107	13.3%	80.0%	15	\$ 1,057	12	-	3	Yes		
A-B CREDIT UNION	3	\$27	7.0%	14.0%	43	\$ 2,114	6	37	-	No		
ABN AMRO MORTGAGE GROUP, INC.	14	\$6,206	3.5%	9.4%	395	\$ 75,754	37	321	37	No		
ACCESS NATIONAL	-	\$0	0.0%	50.0%	2	\$ 219	1	1	-	No		
ACCREDITED HOME LENDERS, INC.	1	\$45	20.0%	20.0%	5	\$ 453	1	3	1	No		
ADVANTA BANK										No	1,683	\$ 15,091
AEGIS LENDING CORPORATION	-	\$0	0.0%	55.0%	20	\$ 859	11	-	9	No		
AEGIS WHOLESALE CORPORATION	1	\$156	100.0%	0.0%	1	\$ 156	-	-	1	No		
ALLCO CREDIT UNION	-	\$0	0.0%	4.0%	25	\$ 3,186	1	24	-	No		
ALLSTATE BANK	-	\$0	0.0%	0.0%	1	\$ 190	-	1	-	No		
AMCORE BANK, N.A.	-	\$0	0.0%	0.0%	8	\$ 5,117	-	6	2	No	40	\$ 3,049
AMERICAN BANK	-	\$0	0.0%	0.0%	4	\$ 633	-	4	-	No		
AMERICAN BUSINESS FINANCIAL	-	\$0	0.0%	50.0%	2	\$ 153	1	-	1	Yes		
AMERICAN EQUITY MORTGAGE	-	\$0	0.0%	0.0%	2	\$ 347	-	2	-	No		
AMERICAN FIDELITY MORTGAGE	-	\$0	0.0%	0.0%	1	\$ 82	-	1	-	No		
AMERICAN HOME MORTGAGE	2	\$288	12.5%	18.8%	16	\$ 2,436	3	13	-	No		
AMERICAN MORTGAGE CORPORATION	-	\$0	0.0%	0.0%	2	\$ 119	-	2	-	No		
AMERICAN MORTGAGE LLC	-	\$0	0.0%	20.0%	10	\$ 1,358	2	8	-	No		
AMERICAN MORTGAGE NETWORK, INC	-	\$0	0.0%	0.0%	2	\$ 446	-	2	-	No		
AMERICAN RESIDENTIAL MORT, LP	-	\$0	0.0%	0.0%	1	\$ 105	-	1	-	No		
AMERICA'S MONEYLINE	-	\$0	0.0%	0.0%	1	\$ 149	-	1	-	No		
AMERIFIRST FINANCIAL CORPORATI	-	\$0	0.0%	0.0%	2	\$ 441	-	2	-	No		
AMERUS HOME LENDING, INC	-	\$0	0.0%	100.0%	2	\$ 280	2	-	-	Yes		
AMPRO MORTGAGE CORPORATION	-	\$0	0.0%	100.0%	1	\$ 175	1	-	-	No		
ANCHORBANK FSB	6	\$459	2.1%	6.4%	283	\$ 48,784	18	251	14	No	118	\$ 23,991
APPLETREE CREDIT UNION	-	\$0	0.0%	11.1%	9	\$ 606	1	8	-	No		
ARGENT MORTGAGE COMPANY	37	\$2,260	22.6%	63.4%	164	\$ 15,568	104	38	22	No		
ASSOCIATED BANK MINNESOTA, N.A	-	\$0	0.0%	0.0%	2	\$ 57	-	2	-	No		
ASSOCIATED BANK, N.A.	47	\$3,420	5.8%	13.8%	813	\$ 56,038	112	638	63	No	799	\$ 154,249
ASSOCIATED MORTGAGE CO, INC	9	\$914	3.2%	10.4%	279	\$ 40,400	29	250	-	No		
AVIZEN LENDING SOLUTIONS	-	\$0	0.0%	42.9%	7	\$ 674	3	3	1	No		
BANCGROUP MORTGAGE CORPORATION	-	\$0	0.0%	0.0%	1	\$ 247	-	-	1	No		
BANK MUTUAL	17	\$1,073	4.7%	18.4%	358	\$ 78,431	66	278	14	No	39	\$ 90,159
BANK OF AMERICA, N.A.	16	\$3,048	4.0%	12.9%	402	\$ 56,258	52	347	3	No	74	\$ 489
BANK OF BLUE VALLEY	-	\$0	0.0%	0.0%	1	\$ 135	-	1	-	No		

APPENDIX C

HMDA residential lending includes loans originated in the Target Area (TA). The percentages excludes all refinancing loans. Appendix C includes all lenders who made residential loans in the Metro Area, and business lenders who made more than 20 business loans

	# of Non-Refi To TA	(\$000's)		% Non-Refi To Minorities	Total Non-Refi Loans Originated	(\$000's)		Minorities Non-Refi Loans Originated	White Non-Refi Loans Originated	Race NA Non-Refi Loans Originated	Sub-Prime Lender?	Number Business Loans	(\$000's) Business Loans
		\$ of Non-Refi To TA	% Non-Refi To TA			Total Non-Refi Loans Originated	Total Non-Refi Loans Originated						
BANK OF DEERFIELD	-	\$0	0.0%	0.0%	2	\$ 116	-	2	-	-	No		
BANK OF KENOSHA	1	\$115	25.0%	0.0%	4	\$ 517	-	4	-	-	No		
BANK ONE, NA ILLINOIS	-	\$0	0.0%	0.0%	8	\$ 3,511	-	7	-	1	No	2,131	\$ 68,038
BANK ONE, NA	18	\$2,017	6.5%	18.9%	275	\$ 30,312	52	219	-	4	No	227	\$ 32,576
BANKERS MORTGAGE COMPANY, LLC	-	\$0	0.0%	0.0%	1	\$ 177	-	1	-	-	No		
BANKFINANCIAL, F.S.B.	-	\$0	0.0%	0.0%	1	\$ 280	-	-	-	1	No	2	\$ 1,071
BAY VIEW FEDERAL S&L ASSN.	2	\$869	15.4%	15.4%	13	\$ 2,729	2	7	-	4	No		
BAYLAKE BANK	-	\$0	0.0%	0.0%	1	\$ 10	-	1	-	-	No	1	\$ 450
BELL AMERICA MORTGAGE LLC	-	\$0	0.0%	0.0%	1	\$ 205	-	1	-	-	No		
BENEFICIAL	12	\$65	12.0%	43.0%	100	\$ 786	43	42	-	15	Yes		
BEST RATE FUNDING CORP.	-	\$0	0.0%	50.0%	2	\$ 495	1	-	-	1	No		
BESTSOURCE CREDIT UNION	-	\$0	0.0%	0.0%	7	\$ 224	-	7	-	-	No		
BNC MORTGAGE	18	\$980	29.0%	46.8%	62	\$ 6,580	29	33	-	-	No		
BUSEY BANK	-	\$0	0.0%	0.0%	1	\$ 409	-	1	-	-	No		
CAMBRIDGE STATE BANK	-	\$0	0.0%	0.0%	1	\$ 240	-	1	-	-	No		
CAPITAL ONE, FSB	-										No	7,198	\$ 28,069
CBG MORTGAGE INC	-	\$0	0.0%	11.7%	60	\$ 8,446	7	52	-	1	No		
CENDANT MORTGAGE	15	\$1,822	4.4%	11.5%	338	\$ 49,631	39	150	-	149	No		
CENTEX HOME EQUITY COMPANY, LL	-	\$0	0.0%	20.0%	10	\$ 1,257	2	2	-	6	Yes		
CHAPEL MORTGAGE	-	\$0	0.0%	33.3%	3	\$ 267	1	2	-	-	No		
CHARTER ONE BANK	-	\$0	0.0%	0.0%	5	\$ 21,421	-	-	-	5	No		
CHARTER ONE MORTGAGE CORP	-	\$0	0.0%	0.0%	2	\$ 205	-	2	-	-	No		
CHASE MANHATTAN BANK USA, NA	-	\$0	0.0%	12.5%	8	\$ 205	1	6	-	1	Yes	481	\$ 11,348
CHASE MANHATTAN MORTGAGE CORP	21	\$1,160	9.1%	13.9%	230	\$ 30,044	32	187	-	11	No		
CHERRY CREEK MORTGAGE CO., INC	-	\$0	0.0%	0.0%	1	\$ 137	-	1	-	-	No		
CHICAGO BANCORP, INC.	1	\$252	14.3%	28.6%	7	\$ 878	2	5	-	-	No		
CITIBANK, FSB	-	\$0	0.0%	8.3%	12	\$ 2,181	1	8	-	3	No		
CITYBANK USA, NA	-										No	3,939	\$ 19,837
CITIFINANCIAL MORTGAGE COMPANY	-	\$0	0.0%	0.0%	3	\$ 372	-	3	-	-	Yes		
CITIMORTGAGE, INC	2	\$544	3.1%	18.8%	64	\$ 12,028	12	44	-	8	No		
CITIZENS BANK	-	\$0	0.0%	0.0%	1	\$ 254	-	1	-	-	No		
CITIZENS BANK OF MUKWONGO	-	\$0	0.0%	3.4%	147	\$ 21,123	5	140	-	2	No	403	\$ 47,415
CITIZENS STATE BANK	1	\$260	33.3%	0.0%	3	\$ 602	-	2	-	1	No		
CITY 1ST MORTGAGE SERVICES, LC	2	\$133	16.7%	0.0%	12	\$ 1,439	-	10	-	2	No		
COLLATERAL MORTGAGE CAPITAL	-	\$0	0.0%	0.0%	6	\$ 19,318	-	-	-	6	No		
COLONIAL SAVINGS, F.A.	-	\$0	0.0%	0.0%	1	\$ 232	-	1	-	-	No		
COLORADO FEDERAL SAVINGS BANK	-	\$0	0.0%	0.0%	2	\$ 136	-	2	-	-	No		
COLUMBIA NATIONAL, INC.	-	\$0	0.0%	25.0%	4	\$ 535	1	3	-	-	No		
COMMERCIAL FEDERAL BANK	-	\$0	0.0%	0.0%	1	\$ 102	-	1	-	-	No		
COMMUNITY BANK & TRUST	1	\$320	9.1%	18.2%	11	\$ 2,575	2	5	-	4	No	40	\$ 8,855

APPENDIX C

HMDA residential lending includes loans originated in the Target Area (TA). The percentages excludes all refinancing loans. Appendix C includes all lenders who made residential loans in the Metro Area, and business lenders who made more than 20 business loans

	# of Non-Refi To TA	(\$000's)		% Non-Refi To Minorities	Total Non-Refi Loans Originated	Total Non-Refi Loans Originated	Minorities Non-Refi Loans Originated	White Non-Refi Loans Originated	Race NA Non-Refi Loans Originated	Sub-Prime Lender?	Number Business Loans	(\$000's) Business Loans
		\$ of Non-Refi To TA	% Non-Refi To TA									
COMMUNITY BANK OF GRAFTON	-	\$0	0.0%	3.1%	32	\$ 4,727	1	31	-	No		
COMMUNITY FIRST CREDIT UNION	-	\$0	0.0%	0.0%	2	\$ 271	-	2	-	No		
COMMUNITY STATE BANK	-	\$0	0.0%	0.0%	1	\$ 133	-	1	-	No	1	\$ 150
CONCORDE ACCEPTANCE CORPORATIO	4	\$286	20.0%	55.0%	20	\$ 2,034	11	8	1	No		
CONSECO BANK, INC.	-	\$0	0.0%	50.0%	2	\$ 19	1	-	1	No		
CONTINENTAL SAVINGS BANK, FSB	8	\$721	7.3%	11.0%	109	\$ 18,196	12	95	2	No		
COUNTRYWIDE HOME LOANS	71	\$5,869	6.0%	22.2%	1,190	\$ 166,177	264	890	36	No		
CRESCENT MORTGAGE SVC, INC	-	\$0	0.0%	0.0%	12	\$ 1,832	-	12	-	No		
CSMC INC., DBA CENTRAL STATES	-	\$0	0.0%	0.0%	5	\$ 809	-	4	1	No		
CTX MORTGAGE COMPANY, LLC	24	\$1,356	6.9%	63.8%	348	\$ 34,975	222	116	10	No		
CUNA CREDIT UNION	-	\$0	0.0%	0.0%	1	\$ 128	-	1	-	No		
DANE COUNTY CREDIT UNION	-	\$0	0.0%	0.0%	1	\$ 130	-	1	-	No		
DECISION ONE MORTGAGE	4	\$331	5.9%	39.7%	68	\$ 7,735	27	41	-	No		
DEVON BANK	-	\$0	0.0%	100.0%	1	\$ 70	1	-	-	No		
DISCOVER BANK	-	\$0	0.0%	0.0%	1	\$ 10	-	-	1	No		
DOLLAR BANK, FSB	-	\$0	0.0%	5.9%	17	\$ 7,636	1	16	-	No		
DOMESTIC BANK	3	\$252	6.8%	47.7%	44	\$ 4,772	21	17	6	No		
DRAPER AND KRAMER MORTGAGE COR	-	\$0	0.0%	100.0%	1	\$ 145	1	-	-	No		
E*TRADE BANK	-	\$0	0.0%	0.0%	10	\$ 2,040	-	5	5	No		
EASTWOOD BANK	1	\$128	100.0%	0.0%	1	\$ 128	-	1	-	No		
EDUCATORS CREDIT UNION	2	\$176	4.5%	13.6%	44	\$ 4,436	6	37	1	No		
E-LOAN, INC.	-	\$0	0.0%	41.7%	12	\$ 2,612	5	4	3	No		
EMIGRANT MORTGAGE COMPANY	-	\$0	0.0%	0.0%	2	\$ 230	-	2	-	No		
EMSBLA CREDIT UNION	2	\$342	9.1%	13.6%	22	\$ 4,185	3	17	2	No		
ENCORE CREDIT CORP.	2	\$116	28.6%	71.4%	7	\$ 605	5	2	-	No		
ENTERPRISE CREDIT UNION	1	\$35	1.6%	6.3%	63	\$ 2,065	4	48	11	No		
ENTRUST MORTGAGE	-	\$0	0.0%	0.0%	2	\$ 130	-	2	-	No		
EQUIFIRST CORPORATION	1	\$46	6.3%	25.0%	16	\$ 1,806	4	11	1	Yes		
EQUITY ONE, INC.	-	\$0	0.0%	16.7%	6	\$ 931	1	5	-	Yes		
EQUITY PLUS, INC	2	\$252	22.2%	44.4%	9	\$ 935	4	1	4	No		
F&M BANK - WISCONSIN	2	\$245	1.8%	2.6%	114	\$ 13,747	3	111	-	No		
FED MED BANK, FSB	-	\$0	0.0%	0.0%	2	\$ 406	-	2	-	No		
FIELDSTONE MORTGAGE COMPANY	-	\$0	0.0%	44.4%	9	\$ 1,110	4	2	3	No		
FIFTH THIRD BANK (MICHIGAN)	-	\$0	0.0%	0.0%	1	\$ 100	-	1	-	No	4	\$ 1,390
FIFTH THIRD MORTGAGE COMPANY	-	\$0	0.0%	0.0%	1	\$ 157	-	1	-	No		
FINANCE AMERICA, LLC	14	\$679	21.5%	63.1%	65	\$ 5,083	41	14	10	No		
FIRST ALLIANCE BANK, FSB	-	\$0	0.0%	100.0%	1	\$ 74	1	-	-	No		
FIRST AMERICAN CREDIT UNION	-	\$0	0.0%	0.0%	2	\$ 195	-	2	-	No		
FIRST BANK	-	\$0	0.0%	0.0%	1	\$ 100	-	1	-	No		
FIRST BANK FINANCIAL CENTRE	-	\$0	0.0%	1.2%	86	\$ 15,493	1	85	-	No	363	\$ 59,892

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	# of Non-Refi To TA	(\$000's)		% Non-Refi To Minorities	% Non-Refi To Minorities	(\$000's)		Minorities Non-Refi Loans Originated	White Non-Refi Loans Originated	Race NA Non-Refi Loans Originated	Sub-Prime Lender?	Number Business Loans	(\$000's) Business Loans
		\$ of Non-Refi To TA	% Non-Refi To TA			Total Non-Refi Loans Originated	Total Non-Refi Loans Originated						
FIRST BANKING CENTER	1	\$60	16.7%	0.0%	6	\$ 805	-	6	-	-	No	42	\$ 9,146
FIRST BUSINESS BANK-MILWAUKEE	1	\$149	14.3%	0.0%	7	\$ 897	-	2	5	-	No		
FIRST CAPITAL FINANCIAL	-	\$0	0.0%	0.0%	7	\$ 926	-	6	1	-	No		
FIRST CONTINENTAL MORTGAGE LTD	-	\$0	0.0%	6.3%	48	\$ 8,101	3	40	5	-	No		
FIRST FEDERAL CAPITAL BANK	5	\$1,901	11.9%	4.8%	42	\$ 9,506	2	31	9	-	No	15	\$ 6,725
FIRST FEDERAL SAVINGS BK OF WI	-	\$0	0.0%	0.0%	44	\$ 9,479	-	44	-	-	No		
FIRST FRANKLIN FINANCIAL CORP.	22	\$1,389	7.0%	30.7%	316	\$ 29,619	97	178	41	-	Yes		
FIRST HORIZON HOME LOAN CORP	-	\$0	0.0%	16.7%	12	\$ 1,419	2	9	1	-	No		
FIRST MAGNUS FINANCIAL CORP	-	\$0	0.0%	9.5%	21	\$ 3,169	2	16	3	-	No		
FIRST MUTUAL BANK	1	\$11	16.7%	33.3%	6	\$ 56	2	4	-	-	No		
FIRST NATIONAL BANK	-	\$0	0.0%	0.0%	2	\$ 763	-	1	1	-	No	20	\$ 4,290
FIRST NATIONAL BANK & TRUST CO	-	\$0	0.0%	0.0%	1	\$ 341	-	1	-	-	No	1	\$ 300
FIRST NATIONAL BANK OF ARIZONA	4	\$304	23.5%	76.5%	17	\$ 1,638	13	4	-	-	No		
FIRST NATIONAL BANK-HARTFORD	-	\$0	0.0%	0.0%	27	\$ 3,888	-	24	3	-	No		
FIRST NATIONAL BANK-MANITOWOC	-	\$0	0.0%	0.0%	2	\$ 346	-	2	-	-	No		
FIRST NATIONAL BANK-OMAHA	-										No	75	\$ 414
FIRST NLC FINANCIAL SERVICES	2	\$123	8.7%	39.1%	23	\$ 1,556	9	10	4	-	No		
FIRST RESIDENTIAL MORTGAGE	-	\$0	0.0%	50.0%	2	\$ 720	1	1	-	-	No		
FIRST STATE MORTGAGE CORPORATI	3	\$101	23.1%	38.5%	13	\$ 1,018	5	5	3	-	No		
FIRST TENNESSEE BANK-	-	\$0	0.0%	0.0%	1	\$ 26	-	-	1	-	No	1	\$ 13
FLAGSTAR BANK	9	\$937	3.8%	10.1%	237	\$ 36,114	24	207	6	-	No		
FLEET NATIONAL BANK	-	\$0	0.0%	20.0%	5	\$ 389	1	2	2	-	No	356	\$ 2,507
FLORIDA BANK, N.A.	1	\$247	100.0%	0.0%	1	\$ 247	-	1	-	-	No		
FM BANK WISCONSIN	-										No	65	\$ 16,068
FOX VALLEY SAVINGS BANK	-	\$0	0.0%	0.0%	1	\$ 122	-	1	-	-	No		
FRANKLIN AMERICAN MORTGAGE CO	5	\$557	6.1%	13.4%	82	\$ 12,205	11	65	6	-	No		
FRANKLIN FINANCIAL	-	\$0	0.0%	33.3%	3	\$ 290	1	2	-	-	No		
FRANKLIN FINANCIAL GROUP	15	\$1,259	10.1%	31.8%	148	\$ 15,123	47	87	14	-	No		
FRANKLIN STATE BANK	1	\$548	6.7%	26.7%	15	\$ 1,865	4	11	-	-	No		
FREEDOM MORTGAGE CORPORATION	-	\$0	0.0%	0.0%	2	\$ 164	-	1	1	-	No		
FREMONT INVESTMENT & LOAN	2	\$117	1.9%	31.8%	107	\$ 12,100	34	59	14	-	Yes		
FULL SPECTRUM LENDING	1	\$30	10.0%	10.0%	10	\$ 1,018	1	6	3	-	Yes		
GATEWAY MORTGAGE CORPORATION	-	\$0	0.0%	0.0%	7	\$ 1,159	-	7	-	-	No		
GB HOME EQUITY, LLC	11	\$252	3.2%	8.7%	343	\$ 8,859	30	260	53	-	No		
GE CAPITAL FINANCIAL INC	-										No	1,920	\$ 7,919
GLACIER HILLS CREDIT UNION	-	\$0	0.0%	0.0%	60	\$ 3,264	-	60	-	-	No		
GMAC MORTGAGE CORPORATION	3	\$250	2.5%	8.3%	120	\$ 17,551	10	78	32	-	No		
GN MORTGAGE, LLC	-	\$0	0.0%	15.4%	13	\$ 1,801	2	11	-	-	No		
GRAFTON STATE BANK	-	\$0	0.0%	0.0%	27	\$ 4,435	-	22	5	-	No		

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		\$ of Non-Refi <u>To TA</u>	% Non-Refi <u>To TA</u>			Total Non-Refi <u>Loans</u> <u>Originated</u>	Total Non-Refi <u>Loans</u> <u>Originated</u>						
GREAT MIDWEST BANK, S.S.B.	10	\$722	3.1%	10.2%	322	\$ 45,200	33	280	9	No			
GREENLEAF WAYSIDE BANK	-	\$0	0.0%	0.0%	1	\$ 108	-	1	-	No			
GREENPOINT MORTGAGE FUNDING, I	-	\$0	0.0%	14.3%	7	\$ 1,142	1	6	-	Yes			
GUARANTY RESIDENTIAL LENDING	-	\$0	0.0%	0.0%	5	\$ 763	-	2	3	No			
GUARDIAN CREDIT UNION	8	\$237	2.2%	7.0%	372	\$ 18,123	26	345	1	No			
H&R BLOCK ,ORTGAGE CORPORATION	-	\$0	0.0%	50.0%	4	\$ 450	2	1	1	No			
HARRIS BANK WOODSTOCK	-	\$0	0.0%	0.0%	1	\$ 18	-	1	-	No			
HARRIS TRUST AND SAVINGS BANK	-	\$0	0.0%	0.0%	6	\$ 1,314	-	5	1	No			
HARTFORD SAVINGS BANK	-	\$0	0.0%	1.2%	82	\$ 10,001	1	69	12	No			
HARTLAND MORTGAGE CENTERS INC.	-	\$0	0.0%	0.0%	2	\$ 382	-	2	-	No			
HCL FINANCE, INC	-	\$0	0.0%	0.0%	1	\$ 73	-	-	1	No			
HEARTLAND CREDIT UNION	-	\$0	0.0%	0.0%	3	\$ 324	-	3	-	No			
HEARTLAND ENTERPRISES, INC.	-	\$0	0.0%	0.0%	1	\$ 65	-	-	1	No			
HERITAGE CREDIT UNION	-	\$0	0.0%	0.0%	1	\$ 171	-	1	-	No			
HIBERNIA NATIONAL BANK	-	\$0	0.0%	0.0%	1	\$ 35	-	-	1	No			
HOME FEDERAL SAVINGS BANK	-	\$0	0.0%	0.0%	1	\$ 134	-	1	-	No			
HOME LOAN CENTER INC.	-	\$0	0.0%	0.0%	2	\$ 256	-	-	2	No			
HOME LOAN EXPRESS, LLC	-	\$0	0.0%	40.0%	5	\$ 1,103	2	3	-	No			
HOME STATE BANK, N.A.	1	\$323	50.0%	0.0%	2	\$ 507	-	2	-	No			
HOMEBOUND MORTGAGE	-	\$0	0.0%	50.0%	6	\$ 880	3	3	-	No			
HOMEcomings FINANCIAL NETWORK	-	\$0	0.0%	11.1%	9	\$ 1,167	1	3	5	No			
HOMELAND MORTGAGE INC.	-	\$0	0.0%	30.8%	13	\$ 1,507	4	9	-	No			
HOMEOWNERS MORTGAGE CORP	-	\$0	0.0%	17.2%	29	\$ 7,415	5	24	-	No			
HOMETOWN BANK	-	\$0	0.0%	0.0%	2	\$ 109	-	2	-	No			
HOMETOWN MORTGAGE AND FINANCE	-	\$0	0.0%	0.0%	12	\$ 420	-	11	1	No			
HORICON STATE BANK	2	\$171	5.1%	2.6%	39	\$ 5,243	1	38	-	No	50	\$ 5,761	
HOUSEHOLD FINANCE CORPORATION	-	\$0	0.0%	16.7%	6	\$ 303	1	4	1	Yes			
HSBC MORTGAGE CORPORATION	-	\$0	0.0%	25.0%	8	\$ 2,272	2	5	1	No			
INDYMAC BANK, F.S.B.	1	\$41	3.2%	25.8%	31	\$ 4,495	8	21	2	No			
ING BANK, FSB	1	\$166	16.7%	16.7%	6	\$ 1,298	1	2	3	No			
INVESTORSBANK	-	\$0	0.0%	0.0%	25	\$ 6,585	-	25	-	No			
IRWIN MORTGAGE CORP	-	\$0	0.0%	6.8%	88	\$ 15,131	6	81	1	No			
ISB COMMUNITY BANK	-	\$0	0.0%	0.0%	5	\$ 892	-	5	-	No			
IVANHOE FINANCIAL, INC.	-	\$0	0.0%	50.0%	2	\$ 323	1	1	-	No			
JAMES B NUTTER AND COMPANY	-	\$0	0.0%	50.0%	2	\$ 267	1	1	-	No			
JLM DIRECT FUNDING, LTD.	-	\$0	0.0%	0.0%	2	\$ 479	-	2	-	No			
JOHNSON BANK	5	\$860	2.6%	6.2%	195	\$ 45,226	12	180	3	No	298	\$ 91,106	
JOURNAL CREDIT UNION	1	\$11	8.3%	25.0%	12	\$ 893	3	9	-	No			

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		\$ of Non-Refi To TA	% Non-Refi To TA			Total Non-Refi Loans Originated	Total Non-Refi Loans Originated						
JPMORGAN CHASE BANK	-	\$0	0.0%	0.0%	9	\$ 29,690	-	-	9	No		1	\$ 25
KEYBANK USA, N.A.	3	\$46	2.2%	21.7%	138	\$ 1,255	30	108	-	Yes			
KIMCENTRAL CREDIT UNION	-	\$0	0.0%	0.0%	1	\$ 82	-	1	-	No			
KRAFT FOODS FEDERAL CU	-	\$0	0.0%	0.0%	1	\$ 40	-	1	-	No			
LANDMARK CREDIT UNION	28	\$969	1.2%	4.6%	2,244	\$ 135,300	103	2,017	124	No			
LASALLE BANK NA	-	\$0	0.0%	75.0%	4	\$ 512	3	-	1	No	13	\$ 4,475	
LAYTON STATE BANK	2	\$703	9.1%	31.8%	22	\$ 3,004	7	10	5	No			
LEGACY BANK	43	\$2,991	38.7%	50.5%	111	\$ 8,602	56	15	40	No			
LEHMAN BROTHERS BANK	-	\$0	0.0%	25.0%	8	\$ 1,039	2	6	-	No			
LENDSOURCE, INC.	1	\$78	16.7%	50.0%	6	\$ 751	3	3	-	Yes			
LINCOLN STATE BANK	9	\$1,833	14.3%	19.0%	63	\$ 12,823	12	35	16	No			
LOAN LINK FINANCIAL SERVICES	-	\$0	0.0%	0.0%	2	\$ 783	-	2	-	No			
LONG BEACH MORTGAGE CO.	3	\$96	6.3%	35.4%	48	\$ 4,151	17	28	3	Yes			
M&I BANK FSB	-	\$0	0.0%	0.0%	8	\$ 625	-	7	1	No			
M&I MARSHALL & ILSLEY BANK	56	\$20,235	5.6%	17.2%	1,008	\$ 285,533	173	729	106	No	3,802	\$ 736,197	
M&I MORTGAGE CORP	13	\$1,767	2.7%	8.6%	490	\$ 82,136	42	428	20	No			
MAJESTIC MORTGAGE CORPORATION	-	\$0	0.0%	10.0%	10	\$ 2,127	1	9	-	No			
MARINE BANK	4	\$248	57.1%	14.3%	7	\$ 621	1	2	4	No	162	\$ 39,976	
MARITIME SAVINGS BANK	14	\$4,712	7.6%	8.6%	185	\$ 25,665	16	160	9	No	4	\$ 405	
MARKET STREET MORTGAGE CORP	-	\$0	0.0%	0.0%	4	\$ 657	-	4	-	No			
MASTER FINANCIAL, INC.	1	\$25	25.0%	100.0%	4	\$ 210	4	-	-	No			
MATRIX FINANCIAL SERVICES CORP	-	\$0	0.0%	33.3%	6	\$ 655	2	4	-	No			
MBNA AMERICA (DELAWARE), N.A.	-	\$0	0.0%	100.0%	1	\$ 90	1	-	-	Yes	2,864	\$ 16,452	
MERRILL LYNCH CREDIT CORP.	1	\$430	3.2%	0.0%	31	\$ 9,859	-	22	9	No			
MESA NATIONAL BANK	-	\$0	0.0%	0.0%	1	\$ 180	-	1	-	No			
MIDAMERICA BANK	43	\$6,634	3.3%	19.4%	1,315	\$ 205,504	255	1,058	2	No	421	\$ 56,106	
MIDDLETON COMMUNITY BANK	-	\$0	0.0%	0.0%	2	\$ 112	-	2	-	No			
MIDFIRST BANK	-	\$0	0.0%	0.0%	5	\$ 194	-	3	2	No			
MID-WISCONSIN BANK	-	\$0	0.0%	0.0%	1	\$ 28	-	1	-	No			
MILA, INC.	1	\$30	2.4%	47.6%	42	\$ 3,435	20	19	3	No			
MILWAUKEE METROPOLITAN C U	6	\$54	11.3%	26.4%	53	\$ 3,061	14	35	4	No			
MITCHELL BANK	10	\$362	25.6%	46.2%	39	\$ 2,941	18	13	8	No			
MLSG, INC.	-	\$0	0.0%	33.3%	6	\$ 420	2	2	2	No			
MLWAUKEE WESTERN BANK	3	\$172	7.0%	14.0%	43	\$ 5,301	6	34	3	No			
MOLTON, ALLEN & WILLIAMS MTG	-	\$0	0.0%	100.0%	1	\$ 131	1	-	-	No			
MORTGAGE CENTER LC	-	\$0	0.0%	0.0%	1	\$ 258	-	1	-	No			
MORTGAGE LENDERS NETWORK USA	-	\$0	0.0%	40.7%	27	\$ 3,500	11	16	-	Yes			
MORTGAGE ONE	-	\$0	0.0%	0.0%	1	\$ 160	-	1	-	No			
MORTGAGE SERVICES, INC.	4	\$502	6.5%	21.0%	62	\$ 10,364	13	48	1	No			

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		\$ of Non-Refi <u>To TA</u>	% Non-Refi <u>To TA</u>			Total Non-Refi Loans <u>Originated</u>	Total Non-Refi Loans <u>Originated</u>						
MORTGAGEIT INC	1	\$67	1.2%	8.6%	81	\$ 11,362	7	69	5	No			
MSDW CREDIT CORPORATION	-	\$0	0.0%	0.0%	4	\$ 591	-	1	3	No			
NATIONAL BANK OF COMMERCE	-	\$0	0.0%	0.0%	1	\$ 156	-	1	-	No	1	\$ 50	
NATIONAL BANK OF KANSAS CITY	-	\$0	0.0%	0.0%	4	\$ 437	-	1	3	No			
NATIONAL CITY BANK	-	\$0	0.0%	5.6%	18	\$ 557	1	14	3	No	7	\$ 114	
NATIONAL CITY BANK, MICHIGAN/I	-	\$0	0.0%	0.0%	1	\$ 216	-	1	-	No			
NATIONAL CITY MORTGAGE CORPORA	10	\$940	3.4%	18.6%	296	\$ 43,109	55	220	21	No			
NATIONAL CITY MORTGAGE SERVICE	-	\$0	0.0%	0.0%	1	\$ 215	-	1	-	No			
NATIONAL EXCHANGE BANK	1	\$520	2.1%	2.1%	47	\$ 5,173	1	45	1	No	140	\$ 14,934	
NATIONWIDE ADVANTAGE MORTGAGE	-	\$0	0.0%	100.0%	1	\$ 109	1	-	-	No			
NAVY FEDERAL CREDIT UNION	1	\$13	7.7%	30.8%	13	\$ 1,104	4	7	2	No			
NEW CENTURY MORTGAGE CORP.	7	\$771	7.4%	51.6%	95	\$ 9,601	49	38	8	No			
NEW STATE MORTGAGE COMPANY	-	\$0	0.0%	0.0%	2	\$ 333	-	2	-	No			
NEXSTAR FINANCIAL CORPORATION	-	\$0	0.0%	16.7%	6	\$ 684	1	5	-	No			
NICOLET NATIONAL BANK	1	\$234	33.3%	0.0%	3	\$ 684	-	3	-	No			
NORTH MILWAUKEE STATE BANK	7	\$516	30.4%	78.3%	23	\$ 2,180	18	2	3	No			
NORTH SHORE BANK, FSB	5	\$940	1.2%	11.3%	426	\$ 115,356	48	362	16	No	61	\$ 10,782	
NORTHERN TRUST BANK, FSB	1	\$361	4.2%	8.3%	24	\$ 7,391	2	22	-	No	1	\$ 50	
NOVASTAR HOME MORTGAGE	-	\$0	0.0%	0.0%	2	\$ 442	-	-	2	No			
NOVASTAR MORTGAGE INC	3	\$489	30.0%	60.0%	10	\$ 1,643	6	4	-	No			
OAK STREET MORTGAGE	2	\$119	8.3%	45.8%	24	\$ 2,862	11	9	4	No			
OHIO SAVINGS BANK	7	\$1,069	2.2%	11.5%	312	\$ 50,789	36	264	12	No			
OLD SECOND MORTGAGE	-	\$0	0.0%	0.0%	1	\$ 147	-	1	-	No			
OOSTBURG STATE BANK	-	\$0	0.0%	0.0%	1	\$ 166	-	1	-	No			
OPTIMUM MORTGAGE SERVICES, INC	-	\$0	0.0%	5.0%	20	\$ 3,247	1	19	-	No			
OPTION ONE MORTGAGE CORP.	10	\$434	6.0%	47.9%	167	\$ 14,811	80	74	13	No			
OREGON COMMUNITY BANK & TRUST	-	\$0	0.0%	0.0%	1	\$ 94	-	1	-	No			
OXFORD BANK & TRUST	-	\$0	0.0%	0.0%	1	\$ 21	-	1	-	No			
OZAUKEE BANK	12	\$2,738	2.4%	1.8%	495	\$ 87,247	9	460	26	No	292	\$ 32,567	
PARAGON HOME LENDING, LLC	84	\$5,899	4.9%	22.9%	1,707	\$ 205,620	391	926	390	No			
PARAMOUNT BANK	-	\$0	0.0%	0.0%	1	\$ 444	-	1	-	No			
PARISH NATIONAL BANK	6	\$511	1.3%	5.9%	454	\$ 72,387	27	388	39	No			
PARK BANK	1	\$195	5.6%	16.7%	18	\$ 8,360	3	12	3	No	435	\$ 93,931	
PEOPLE'S CHOICE HOME LOAN, INC	3	\$205	42.9%	71.4%	7	\$ 487	5	-	2	No			
PEOPLES STATE BANK	-	\$0	0.0%	15.0%	20	\$ 2,701	3	10	7	No			
PGNF HONE LENDING CORP	-	\$0	0.0%	75.0%	4	\$ 429	3	1	-	Yes			
PLATINUM HOME MORTGAGE CORP	4	\$168	21.1%	36.8%	19	\$ 2,849	7	11	1	No			
PORT WASHINGTON STATE BANK	2	\$176	1.4%	7.6%	145	\$ 19,400	11	112	22	No			
PRIMARY RESIDENTIAL MORTGAGE,	-	\$0	0.0%	25.0%	4	\$ 402	1	3	-	No			

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	# of Non-Refi <u>To TA</u>	(\$000's)		% Non-Refi To <u>Minorities</u>	% Non-Refi To <u>Minorities</u>	(\$000's)		Minorities Non-Refi Loans <u>Originated</u>	White Non-Refi Loans <u>Originated</u>	Race NA Non-Refi Loans <u>Originated</u>	Sub-Prime Lender?	Number Business Loans	(\$000's) Business Loans
		\$ of Non-Refi <u>To TA</u>	% Non-Refi <u>To TA</u>			Total Non-Refi Loans <u>Originated</u>	Total Non-Refi Loans <u>Originated</u>						
PRINCIPAL BANK	-	\$0	0.0%	40.0%	10	\$ 182		4	4	2	No		
PRINCIPAL RESIDENTIAL MTG, INC	8	\$1,244	3.0%	11.4%	264	\$ 42,126		30	212	22	No		
PROSPERA CREDIT UNION	-	\$0	0.0%	0.0%	1	\$ 139		-	1	-	No		
PROVIDENT BANK	5	\$283	17.2%	31.0%	29	\$ 9,432		9	10	10	Yes		
PROVIDENT FUNDING ASSOCIATES,	-	\$0	0.0%	0.0%	8	\$ 955		-	8	-	No		
PYRAMAX BANK	13	\$1,641	2.3%	7.4%	566	\$ 77,135		42	519	5	No	81	\$ 17,290
QUICKEN LOANS, INC.	-	\$0	0.0%	0.0%	19	\$ 2,466		-	7	12	No		
RATEONE HOME LOANS	-	\$0	0.0%	0.0%	2	\$ 490		-	-	2	No		
RAYMOND JAMES BANK, FSB	-	\$0	0.0%	0.0%	1	\$ 110		-	-	1	No		
RBC MORTGAGE COMPANY	-	\$0	0.0%	12.0%	25	\$ 4,510		3	20	2	No		
RBMG, INC.	1	\$132	2.8%	11.1%	36	\$ 5,633		4	32	-	No		
REGIONS BANK	2	\$105	8.0%	52.0%	25	\$ 3,239		13	10	2	No		
RESIDENTIAL LOAN CENTERS	-	\$0	0.0%	0.0%	2	\$ 352		-	2	-	No		
RESOURCE BANK	-	\$0	0.0%	0.0%	2	\$ 170		-	-	2	No		
R-G CROWN BANK	1	\$3	100.0%	0.0%	1	\$ 3		-	1	-	No		
RIDGESTONE BANK	1	\$112	20.0%	0.0%	5	\$ 1,820		-	4	1	No		
RIVER CITY MORTGAGE CORP.	-	\$0	0.0%	14.3%	7	\$ 1,389		1	6	-	No		
RIVER VALLEY STATE BANK	-	\$0	0.0%	0.0%	1	\$ 82		-	1	-	No	5	\$ 1,003
S&C BANK	-	\$0	0.0%	0.0%	2	\$ 139		-	2	-	No		
SAXON MORTGAGE	1	\$34	16.7%	50.0%	6	\$ 530		3	3	-	No		
SEBRING CAPITAL PARTNERS, L.P.	-	\$0	0.0%	40.6%	32	\$ 2,051		13	16	3	No		
SECURED FUNDING CORPORATION	-	\$0	0.0%	0.0%	1	\$ 110		-	-	1	Yes		
SHELTER MORTGAGE COMPANY, LLC	15	\$1,980	3.8%	23.8%	399	\$ 56,587		95	304	-	No		
SIB MORTGAGE CORP.	9	\$1,354	2.5%	9.9%	355	\$ 56,256		35	315	5	No		
SIERRA PACIFIC MORTGAGE	-	\$0	0.0%	0.0%	2	\$ 287		-	2	-	No		
SIRVA MORTGAGE, INC.	1	\$164	3.3%	10.0%	30	\$ 7,068		3	26	1	No		
SOUTH CENTRAL BANK	1	\$14	1.4%	4.2%	72	\$ 763		3	56	13	No		
SOUTHPORT BANK	-	\$0	0.0%	0.0%	1	\$ 10,000		-	-	1	No		
SOUTHSTAR FUNDING, LLC.	-	\$0	0.0%	25.0%	12	\$ 1,491		3	6	3	Yes		
ST. FRANCIS MORTGAGE CORP.	-	\$0	0.0%	0.0%	3	\$ 603		-	3	-	No		
STATE BANK OF CROSS PLAINS	-	\$0	0.0%	0.0%	3	\$ 458		-	3	-	No	1	\$ 50
STATE BANK OF NEWBURG	-	\$0	0.0%	0.0%	21	\$ 2,717		-	21	-	No		
STATE CENTRAL CREDIT UNION	3	\$47	3.3%	9.8%	92	\$ 9,708		9	83	-	No		
STATE FARM BANK, FSB	1	\$229	6.3%	12.5%	16	\$ 3,831		2	14	-	No		
STATE FINANCIAL BANK, NA	34	\$3,048	34.3%	26.3%	99	\$ 18,423		26	42	31	No	602	\$ 95,855
STILLMAN BANCCORP, N.A.	-	\$0	0.0%	0.0%	1	\$ 200		-	1	-	No		
SUMMIT CREDIT UNION	1	\$41	25.0%	0.0%	4	\$ 222		-	4	-	No		
SUMMIT MORTGAGE CORPORATION	3	\$194	3.2%	7.5%	93	\$ 12,659		7	86	-	No		
SUN SECURITY BANK OF AMERICA	-	\$0	0.0%	100.0%	2	\$ 322		2	-	-	No		

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		\$ of Non-Refi <u>To TA</u>	% Non-Refi <u>To TA</u>		Total Non-Refi Loans <u>Originated</u>	Total Non-Refi Loans <u>Originated</u>						
SUNSET BANK & SAVINGS	2	\$240	1.5%	12.2%	131	\$ 20,098	16	113	2	No		
SUNTRUST MORTGAGE, INC	1	\$208	1.2%	2.3%	86	\$ 15,003	2	79	5	No		
TAYLOR, BEAN, & WHITAKER	1	\$262	33.3%	0.0%	3	\$ 542	-	3	-	No		
TCF MORTGAGE CORPORATION	9	\$551	13.4%	43.3%	67	\$ 8,355	29	38	-	No		
TCF NATIONAL BANK	24	\$2,591	7.8%	10.5%	306	\$ 11,633	32	261	13	No		
THE BANK OF KAUKAUNA	-	\$0	0.0%	0.0%	1	\$ 25	-	1	-	No	89	\$ 29,740
THE BANK OF NEW GLARUS	-	\$0	0.0%	0.0%	1	\$ 94	-	1	-	No		
THE EQUITABLE BANK, S.S.B.	22	\$1,780	2.6%	12.5%	848	\$ 139,202	106	742	-	No		
THE HUNTINGTON NATIONAL BANK	-	\$0	0.0%	6.6%	196	\$ 41,694	13	170	13	No	1	\$ 15
THE NORTHERN TRUST COMPANY	1	\$225	16.7%	0.0%	6	\$ 2,173	-	6	-	No		
THE PARK BANK	-	\$0	0.0%	0.0%	1	\$ 25	-	1	-	No		
THE PITNEY BOWES BANK	-	\$0	0.0%	0.0%	1	\$ 13	-	1	-	No	805	\$ 7,671
THE PEOPLES STATE BANK	-	\$0	0.0%	0.0%	1	\$ 205	-	1	-	No		
THE RIVERBANK	-	\$0	0.0%	0.0%	5	\$ 556	1	3	1	No		
THINK FEDERAL CREDIT UNION	-	\$0	0.0%	20.0%	2	\$ 372	-	2	-	No		
THORNBURG MORTGAGE HOME LOANS	-	\$0	0.0%	0.0%	6	\$ 412	1	3	2	No		
THRIVENT FINANCIAL BANK	-	\$0	0.0%	16.7%	28	\$ 7,067	-	16	12	No		
TOWN BANK	2	\$931	7.1%	0.0%	3	\$ 380	-	3	-	No		
TRANE FEDERAL CREDIT UNION	-	\$0	0.0%	0.0%	10	\$ 2,102	-	10	-	No		
TREASURY BANK NATIONAL ASSOC.	-	\$0	0.0%	0.0%	325	\$ 36,867	46	243	36	No	628	\$ 71,859
TRI CITY NATIONAL BANK	12	\$342	3.7%	14.2%	1	\$ 297	-	1	-	No		
UNION BANK & TRUST COMPANY	-	\$0	0.0%	0.0%	3	\$ 361	-	3	-	No		
UNION FEDERAL BANK OF INDIANAP	-	\$0	0.0%	0.0%	13	\$ 1,844	-	12	1	No	1	\$ 31
UNION PLANTERS BANK, N.A.	-	\$0	0.0%	0.0%	649	\$ 91,039	72	447	130	No		
UNIVERSAL HOME LENDING	29	\$2,695	4.5%	11.1%	25	\$ 3,302	6	16	3	No		
UNIVERSAL MORTGAGE CORPORATION	5	\$557	20.0%	24.0%	73	\$ 7,600	15	49	9	No		
UNIVERSITY OF WISCONSIN CREDIT	8	\$407	11.0%	20.5%	297	\$ 14,101	57	214	26	No	1,799	\$ 17,266
US BANK NORTH DAKOTA	23	\$778	7.7%	19.2%	1,106	\$ 161,686	335	733	38	No	1,041	\$ 197,741
US BANK, N.A.	64	\$4,856	5.8%	30.3%	40	\$ 5,718	3	28	9	No		
USAA FEDERAL SAVINGS BANK	2	\$129	5.0%	7.5%	66	\$ 9,869	13	45	8	No	1	\$ 1,000
WACHOVIA BANK	5	\$637	7.6%	19.7%	290	\$ 48,655	36	227	27	No		
WASHINGTON MUTUAL BANK, FA	13	\$903	4.5%	12.4%	21	\$ 3,191	1	20	-	No		
WASHTENAW MORTGAGE COMPANY	1	\$33	4.8%	4.8%	276	\$ 41,514	28	233	15	No	678	\$ 91,391
WAUKESHA STATE BANK	2	\$187	0.7%	10.1%	995	\$ 223,686	102	695	198	No	7	\$ 3,308
WAUWATOSA SAVINGS BANK	177	\$25,606	17.8%	10.3%	1	\$ 115	1	-	-	No		
WELLS FARGO BANK MINNESOTA NA	-	\$0	0.0%	100.0%	14	\$ 106	7	7	-	No		
WELLS FARGO BANK NEVADA, NA	2	\$14	14.3%	50.0%	52	\$ 3,250	5	35	12	No	966	\$ 37,524
WELLS FARGO BANK WISCONSIN, NA	3	\$215	5.8%	9.6%	145	\$ 4,189	22	107	16	No		
WELLS FARGO BANK, NA	8	\$247	5.5%	15.2%								

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		\$ of Non-Refi <u>To TA</u>	% Non-Refi <u>To TA</u>			Total Non-Refi Loans <u>Originated</u>	Total Non-Refi Loans <u>Originated</u>						
WELLS FARGO FINL WISCONSIN INC	-	\$0	0.0%	0.0%	2	\$ 338	-	-	2	No			
WELLS FARGO FUNDING	10	\$1,658	2.1%	14.3%	483	\$ 81,036	69	326	88	No			
WELLS FARGO HOME MORTGAGE	69	\$10,311	3.8%	16.2%	1,830	\$ 325,398	297	1,427	106	No			
WELLS FARGO HOME MORTGAGE	1	\$164	100.0%	0.0%	1	\$ 164	-	1	-	No			
WEST BEND SAVINGS BANK	2	\$488	0.9%	3.4%	235	\$ 44,384	8	221	6	No	269	\$ 34,660	
WEST POINTE BANK	-	\$0	0.0%	0.0%	1	\$ 436	-	1	-	No			
WESTAMERICA MORTGAGE COMPANY	-	\$0	0.0%	25.0%	4	\$ 562	1	3	-	No			
WILMINGTON FINANCE, INC.	-	\$0	0.0%	33.3%	6	\$ 752	2	1	3	No			
WISCONSIN COMMUNITY BANK	-	\$0	0.0%	0.0%	2	\$ 265	-	2	-	No	10	\$ 2,558	
WISCONSIN MORTGAGE CORPORATION	29	\$3,649	2.1%	11.8%	1,351	\$ 188,451	159	1,192	-	No			
WISCONSIN STATE BANK	-	\$0	0.0%	0.0%	11	\$ 1,189	-	10	1	No			
WMC MORTGAGE CORP.	1	\$67	2.9%	60.0%	35	\$ 3,055	21	5	9	Yes			
WORLD SAVINGS BANK	20	\$8,627	10.2%	19.4%	196	\$ 36,445	38	140	18	No			

TRACTS IN CITY TARGET AREA

44	45	46	47	63	64	65	66	67
68	69	70	79	80	81	82	83	84
85	86	87	88	89	90	96	97	98
99	100	101	102	103	104	105	106	107
108	110	111	112	113	114	115	116	117
118	119	120	121	122	123	132	134	135
136	137	138	139	140	141	142	145	146
147	148	149	150	152	154	155	156	157
158	163	164	165	166	167	168	174	178