



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

Evaluation Period Ending
December 31, 2002

Community Reinvestment Act Performance Evaluation

Standard Federal Bank, NA
Charter Number: 16660

2600 West Big Beaver Road
Troy, Michigan 48084

Office of the Comptroller of the Currency

Large Bank Supervision
250 E Street, S.W.
Washington, DC, 20219

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

Table of Contents

Overall CRA Rating	2
Definitions and Common Abbreviations	3
Description of Institution	7
Scope of The Evaluation	8
Fair Lending Review	11
State Rating (Michigan)	12
State Rating (Indiana)	27
Appendix A: Scope of Examination	A-1
Appendix B: Summary of State Ratings	B-1
Appendix C: Market Profiles for Full-Scope Areas	C-1
Appendix D: Tables of Performance Data	D-1

Overall CRA Rating

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

The following table indicates the performance level of **Standard Federal Bank, NA** with respect to the lending, investment, and service tests:

Performance Levels	Standard Federal Bank, NA Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- Overall lending activity levels are good and have positively impacted persons of different income levels. In many instances the bank’s lending market share presence is greater than its deposit market share, especially for low- and moderate-income persons.
- Standard Federal Bank, NA’s HMDA lending performance is good. The bank’s small business geographic distribution is also good. The bank’s retail and commercial lending programs address the most critical credit needs identified for its assessment areas. Standard Federal Bank, NA offers several innovative lending programs.
- The good level of community development lending had a positive impact on the bank’s Lending Test rating.
- Standard Federal Bank, NA has a good level of qualified community development investments.
- Accessibility of the bank’s retail service delivery systems is good with their locations convenient to all portions of the bank’s assessment areas. Hours of operation are reasonable and services are consistent throughout Standard Federal Bank, NA’s assessment areas.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Block Numbering Area (BNA): A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male household and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract or a block numbering area delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn).

Home Mortgage Loans: such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes loans for multifamily (five or more families) dwellings, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of

individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Area (MA): Any primary metropolitan statistical area (PMSA), metropolitan statistical area (MSA), or consolidated metropolitan area (CMSA), as defined by the Office of Management and Budget, with a population of 250,000 or more, and any other area designated as such by the appropriate federal financial supervisory agency.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated Area: A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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

Upper-Income: Individual income that is more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.

Description of Institution

Standard Federal Bank, NA (Stan Fed), Troy, Michigan is a large full service interstate bank with banking offices in Michigan and Indiana.

Stan Fed is a wholly owned subsidiary of LaSalle Bank Corporation, a multi-bank holding company, headquartered in Chicago, Illinois with total assets as of December 31, 2002 of \$103 billion. Stan Fed is an indirect subsidiary of Netherlands based ABN AMRO Bank N.V., one of the world's largest financial institutions with total assets of 597.4 billion EURO. ABN AMRO Bank N.V. has 3,400 locations in over 60 countries and territories. Lending and investment activity by LaSalle Bank, NA, Chicago, Illinois, an affiliated financial institution, within Stan Fed's assessment areas was taken into consideration in evaluating the bank's performance (This lending was excluded from LaSalle Bank, NA's CRA Public Evaluation). The financial condition and performance of Stan Fed's affiliates did not negatively impact the bank's compliance with CRA. The Appendix includes information on affiliates, products, and assessment areas reviewed during this evaluation.

As of December 31, 2002 Stan Fed reported total assets of \$45.9 billion, net loans of \$27 billion (83% in real estate secured loans, primarily residential properties; 15% commercial and industrial loans; and the remaining 2% in consumer and other credit), total deposits of \$23.2 billion (\$20.1 billion of domestic deposits and \$3.1 billion of foreign deposits), and tier 1 capital of \$2.9 billion. The bank's most significant operating subsidiary is ABN AMRO Mortgage Group, Inc. (AAMG). AAMG is the fifth largest mortgage loan originator in the country and primarily operates through networks of independent real estate mortgage brokers and correspondent banks. HMDA loans made in the bank's assessment areas through AAMG were considered as part of this evaluation.

Standard Federal Bank was merged into Michigan National Bank in October 2001, retaining the national bank charter and changing its name to Standard Federal Bank, NA. Stan Fed did not face any major legal or financial impediments that would hamper its ability to help meet the credit needs of its communities. The bank's primary business focus remains as a large retail banking organization.

The last CRA evaluation is dated October 5, 1998, and the bank was rated Satisfactory.

Scope of the Evaluation

Evaluation Period/Products Evaluated

Stan Fed's HMDA mortgage lending and small business lending were evaluated for the period January 1, 2000 through December 31, 2002. Community development loans, investments and services were analyzed for the time frame of October 5, 1998 through December 31, 2002.

In analyzing Stan Fed's performance under the Lending Test, we placed greater emphasis on home mortgage purchase and refinancing loans as such loans comprised a significant (92% of total number of reported loans) portion of the loans subject to our review. Borrower and geographic distribution and market share were reviewed, as well as the bank's responsiveness to identified community credit needs. Community development lending was a positive factor in the bank's Lending Test rating. Small farm lending and multi-family lending are not considered significant lines of business by the bank supported by low volumes, and therefore were not analyzed for the bank's Lending Test performance.

Investment levels and qualitative factors such as leadership roles, innovativeness, and complexity were analyzed for the Investment Test. For the Service Test we focused our review on the geographic distribution of bank offices and community development service activities.

Data Integrity

Stan Fed's public lending information and community development data is mostly accurate. As part of this CRA evaluation, the accuracy and reliability of the bank's publicly filed HMDA and CRA regulation data was reviewed and validated. HMDA data was found to be accurate. HMDA data for AAMG was also reviewed and found to be accurate. Small Business revenue data reported under the CRA regulation was found to have an unacceptable level of errors and as such the revenue data reported in this evaluation is not considered reliable and was not used in evaluating the bank's lending performance. This factor was not considered significant in evaluating the bank's lending performance due to the small percentage of small business loans purchased or originated in relation to the total number of reported loans. In addition, community development loans, investments, and services submitted by the bank for consideration were verified to ensure they met the regulatory definition and purpose requirements for community development. Community development data contained in this public evaluation is accurate. Small loans to farms and multi-family loans were not tested for accuracy or analyzed for lending test performance conclusions.

Selection of Areas for Full-Scope Review

MI

The Detroit CMSA with the corresponding three MSAs (Detroit, Ann Arbor, and Flint) was selected for full scope review for this evaluation.

IN

The South Bend assessment area was selected for full scope review for this evaluation.

Refer to the “Scope” section under each state rating for details regarding how the areas were selected for full scope reviews.

Ratings

The bank’s overall rating is a blend of the state ratings. Stan Fed’s overall rating is based primarily on the bank’s performance in MI. Michigan makes up 99.25% of the bank’s deposits, 98.26% of the number of reported loans, 98.53% of the bank’s qualified investments and 97.03% of the bank’s branches are located in Michigan.

The state ratings are based primarily on those areas that received full-scope reviews. Refer to the “Scope” section under each state rating for details regarding how the areas were weighted in arriving at the overall state rating.

Other – Community Contacts

Our evaluation took into consideration information derived from members of the local community obtained during this evaluation and over the past year. We contacted ten community organizations in the Detroit area which focus on affordable housing, social service, small business, neighborhood development, and fair banking initiatives. We also contacted four governmental offices that focus on business development, economic development, downtown development and affordable housing. An organization from the Ann Arbor MSA that focuses on small business needs was also contacted. In the Flint MSA, we contacted five organizations that have affordable housing, small business development, neighborhood development, and social service initiatives. Common needs identified by the contacts were the need for affordable single-family and multifamily housing; the need to rehabilitate existing homes, including those in low- and moderate-income neighborhoods; the need for additional business financing with flexible underwriting, including small size loans and more use of U.S. Small Business Administration loan programs; the need for additional small business and personal financial education initiatives; the need for predevelopment project financing; and the need for additional use of Federal Home Loan Bank funds, especially for housing rehabilitation.

During our evaluation we determined that there have been opportunities for financial institutions to extend CD loans, make qualified investments, and provide CD services within the Detroit CMSA assessment area.

Fair Lending Review

We found no evidence of illegal discrimination or other illegal credit practices.

State Rating

State of Michigan

CRA Rating for Michigan: Satisfactory

The lending test is rated: High Satisfactory

The investment test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending performance is good and has positively impacted persons of different income levels.
- The bank's retail and commercial lending programs address the most critical credit needs identified for its communities, and include several innovative lending products.
- The bank has a good level of community development lending.
- Standard Federal Bank, NA has a good level of qualified community development investments.
- Accessibility of the bank's retail service delivery systems is good with their locations convenient to all portions of the bank's communities, including low- and moderate-income areas.

Description of Institution's Operations in Michigan

Stan Fed is a full service retail institution with retail mortgage lending as their primary line of business. Within the State of Michigan the bank operates 261 branches and 772 ATMs. In Michigan the bank has defined ten assessment areas. The Detroit CMSA is the largest assessment area and represents the vast majority of the state's deposits and loans.

Refer to the Market Profiles for the State of Michigan in appendix C for detailed demographics and other performance context information for areas that received full-scope reviews.

Scope of Evaluation in Michigan

For the State of Michigan the Detroit CMSA (comprised of the Detroit, Ann Arbor, and Flint MSAs) was chosen for a full scope review. The Detroit CMSA comprises 89.24% of the state's deposits, 78.99% of the total number of reported loans, 89.63% of the qualified investments evaluated, and 72.8% of the bank's branch offices located in Michigan.

Benton Harbor, Grand Rapids, Jackson, Kalamazoo, Lansing, Saginaw, and the three designated "Non-Metropolitan" assessment areas received limited scope reviews for this evaluation.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Michigan is rated High Satisfactory. Based on full-scope reviews, the bank's performance in the Detroit CMSA is good.

Lending Activity

Refer to Tables 1 Lending Volume and 1 Other in the state of Michigan section of appendix D for the facts and data used to evaluate the bank's lending activity.

The bank's overall lending activity level is excellent. The bank's lending programs meet the most pressing credit needs within its assessment areas. These needs were assessed to be home mortgage products and small business lending. In our analysis of Stan Fed's lending performance more weight was given to home purchase and refinancings, as these products comprised the vast majority of loans reviewed for CRA purposes. For originated and purchased loans, for both home purchase and refinancings, Stan Fed's market share in the Detroit CMSA was ranked second overall, matching their deposit market share ranking.

A lending gap analysis was performed on the bank's lending performance in the full scope assessment area. No significant lending gaps were noted in the Detroit, Ann Arbor, or Flint MSAs. Of the bank's retail mortgage portfolio a majority of the loans were made within the bank's designated assessment areas.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to Tables 2, 3, 4 and 5 in the state of Michigan section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

Geographic distribution of home purchase and home refinancing loans for the Detroit CMSA is adequate. Geographic distribution of home purchase mortgage loans is adequate for the Detroit MSA. For the Ann Arbor and Flint MSAs the geographic distribution of home purchase mortgage loans is also adequate. Geographic distribution of home refinancing loans for the Detroit MSA is poor. For the Ann Arbor and Flint assessment areas the geographic distribution of home refinancing loans is adequate.

In low-income areas the bank's geographic distribution of home purchase mortgage loans is poor. The portion of home purchase loans originated or purchased in low-income geographies is well below the percent of owner occupied units in like geographies. For the Detroit and Ann Arbor MSAs the bank's geographic distribution market share percentage for home purchase mortgage loans is considered adequate as it is below their overall market share percentage. For the Flint MSA the bank's geographic distribution for home purchase loans market share percentage is good with the market share percentage close to the bank's overall market share percentage in the Flint MSA. The bank's geographic market share ranking for home purchase loans is excellent in low-income geographies for the Detroit and Flint MSAs, as the market share ranking in low-income geographies matches the bank's overall market share ranking in those MSAs. The bank's geographic market share ranking of home purchase loans is adequate in the Ann Arbor MSA as that ranking is close to their overall market share ranking for the Ann Arbor MSA.

A factor taken into consideration in reaching a conclusion on the bank's performance in geographic distribution of home purchase loans in the Detroit MSA is that 53% of the owner occupied housing units in the City of Detroit are owned free and clear of mortgage debt. The City of Detroit contains a majority (68%) of low- and moderate-income census tracts in the Detroit MSA. These facts coupled with lower applications per number of owner occupied housing units in the low-income areas of the Detroit MSA demonstrates lower opportunities and less demand for mortgage products in these areas.

For the Detroit and Ann Arbor MSAs, the bank's portion of home purchase loans originated or purchased in moderate-income geographies is adequate as it is near to the percentage of owner occupied units in moderate-income areas. The bank's portion of home purchase loans originated or purchased in moderate-income areas for the Flint MSA is good as it is close to the percentage of owner occupied units in those areas. The bank's home purchase loan market share percentage in moderate-income geographies is adequate for the Detroit MSA as the ratio is near to the bank's overall market share ratio, and is excellent in the Ann Arbor and Flint MSAs as their percentage exceeds the bank's overall home purchase market share percentage in those areas. For moderate-income geographies in the Detroit, Ann Arbor and Flint MSAs, the bank's geographic distribution market share ranking of home purchase loans is excellent as the market share ranking for those geographies matches the bank's overall market share ranking.

In the full scope assessment area the bank's geographic distribution of home refinancing loans in low-income areas is poor. The portion of home refinancing loans originated or purchased in low-income geographies is well below the percent of owner occupied units in like geographies. For the Detroit, Ann Arbor, and Flint MSAs the bank's geographic distribution market share percentage is considered poor as it is also well below their overall market share percentages in the respective geographic areas. The bank's geographic market share ranking for home refinancing loans is adequate in low-income geographies for the Detroit MSA, as the market share ranking in these geographies is near to the bank's overall market share ranking for the Detroit MSA. The bank's home refinancing loan geographic market share ranking for low-income areas in the Ann Arbor MSA is excellent as it matches the bank's overall market share ranking for home refinancing loans in the Ann Arbor MSA. The bank's geographic market share ranking for home refinancing loans in low-income areas in the Flint MSA is good as its market share ranking is close to the bank's overall market share ranking of home refinancing loans in the Flint MSA.

For the full scope assessment area the bank's geographic distribution performance of home refinancing loans in moderate-income areas is poor. The portion of home refinancing loans originated or purchased in moderate-income geographies is well below the percent of owner occupied units in like geographies. For the Detroit MSA the bank's geographic distribution market share percentage for moderate-income geographies is considered poor as it is also well below the bank's overall market share percentage for home refinancing loans in the Detroit MSA. The market share percentage for home refinancing loans in moderate-income areas of the Ann Arbor and Flint MSAs is good as the percentage is close to the bank's overall market share percentage of home refinancing loans in like areas. In the Detroit MSA the bank's market share ranking for home refinancing loans in moderate-income geographies is good as its market share ranking is close to the bank's overall market share ranking of home refinancing loans in the Detroit MSA. The bank's market share ranking for home refinancing loans in moderate-income areas in the Ann Arbor and Flint MSAs is excellent as the ranking matches the bank's overall market share ranking for home refinancing loans in those MSAs.

A separate lending analysis was not performed on the bank's geographic lending performance for home improvement or multi-family lending due to the insignificant volume of home improvement and multi-family loans originated or purchased during the evaluation time frame.

Small Loans to Businesses

Refer to Table 6 in the state of Michigan section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The bank's geographic distribution of small loans to businesses in low- and moderate-income areas for the Detroit CMSA is good.

The bank's geographic distribution of small loans to businesses in low-income geographies in the Detroit MSA is adequate as the portion of the bank's loans made in low-income geographies is near to the percent of small businesses located in low-income areas. Stan Fed's geographic distribution of small loans to businesses in low-income geographies in the Ann Arbor and Flint MSAs is excellent with the portion of the bank's loans made in low-income geographies exceeding the percent of small businesses located in those geographies. The bank's geographic distribution market share in low-income census tracts for the Detroit MSA is good as the percentage is close to the bank's overall small business market share for the Detroit MSA. The bank's geographic distribution market share in low-income census tracts for the Ann Arbor, and Flint MSAs is excellent and exceeds the bank's overall small business market share for each of those areas.

In the Detroit and Flint MSAs the bank's portion of small loans to businesses made in moderate-income geographies is excellent as it exceeds the percentage of small businesses in like geographies for each area. For the Ann Arbor MSA the bank's portion of small business loans made in moderate-income geographies is adequate as the percentage of small loans to businesses made or purchased in moderate-income areas is below the percentage of small businesses located in those areas. The bank's geographic distribution market share in moderate-income census tracts for the Detroit MSA is good as it is close to the bank's overall small business market share for that area. Stan Fed's geographic distribution market share of small loans to businesses in moderate-income geographies for the Ann Arbor MSA is poor and well below the bank's overall market share for the area. The geographic distribution market share in moderate-income areas for the Flint MSA is excellent and exceeds the bank's overall small business market share for that area.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 8, 9 and 10 in the state of Michigan section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Borrower distribution of home purchase and home refinancing loans for the Detroit CMSA is good. Borrower distribution of home purchase mortgage loans is excellent for the Detroit, Ann Arbor, and Flint MSAs. Borrower distribution of home refinancing loans for the Detroit, Ann Arbor, and Flint MSAs is good.

In the Detroit, Ann Arbor, and Flint MSAs the portion of home purchase loans made to low-income applicants is excellent when compared to the percentage of low-income families that can realistically afford a home mortgage loan. The number and percentage of families living below the poverty level is a significant factor taken into consideration in reaching a conclusion for this analysis. According to census data, there are over 240,000 households (12.85%) living below the poverty level in the Detroit CMSA

equaling approximately 50% of the low-income families. By taking this ratio into consideration the bank's lending ratio to low-income borrowers that can realistically afford a home mortgage in the Detroit and Flint MSAs is excellent with the bank's ratio exceeding 50% of the low-income family populations. The bank's lending ratio to low-income borrowers in the Ann Arbor MSA is good with the lending ratio close to 50% of the low-income family population. For the Detroit MSA the bank's borrower distribution market share percentage is good and is close to the bank's overall market share percentage for the Detroit MSA. For the Detroit MSA the bank's borrower distribution market share ranking is excellent for low-income borrowers as it matches the bank's overall market share ranking for home purchase loans in the Detroit MSA. For the Ann Arbor, and Flint MSAs the bank's borrower distribution market share and ranking for low-income borrowers is excellent and exceeds their overall market share and ranking. The bank's portion of loans made to moderate-income borrowers in the Detroit, Ann Arbor, and Flint MSAs is excellent as the percentage of loans made to moderate-income borrowers exceeds the percentage of moderate-income families. In Detroit, Ann Arbor, and Flint the bank's market share and ranking for moderate-income applicants are excellent as they exceed the bank's overall market share percentage and ranking for each of the MSAs.

Although the ratio of home refinancing loans made to low-income borrowers is well below the percentage of low-income families in each of the bank's assessment areas, the bank's overall lending performance to low-income borrowers is adequate. The portion of home refinancing loans made to low-income applicants is adequate when compared to the percentage of low-income families that can afford a home mortgage loan in the Detroit and Ann Arbor MSAs. With approximately 50% of the low-income families living below the poverty level, the bank's percentage of loans to low-income applicants is near to the percentage of low-income families that can afford a home refinancing loan. In the Flint MSA the bank's performance of lending to low-income borrowers is poor as its ratio is well below the percentage of low-income families that can afford a home refinancing loan. In the Detroit, Ann Arbor, and Flint MSAs the bank's borrower distribution market share and ranking for low-income borrowers is excellent and exceeds their overall market share and ranking. For the Detroit, Ann Arbor, and Flint MSAs the bank's portion of loans made to moderate-income borrowers is excellent as the percentage of loans made to moderate-income applicants exceeds the percentage of moderate-income families. In Detroit, Ann Arbor, and Flint the bank's market share and ranking for moderate-income applicants are excellent as they exceed the bank's overall market share percentage and ranking for each of the MSAs.

Small Loans to Businesses

Due to high levels of inaccurate reporting of small business revenues for CRA data for Stan Fed, this lending test performance analysis was not done.

Community Development Lending

Refer to Table 1 Lending Volume in the state of Michigan section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

The level of CD lending in the Detroit CMSA is good, based on good performance in the Detroit and Flint MSAs. No CD lending activities were identified within the Ann Arbor MSA. CD lending was given positive consideration when drawing overall Lending Test rating conclusions for Michigan.

Standard Fed originated 25 CD loans totaling \$85 million during the evaluation period in the Detroit MSA. Examples of how CD lending helped to address the needs of the community are summarized below:

- Nine loans totaling \$37 million were to organizations that primarily provide services targeted to low- and moderate-income individuals and families in the Detroit area. Proceeds from a \$3.5 million loan were used to construct a new facility in downtown Detroit for an organization that provides a wide range of community development services to families and individuals who primarily have low- and moderate-income levels.
- Eight loans totaling \$34 million were to revitalize and stabilize low- and moderate-income portions of Detroit. The purpose of one loan was for the construction and end financing of a new strip shopping center in Detroit's Empowerment Zone. Abandoned buildings were torn down and the site put back to use through the creation of the shopping center. Proceeds from another loan were used to renovate a deteriorating hotel within the Empowerment Zone. Two other loans financed the revitalization of vacant buildings within the City of Detroit's targeted lower Woodward section of the downtown area.
- Eight loans totaling \$14 million were for affordable housing purposes targeted to low- and moderate-income individuals within the assessment area. Three of the facilities were for the construction of new single-family homes in the City of Pontiac. A \$2 million loan was for the renovation of an apartment complex in a low-income section of downtown Detroit to convert it to affordable condominiums.

In addition, two letters of credit and one small loan to a business have CD characteristics, as they also were for the revitalization of low- and moderate-income portions of Detroit.

In the Flint MSA, Stan Fed originated three CD loans for \$1.7 million for the purpose of providing services targeted to low- and moderate-income individuals, and for the revitalization of a low-income portion of Flint. The purpose of one loan was to purchase and rehabilitate a vacant building in order to bring a new business into the Flint Enterprise Zone. In addition, one small loan to a business located in Flint's Enterprise Zone has CD characteristics, as the organization primarily provides services targeted to low- and moderate-income individuals within the area.

While Standard Fed's CD lending activities helped address the needs of its assessment areas, none of the activities were considered complex or innovative in nature.

Product Innovation and Flexibility

Stan Fed provides the full range of conventional and government lending for home mortgage and small business lending. The bank offers FHA and VA mortgage loan products as well as some proprietary affordable home loan mortgage products and programs. Stan Fed also offers down payment assistance through local homeownership programs. The bank is a designated SBA preferred lender.

In the realm of home mortgage lending, Stan Fed through AAMG has extended itself in the development and piloting of innovative home lending products and programs. Several of these products and programs have positively impacted low- and moderate-income persons.

In 1990, Stan Fed introduced its Community Home Buyers Program. The program features expanded underwriting guidelines to assist low- and moderate-income applicants in obtaining a mortgage. The expanded underwriting guidelines include accepting alternative sources of credit history, greater housing and debt ratios and relaxed down payment requirements. Under the Community Home Buyers Program the applicant must first attend an educational seminar on the mortgage application and loan process. The seminar also covers other financial topics such as credit history, budgets, and aspects of choosing a home that would be affordable to the applicant. The seminar was developed and is offered by Stan Fed employees. During the evaluation period the bank made 374 loans under the Community Home Buyers Program with just under \$33 million extended.

In 1988, Stan Fed implemented a second and third review program for all preliminary loan disapprovals for all low- and moderate-income applicants. The program has been expanded over the years and now includes all minority applicants and all applicants seeking to secure a real estate mortgage with property located in Detroit. The program is known as the Special Tracking Program. Since loans made under the Special Tracking Program were originally recommended for denial means that the loans made do not conform to standard mortgage loan underwriting guidelines. During the evaluation period 1,924 loans were made under this program for over \$210 million.

In 1999, Stan Fed developed a special home loan program in conjunction with Habitat for Humanity of Michigan and Fannie Mae. Under this program, Habitat for Humanity of Michigan would build a home for a prospective buyer, Stan Fed would originate and service a special home mortgage, and Fannie Mae would purchase the mortgages through its mortgage backed securities program. Proceeds from the sale of the securities would go directly back to Habitat for Humanity of Michigan, providing more funds for more homes. The special mortgage product is a low down payment, zero percent interest for ten years, with a guaranteed low-interest rate thereafter, a fully forgivable second mortgage that is forgiven when predetermined conditions are met (usually 10 years of residency by the homeowner). Twelve loans were made under this program during the evaluation period.

During the evaluation period Stan Fed developed a lending program to provide mortgage-like financing to Muslims residing in Michigan who are constrained by traditional Islamic teachings from paying interest on loans. The program was developed in conjunction with Freddie Mac and a real estate mortgage broker/lender in Detroit. The new initiative enables prospective homeowners to enter into long-term lease purchase arrangements that permit them to later sell the house and profit from any home price appreciation. The real estate broker would purchase the property on behalf of the Muslim applicant and enter into a long-term lease agreement with them. The real estate broker would finance the purchase from a conventional 30-year-fixed rate mortgage issued from Stan Fed. Freddie Mac committed to invest \$10 million in the purchase of these new lease-purchase mortgages. No mortgages have yet been made under this new program.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Benton Harbor, Kalamazoo, and Lansing is not inconsistent with the bank's overall High Satisfactory performance under the lending test in Michigan. In the Grand Rapids assessment area the bank's performance is stronger than the bank's overall performance in the state. In the Jackson, Saginaw, and Non-Metropolitan assessment areas the bank's performance is weaker than the bank's overall performance in the state. Refer to the Tables 1 through 11 in the state of Michigan section of appendix D for the facts and data that support these conclusions. Lending test performance in the limited scope review areas did not have any impact on the overall lending test performance rating for the bank.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Michigan is rated High Satisfactory. Based on full-scope reviews, the bank's performance in the Detroit CMSA is good.

Refer to Table 14 in the state of Michigan section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Stan Fed's qualified investments primarily address the affordable housing and service needs of low- and moderate-income individuals. Other investments support the revitalization and stabilization of some low- and moderate-income areas, while some provide small business financing. Although centered in the Detroit MSA, investment activity has occurred within each of the bank's assessment areas. The primary investments are mortgage-backed securities secured by residential mortgages to low- and moderate-income individuals, municipal bonds for community development purposes, and investment in the bank's Community Development Corporation (CDC).

Stan Fed's CDC was created in 1997. During the current evaluation period the bank invested an additional \$19.5 million in the subsidiary. Through the CDC, Stan Fed has been especially responsive in addressing the community development needs of the community, primarily through direct lending for community development purposes. The CDC has provided financing to businesses, non-profit organizations, and individuals under terms and conditions that would not normally be available through traditional bank loans. The CDC's primary activities include residential real estate development through acquisition, rehab, and new construction; small business lending, including temporary and permanent capital; real estate acquisition and business expansion; and community services such as credit counseling, homeowner assistance, and home buyer assistance. For analysis purposes, we allocated Stan Fed's investment in its CDC to the assessment areas consistent with the CDC's level of activity in each area.

Qualified Investment Activity – MI

The volume of community development qualified investments in the Detroit CMSA is good. Totaling nearly \$140 million, 94% of investment dollars and 98% of the number of investments were made during the current evaluation period. This volume of activity is considered good in relation to the bank's community development investment capacity and the needs and opportunities within the market. Qualified investments within the Detroit CMSA during the evaluation period were centered in:

- The purchase of nearly \$40 million in mortgage-backed securities for affordable housing purposes by Stan Fed. The securities support the affordable housing needs within the Detroit, Ann Arbor, and Flint MSAs, as the underlying mortgages are on homes owned by low- and moderate-income borrowers.
- The purchase of \$73 million in Detroit School District bonds by LaSalle Bank, N.A. Bond proceeds funded the construction and improvement of Detroit school buildings, as well as the purchase of needed school equipment. The majority of students in the district are from low- and moderate-income households. Improving the district, including the

need for improving the physical school structures, is a key component of revitalizing the City of Detroit.

- The purchase of a \$3 million Fannie Mae Delegated Underwriting and Servicing (DUS) mortgage-backed security by Stan Fed. This security financed a multi-family housing project for low- and moderate-income individuals in the Detroit suburb of Southgate.
- Activities conducted by the bank's CDC represent \$14 million of financing of local community development initiatives in the Detroit, Ann Arbor, and Flint MSAs during the evaluation period. Examples are: A loan was made to a housing development organization in Flint to construct affordable single-family housing units for low- and moderate-income individuals. The city sold lots for \$1 and provided gap financing. The CDC made a loan to a housing organization in Ypsilanti (Ann Arbor MSA) to purchase and renovate an affordable multi-family housing complex. A working capital loan was provided to an affordable housing corporation in the Ann Arbor MSA. A loan was made to a non-profit real estate investment company for the construction of two affordable single-family homes in Detroit. Another loan was made to a housing association to finance the construction of single-family homes for low- and moderate-income people in Detroit. A loan was made to a church located in a low-income section of Detroit. The church has contributed to the revitalization of the area through the renovation and expansion of its facility, and has provided services to low- and moderate-income individuals in the area. A loan was made to finance the purchase and renovation of a restaurant in a low-income section of Detroit's Empowerment Zone. A loan was made to a cooperative grocery store located in Detroit's Empowerment Zone that primarily serves low- and moderate-income individuals in the area. The proceeds of a loan to a real estate holding company were used to acquire and renovate an affordable housing apartment building in Detroit's Empowerment Zone. Furthermore, through investments in Michigan Capital Funds for Housing, five affordable multi-family housing projects in Detroit and one in Flint were financed during the evaluation period.
- Standard Federal provided over \$2.1 million in the form of qualified grants to 161 organizations in the Detroit, Ann Arbor, and Flint MSAs during the evaluation period. The majority of grant dollars went to Detroit organizations for community development service purposes. Services were primarily education-oriented and targeted to low- and moderate-income individuals. Other services included housing and services for the homeless, shelters for abused women and children, food and clothing banks, childcare, and health-care. Grants also went to non-profit organizations for affordable housing purposes, including the construction and rehabilitation of housing for low- and moderate-

income persons. Some grants supported initiatives to stabilize and revitalize low- and moderate-income areas, while others focused on small business financing initiatives.

Stan Fed qualified investments are responsive to the needs of the community, but are not innovative or complex in nature.

Positive consideration was also given to qualified investments in Michigan that do not have a direct benefit on the bank's assessment areas. Totaling \$1.9 million dollars, these investments are primarily mortgage-backed securities for affordable housing purposes. Positive consideration was given to these investments as Stan Fed has otherwise addressed the community development needs of its assessment areas to a satisfactory degree.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Grand Rapids, Jackson, and Saginaw is not inconsistent with the bank's overall High Satisfactory performance under the investment test in Michigan. In the Benton Harbor, Kalamazoo, Lansing, and Non-metropolitan assessment areas performance is weaker than the bank's overall performance in the state. Refer to the Table 12 in the state of Michigan section of appendix D for the facts and data that support these conclusions. Investment Test performance in the limited-scope assessment areas did not impact the Investment Test rating for Michigan.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in Michigan is rated High Satisfactory. Based on full-scope reviews, the bank's performance in the Detroit CMSA good.

Retail Banking Services

Refer to Table 15 in the state of Michigan section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Service delivery systems are accessible to geographies and individuals of different income levels for MI. Branch distribution for the Detroit MSA is adequate in low-income areas and good in moderate-income areas. In Ann Arbor and Flint MSAs, branch distribution is excellent overall in low- and moderate-income areas.

The bank has 64 ATMs located in low-income census tracts and 65 ATMs located in moderate-income tracts, over 16% of the bank's ATMs are located in low- and moderate-income tracts in Michigan.

All branches in low- and moderate-income areas are full service branches. Hours of operation are consistent throughout the bank's branch network and are considered convenient to the needs of the bank's communities. All branches offer a full array of retail and investment banking products. Commercial business clients have access through referrals to all corporate products including loan financing, lock box, and cash management services. Stan Fed offers banking by mail, telephone, and through the Internet. Convenient on-line and telephone bill payment services are also offered. All of these service means are available to all customers.

Community Development Services

In Michigan Stan Fed provides a good level of community development services. Stan Fed actively addresses the needs of its communities through providing various community development services within its assessment areas. Bank officers and employees have provided technical assistance to and have taken active roles in many local organizations and initiatives for community development purposes. At times, bank officers and employees have taken leadership roles on key committees, advisory boards, or boards of directors of community organizations. As examples, a senior Stan Fed officer chaired Habitat for Humanity of Michigan's board of directors during most of the evaluation period, and a senior officer currently serves on the Policy Board for the statewide Michigan Local Initiatives Support Corporation (LISC), a nationally based organization that supports local community development corporation initiatives.

One primary community development service that Stan Fed has focused on has been providing financial and affordable housing education targeted to low- and moderate-income persons. Stan Fed conducted 82 Community Homebuyer Seminars from 2000 through 2002, with more than 2,250 individuals attending the seminars during the evaluation period. The seminars, held at various locations throughout the community, describe the mortgage application process, the credit underwriting process, ways to select realtors and home inspectors, and provide other information necessary to purchase, finance, and maintain a home. In 2002, Stan Fed participated in the FDIC's Money Smart financial education program by conducting 12 workshops targeted to low- and moderate-income individuals, with 166 persons attending. Other workshops and seminars that Stan Fed has conducted include budgeting, banking, home savings programs, home repair and maintenance, credit, business plans, and business financing.

A second primary way that Stan Fed supports local organizations, including non-profits, is through on-going active participation in the Federal Home Loan Bank of Indianapolis' (FHLBI) Affordable Housing Program. As a member of FHLBI, Stan Fed sponsors competitive applications for grant funding to support affordable housing projects. Sponsors of awarded grants have responsibilities for monitoring and reporting on the

projects as well. During the evaluation period, Stan Fed was one of the leading grant sponsors with 38 applications (under both the Standard Federal and Michigan National names) receiving grants totaling \$5.55 million for nearly 800 rental and owner-occupied affordable housing units. Stan Fed has also been an active participant in FHLBI's Home Savings Program. Under this program, FHLB funds are used for down payment and closing cost assistance for low- and moderate-income homebuyers. During the evaluation period, 184 Stan Fed mortgage customers received \$655 thousand of assistance under this program.

Stan Fed waives fees on Interest on Lawyers Trust Accounts (IOLTA). Funds from these deposit accounts are used for legal services for the poor. Stan Fed currently is waiving fees on more than 800 IOLTA accounts.

Community Development Service Activity – MI

Stan Fed has provided a good level of community development services within the Detroit CMSA. Bank officers and employees have provided technical assistance to and taken active roles in many local organizations and initiatives for community development purposes. Employees and officers have served in leadership roles on key committees, advisory boards, or boards of directors of community organizations. Employees have conducted Community Homebuyer Seminars targeted to low- and moderate-income individuals, and have conducted various other community development workshops and seminars in the Detroit, Ann Arbor, and Flint MSAs. Some examples are a home savings program presentation in Inkster; various Money Smart financial education workshops, including 6 in Detroit; budget and banking workshops; a financial workshop in River Rouge; 18 elementary banking school workshops at two schools in Detroit with nearly 30 participants per session; banking workshops in Highland Park, a home repair program to a neighborhood development organization in Detroit; and a predatory lending workshop in Flint. Stan Fed employees have also taken leadership roles in the planning and sponsoring of homebuyer fairs in various communities.

Substantive support to organizations within the Detroit CMSA has been provided through sponsoring Affordable Housing Program applications with the FHLB of Indianapolis. During the evaluation period, 21 applications were approved totaling grants of \$3.5 million for the Detroit MSA, and 3 applications were approved for grants totaling \$99 thousand from the Ann Arbor MSA. These projects involved 458 housing units in the Detroit area and 19 units in the Ann Arbor MSA. In addition, a \$500,000 grant was awarded for a bank-sponsored application for a statewide Habitat for Humanity down payment assistance program. Stan Fed was the leader in approved grant applications for the Detroit CMSA in terms of number of approved grant applications during the evaluation period.

Stan Fed employees and officers have helped organize and host annual Financial Institutions Housing Conferences in Detroit. Local community organizations, financial institutions, government, the real estate community, and individuals from the general

public to meet and share ideas on how to revitalize and rebuild the city of Detroit, including creating more and better affordable housing.

Bank officers and employees participate in the Detroit Mortgage Plan, an organization formed to ensure the availability of home mortgage loans especially low- and moderate-income applicants. If a resident or potential resident of the community feels that their loan application has been unfairly denied, the application can be appealed to this group. A representative of the bank has also served as a member of the Detroit Neighborhood Housing Services' home improvement loan pool committee. Targeted to a low- and moderate-income segment of Detroit, this committee reviews loan applications from individuals who have been unable to obtain traditional bank financing.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Grand Rapids, Jackson, and Saginaw is not inconsistent with the bank's overall High Satisfactory performance under the service test in Michigan. In the Benton Harbor, Kalamazoo, Lansing, and Non-metropolitan assessment areas the bank's performance is weaker than the bank's overall performance in the state. Refer to Table 13 in the state of Michigan section of appendix D for the facts and data that support these conclusions. Performance in the limited-scope assessment areas did not impact the Service Test rating for Michigan.

State Rating

State of Indiana

CRA Rating for Indiana: Satisfactory

The lending test is rated: Low Satisfactory

The investment test is rated: High Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending performance is adequate with the bank's retail and commercial lending programs addressing the most critical credit needs identified for its assessment areas. The bank does offer several innovative lending products.
- The bank has an adequate level of community development lending.
- Standard Federal Bank, NA has a good level of qualified community development investments.
- Accessibility of the bank's retail service delivery systems is adequate with their locations convenient to all portions of the bank's communities, including low- and moderate-income areas.

Description of Institution's Operations in Indiana

Stan Fed is a full service retail institution with retail mortgage lending as their primary line of business. Within the state of Indiana the bank operates 8 branches and 52 ATMs. In Indiana the bank has defined two assessment areas, South Bend and Elkhart.

Refer to the Market Profiles for the state of Indiana in appendix C for detailed demographics and other performance context information for areas that received full-scope reviews.

Scope of Evaluation in Indiana

For the state of Indiana the South Bend assessment area was chosen for a full scope review. South Bend assessment area represents 79.06% of the state's deposits, 60.96% of the total number of reported loans, 55.58% of the qualified investments evaluated, and 75.0% of the branches located in Indiana. Elkhart assessment area received a limited-scope review for this evaluation.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Indiana is rated Low Satisfactory. Based on full-scope reviews, the bank's performance in South Bend is adequate.

Lending Activity

Refer to Tables 1 "Lending Volume" and Table 1 "Other Products" in the state of Indiana section of appendix D for the facts and data used to evaluate the bank's lending activity.

The bank's overall lending activity level is excellent. The bank's lending programs meet the most pressing credit needs within its assessment areas. These needs were assessed to be home mortgage products and small business lending. In our analysis of Stan Fed's lending performance more weight was given to home purchase and refinancings, as these products comprised the vast majority of loans reviewed for CRA purposes. In South Bend, IN for originated and purchased loans, Stan Fed has a market share ranking of one for refinancing and four for home purchase. Both of these market share rankings exceed the bank's deposit market share ranking (seventh) in South Bend, IN.

A lending gap analysis was performed on the bank's lending performance in the full scope assessment area. No significant lending gaps were noted in the South Bend assessment area. Of the bank's retail mortgage portfolio a majority of the loans were made within the bank's designated assessment areas.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to Tables 2, 3, 4 and 5 in the state of Indiana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

Geographic distribution of home purchase mortgage and home refinancing loans is poor for the South Bend assessment area.

In low-income areas the bank's geographic distribution of home purchase mortgage loans is poor. The portion of home purchase loans originated or purchased in low-income geographies is well below the percent of owner occupied units in like geographies. For the South Bend assessment area the bank's geographic distribution market share percentage and ranking is considered poor as it is also well below their overall market share percentage and ranking for home purchase loans.

In moderate-income areas the bank's geographic distribution of home purchase mortgage loans is poor. The portion of home purchase loans originated or purchased in moderate-income geographies is well below the percent of owner occupied units in like geographies. For the South Bend assessment area the bank's geographic distribution market share percentage and ranking for moderate-income geographies is considered poor as it is also well below their overall market share percentage and ranking for home purchase loans.

In low-income areas the bank's geographic distribution of home refinancing loans is poor. The portion of home refinancing loans originated or purchased in low-income geographies is well below the percent of owner occupied units in like geographies. For the South Bend assessment area the bank's geographic distribution market share percentage in low-income geographies is considered poor as it is also well below their overall market share percentage for home refinancing loans. The bank's low-income geographic market share ranking of home refinancing loans is adequate in the South Bend assessment area as that ranking is close to their overall market share ranking for the South Bend assessment area.

In moderate-income areas the bank's geographic distribution of home refinancing loans is poor. The portion of home refinancing loans originated or purchased in moderate-income geographies is well below the percent of owner occupied units in like geographies. For the South Bend assessment area the bank's geographic distribution market share percentage in moderate-income areas is considered poor as it is also well below their overall market share percentage for home refinancing loans. The bank's moderate-income geographic market share ranking of home purchase loans is adequate in the South Bend assessment area as that ranking is close to their overall market share ranking for the South Bend assessment area.

A separate lending analysis was not performed on the bank's geographic lending performance for home improvement or multi-family lending due to the insignificant volume of home improvement and multi-family loans originated or purchased during the evaluation time frame.

Small Loans to Businesses

Refer to Table 6 in the state of Indiana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

Geographic distribution of small loans to businesses is poor for the South Bend assessment area.

In low- and moderate-income areas the bank's geographic distribution of small loans to businesses is poor. The portion of small loans to businesses made or purchased in the South Bend assessment area for both low- and moderate-income geographies is well below the percent of businesses in like geographies. For the South Bend assessment

area the bank's geographic distribution market share percentage is considered poor as it is also well below their overall market share percentage for small loans to businesses in both low- and moderate-income areas.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 8, 9 and 10 in the state of Indiana section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Borrower distribution of home purchase and home refinancing loans for the South Bend assessment area is excellent.

Although the ratio of home refinancing loans made to low-income borrowers is well below the percentage of low-income families in the bank's South Bend assessment area, the bank's overall lending performance to low-income borrowers is adequate. The number and percentage of families living below the poverty level is a significant factor taken into consideration in reaching a conclusion for this analysis. Nine percent of the households live below the poverty level in the South Bend MSA. The bank's low-income borrower distribution of home purchase mortgage loans originated or purchased is adequate. The portion of home purchase loans originated or purchased to low-income borrowers is near the percentage of families that can afford a home purchase mortgage loan. For the South Bend assessment area the bank's borrower distribution market share percentage and ranking for low-income borrowers is considered poor as it is well below their overall market share percentage and ranking for home purchase loans.

The bank's moderate-income borrower distribution of home purchase mortgage loans is excellent as the ratio of bank loans originated or purchased to moderate-income borrowers exceeds the percentage of moderate-income families in the South Bend assessment area. Stan Fed's market share percentage and ranking for home purchase loans to moderate-income borrowers is good. The bank's market share ratio and ranking for home purchase loans to moderate-income borrowers are close to the bank's overall market share ratio and ranking for home purchase loans in the South Bend assessment area.

The bank's low-income borrower distribution of home refinancing loans originated or purchased is good based on the analysis of lending performance to those who can afford a home refinancing loan. The portion of home refinancing loans originated or purchased to low-income borrowers is close to the percentage of families that can afford a home refinancing mortgage loan. The bank's borrower distribution market share percentage and ranking for low-income borrowers are adequate as it is near to the bank's overall market share percentage and ranking for home refinancing loans in the South Bend assessment area.

The bank's moderate-income borrower distribution of home refinancing loans is excellent as the ratio of bank loans originated or purchased to moderate-income borrowers exceeds the percentage of moderate-income families in the South Bend assessment area. Stan Fed's market share percentage and ranking for home refinancing loans to moderate-income borrowers is excellent. The bank's market share ratio and ranking for home refinancing loans to moderate-income borrowers meets the bank's overall market share ratio and ranking for home refinancing loans in the South Bend assessment area

Small Loans to Businesses

Due to high levels of inaccurate reporting of small business revenues for CRA data for Stan Fed, this lending test performance analysis was not done.

Community Development Lending

Refer to Table 1 Lending Volume in the state of Indiana section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

CD lending in the South Bend assessment area is adequate. Stan Fed participates in a local affordable housing loan pool program. During the evaluation period 26 loans were generated with Stan Fed's portion of the funding of the loans totaling \$170 thousand. CD lending had a neutral impact when drawing overall Lending Test rating conclusions for Indiana.

Product Innovation and Flexibility

See Michigan write up on product innovation and flexibility.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Elkhart assessment area is not inconsistent with the bank's overall Low Satisfactory Lending Test in Indiana. Refer to the Tables 1 through 11 in the state of Indiana section of appendix D for the facts and data that support these conclusions. Performance in the limited scope assessment area did not impact the Lending Test rating for Indiana.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Indiana is rated High Satisfactory. Based on full-scope reviews, the bank's performance in the South Bend assessment area is good.

Refer to Table 14 in the state of Indiana section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

The volume of community development qualified investments in the South Bend assessment area is good. Totaling nearly \$1.3 million, all investments were made during the current evaluation period. This volume of activity is considered good in relation to the bank's community development investment capacity and the needs and opportunities within the market. The major investments are \$572 thousand of mortgage-backed securities that are secured by residential home loans to low- and moderate-income borrowers, and a \$200 thousand Fannie Mae DUS mortgage backed-security that financed a multi-family affordable housing project for low- and moderate-income individuals in South Bend; and a \$457 thousand contribution to support the construction of single-family affordable homes in South Bend. Stan Fed also provided grants totaling \$21 thousand to five organizations that provide social services and affordable housing related programs for low- and moderate-income individuals.

Stan Fed qualified investments are responsive to the needs of the community, but are not innovative or complex in nature.

Positive consideration was also given to qualified investments in Indiana that do not have a direct benefit on the bank's assessment areas. Totaling \$585 thousand dollars, these investments are primarily mortgage-backed securities for affordable housing purposes. Positive consideration was given to these investments as Stan Fed has otherwise addressed the community development needs of its assessment areas to a satisfactory degree.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Elkhart assessment area is not inconsistent with the bank's overall High Satisfactory performance under the Investment Test in Indiana. Refer to the Tables 12 in the state of Indiana section of appendix D for the facts and data that support these conclusions. Performance in the limited scope assessment area did not impact the Investment Test rating for Indiana.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in Indiana is rated Low Satisfactory. Based on full-scope reviews, the bank's performance in the South Bend assessment area is adequate.

Retail Banking Services

Refer to Table 15 in the state of Indiana section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Branch distribution for South Bend is excellent in low-income areas and poor in moderate-income areas. Service delivery systems are readily accessible to geographies and individuals of different income levels for the South Bend assessment area.

The bank has 3 ATMs located in low-income census tracts and 3 ATMs located in moderate-income tracts, over 11% of the bank's ATMs are located in low- and moderate-income tracts in Indiana.

The branch located in the low-income area is a full service branch. Hours of operation are consistent throughout the bank's branch network and are considered convenient to the needs of the bank's communities. All branches offer a full array of retail and investment banking products. Commercial business clients have access through referrals to all corporate products including loan financing, lock box, and cash management services. Stan Fed offers banking by mail, telephone, and through the Internet. Convenient on-line and telephone bill payment services are also offered.

Community Development Services

Stan Fed actively addresses the needs of its communities through providing various community development services within its assessment areas. Bank officers and employees have provided technical assistance to and have taken active roles in local organizations and initiatives for community development purposes.

Stan Fed has provided an adequate level of CD services to the South Bend assessment area during the evaluation period. Bank employees and officers have been involved with various community organizations, sometimes in a leadership capacity, that provide services targeted to low- and moderate-income individuals. Bank representatives have served on various committees and boards of local community development organizations, including the South Bend Neighborhood Housing Services board and the

local advisory committee for LISC. Furthermore, Stan Fed employees have conducted Community Home Buyers financial educational seminars during the evaluation period.

Five Affordable Housing Program applications sponsored by Stan Fed during the evaluation period were awarded grants totaling \$1.08 million to support affordable housing projects in South Bend and the state of Indiana, involving 158 housing units.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Elkhart assessment area is not inconsistent with the bank's overall Low Satisfactory performance under the Service Test in Indiana. Refer to Table 13 in the state of Indiana section of appendix D for the facts and data that support these conclusions. Performance in the limited scope assessment area did not impact the Service Test rating for Indiana.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and non-metropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD Loans): (01/01/00 to 12/31/02) Investment and Service Tests and CD Loans: (10/05/98 to 12/31/02)	
Financial Institution	Products Reviewed	
Standard Federal Bank, NA Troy, MI	HMDA products Small Business lending Community Development lending and services Investments	
Affiliate(s)	Affiliate Relationship	Products Reviewed
AAMG, Inc. Ann Arbor, MI	Bank Operating Subsidiary	HMDA products
LaSalle Bank, NA Chicago, IL	Holding Company Subsidiary	HMDA products Small Business lending Investments
Lease Plan	Holding Company Subsidiary	Investments
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Ann Arbor	Full Scope	
Detroit	Full Scope	
Flint	Full Scope	
Benton Harbor	Limited Scope	
Grand Rapids	Limited Scope	
Jackson	Limited Scope	
Kalamazoo	Limited Scope	
Lansing	Limited Scope	
Saginaw	Limited Scope	
Non-Metropolitan Areas, MI	Limited Scope	
South Bend	Full Scope	
Elkhart	Limited Scope	

Appendix B: Summary of State Ratings

RATINGS		Standard Federal Bank, NA		
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State Rating
Standard Federal Bank NA	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State:				
Michigan	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Indiana	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory

(*) The lending test is weighted more heavily than the investment and service tests in the overall rating.

Appendix C: Market Profiles for Full-Scope Areas

Ann Arbor, Michigan	C-2
Detroit, Michigan	C-4
Flint, Michigan	C-6
South Bend, Indiana	C-8

State of Michigan Full-Scope Areas

Ann Arbor, Michigan

Demographic Information for Full-Scope Area: Ann Arbor, Michigan										
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #				
Geographies (Census Tracts/BNAs)	123	7.32	21.95	46.34	22.76	1.63				
Population by Geography	490,058	6.88	21.53	49.02	22.26	0.32				
Owner-Occupied Housing by Geography	114,652	0.77	18.41	56.54	24.28	0.00				
Businesses by Geography	32,698	6.31	18.03	49.91	25.73	0.02				
Farms by Geography	1,801	0.50	19.05	59.80	20.65	0.00				
Family Distribution by Income Level	120,463	18.62	18.46	25.41	37.52	0.00				
Distribution of Low- and Moderate-Income Families throughout AA Geographies	44,660	5.84	34.15	48.79	11.22	0.00				
Median Family Income	= \$45,123	Median Housing Value				= \$94,930				
HUD Adjusted Median Family Income for 2002	= \$76,000					Unemployment Rate				= % 2.70
Households Below the Poverty Level	= 17,146									

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 1990 U.S. Census, and 2002 HUD updated MFI.

MSA Information

Stan Fed defines its delineated Ann Arbor community to be the Ann Arbor MSA that consists of Livingston, Washtenaw, and Lenawee Counties in Michigan. The Ann Arbor MSA is located in the southeastern portion of the state of Michigan, west of the City of Detroit, and is a part of the Detroit Michigan CMSA. The area does not arbitrarily exclude any low- or moderate-income areas and meets all the legal requirements of the CRA.

The city of Ann Arbor is the major metropolitan area of the MSA and encompasses 26% of the MSA's total population. The remainder of the MSA consists of small towns and rural areas.

Operations Within the Ann Arbor MSA

Stan Fed operates sixteen offices in the delineated Ann Arbor MSA. According to the FDIC deposit market share report dated June 30, 2002 the bank has 6.72% of the area's deposit market share with a ranking of fifth out of a total of 26 institutions. The financial institution with the largest market share for the area has 14 offices and holds 11.85 % of the deposits for the assessment area.

Economic Factors

The Ann Arbor MSA's economy is largely dependent on the service industry, primarily education and health maintenance and research organizations. In recent years the employment situation in the Ann Arbor region has been mostly positive with good growth in the retail and construction sectors, and the area has higher income and housing values than in surrounding areas. Unemployment rates for Ann Arbor are below the state of Michigan and national averages. The major employers include: University of Michigan; University of Michigan Medical Center; Saint Joseph Mercy Hospital; Pfizer Global Research and Development; General Motors Corporation; Tecumseh Products; Citizens Insurance, and Wal-Mart.

Market Profiles for Areas Receiving Full-Scope Reviews

Detroit, Michigan

Demographic Information for Full-Scope Area: Detroit, Michigan						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1,166	17.24	15.69	41.68	24.01	1.37
Population by Geography	4,207,319	13.89	15.52	43.94	26.57	0.08
Owner-Occupied Housing by Geography	1,082,195	7.93	13.16	48.48	30.42	0.00
Businesses by Geography	209,335	6.48	11.59	45.01	36.75	0.17
Farms by Geography	4,887	1.74	7.24	61.00	30.02	0.00
Family Distribution by Income Level	1,113,454	21.94	16.73	22.17	39.16	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	430,540	24.33	22.54	41.33	11.80	0.00
Median Family Income = \$40,727		Median Housing Value = \$70,532				
HUD Adjusted Median Family Income for 2002 = \$69,900		Unemployment Rate = % 4.39				
Households Below the Poverty Level = 201,065						

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 1990 U.S. Census, and 2002 HUD updated MFI.

MSA Information

Stan Fed defines its delineated Detroit community to be most of the Detroit MSA and it consists of all of Macomb, Monroe, Oakland, St. Clair, and Wayne Counties in Michigan. The bank also includes two bordering census tracts in Lapeer County, Michigan. These two census tracts are included in the bank's community due to their geographic proximity to bank offices in neighboring counties. The portion of Lapeer County that is not included in the bank's defined area is predominately middle-income. The Detroit MSA is located in the southeastern portion of the state of Michigan and is the significant portion of the Detroit Michigan CMSA. The MSA does not arbitrarily exclude any low- or moderate-income areas and meets all the legal requirements of the CRA.

The city of Detroit is the major metropolitan area of the MSA and encompasses close to 24.4% of the MSA's total population. The remainder of the MSA consists of suburban centers, small towns, and rural areas.

Operations Within the Detroit MSA

Stan Fed operates 163 offices in the delineated Detroit MSA. According to the FDIC deposit market share report dated June 30, 2002 the bank has 22.25% of the area's deposit market share for a ranking of two out of a total of 56 institutions. The financial institution with the largest market share for the area also has 163 offices and holds 26.31% of the deposits for the assessment area.

Economic Factors

The Detroit MSA's economy is mixed with a large dependency on manufacturing, particularly automobile and auto-related products in towards the City of Detroit, while more suburban areas have been able to diversify more into service and retail industries. Unemployment rates for Detroit are in line with the state of Michigan and national averages. Outside of the automobile industry the major employers include: K-Mart, The Detroit Medical Center, Ameritech, William Beaumont Hospital, EDS Corporation, and Mercy-Memorial Hospital Corporation.

Market Profiles for Areas Receiving Full-Scope Reviews

Flint, Michigan

Demographic Information for Full-Scope Area: Flint, Michigan						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	101	16.83	18.81	42.57	21.78	0.00
Population by Geography	430,459	12.59	18.07	41.58	27.76	0.00
Owner-Occupied Housing by Geography	113,585	7.65	16.57	45.37	30.41	0.00
Businesses by Geography	19,697	9.93	14.81	45.53	29.73	0.00
Farms by Geography	694	1.59	6.34	43.52	48.55	0.00
Family Distribution by Income Level	116,872	24.56	14.77	21.55	39.12	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	45,967	20.71	25.35	38.34	15.60	0.00
Median Family Income = \$36,700		Median Housing Value = \$50,335				
HUD Adjusted Median Family Income for 2002 = \$55,600		Unemployment Rate = % 5.10				
Households Below the Poverty Level = 25,654						

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 1990 U.S. Census, and 2002 HUD updated MFI.

MSA Information

Stan Fed defines its delineated Flint community to be the Flint MSA that consists of Genesee County, Michigan. Genesee County is located in the southeastern portion of the state of Michigan and is a part of the Detroit Michigan CMSA. The assessment area does not arbitrarily exclude any low- or moderate-income areas and meets all the legal requirements of the CRA.

The city of Flint is the major metropolitan area of the MSA and encompasses close to 33% of the MSA's total population. The remainder of the MSA consists of small towns and rural areas.

Operations Within the Flint MSA

Stan Fed operates eleven offices in the delineated Flint MSA. According to the FDIC deposit market share report dated June 30, 2002 the bank has 6.1% of the area's deposit market share with a ranking of sixth out of a total of twelve institutions. The financial institution with the largest market share for the area has 21 offices and holds 35.3% of the deposits for the assessment area.

Economic Factors

The Flint MSA's economy is largely dependent on manufacturing, particularly automobile and auto-related products. In recent years the employment situation in the Flint region has been mostly negative as the area is continuing to feel the effects of industrial downsizing and restructuring. Unemployment rates for Flint are well above the state of Michigan and national averages. Outside of the automobile industry the major employers are part of the service sector and include: Genesee's Regional Medical Center, Hurley Medical Center, McLaren Regional Medical Center, Mott Community College and Sears Roebuck and Company. One third of the area is farmed.

Market Profiles for Areas Receiving Full-Scope Reviews

South Bend, Indiana

Demographic Information for Full-Scope Area: South Bend, Indiana						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	69	7.25	26.09	50.72	15.94	0.00
Population by Geography	247,052	3.07	23.16	55.63	18.14	0.00
Owner-Occupied Housing by Geography	66,492	2.02	18.67	59.38	19.93	0.00
Businesses by Geography	13,169	9.28	19.58	54.85	16.29	0.00
Farms by Geography	450	1.11	3.11	80.22	15.56	0.00
Family Distribution by Income Level	63,998	17.81	19.60	24.14	38.45	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	23,943	5.11	30.85	55.54	8.50	0.00
Median Family Income = \$34,206		Median Housing Value = \$53,313				
HUD Adjusted Median Family Income for 2002 = \$55,700		Unemployment Rate = % 2.88				
Households Below the Poverty Level = 8,924						

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 1990 U.S. Census, and 2002 HUD updated MFI.

Assessment Area Information

Stan Fed defines its South Bend assessment area to be the South Bend MSA that consists of St. Joseph County, Indiana. St. Joseph County is located in the north-central portion of the state of Indiana and borders the state of Michigan. The assessment area does not arbitrarily exclude any low- or moderate-income areas and meets all the legal requirements of the CRA.

St. Joseph County consists of approximately 457 square miles and is the fourth largest county in Indiana. The city of South Bend is the major metropolitan area of the MSA and encompasses close to 40% of the MSA's total population. The remainder of the MSA consists of small towns and rural areas.

Operations Within the South Bend Assessment Area

Stan Fed operates six offices in the delineated South Bend assessment area. According to the FDIC deposit market share report dated June 30, 2002 the bank has 3.4% of the area's deposit market share with a ranking of seventh out of a total of eleven institutions. The financial institution with the largest market share for the area has 22 offices and holds 52.8% of the deposits for the assessment area.

Economic Factors

The South Bend MSA has a diverse employment base and is a hub to essential services for the region as well as having a strong tourism component. Many economic factors are favorable in the area including higher job creation and lower unemployment statistics than for the state of Indiana and national levels in recent years. The vast majority of businesses are small businesses. Largest employers in the area include University of Notre Dame; St. Joseph Regional Medical Center; South Bend Community School Corp.; Diocese of Ft. Wayne/South Bend; and Memorial Health Services.

Appendix D: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Tables without data are not included in this PE.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. Refer to Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of Assessment Area,” in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1

million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1. Lending Volume

LENDING VOLUME		State: Michigan				Evaluation Period: January 1, 2000 to December 31, 2002						
MSA/Assessment Area:	% of Rated Area Loans (#) in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MSA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full-Review:												
Ann Arbor	10.92	24,866	3,973,077	567	128,001	0	0	0	0	25,433	4,101,078	2.37
Detroit	65.05	143,913	19,147,956	7,509	1,693,713	4	266	25	85,115	151,451	20,927,050	85.69
Flint	3.02	6,573	718,484	444	87,505	1	298	3	1,720	7,021	808,007	1.17
Detroit CMSA Combined	78.99	175,352	23,839,517	8,520	1,909,219	5	564	28	86,835	183,905	25,836,135	89.24
Limited-Review:												
Benton Harbor	0.72	1,543	177,667	138	31,397	1	200	0	0	1,682	209,264	0.63
Grand Rapids	5.03	10,627	1,264,279	1,062	265,196	0	0	33	374	11,722	1,529,849	1.93
Jackson	2.36	5,441	559,191	62	12,388	1	40	0	0	5,504	571,619	0.46
Kalamazoo	4.79	10,206	1,094,291	822	175,333	10	1,475	105	2,273	11,143	1,273,372	2.95
Lansing	3.36	7,217	865,163	606	100,613	2	400	3	5,515	7,828	971,691	2.09
Saginaw	3.64	8,081	783,193	342	55,246	0	0	62	425	8,485	838,864	2.17
Non-Metropolitan Areas	1.10	2,364	207,728	167	29,546	20	3,153	0	0	2,551	240,427	0.54

(*) Rated area refers to either the state or multi-state MSA rating area.

(**) The evaluation period for Community Development Loans is September 30, 1998 to December 31, 2002.

(***) Deposit data as of June 30, 2002. Rated area refers to either the state or multi-state MSA rating area.

Table 1. Other Products – Not Applicable

LENDING VOLUME		State: Michigan				Evaluation Period: January 1, 2000 to December 31, 2002								
MSA/Assessment Area:	% of Rated Area Loans (#) in MSA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in MSA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full-Review:														
Ann Arbor														2.37
Detroit														85.69
Flint														1.17
Detroit CMSA Combined														89.24
Limited Review:														
Benton Harbor														0.63
Grand Rapids														1.93
Jackson														0.46
Kalamazoo														2.95
Lansing														2.09
Saginaw														2.17
Non-Metropolitan Areas														0.54

(*) Rated area refers to either the state or multi-state MSA rating area.

(**) The evaluation period for Optional Product Line(s) is from January 1, 2000 to December 31, 2002.

(***) Deposit data as of June 30, 2002. Rated area refers to either the state or multi-state MSA rating area.

Table 1. Other Products – Not Applicable

LENDING VOLUME		State: Michigan		Evaluation Period: January 1, 2000 to December 31, 2002	
MSA/Assessment Area:	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$(000's)	#	\$(000's)	
Full-Review:					
Ann Arbor					
Detroit					
Flint					
Detroit CMSA Combined					
Limited –Review					
Benton Harbor					
Grand Rapids					
Jackson					
Kalamazoo					
Lansing					
Saginaw					
Non-Metropolitan Areas					

(*) Rated area refers to either the state or multi-state MSA rating area.

(**) The evaluation period for Optional Product Line(s) is from January 1, 2000 to December 31, 2002.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE												State: Michigan		Evaluation Period: January 1, 2000 to December 31, 2002				
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***							
	#	% of Total*	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full-Review:																		
Ann Arbor	7,369	11.61	0.77	0.53	18.41	14.45	56.54	56.95	24.28	27.97	16.07	5.86	17.94	15.46	16.96			
Detroit	40,620	64.02	7.93	2.43	13.16	10.00	48.48	52.47	30.42	34.95	12.47	9.11	10.32	12.79	13.32			
Flint	2,238	3.53	7.65	2.82	16.57	16.31	45.37	42.54	30.41	38.34	10.38	9.79	13.88	10.07	9.70			
Detroit CMSA Combined	50,227	79.16	7.28	2.17	13.92	10.93	48.92	52.69	29.88	34.08	12.76	9.00	11.54	13.00	13.35			
Limited-Review:																		
Benton Harbor	450	0.71	4.75	0.00	4.75	2.67	68.46	70.89	22.04	26.44	4.44	0.00	0.91	4.93	4.02			
Grand Rapids	2,588	4.08	2.04	2.32	7.26	7.96	62.50	55.64	28.20	34.04	5.52	5.14	6.19	4.94	6.63			
Jackson	1,427	2.25	2.20	1.26	9.96	8.83	79.58	80.03	8.26	9.88	18.02	7.41	15.69	18.76	17.75			
Kalamazoo	3,188	5.02	3.59	2.07	18.17	7.94	45.26	38.74	32.98	51.22	10.10	5.80	5.68	9.47	12.60			
Lansing	2,225	3.51	2.88	2.92	9.39	7.55	61.84	57.66	25.89	31.82	8.85	5.09	6.69	8.36	11.32			
Saginaw	2,760	4.35	3.90	1.16	16.11	9.86	61.03	58.19	18.95	30.65	12.37	4.72	5.76	11.92	18.55			
Non-Metropolitan Areas	581	0.92	0.20	0.00	2.19	0.86	59.82	59.24	37.78	39.90	8.89	0.00	0.00	8.87	9.66			

(*) Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

(**) Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

(***) Based on 2002 Aggregate HMDA Data only.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT												State: Michigan		Evaluation Period: January 1, 2000 to December 31, 2002				
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***							
	#	% of Total*	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full-Review:																		
Ann Arbor	670	7.26	0.77	0.00	18.41	6.42	56.54	44.03	24.28	22.99	4.10	0.00	3.04	4.56	3.95			
Detroit	6,795	73.68	7.93	2.37	13.16	6.87	48.48	39.13	30.42	25.90	5.16	2.46	3.35	5.77	5.63			
Flint	206	2.23	7.65	5.34	16.57	12.14	45.37	33.98	30.41	29.13	0.77	0.00	0.67	0.58	1.20			
Detroit CMSA Combined	7,671	83.17	7.28	2.24	13.92	6.97	48.92	39.42	29.88	25.73	4.61	2.20	3.03	5.19	4.93			
Limited-Review:																		
Benton Harbor	60	0.65	4.75	1.67	4.75	6.67	68.46	55.00	22.04	8.33	1.11	0.00	3.33	1.41	0.51			
Grand Rapids	259	2.881	2.04	2.32	7.26	6.18	62.50	46.33	28.20	37.45	0.39	0.00	0.48	0.32	0.55			
Jackson	217	2.35	2.20	0.92	9.96	2.30	79.58	53.00	8.26	5.07	5.60	5.00	2.90	5.75	7.58			
Kalamazoo	364	3.95	3.59	3.57	18.17	7.97	45.26	29.67	32.98	29.12	3.44	7.55	1.01	2.99	5.23			
Lansing	193	2.09	2.88	3.63	9.39	9.84	61.84	55.44	25.89	23.83	0.93	2.63	0.76	0.81	1.19			
Saginaw	339	3.68	3.90	5.90	16.11	8.26	61.03	43.66	18.95	16.52	3.65	9.09	1.67	3.49	5.45			
Non-Metropolitan Areas	120	1.30	0.20	0.00	2.19	0.00	59.82	66.27	37.78	33.73	3.92	0.00	0.00	5.88	1.43			

(*) Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

(**) Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

(***) Based on 2002 Aggregate HMDA Data only.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE												State: Michigan		Evaluation Period: January 1, 2000 to December 31, 2002				
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***							
	#	% of Total*	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full-Review:																		
Ann Arbor	16,821	11.36	0.77	0.51	18.41	10.98	56.54	55.40	24.28	31.84	16.00	9.01	15.10	15.80	16.84			
Detroit	96,434	65.13	7.93	1.23	13.16	6.14	48.48	48.27	30.42	42.42	14.29	5.55	9.28	15.04	15.15			
Flint	4,125	2.79	7.65	1.50	16.57	9.07	45.37	42.38	30.41	45.70	9.18	7.03	9.14	9.32	9.14			
Detroit CMSA Combined	117,380	79.28	7.28	1.13	13.92	6.93	48.92	49.08	29.88	41.02	14.20	5.76	10.18	14.85	14.90			
Limited-Review:																		
Benton Harbor	1,033	0.70	4.75	0.77	4.75	2.61	68.46	66.12	22.04	28.94	6.46	1.97	5.56	6.63	6.45			
Grand Rapids	7,778	5.25	2.04	1.50	7.26	6.11	62.50	55.89	28.20	36.19	7.54	6.78	9.20	7.37	7.61			
Jackson	3,797	2.56	2.20	0.58	9.96	5.00	79.58	82.70	8.26	9.59	22.67	5.47	18.31	22.88	26.77			
Kalamazoo	6,652	4.49	3.59	1.19	18.17	6.30	45.26	39.75	32.98	50.84	16.18	5.14	6.62	15.24	20.81			
Lansing	4,796	3.24	2.88	1.65	9.39	5.11	61.84	59.82	25.89	32.96	9.50	5.57	7.48	9.57	9.95			
Saginaw	4,976	3.36	3.90	0.54	16.11	5.75	61.03	60.51	188.95	31.51	14.33	6.18	6.83	14.07	18.75			
Non-Metropolitan Areas	1,663	1.12	0.20	0.00	2.19	0.93	59.82	56.62	37.78	42.45	13.83	0.00	6.06	14.51	13.47			

(*) Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

(**) Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

(***) Based on 2002 Aggregate HMDA Data only.

Table 5 Geographic Distribution of Multifamily Loans

Geographic Distribution: Multifamily Loans			Geography: Michigan						Evaluation Period: January 1, 2000 to December 31, 2002						
MSA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***				
	#	% of Total*	% of MF Units**	% BANK Loans	% of MF Units**	% BANK Loans	% of MF Units**	% BANK Loans	% of MF Units**	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full-Review:															
Ann Arbor	6	6.90	15.02	16.67	35.17	33.33	30.12	50.00	19.69	0.00	1.96	5.26	0.00	0.00	0.00
Detroit	64	73.56	18.24	3.13	14.61	7.81	44.70	79.69	22.46	9.38	20.65	0.00	3.13	34.15	15.00
Flint	4	4.60	12.66	25.00	18.43	0.00	35.67	25.00	33.24	50.00	6.67	100.00	0.00	0.00	0.00
Detroit CMSA Combined	74	85.06	17.50	5.41	17.30	9.46	42.39	74.32	22.80	10.81	15.38	4.88	2.27	28.00	8.33
Limited-Review:															
Benton Harbor	0	0.00	12.85	0.00	12.16	0.00	61.75	0.00	13.24	0.00	0.00	0.00	0.00	0.00	0.00
Grand Rapids	2	2.30	4.29	0.00	9.17	0.00	69.96	100.00	16.58	0.00	1.33	0.00	0.00	3.03	0.00
Jackson	0	0.00	15.65	0.00	15.45	0.00	64.40	0.00	4.51	0.00	0.00	0.00	0.00	0.00	0.00
Kalamazoo	2	2.30	9.79	0.00	27.37	50.00	30.27	0.00	32.39	50.00	3.33	0.00	5.26	0.00	9.09
Lansing	3	3.45	11.77	0.00	23.33	33.33	35.70	33.33	29.19	33.33	1.52	0.00	0.00	5.56	0.00
Saginaw	6	6.90	12.44	16.67	13.11	16.67	42.15	16.67	32.30	50.00	9.52	0.00	25.00	11.11	0.00
Non-Metropolitan Areas	0	0.00	0.00	0.00	9.02	0.00	59.18	0.00	31.80	0.00	0.00	0.00	0.00	0.00	0.00

(*) Multifamily loans originated and purchased in the MSA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

(**) Percentage of multifamily units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 1990 Census information.

(***) Based on 2002 Aggregate HMDA Data only.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												State: Michigan		Evaluation Period: January 1, 2000 to December 31, 2002				
MSA/Assessment Area:	Total Small Loans To Businesses		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***							
	#	% of Total*	% of Businesses **	% BANK Loans	% of Businesses **	% BANK Loans	% of Businesses **	% BANK Loans	% of Businesses **	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full-Review:																		
Ann Arbor	567	4.84	6.31	6.70	18.03	10.41	49.91	46.21	25.73	36.68	1.24	2.30	0.74	1.13	1.44			
Detroit	7,509	64.07	6.48	5.44	11.59	11.71	45.01	40.57	36.75	42.29	2.97	2.80	2.65	2.54	3.43			
Flint	444	3.79	9.93	12.16	14.81	15.99	45.53	41.22	29.73	30.63	1.87	3.45	2.07	1.29	1.82			
Detroit CMSA Combined	8,520	72.70	6.72	5.87	12.64	11.84	45.66	40.98	34.84	41.31	2.67	2.81	2.26	2.25	3.13			
Limited-Review:																		
Benton Harbor	138	1.18	6.24	1.45	9.55	12.32	65.63	50.72	18.58	35.51	1.00	0.00	1.25	0.81	1.82			
Grand Rapids	1,062	9.06	6.76	10.17	9.85	11.58	56.12	47.83	27.27	30.41	1.67	3.03	2.14	1.21	2.16			
Jackson	62	0.53	10.46	1.61	14.85	22.58	69.64	74.19	5.04	1.61	0.69	0.00	2.48	0.58	0.00			
Kalamazoo	822	7.01	8.26	8.71	16.66	11.99	40.75	46.72	32.60	32.58	2.89	3.15	1.67	3.05	2.72			
Lansing	606	5.17	8.10	8.58	12.45	13.86	48.49	39.93	30.97	37.62	2.05	1.74	2.68	1.42	2.61			
Saginaw	342	2.92	7.78	11.40	15.79	11.40	56.95	62.28	19.48	14.91	1.36	2.21	1.30	1.30	0.90			
Non-Metropolitan Areas	167	1.43	0.13	2.99	2.12	0.00	59.82	67.07	37.93	29.94	1.38	11.11	0.00	1.07	1.04			

(*) Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

(**) Source of Data-Dunn and Bradstreet.

(***) Based on 2002 Aggregate Small Business Data only.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS												State: Michigan		Evaluation Period: January 1, 2000 to December 31, 2002				
MSA/Assessment Area:	Total Small Loans To Farms		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***							
	#	% of Total*	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full-Review:																		
Ann Arbor	0	0.00	0.50	0.00	19.04	0.00	59.80	0.00	20.66	0.00	0.00	0.00	0.00	0.00	0.00			
Detroit	4	10.26	1.74	0.00	7.24	25.00	61.00	50.00	30.02	25.00	2.70	0.00	0.00	2.67	5.56			
Flint	1	2.56	1.59	0.00	6.34	0.00	43.52	0.00	48.56	100.00	0.00	0.00	0.00	0.00	0.00			
Detroit CMSA Combined	5	12.82	1.42	0.00	10.04	20.00	59.06	40.00	29.48	40.00	1.52	0.00	0.00	1.63	2.78			
Limited-Review:																		
Benton Harbor	1	2.56	0.58	0.00	1.73	0.00	85.28	100.00	12.41	0.00	1.15	0.00	0.00	1.27	0.00			
Grand Rapids	0	0.00	1.00	0.00	2.38	0.00	71.13	0.00	25.49	0.00	0.00	0.00	0.00	0.00	0.00			
Jackson	1	2.56	0.48	0.00	2.42	0.00	94.43	100.00	2.66	0.00	0.00	0.00	0.00	0.00	0.00			
Kalamazoo	10	25.64	2.12	10.00	19.62	0.00	53.68	50.00	24.58	40.00	3.40	0.00	0.00	0.00	14.81			
Lansing	2	5.13	0.90	0.00	2.85	0.00	78.96	100.00	17.29	0.00	1.69	0.00	0.00	2.00	0.00			
Saginaw	0	0.00	0.40	0.00	13.41	0.00	71.99	0.00	14.21	0.00	0.00	0.00	0.00	0.00	0.00			
Non-Metropolitan Areas	20	51.28	0.00	5.00	0.26	0.00	63.01	50.00	36.73	45.00	6.09	0.00	0.00	4.94	8.33			

(*) Small loans to farms originated and purchased in the MSA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

(**) Source of Data-Dunn and Bradstreet.

(***) Based on 2002 Aggregate Small Farm Data only.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE												State: Michigan		Evaluation Period: January 1, 2000 to December 31, 2002				
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****							
	#	% of Total*	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	Overall	Low	Mod	Mid	Upp			
Full-Review:																		
Ann Arbor	7,369	11.61	18.62	8.94	18.46	24.95	25.41	32.21	37.52	33.90	18.25	20.26	18.76	17.57	17.86			
Detroit	40,620	64.02	21.94	11.29	16.73	28.88	22.17	29.48	39.16	30.35	14.35	13.66	14.55	15.09	13.72			
Flint	2,238	3.53	24.56	13.85	14.77	26.98	21.55	30.75	39.12	28.42	12.10	13.90	13.32	12.56	10.02			
Detroit CMSA Combined	50,227	79.16	21.87	11.06	16.71	28.21	22.41	29.94	39.01	30.79	14.68	14.35	14.96	15.25	13.98			
Limited-Review:																		
Benton Harbor	450	0.71	21.03	6.24	16.68	15.37	23.55	25.17	38.75	53.23	5.30	2.26	2.84	5.33	7.78			
Grand Rapids	2,588	4.08	15.40	11.15	16.99	28.08	27.08	29.95	40.53	30.81	6.82	6.43	6.52	6.81	7.41			
Jackson	1,427	2.25	19.56	7.67	18.07	24.91	24.03	29.91	38.33	37.51	19.89	19.47	20.27	19.79	19.79			
Kalamazoo	3,188	5.02	21.00	5.25	17.17	19.65	22.58	29.18	39.25	45.91	12.71	6.87	10.44	13.37	15.18			
Lansing	2,225	3.51	19.30	9.39	17.62	24.50	24.50	31.13	38.57	34.98	10.60	7.08	10.18	11.38	11.87			
Saginaw	2,760	4.35	22.74	11.76	16.14	25.30	21.98	28.72	39.14	34.22	14.33	10.30	13.36	14.82	16.84			
Non-Metropolitan Areas	581	0.92	16.60	5.21	15.87	18.40	21.15	30.03	46.38	46.35	10.59	8.59	8.95	10.43	12.21			

(*) Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

(**) Percentage of Families is based on 1990 Census information.

(***) As a percentage of loans with borrower income information available. No information was available for 1.26% of loans originated and purchased by the bank.

(****) Based on 2002 Aggregate HMDA Data only.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT												State: Michigan		Evaluation Period: January 1, 2000 to December 31, 2002				
MSA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****							
	#	% of Total*	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	Overall	Low	Mod	Mid	Upp			
Full-Review:																		
Ann Arbor	670	7.26	18.62	7.16	18.46	20.04	25.41	34.97	37.52	37.83	4.25	4.29	4.20	4.38	4.10			
Detroit	6,795	73.68	21.94	13.97	16.73	23.71	22.17	27.97	39.16	34.35	5.29	4.99	5.63	5.69	4.64			
Flint	206	2.23	24.56	16.97	14.77	18.18	21.55	24.24	39.12	40.61	0.80	1.50	0.44	1.06	0.51			
Detroit CMSA Combined	7,671	83.17	21.87	13.46	16.71	23.23	22.41	28.47	39.01	34.84	4.74	4.64	5.05	5.07	4.08			
Limited-Review:																		
Benton Harbor	60	0.65	21.03	20.93	16.68	27.91	23.55	23.26	38.75	27.91	1.14	1.83	1.46	0.97	0.93			
Grand Rapids	259	2.81	15.40	10.88	16.99	22.18	27.08	28.03	40.53	38.91	0.41	0.27	0.70	0.11	0.53			
Jackson	217	2.35	19.56	6.82	18.07	18.94	24.03	32.58	38.33	41.67	5.68	4.12	5.36	6.28	5.94			
Kalamazoo	364	3.95	21.00	13.44	17.17	17.39	22.58	24.90	39.25	44.27	3.55	2.54	2.29	3.08	5.50			
Lansing	193	2.09	19.30	17.37	17.62	21.56	24.50	27.54	38.57	33.53	0.97	2.41	0.62	0.51	1.12			
Saginaw	339	3.68	22.74	18.73	16.14	19.52	21.98	29.48	39.14	32.27	3.71	3.49	3.88	3.47	3.94			
Non-Metropolitan Areas	120	1.30	16.60	6.10	15.87	21.95	21.15	29.27	46.38	42.68	4.06	0.00	3.70	5.84	4.04			

(*) Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
 (**) Percentage of Families is based on 1990 Census information.
 (***) As a percentage of loans with borrower income information available. No information was available for 26.36% of loans originated and purchased by the bank.
 (****) Based on 2002 Aggregate HMDA Data only.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE											State: Michigan		Evaluation Period: January 1, 2000 to December 31, 2002				
MSA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****						
	#	% of Total*	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	Overall	Low	Mod	Mid	Upp		
Full-Review:																	
Ann Arbor	16,821	11.36	18.62	7.13	18.46	21.27	25.41	32.23	37.52	39.37	18.69	16.77	17.02	19.14	19.78		
Detroit	96,434	65.13	21.94	8.67	16.73	22.72	22.17	30.19	39.16	38.42	16.44	14.00	15.67	17.25	16.98		
Flint	4,125	2.79	24.56	7.32	14.77	20.40	21.55	30.93	39.12	41.35	10.57	10.47	10.91	10.25	10.66		
Detroit CMSA Combined	117,380	79.28	21.87	8.39	16.71	22.43	22.41	30.52	39.01	38.66	16.37	14.13	15.58	17.06	16.91		
Limited-Review:																	
Benton Harbor	1,033	0.70	21.03	6.38	16.68	18.15	23.55	25.42	38.75	50.05	8.37	5.93	9.18	8.23	8.60		
Grand Rapids	7,778	5.25	15.40	8.54	16.99	25.18	27.08	31.71	40.53	34.56	10.06	10.32	10.34	10.04	9.82		
Jackson	3,797	2.56	19.56	5.55	18.07	17.48	24.03	30.36	38.33	46.61	25.40	20.55	20.61	25.36	28.65		
Kalamazoo	6,652	4.49	21.00	4.74	17.17	17.15	22.58	27.00	39.25	51.10	20.46	11.31	15.37	20.00	24.85		
Lansing	4,796	3.24	19.30	8.06	17.62	20.68	24.50	30.82	38.57	40.44	12.03	11.83	11.95	11.99	12.15		
Saginaw	4,976	3.36	22.74	5.86	16.14	18.54	21.98	29.50	39.14	46.10	15.85	9.55	13.09	16.59	18.15		
Non-Metropolitan Areas	1,663	1.12	16.60	3.77	15.87	15.88	21.15	25.61	46.38	54.74	16.44	11.68	13.95	14.97	18.67		

(*) Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

(**) Percentage of Families is based on 1990 Census information.

(***) As a percentage of loans with borrower income information available. No information was available for 5.76% of loans originated and purchased by the bank.

(****) Based on 2002 Aggregate HMDA Data only.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES			State: Michigan		Evaluation Period: January 1, 2000 to December 31, 2002				
	Total Small Loans to Businesses		Businesses with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share****	
	#	% of Total*	% of Businesses**	% BANK Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 million or less
Full-Review:									
Ann Arbor	567	4.84	77.44	21.52	54.32	16.93	28.75	1.24	0.72
Detroit	7,509	64.07	73.94	24.49	51.30	19.86	28.85	2.97	2.38
Flint	444	3.79	79.09	22.07	53.38	22.07	24.55	1.87	1.35
Detroit CMSA Combined	8,520	72.70	74.76	24.17	51.61	19.78	28.62	2.67	2.05
Limited-Review:									
Benton Harbor	138	1.18	79.40	22.46	49.28	20.29	30.43	1.00	0.82
Grand Rapids	1,062	9.06	76.64	21.47	50.00	18.46	31.54	1.67	0.92
Jackson	62	0.53	79.03	35.48	54.84	19.35	25.81	0.69	0.75
Kalamazoo	822	7.01	79.79	25.67	49.15	22.26	28.59	2.89	2.36
Lansing	606	5.17	78.70	27.72	60.73	19.31	19.97	2.05	1.65
Saginaw	342	2.92	80.67	26.32	55.85	27.49	16.67	1.36	1.33
Non-Metropolitan Areas	167	1.43	80.21	20.36	55.09	25.15	19.76	1.38	1.05

(*) Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

(**) Businesses with revenues of \$1 million or less as a percentage of all businesses.

(***) Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 57.36% of small loans to businesses originated and purchased by the bank.

(****) Based on 2002 Aggregate Small Business Data only.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS			State: Michigan		Evaluation Period: January 1, 2000 to December 31, 2002				
	Total Small Loans to Farms		Farms with Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share****	
	#	% of Total*	% of Businesses**	% BANK Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 million or less
Full-Review:									
Ann Arbor	0	0.00	95.61	0.00	0.00	0.00	0.00	0.00	0.00
Detroit	4	10.26	92.51	75.00	75.00	25.00	0.00	2.70	2.35
Flint	1	2.56	95.68	100.00	0.00	0.00	100.00	0.00	0.00
Detroit CMSA Combined	5	12.82	93.57	80.00	60.00	20.00	20.00	1.52	1.27
Limited-Review:									
Benton Harbor	1	2.56	93.36	0.00	0.00	100.00	0.00	1.15	0.00
Grand Rapids	0	0.00	90.67	0.00	0.00	0.00	0.00	0.00	0.00
Jackson	1	2.56	96.13	100.00	100.00	0.00	0.00	0.00	0.00
Kalamazoo	10	25.64	92.12	40.00	60.00	20.00	20.00	3.40	0.90
Lansing	2	5.13	95.68	0.00	50.00	0.00	50.00	1.69	0.00
Saginaw	0	0.00	96.57	0.00	0.00	0.00	0.00	0.00	0.00
Non-Metropolitan Areas	20	51.28	96.28	45.00	50.00	25.00	25.00	6.09	2.06

(*) Small loans to farms originated and purchased in the MSA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

(**) Farms with revenues of \$1 million or less as a percentage of all businesses.

(***) Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 34.09% of small loans to businesses originated and purchased by the bank.

(****) Based on 2002 Aggregate Small Farm Data only.

**Table 13. Geographic and Borrower Distribution of Consumer Loans (Institution’s Option)
– Not Applicable**

		Geographic and Borrower Distribution: CONSUMER LOANS				State: Michigan				Evaluation Period: January 1, 2000 to December 31, 2002								
MSA/Assessment Area:	Total Consumer Loans		Geographic Distribution								Borrower Distribution							
			Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total**	% of Hhlds*	% BANK Loans	% of Hhlds*	% BANK Loans	% of Hhlds*	% BANK Loans	% of Hhlds*	% BANK Loans	% of Hhlds*	% BANK Loans	% of Hhlds*	% BANK Loans	% of Hhlds*	% BANK Loans	% of Hhlds*	% BANK Loans
Full-Review:																		
Ann Arbor																		
Detroit																		
Flint																		
Detroit CMSA Combined																		
Limited-Review:																		
Benton Harbor																		
Grand Rapids																		
Jackson																		
Kalamazoo																		
Lansing																		
Saginaw																		
Non-Metropolitan Areas																		

(*) Percentage of Households (Hhlds) is based on 1990 Census information.

(**) Consumer loans originated and purchased in the MSA/AA as a percentage of all consumer loans originated and purchased in the rated area.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		State: Michigan		Evaluation Period: to December 31, 2002					
MA/Assessment Areas:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$'s	#	\$ (000's)
Full-Review:									
Ann Arbor	2	1,270	19	5,816	21	7,086	4.54	0	0
Detroit	3	6,090	143	125,037	146	131,127	84.03	0	0
Flint	1	419	16	1,236	17	1,655	1.06	0	0
Detroit CMSA Combined	6	7,779	178	132,089	184	139,868	89.63	0	0
Limited-Review:									
Benton Harbor	1	28	7	323	8	351	0.22	0	0
Grand Rapids	2	1,409	12	2,366	14	3,775	2.42	0	0
Jackson	1	140	11	1,496	12	1,636	1.05	0	0
Kalamazoo	1	248	16	2,421	17	2,669	1.71	0	0
Lansing	1	168	14	832	15	1,000	0.64	0	0
Saginaw	2	1,192	24	3,201	26	4,393	2.82	0	0
Non-Metropolitan Areas	0	0	7	403	7	403	0.26	0	0
Qualified Investments Outside of AAS	1	784	32	1,162	33	1,946	1.25	0	0

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

(**) "Unfunded Commitments" means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								State: Michigan		Evaluation Period: to December 31, 2002							
MSA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in MSA/AA	# of BANK Branches	% of Rated Area Branches in MSA/AA	Location of Branches by Income of Geographies				# of Branch Closings	# of Branch Openings	Net Change in Location of Branches (+ or -)				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Review:																	
Ann Arbor	2.37	16	6.13	2	6	7	1	0	1	0	+1	0	0	6.88	21.53	49.02	22.26
Detroit	85.69	163	62.45	4	21	75	63	0	4	+1	0	+2	+1	13.89	15.52	43.94	26.57
Flint	1.17	11	4.22	1	4	4	2	0	0	0	0	0	0	12.59	18.07	41.58	27.76
Detroit CMSA Combined	89.24	190	72.80	7	31	86	66	0	5	+1	+1	+2	+1	13.11	16.31	44.23	26.26
Limited-Review																	
Benton Harbor	0.63	4	1.53	0	2	1	1	0	0	0	0	0	0	9.74	6.53	65.19	18.53
Grand Rapids	1.93	16	6.13	1	4	5	6	0	0	0	0	0	0	4.25	9.96	60.22	25.57
Jackson	0.46	4	1.53	1	0	3	0	0	0	0	0	0	0	5.63	13.71	72.13	6.70
Kalamazoo	2.95	16	6.13	1	1	7	6	0	0	0	0	0	0	7.90	21.41	41.45	29.07
Lansing	2.09	13	4.98	1	2	6	4	0	0	0	0	0	0	5.70	14.30	53.15	26.85
Saginaw	2.17	13	4.98	1	2	6	4	0	0	0	0	0	0	7.11	18.19	56.42	18.28
Non-Metropolitan Areas	0.54	5	1.92	0	0	3	2	0	0	0	0	0	0	0.23	2.71	60.48	36.57

Table 1. Lending Volume

LENDING VOLUME		State: Indiana				Evaluation Period: January 1, 2000 to December 31, 2002						
MSA/Assessment Area:	% of Rated Area Loans (#) in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MSA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full-Review:												
South Bend	61.22	2,454	234,068	38	8,727	0	0	27	250	2,519	243,045	79.06
Limited-Review:												
Elkhart	38.78	1,588	151,749	7	2,087	0	0	12	108	1,607	153,944	20.94
CD Loans Outside of AA	0.00	0	0	0	0	0	0	6	289,700	6	289,700	0.00

(*) Rated area refers to either the state or multi-state MSA rating area.

(**) The evaluation period for Community Development Loans is June 30, 1999 to December 31, 2002.

(***) Deposit data as of June 30, 2002. Rated area refers to either the state or multi-state MSA rating area.

Table 1. Other Products – Not Applicable

LENDING VOLUME		State: Indiana				Evaluation Period: January 1, 2000 to December 31, 2002								
MSA/Assessment Area:	% of Rated Area Loans (#) in MSA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in MSA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full-Review:														
South Bend														
Limited -Review														
Elkhart														

(*) Rated area refers to either the state or multi-state MSA rating area.

(**) The evaluation period for Optional Product Line(s) is from January 1, 2000 to December 31, 2002.

(***) Deposit data as of June 30, 2002. Rated area refers to either the state or multi-state MSA rating area.

Table 1. Other Products – Not Applicable

LENDING VOLUME		State: Indiana		Evaluation Period: January 1, 2000 to December 31, 2002	
MSA/Assessment Area:	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$(000's)	#	\$(000's)	
Full-Review:					
South Bend					
Limited –Review					
Elkhart					

(*) Rated area refers to either the state or multi-state MSA rating area.

(**) The evaluation period for Optional Product Line(s) is from January 1, 2000 to December 31, 2002.

(***)

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE															State: Indiana		Evaluation Period: January 1, 2000 to December 31, 2002				
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***										
	#	% of Total*	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	Overall	Low	Mod	Mid	Upp						
Full-Review:																					
South Bend	892	64.78	2.02	1.35	18.67	5.04	59.38	51.35	19.93	42.26	5.69	0.00	1.01	5.80	8.73						
Limited-Review:																					
Elkhart	485	35.22	0.03	0.00	4.01	1.03	86.30	80.82	9.66	18.14	3.75	0.00	0.92	3.77	4.38						

(*) Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

(**) Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

(***) Based on 2002 Aggregate HMDA Data only.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT												State: Indiana		Evaluation Period: January 1, 2000 to December 31, 2002		
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***					
	#	% of Total*	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full-Review:																
South Bend	63	55.75	2.02	0.00	18.67	3.17	59.38	36.51	19.93	11.11	1.49	0.00	0.00	1.75	2.04	
Limited-Review:																
Elkhart	50	44.25	0.03	0.00	4.01	0.00	86.30	54.00	9.66	6.00	0.64	0.00	0.00	0.76	0.00	

(*) Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

(**) Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

(***) Based on 2002 Aggregate HMDA Data only.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE												State: Indiana		Evaluation Period: January 1, 2000 to December 31, 2002				
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***							
	#	% of Total*	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full-Review:																		
South Bend	1,499	58.74	2.02	0.60	18.67	4.87	59.38	52.23	19.93	40.23	7.75	3.74	3.89	7.20	10.22			
Limited-Review:																		
Elkhart	1,053	41.26	0.03	0.00	4.01	2.28	86.30	78.82	9.66	16.52	7.44	0.00	4.47	7.20	9.66			

(*) Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

(**) Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

(***) Based on 2002 Aggregate HMDA Data only.

Table 5 Geographic Distribution of Multifamily Loans

Geographic Distribution: Multifamily Loans			Geography: Indiana						Evaluation Period: January 1, 2000 to December 31, 2002						
MSA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***				
	#	% of Total*	% of MF Units**	% BANK Loans	% of MF Units**	% BANK Loans	% of MF Units**	% BANK Loans	% of MF Units**	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full-Review:															
South Bend	0	0.00	6.62	0.00	22.49	0.00	49.18	0.00	21.72	0.00	0.00	0.00	0.00	0.00	0.00
Limited-Review:															
Elkhart	0	0.00	3.74	0.00	10.01	0.00	82.99	0.00	3.26	0.00	0.00	0.00	0.00	0.00	0.00

(*) Multifamily loans originated and purchased in the MSA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

(**) Percentage of multifamily units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 1990 Census information.

(***) Based on 2002 Aggregate HMDA Data only.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												State: Indiana		Evaluation Period: January 1, 2000 to December 31, 2002				
MSA/Assessment Area:	Total Small Loans To Businesses		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***							
	#	% of Total*	% of Businesses **	% BANK Loans	% of Businesses **	% BANK Loans	% of Businesses **	% BANK Loans	% of Businesses **	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full-Review:																		
South Bend	38	84.44	9.28	0.00	19.58	5.26	54.85	63.16	16.30	31.58	0.33	0.00	0.11	0.32	0.38			
Limited-Review:																		
Elkhart	7	15.56	4.98	0.00	5.48	0.00	83.29	100.00	6.25	0.00	0.06	0.00	0.00	0.08	0.00			

(*) Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

(**) Source of Data-Dunn and Bradstreet.

(***) Based on 2002 Aggregate Small Business Data only.

Table 7. Geographic Distribution of Small Loans to Farms – Not Applicable

Geographic Distribution: SMALL LOANS TO FARMS														State: Indiana		Evaluation Period: January 1, 2000 to December 31, 2002				
MSA/Assessment Area:	Total Small Loans To Farms		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***									
	#	% of Total*	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full-Review:																				
South Bend																				
Limited-Review:																				
Elkhart																				

(*) Small loans to farms originated and purchased in the MSA/AA as a percentage of all small loans to farms originated and purchased in the rated area.
 (**) Source of Data-Dunn and Bradstreet.
 (***) Based on 2002 Aggregate Small Farm Data only.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE												State: Indiana		Evaluation Period: January 1, 2000 to December 31, 2002				
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****							
	#	% of Total*	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	Overall	Low	Mod	Mid	Upp			
Full-Review:																		
South Bend	892	64.78	17.81	5.29	19.60	25.11	24.14	30.41	38.45	39.19	6.66	2.21	6.24	7.49	8.61			
Limited-Review:																		
Elkhart	485	35.22	14.67	12.84	20.67	26.50	28.16	31.26	36.51	29.40	4.17	3.98	3.64	4.44	4.76			

(*) Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

(**) Percentage of Families is based on 1990 Census information.

(***) As a percentage of loans with borrower income information available. No information was available for 0.44% of loans originated and purchased by the bank.

(****) Based on 2002 Aggregate HMDA Data only.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT				State: Indiana		Evaluation Period: January 1, 2000 to December 31, 2002					Market Share (%) by Borrower Income****				
MSA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp
	#	% of Total*	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***					
Full-Review:															
South Bend	63	55.75	17.81	24.14	19.60	20.69	24.14	17.24	38.45	37.93	1.58	1.86	1.54	0.51	2.45
Limited-Review:															
Elkhart	50	44.25	14.67	6.67	20.67	13.33	28.16	46.67	36.51	33.33	0.70	1.52	0.00	1.39	0.00

(*) Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

(**) Percentage of Families is based on 1990 Census information.

(***) As a percentage of loans with borrower income information available. No information was available for 47.79% of loans originated and purchased by the bank.

(****) Based on 2002 Aggregate HMDA Data only.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE												State: Indiana		Evaluation Period: January 1, 2000 to December 31, 2002				
MSA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****							
	#	% of Total*	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	Overall	Low	Mod	Mid	Upp			
Full-Review:																		
South Bend	1,499	58.74	17.81	8.03	19.60	19.68	24.14	26.10	38.45	46.20	9.08	6.63	7.77	8.86	10.77			
Limited-Review:																		
Elkhart	1,053	41.26	14.67	9.65	20.67	25.13	28.16	28.54	36.51	36.68	8.42	7.38	7.93	8.06	9.60			

(*) Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

(**) Percentage of Families is based on 1990 Census information.

(***) As a percentage of loans with borrower income information available. No information was available for 4.86% of loans originated and purchased by the bank.

(****) Based on 2002 Aggregate HMDA Data only.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES			State: Indiana		Evaluation Period: January 1, 2000 to December 31, 2002				
	Total Small Loans to Businesses		Businesses with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share****	
	#	% of Total*	% of Businesses**	% BANK Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 million or less
Full-Review:									
South Bend	38	84.44	74.10	10.53	52.63	7.89	39.47	0.33	0.27
Limited-Review:									
Elkhart	7	15.56	71.38	14.29	14.29	57.14	28.57	0.06	0.06

(*) Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

(**) Businesses with revenues of \$1 million or less as a percentage of all businesses.

(***) Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 62.22% of small loans to businesses originated and purchased by the bank.

(****) Based on 2002 Aggregate Small Business Data only.

Table 12. Borrower Distribution of Small Loans to Farms – Not Applicable

Borrower Distribution: SMALL LOANS TO FARMS		State: Indiana		Evaluation Period: January 1, 2000 to December 31, 2002					
	Total Small Loans to Farms		Farms with Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share****	
	#	% of Total*	% of Businesses**	% BANK Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 million or less
Full-Review:									
South Bend									
Limited-Review:									

(*) Small loans to farms originated and purchased in the MSA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

(**) Farms with revenues of \$1 million or less as a percentage of all businesses.

(***) Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for [Percent] of small loans to businesses originated and purchased by the bank.

(****) Based on 2002 Aggregate Small Farm Data only.

**Table 13. Geographic and Borrower Distribution of Consumer Loans (Institution’s Option)
– Not Applicable**

Geographic and Borrower Distribution: CONSUMER LOANS																				State: Indiana				Evaluation Period: January 1, 2000 to December 31, 2002					
MSA/Assessment Area:	Total Consumer Loans		Geographic Distribution								Borrower Distribution																		
			Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers												
	#	% of Total**	% of Hhlds*	% BANK Loans	% of Hhlds*	% BANK Loans	% of Hhlds*	% BANK Loans	% of Hhlds*	% BANK Loans	% of Hhlds*	% BANK Loans	% of Hhlds*	% BANK Loans	% of Hhlds*	% BANK Loans	% of Hhlds*	% BANK Loans											
Full-Review:																													
South Bend																													
Limited-Review:																													
Elkhart																													

(*) Percentage of Households (Hhlds) is based on 1990 Census information.

(**) Consumer loans originated and purchased in the MSA/AA as a percentage of all consumer loans originated and purchased in the rated area.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS State: Indiana Evaluation Period: to December 31, 2002									
MA/Assessment Areas:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$'s	#	\$ (000's)
Full-Review:									
South Bend	0	0	10	1,294	10	1,294	55.58	0	0
Limited-Review:									
Elkhart	0	0	4	449	9	449	19.29	0	0
Qualified Investments Outside of AAS	0	0	17	585	17	585	25.13	0	0

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

(**) "Unfunded Commitments" means legally binding investment commitments that are tracked and recorded by the banks financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS														State: Indiana		Evaluation Period: to December 31, 2002			
MSA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population					
	% of Rated Area Deposits in MSA/AA	# of BANK Branches	% of Rated Area Branches in MSA/AA	Location of Branches by Income of Geographies				# of Branch Closings	# of Branch Openings	Net Change in Location of Branches (+ or -)				% of the Population within Each Geography					
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp		
Full-Review:																			
South Bend	79.04	6	75.00	1	0	4	1	0	2	0	0	+2	0	3.07	23.16	55.63	18.14		
Limited-Review:																			
Elkhart	20.94	2	25.00	0	1	1	0	0	1	0	0	+1	0	0.46	6.47	84.56	8.52		