CITY OF MILWAUKEE

Annual Review of Lending Practices

of Financial Institutions

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City Comptroller

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REVIEW OF LENDING PRACTICES OF FINANCIAL INSTITUTIONS

I. INTRODUCTION

A. Common Council Authority

1. Common Council Resolution #890493 created the City of Milwaukee's socially responsible investment program. The resolution directed the Comptroller to annually prepare a Financial Institution Lending Report. The resolution also directed that data on lending activities should be requested from each financial institution as these activities relate to the lending goals adopted by the Common Council. This is the thirteenth such lending report issued by the Comptroller since it's inception in 1992.

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

2. This report is based on the following data:

   - 2000 Census data
   - 1994 through 2004 Home Mortgage Disclosure Act (HMDA) data
   - 1996 through 2004 data from the Wisconsin Housing and Economic Development Authority (WHEDA)
   - 2004 Community Reinvestment Act small business lending data.
   - 1996 through 2004 Lending Reports

B. Data Limitations:

1. Information in the report is often shown on a per household basis. This information is calculated using 2000 Census statistics for the Milwaukee Metropolitan Area ("Metropolitan Area").

2. Another major limitation is the timeliness of HMDA data. HMDA data for 2004 was not available until August of 2005. HMDA data also excludes information on pooled funds established by multiple financial institutions or other special programs aimed at increasing Target Area, low income, and minority lending, such as WHEDA programs. However, State WHEDA data is discussed on pages 18 and 19 of the report.

3. This report includes residential loans originated where no race was indicated. In 2004, no race was reported for 4,996 (10.5% of Metropolitan Area applications) HMDA residential loans. This may affect the minority and white percentage increases in lending shown in this report. The high number of home improvement loans where race is not available may have resulted from mail and phone applications for home improvement loans.

4. The Target Area (TA) has not been revised or updated since originated. This allows for consistency in reporting from year to year, but doesn't take into consideration changes in demographics that may have occurred and the revitalization of the downtown and

surrounding areas. For example, the housing makeup of the downtown and Third Ward has changed significantly since 1992 and remains a dynamic and evolving area.

5. Beginning with data collected and reported by HMDA for 2004, "Hispanic" is no longer classified as a race, but is instead classified as an "ethnicity." Those individuals, who would have classified themselves racially as Hispanic, must now choose another race and then select Hispanic as an ethnicity, for example, White Hispanic or Black Hispanic. For the purposes of this report, only those loan applicants that identified themselves as "White, Non-Hispanic" were counted as White. It was decided that if this report identified those defining themselves as White and ethnic Hispanics as White, the comparability of data from prior years would be lost. Every precaution has been taken in an attempt to keep 2004 data comparable with data from prior years.

6. At the time this Report was compiled HUD's list of subprime lenders had not been updated for 2003. For the purposes of this report, 2002 data was used.

C. Refinancing Loan Data Excluded

This report excludes refinancing loans. This was done to prevent refinancing activity, which is driven by decreases in interest rates, from distorting the trends in new home ownership and home improvement loan activity. Within the Milwaukee Metropolitan Area, applications for refinancing loans decreased by approximately 40% to 82,263 in 2004 as mortgage rates stabilized and the rush to refinance came to an end. Refinancing loan originations decreased from 100,252 in 2003 to 45,324, a change of 55%. Even though total refinancings decreased in the Metropolitan Area, TA refinancing applications increased by 21%, from 4,479 in 2003 to 5,423 in 2004. TA refinancing originations totaled 5% of the total Metropolitan Area refinancing originations in 2004, up from 2.1% in 2003. The City of Milwaukee, excluding the TA, made up 29% of refinancing loans originated in 2004.

D. Wisconsin Housing & Economic Development Authority (WHEDA)

WHEDA provided data on the HOME program, Home Improvement Loan Program and the Home Plus Program. Like FHA and VA home improvement loans, WHEDA home improvement loans are not reported separately in this report. Data on the WHEDA Programs is shown on pages 18 and 19 of this report.

E. Definition of Income Areas

Low to Moderate Income Areas are defined as those Census tracts in which median family income is less than 80% of the median family income of the Metropolitan Area. Middle Income Areas are those Census tracts in which median family income is between 80% to 120% of the median family income of the Metropolitan Area, and Upper Income Areas include only Census tracts with median family income exceeding 120% of the Metropolitan Area's median family income. Median family income as determined by the Census Bureau was $63,200 in 2004.

II. CONCLUSIONS –

In 2004 the housing market built on the record home sales experienced in 2003. Metropolitan Area conventional loan applications were up 11.5% from 2003 (from 32,753 to 36,508), and originations were up 8.6% (from 25,104 to 27,264). Nationally, conventional loan originations increased by 21.6% over 2003 levels (from 4,811,096 to 5,852,437) as mortgage interest rates remained affordable and credit continued to be available.

This report shows continued improvement in the Target Area (TA), the City of Milwaukee, and in minority lending in the Metropolitan Area. Steps have been taken by area lenders to make the lending process more inclusive and to make the American dream of home ownership a reality for persons of all ethnicities.

For the period of time covered by this report, the rate of growth for residential lending in the Target Area has out-paced the growth of the Metropolitan Area as a whole. Each year since 1996 the number of loans originated in the TA has grown. In 2004, conventional loan applications in the TA were up 48.1% (2,017 to 2,988) from 2003, and originations were up 46.1% (1,173 to 1,714). Assessed values continue to increase in the TA, indicating that home equity continues to build.

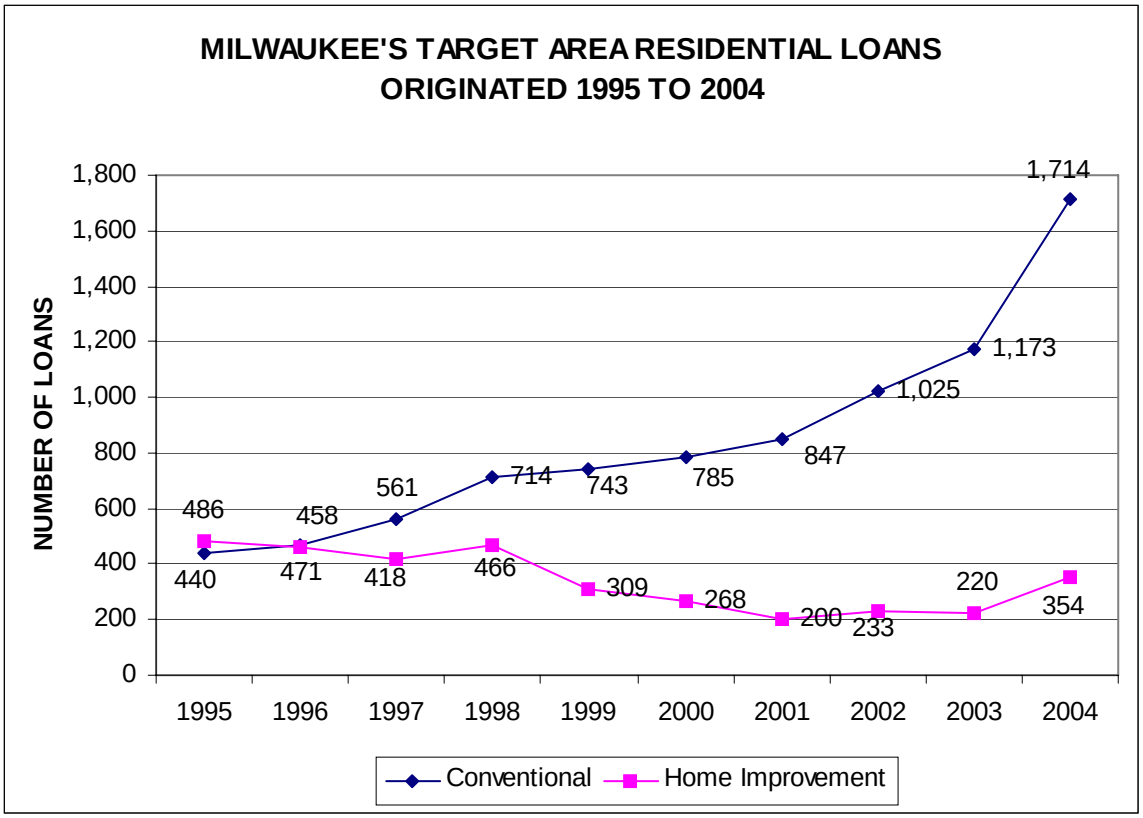
But this report also illustrates that there is work left to be done to close Milwaukee's racial lending gap. Residential loan denial disparity for non-whites compared to whites in the Milwaukee Metropolitan Area, while improved from prior years, is still among the highest in the nation. And while the loan denial rate for Metropolitan Area non-white home loan applicants is declining, mirroring that of the nation as a whole, the denial rate for Metro Area white loan applicants remains among the lowest in the nation.

1. From 1995 Through 2004, Gains in Target Area Conventional Loans Have Substantially Out-Paced Lending in the City as a Whole.

Since 1995, total annual conventional loans originated in the TA have increased by 289.5% (440 to 1,714). In 2004, the TA experienced the largest one year increase in loan activity since this report was originated. Over the same period of time, conventional loans in the Metropolitan Area excluding the TA have increased by 70.3% (15,000 to 25,550). Target Area home purchase lending has outpaced Metropolitan Area lending by a four-to-one margin from 1995 through 2004.

Part of this growth could be attributed to the revitalization of the downtown and Third Ward areas. This growth in housing is spilling over into the Fifth Ward, Brewers Hill, and near East Side. In addition, the City of Milwaukee has added in-fill housing in other TA neighborhoods such as Lindsay Heights, Josie Heights, and City Homes, utilizing tax incremental financing. These development projects offer the prospect of new construction in older, established neighborhoods, thereby injecting new life and new residents into these areas.

For home improvement loans, the number of loans in the TA dropped by 27.2% (486 to 354) between 1995 and 2004, but 2004 activity increased by 60.9% over 2003 levels (220 to 354).

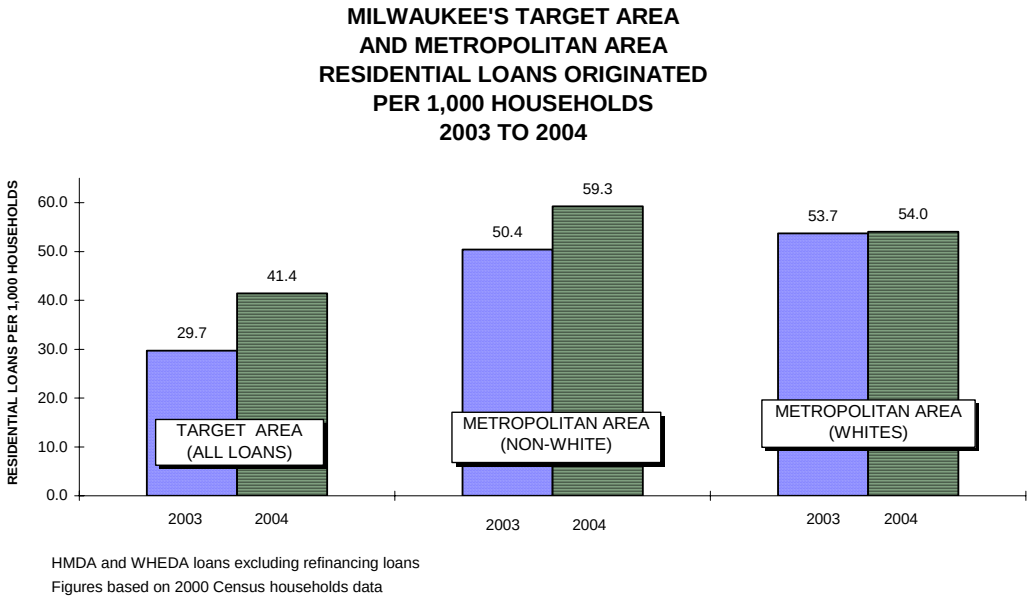


One possible explanation for the overall decline of home improvement loans could be the popularity of home equity loans and home equity lines of credit. Many home owners now rely upon home equity to finance many home repairs. As many of these home equity lines of credit are granted along with a new mortgage,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

	Conventional Loans Number of Loans		Home Improvement Loans Number of Loans		FHA, VA and Multi-Family Loans Number of Loans	
Year	TA	Metropolitan Area Less TA	TA	Metropolitan Area Less TA	TA	Metropolitan Area Less TA
1995	440	15,000	486	7,693	83	1,388
1996	471	17,739	458	8,158	102	1,687
1997	561	17,646	418	6,143	152	2,010
1998	714	21,068	466	5,407	139	2,210
1999	743	20,834	309	5,449	120	2,272
2000	785	19,370	268	4,837	132	2,070
2001	847	21,018	200	4,115	172	2,623
2002	1,025	22,789	233	4,433	173	2,278
2003	1,173	23,931	220	5,036	185	2,153
2004	1,714	25,550	354	4,492	139	1,499

2. Target Area Borrowers and Metropolitan Area Non-White Borrowers Experience the Biggest Gains in Residential Lending.

For the second consecutive year, the biggest percentage gains in residential lending occurred in borrowing within the Target Area and in borrowing for Metropolitan Area minorities. Residential lending per 1,000 households increased by 39.4% (29.7 per thousand in 2003; 41.4 per thousand in 2004) for TA borrowers irrespective of race, and increased by 17.7% for minority borrowers in the Metro-wide area (50.4 per thousand in 2003; 59.3 loans per thousand in 2004). Residential lending to Metropolitan Area whites was flat during the same time period.



The disparity between loans made to Metro Area whites and loans made to individuals in the TA is decreasing. In reading the graph above, notice how the 2003 gap of 24 loans per 1,000 households between Metro Area whites (at 53.7 per 1,000) and TA residents (29.7 loans per 1,000 households) was narrowed to 12.6 loans per 1,000 in 2004 (41.4 loans per 1,000 households for TA, 54.0 loans per 1,000 for Metro Area whites). This not only demonstrates that more loans are being made to individuals in the TA, but also that more people are choosing to reside within the TA.

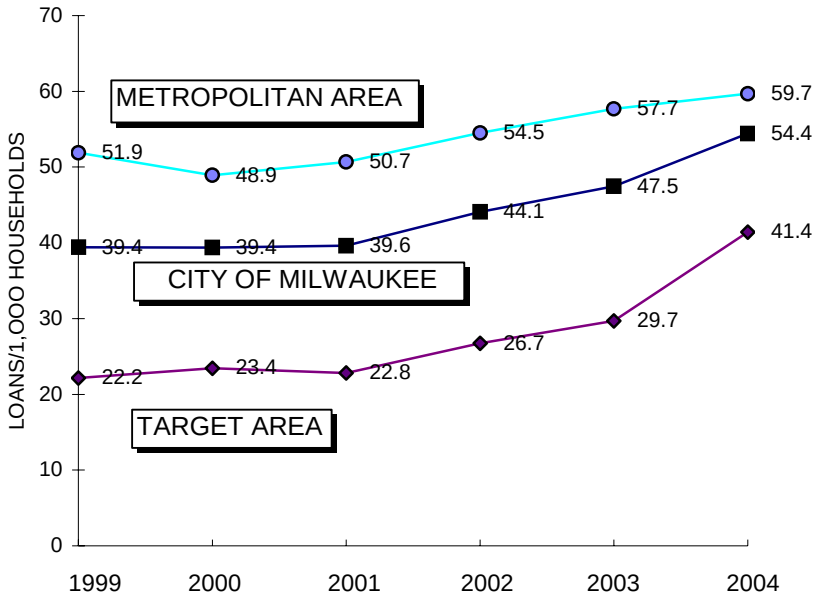
3. Residential Lending Per Thousand Households Increased from 1999 to 2004 for the TA, City of Milwaukee, and the Metropolitan Area.

Point two above looked at changes in lending trends for white and non-white borrowers. Point three examines changes in lending trends by three areas: the Target Area, the City of Milwaukee, and the Metropolitan Area.

Illustrated by the graph on the following page, Target Area residential lending per 1,000 households increased by 86.5% between 1999 and 2004, to 41.4 loans per 1,000 households. Over the same period, lending in the City of Milwaukee increased 38.1% (39.4 per 1,000 households in 1999 to 54.4 in 2004) while Metropolitan Area lending per 1,000 households increased by 15% (from 51.9 in 1999 to 59.7 in 2004) per 1,000 households.

While all three areas experienced a healthy growth in lending from 1999 to 2004, growth in residential lending in the TA has outpaced rates in the rest of the City of Milwaukee and the Metropolitan Area as a whole. Downtown revitalization has also certainly contributed to the increase in lending in the Target Area. Also, programs initiated to target lending practices in the TA are having a positive impact on the properties and residents of the area. The findings discussed in point three are illustrated by the graph below.

MILWAUKEE METROPOLITAN AREA
RESIDENTIAL LOANS ORIGINATED PER 1,000 HOUSEHOLDS
1999 - 2004



HMDA and WHEDA loans excluding refinancing loans

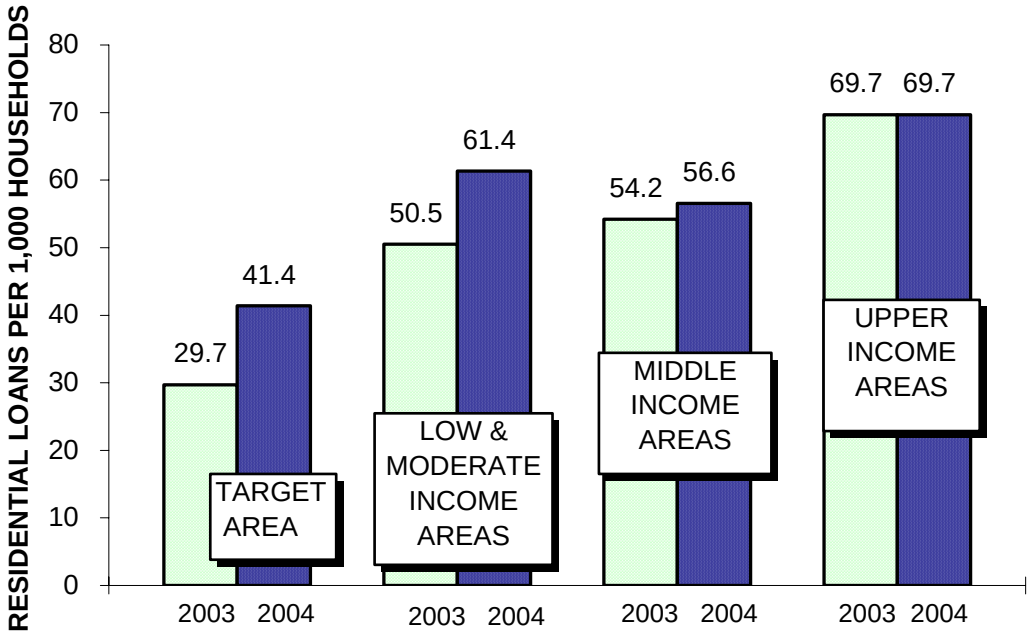
Another way to look at lending is by the income characteristics of residents living in an area. The Community Reinvestment Act requires lenders to attempt to meet the financial needs of residents living in low and moderate income Census tracts.*

In 2003, TA lending was 42.6% of the lending rate occurring in upper income areas (29.7 per thousand in TA, 69.7 per thousand in upper income areas), per the chart on the following page. By 2004, TA lending had improved to 59.4% of lending in upper income areas (41.4 per thousand TA, 69.7 per thousand upper income areas).

Not surprisingly, lending in low and moderate income Census tracts has also improved from 2003. Low and Moderate income lending totals 61.4 loans per thousand households compared to 69.7 loans per thousand households in upper income Census tracts. Upper income lending didn't change from the 2003 Lending Report.

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

MILWAUKEE'S TARGET AREA AND METROPOLITAN AREA RESIDENTIAL LOANS ORIGINATED PER 1,000 HOUSEHOLDS 2003 AND 2004



HMDA and WHEDA loans excluding refinancing loans

Although most of the Target Area is within a low and moderate income area, TA per 1,000 household lending in 2004 represents two-thirds of all lending to all low and moderate income areas. Overall lending to low and moderate income Census tracts across the Milwaukee Metropolitan Area increased, up from 50.5 loans per thousand households in 2003 to almost 61.4 loans per thousand in 2004.

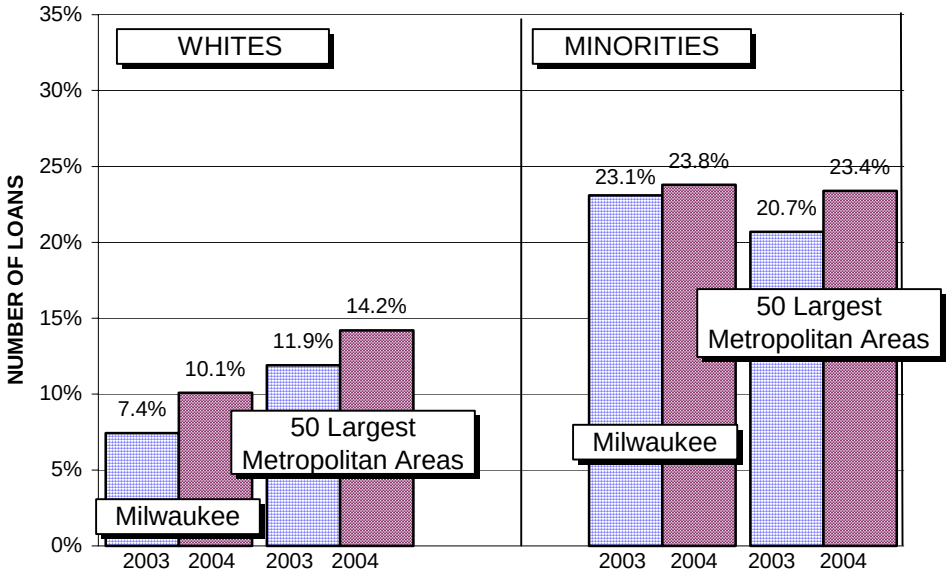
4. <u>Although Disparity Rates Have Improved Substantially, Milwaukee Continues to Lead the US with the Highest Racial Denial Rate Disparity.</u>

Milwaukee and Philadelphia lead the US with the highest racial denial rate disparity of the 50 largest metropolitan areas. This racial disparity in loan denial rates in Milwaukee decreased from 3.1 in 2003 to 2.4 in 2004, a substantial improvement in racial disparity. This change was due in large part to an increase in the white denial rate.

In the Milwaukee Metropolitan Area, the white loan denial rate increased from 7.4% in 2003 to 10.1% in 2004, but is still well below the 50 largest metropolitan area average of 14.2%. The Metropolitan Area non-white loan denial rate increased slightly from 23.1% in 2003 to 23.8% in 2004.

The average non-white denial rate for the 50 largest metropolitan areas is 23.4%. Milwaukee, at 23.8%, ranks 20th highest of the 50 largest metropolitan areas, and is improved two spots from 2003. Yet Milwaukee's white denial rate remained near the bottom (48th) of the rankings, the primary factor behind the high denial rate disparity.

PERCENTAGE OF LOANS DENIED
MILWAUKEE METROPOLITAN AREA VS.
50 LARGEST METROPOLITAN AREAS
FOR 2003 AND 2004



HMDA loans excluding refinancing loans

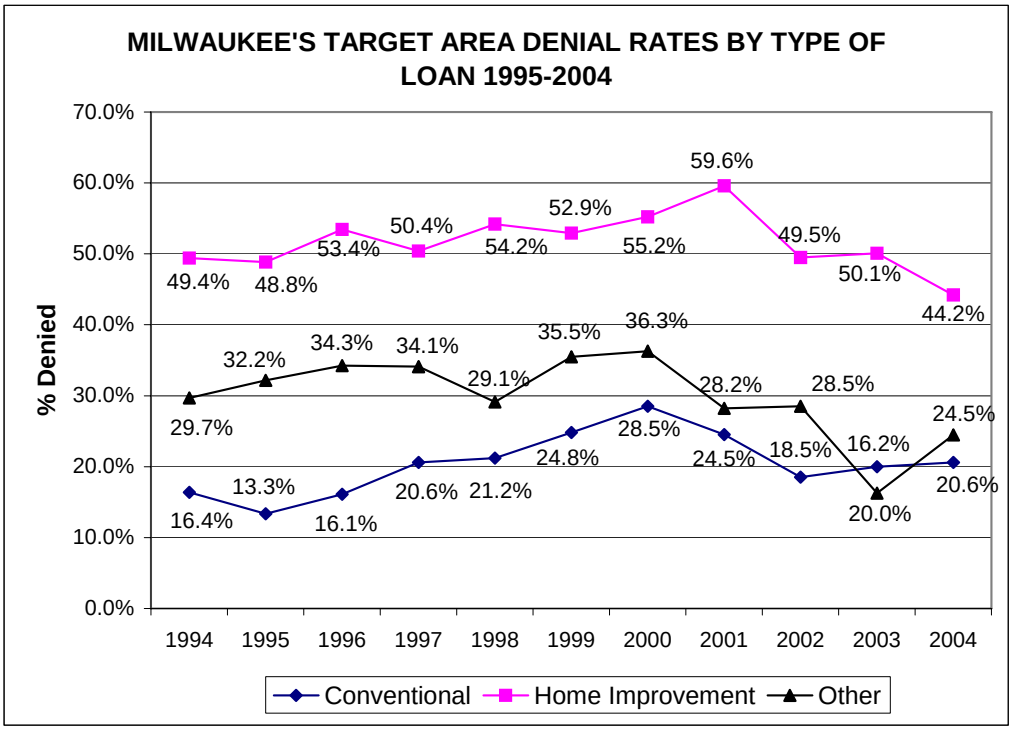
It is likely that some of the change in disparity rates could be attributed to the change in the reporting of race data by HMDA. The decision to consider Hispanic applicants an ethnicity rather than a race may impact the dissemination of the racial makeup of borrowers. These borrowers must now select a race other than Hispanic, changing the racial reporting dynamic.

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

5. In 2004, Target Area Denial Rates for Home Improvement Loans Fell Below 45% for the First Time.

Denial rates for home improvement loans in the TA had remained around 50% since 1994, while TA conventional loan denial rates increased from 16.4% in 1994 to 20.6% in 2004. In 2004, denial rates for home improvement loans fell below 45% for the first time since the inception of this report, and the number of home improvement loans increased for only the second time in the last 7 years.

While it is true that residential loan denial rates in the Target Area have increased since 1994, conventional loan applications in the Target Area have increased 297.9% (751 in 1999 to 2,988 in 2004) over the same time period.



Other includes FHA, VA, WHEDA, MULTI-FAMILY

As the graph above illustrates, while conventional loan denial rates were higher in 2004 than in 1994, denials have recently been declining in the TA, from a high of 28.5% in 2000, to a rate of 20.6% in 2004. Conventional loan denials have been stable in the past three years, hovering around 20%.

CONVENTIONAL LOAN
APPLICATIONS, DENIALS AND DENIAL RATES
1994 AND 2004

	1994 Applications	2004 Applications	1994 Denials	2004 Denials	1994 Denial Rate	2004 Denial Rate
TA	751	2,988	123	617	16.4%	20.6%
Metropolitan Area Less TA	19,593	33,520	1,034	3,206	5.3%	9.6%
National	4,186,275	8,387,613	758,839	1,227,031	18.1%	14.6%

While the denial rate for home improvement loans remains above 40%, the graph illustrates that the improvement loan denial rate in the Target Area has reached a historical low in 2004, falling below 45% for the first time. The chart on the following page demonstrates that, across the Metro Area, from 1994 through 2004, home improvement loan applications are moving in the opposite direction of the national trend in home improvement lending.

HOME IMPROVEMENT LOAN
APPLICATIONS, DENIALS AND DENIAL RATES
1994 AND 2004

	1994 Applications	2004 Applications	1994 Denials	2004 Denials	1994 Denial Rate	2004 Denial Rate
TA	1,490	819	736	362	49.4%	44.2%
Metropolitan Area Less TA	13,005	8,387	2,593	2,529	19.9%	30.2%
National	1,693,358	2,145,090	445,449	791,039	26.3%	36.9%

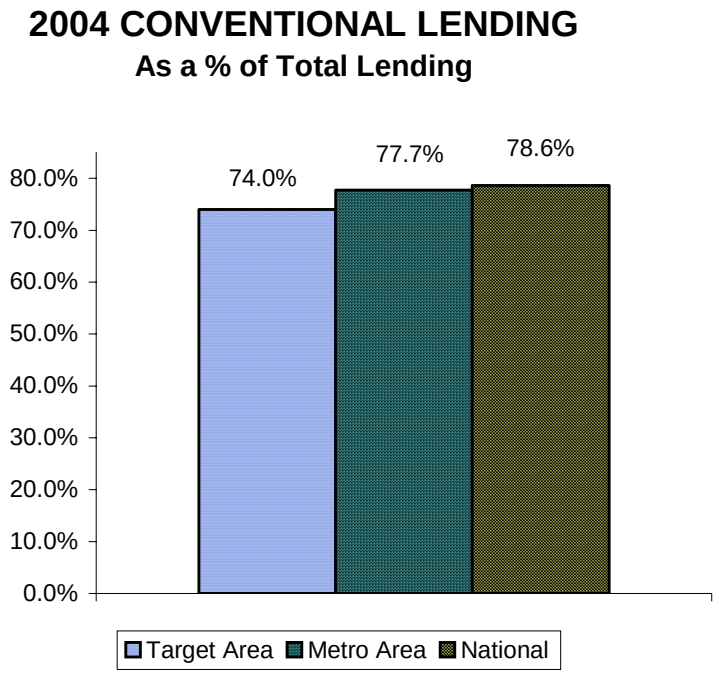
6. Conventional Home Loans Account for 74% of Total TA Loans, an Increase of 5% from the 2003 Lending Report.

Home ownership contributes to building healthy neighborhoods and communities. Conventional home loans are the primary method of financing home ownership in the Target Area, the Metropolitan Area and the Nation. Conventional home loans accounted for only 60% of TA lending in 1999 compared to 71% of lending in the Metropolitan Area and 65% of lending Nationwide. But by 2004, conventional home lending has grown to 74% of all TA lending, comparable to that of the Metropolitan Area (77.7%) and the Nation (78.6%).

RESIDENTIAL LENDING TYPE	TARGET AREA 2004	PERCENT OF TOTAL	METROPOLITAN AREA 2004	PERCENT OF TOTAL	NATIONAL TOTAL 2004	PERCENT OF TOTAL
FHA/VA	62	2.7%	1,237	3.5%	577,551	7.8%
WHEDA HOME PROGRAM	109	4.7%	1,339	3.8%		
CONVENTIONAL	1,714	74.0%	27,264	77.7%	5,852,437	78.6%
HOME IMPROVEMENT	354	15.3%	4,846	13.8%	966,484	13.0%
MULTI-FAMILY	77	3.3%	401	1.1%	47,987	0.6%
TOTAL LENDING	2,316	100.0%	35,087	100.0%	7,444,459	100.0%

The other types of lending commonly found in the Metropolitan Area include Federal Housing Administration (referred to as FHA) and Veterans Administration (referred to as VA) loans. FHA loans target low to moderate income families as well as first-time buyers to assist in the home buying process. The FHA program is administered via the Department of Housing and Urban Development (HUD). Veterans Administration loans are meant to assist former and current members of the United States military obtain home loans. The FHA and VA programs are available nationally and make up about 7.8% of all national lending and 3.5% of local lending.

Locally, WHEDA (Wisconsin Housing and Economic Development Authority) Home Loan Programs provide low down payments and below-market interest rates to first-time buyers or for WHEDA Target Area homebuyers. This program makes up 4.7% of total TA lending and 3.8% of Metropolitan Area lending.



Conventional lending has continued to increase in the Target Area. These increases are no doubt due partially to the influx of new housing in the downtown and Third Ward area. Housing in the downtown and surrounding area continues to increase at a rate of 500 new units annually and should continue to do so in the near term, barring some drastic downturn in the local economy.

7. **<u>In the Milwaukee Metropolitan Area, the Racial Denial Rate Disparity for Residential Mortgage Loans Generally Increases as Incomes Rise. Although to a Lesser Degree, this is also True for the US as a Whole.</u>**

In the Milwaukee Metropolitan Area, the racial denial rate disparity between non-white and white applicants rises from 1.6 for applicants with incomes under 50% of Metropolitan Area median income to 2.5 for applicants with incomes over 120% of Metropolitan Area median income. At each income level, non-white loan denial rates decline as incomes rise, but a slower rate than white applicants, resulting in an increase to the racial denial rate disparity.

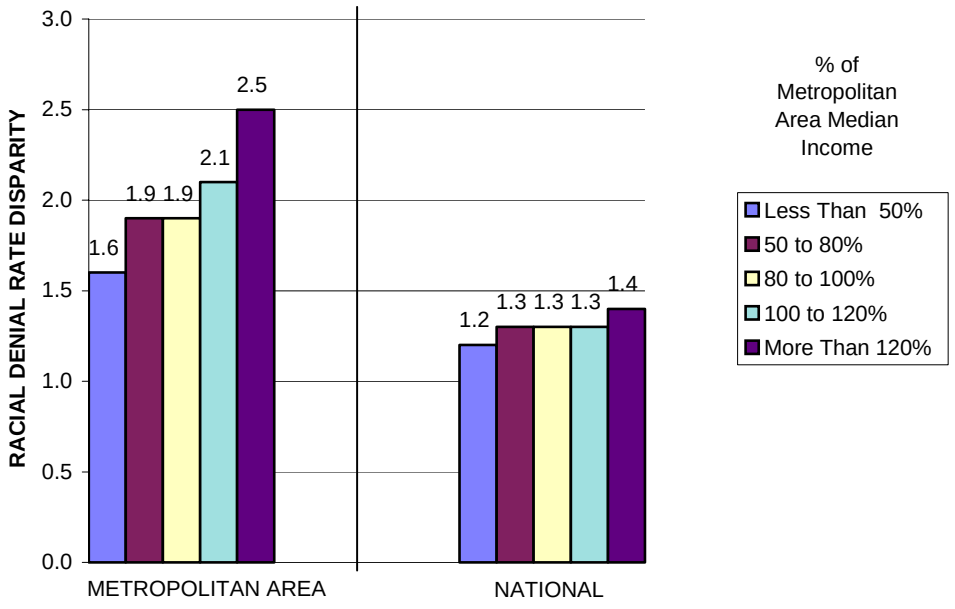
MILWAUKEE METROPOLITAN AREA
2004 HMDA MINORITY/WHITE LOAN DENIAL RATIOS
BY MEDIAN INCOME OF METRO AREAS'
LOAN APPLICANT

(Excludes refinancing Loans)

	Less Than 50%	50% to 79%	80% to 99%	100% to 119%	More than 120%
Non-White	34.3%	23.7%	19.6%	18.8%	17.7%
White	21.5%	12.2%	10.0%	8.9%	7.0%

As illustrated in the table on the previous page, non-white applicants with earnings over 120% of Metropolitan Area median income are more likely to be denied a loan (17.7% denial rate) than white applicants with incomes of 50% to 80% of the Metropolitan Area median income (12.2% denial rate). Minorities with less than 50% of the Metropolitan Area median income have a 34.3% loan denial rate compared to a 21.5% denial rate for whites within the same income group.

MILWAUKEE METROPOLITAN AREA VS. NATIONAL AVERAGE
2004 MINORITY/WHITE LOAN DENIAL RATIOS
BY INCOME AREA



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

NATIONAL TOTALS
2004 HMDA MINORITY/WHITE LOAN DENIAL RATIOS
BY MEDIAN INCOME OF LOAN APPLICANT

(Excludes refinancing Loans)

	Less Than 50%	50% to 79%	80% to 99%	100% to 119%	More than 120%
Non-White	38.6%	24.6%	20.4%	18.5%	15.9%
White	30.9%	19.0%	15.8%	14.1%	11.4%

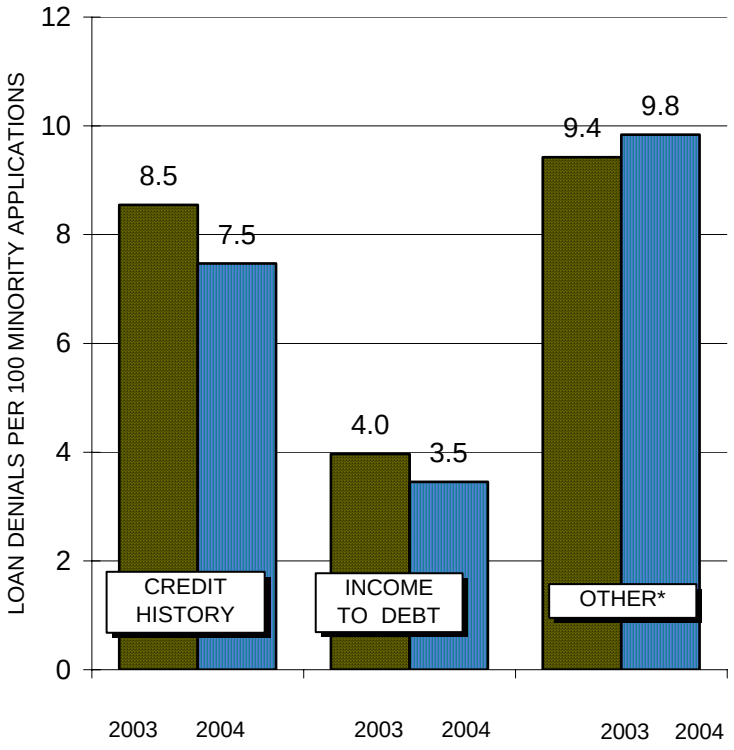
8. Credit History Remains the Primary Reported Reason for Loan Denials.

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

Credit history and credit scores are commonly misunderstood concepts. While most people understand that maintaining a good credit score, and thereby a good credit rating, is important to obtaining financing, few understand what goes into a credit rating. A credit score is determined by five contributing factors; pattern of repayment, debt, track record on credit, recent credit checks, and credit mix.

As the graph below illustrates, from 2003 to 2004, mortgage loan denials attributed to credit history actually declined. But denials associated with credit history still remain the most common reason for a mortgage loan denial.

MILWAUKEE METROPOLITAN AREA
REPORTED REASONS FOR NON-WHITE LOAN DENIALS
PER 100 LOAN APPLICATIONS



HMDA loans excluding refinancing loans

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

In 2004, approximately one-fourth of white loan denials (848 of 3,202) and one-third of non-white loan denials (798 of 2,539) were due to credit history. However, the percentage of reported non-white applications denied because of credit history has declined markedly since 2001.

Many times, a loan denial for credit history isn't a reflection of poor credit on the part of a potential borrower, but a lack of information or missing piece of a credit score. The potential applicant may not have established credit, had any history of borrowing, or no established history of repaying debt. These types of potential borrowers can find it difficult to obtain financing.

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

The two tables below show 2004 HMDA data for financial institutions with the five highest "Percentage-of-Lending" totals in the TA. A ranking of all financial institutions with more than ten loans originated in the Metropolitan Area is shown in Appendix B, which is available to assist in implementation of Common Council resolution #980598. This resolution requires that potential public depositories place within the top half of the financial institutions ranking for TA residential lending in the Comptroller's Annual Lending Report.

MILWAUKEE METROPOLITAN AREA
PERCENTAGE OF RESIDENTIAL LENDING TO THE TARGET AREA
RANKED BY PERCENTAGE OF 2004 LENDING IN THE TA

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

FINANCIAL INSTITUTION	2003 Total Loans	2004 Total Loans	2003 Target Area	2004 Target Area
WAUWATOSA SAVINGS BANK	995	960	17.8%	24.1%
ARGENT MORTGAGE COMPANY	164	708	22.6%	23.0%
LEHMAN BROTHERS BANK	8	167	0%	19.8%
LONG BEACH MORTGAGE CO. *	48	220	6.3%	19.5%
FREMONT INVESTMENT & LOAN *	107	219	1.9%	12.3%

MILWAUKEE METROPOLITAN AREA
PERCENTAGE OF RESIDENTIAL LENDING TO THE TARGET AREA
RANKED BY PERCENTAGE OF 2004 LENDING IN THE TA

Under $15 Million in Residential Loans with 10 or More Loans (Excludes Refinancing)

FINANCIAL INSTITUTION	2003 Total Loans	2004 Total Loans	2003 Target Area	2004 Target Area
PROVIDENT BANK *	29	21	17.2%	52.4%
LEGACY BANK	111	50	38.7%	44.6%
THE CIT GROUP/CONSUMER FINANCE *	0	26	0.0%	42.3%
FINANCE AMERICA, LLC *	65	72	21.5%	33.3%
NORTH MILWAUKEE STATE BANK	23	10	30.4%	30.0%

HMDA loans excluding refinancing loans

*HUD Identified Subprime Lender

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

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

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

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

The HUD study had four major findings:

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

HUD's analysis clearly demonstrates the exponential growth in subprime lending and its disproportionate impact on low-income and, particularly, non-white homeowners and communities throughout the nation. This concentration of subprime activity leaves these homeowners with significant costs of subprime loans. These borrowers may also be vulnerable to predatory lending practices. As a part of this report, any lender identified by HUD as "subprime" will be so noted.

Of all the lenders who originated loans in the Milwaukee Metropolitan Area in 2004, 6% (25 lenders out of 415) were lenders HUD classifies as subprime. In total 1,822 loans worth $171.8 million were made by these lenders, 11.1% (202 of 1,822) originating in the Target Area, and 34.1% (621 of 1,822) to non-white borrowers.

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

CITY OF MILWAUKEE PROGRAMS

The City of Milwaukee, through the Department of City Development, offers several programs aimed at assisting home owners with purchasing and rehabilitating homes.

The Home Rehabilitation Loan Program offers low-interest rehabilitation loans and technical assistance to owner-occupants residing in seven Targeted Investment Neighborhoods (TINs). Interest rate and terms are tied to the income and family size of the applicants. Priorities of the program are code-related repairs and energy conservation items.

Eligibility Guidelines:

· One-to-four family dwelling

· Income limits subject to funding and program availability

Loan Terms:

- Fixed interest rates between zero percent to current market rate for payback loans and 0 percent for Deferred Payment Loans (Interest rates are determined by the income and household size of the applicant)
- Deferred Payment Loans (not requiring payment until property is sold) are available to very low-income homeowners
- Loan term from one to fifteen years
- Monthly payment is based on affordability

The-Buy-In-Your-Neighborhood Program is a special financing program which allows homeowners to purchase a rental property within a three block radius of the house they live in for only 10% down. The idea behind this program is that a rental property owned by a landlord who lives in the neighborhood will be a better-managed property than one that is managed by someone who lives further away.

This program is advantageous because bank financing for the purchase of non owner-occupied rental property typically requires a large down payment of 25 to 30 percent of the purchase price. The Buy in Your Neighborhood Program allows homeowners to purchase the rental property for less of a down payment.

The City of Milwaukee Rental Rehabilitation Loan Program offers landlords forgivable loans for the rehabilitation of residential rental units of two or more bedrooms in seven Targeted Investment Neighborhoods.

Eligible improvements include code items, energy conservation items, roofs, siding, electric, plumbing, heating, kitchen and bathroom remodeling and more. The property must meet building code requirements upon completion of the rehabilitation. The property must also pass re-inspections over a five-year period.

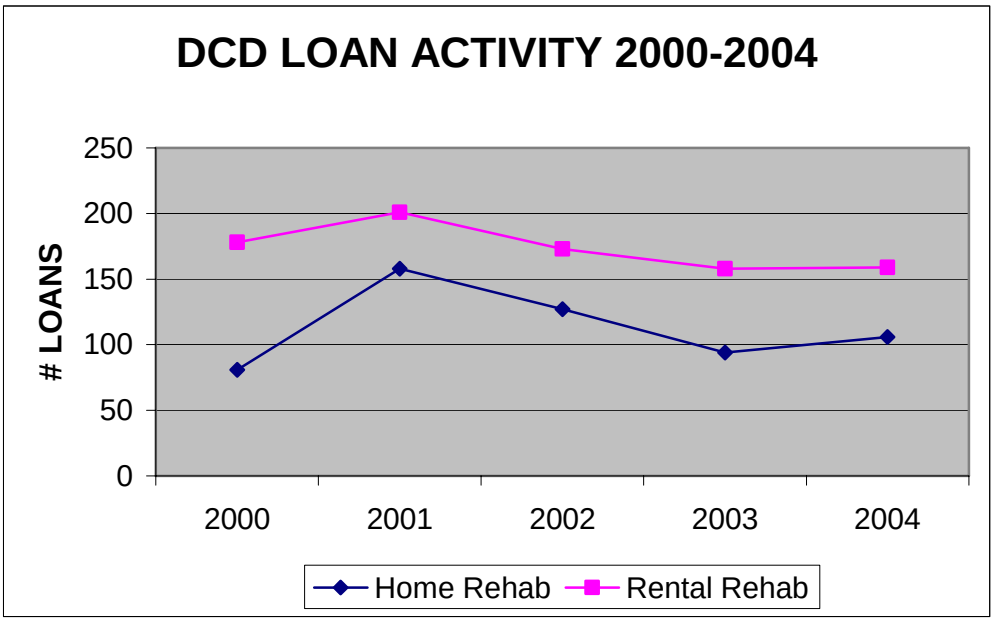
Forgivable loans are available for up to 50 percent of the cost of eligible improvements, but no more than $8,000 for a 2 bedroom unit or $10,000 for a 3 or more bedroom unit. The owner must provide the other 50 percent of the cost of rehabilitation with funds from another source (bank loan, your own cash, etc.). The program can also assist the owner in securing private financing.

LENDING ACTIVITY FOR SELECTED
DEPARTMENT OF CITY DEVELOPMENT (DCD) LENDING PROGRAMS

	2003 *		2004	
	Number of Loans	Amount of Loans	Number of Loans	Amount of Loans
OWNER-OCCUPIED LENDING				
Home Rehabilitation Loan	94	$2,070,527	106	$1,756,015
INVESTOR-OWNER LENDING				
Buy In Your Neighborhood	64	$1,313,045	53	$1,228,730
TOTAL DNS PROGRAMS	158	$3,383,572	159	$2,984,745

Source: DCD - Neighborhood Improvement Development Corporation (NIDC)
* 2003 data revised from 2005 Lending Report per DCD

In total, as the graph below illustrates, participation by Milwaukee residents in the DNS run Home Rehab Loan Program showed a increase in the number of loans made in 2000 versus 2004. Participation in the Rental Rehabilitation Program has remained fairly level since 2000.



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

WHEDA PROGRAMS

The Wisconsin Housing and Economic Development Authority (WHEDA) offers several programs aimed at assisting low to moderate income individuals purchase and rehabilitate a home.

The HOME Loan Program offers below-market fixed interest rate home financing to first-time homebuyers with low to moderate incomes. Features and benefits include; below market interest rate, lower mortgage insurance premium, fast turnaround time, 3% minimum down payment, and Mortgage Guardian mortgage payment protection in the event of involuntary job loss.

Eligibility requirements are: applicants must be first-time home buyers, applicants cannot have had an ownership interest in a principal residence for three years. The two exceptions to these general guidelines are:

1.) The property is located in a target area;
2.) The property will be the subject of a qualified major rehabilitation

Additional requirements are; 1.) limits are placed on the combined income of all adults who will occupy the property and; 2.) the purchase price cannot exceed the limits for the county in which the property is located, and; 3.) the borrower must occupy the property within sixty days of loan closing. 4.) The property must be owner occupied for the entire life of the loan.

The Home Improvement Loan Program provides fixed interest rate financing with no equity requirement. Features and benefits of this program include; no equity required-borrowers can qualify even if they just bought their home, and fixed interest rate for up to 15 years. The combined income of all adults who occupy the property cannot exceed the limits for the county in which the property is located. The property can be a one- to four-unit building, but must be owner occupied and no more than 15% of the property can be used for trade or business purposes.

The HOME Plus Loan Program provides financing of up to $10,000 for down payment and closing costs, and a line of credit for future home repairs. The features and benefits of this program are; a flexible line of credit for home improvements providing the borrower with available financing to handle unexpected repairs, loan proceeds can be used for down payment and closing costs, and interest only repayments for first two-years. Once again, income requirements apply.

WHEDA LOAN PROGRAMS
2004 LOAN ACTIVITY

	Applications	Approved	% Approved
Home Loan Program	1,120	1,039	92.8%
Home Plus Program	148	148	100.0%
Home Improvement Loans			
Single Family	33	16	48.5%
2-4 Family	147	136	92.5%

The Home Plus Program followed up its strong performance in 2003 with an increase in loan activity for 2004. WHEDA granted 148 Home Plus loans in 2004, an increase of 18 percent. The percentage of loans to the TA also increased from 3.2% in 2003 to 8.1% in 2004.

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

In 2004, 39,659 business loans were issued in the Milwaukee Metropolitan Area. Of this total, 6,333 or 16%, were issued in the low-to-moderate income areas, consistent with 2003 activity. TA business loans comprise 6.5% of Metropolitan Area business loans. This is identical to TA residential lending.

Between 2003 and 2004, total business loans increased by over 9% but business lending to low and moderate income areas increased by less than 2%.

MILWAUKEE METROPOLITAN AREA
PERCENTAGE OF BUSINESS LOANS ORIGINATED
BY INCOME OF AREA

	2002	2003	2004	2004 PERCENT OF TOTAL
LOW & MODERATE INCOME AREAS	4,656	5,697	6,333	16.0%
MIDDLE INCOME AREAS	16,636	15,642	16,723	42.2%
UPPER INCOME AREAS	12,348	13,499	15,668	39.5%
TOTAL BUSINESS LENDING*	35,679	36,277	39,659	
TA BUSINESS LOANS	2,416	2,381	2,582	6.5%

*Income Area not available for 935 loans (2%) in 2004.

MILWAUKEE METROPOLITAN AREA
PERCENTAGE OF BUSINESS LENDING TO LOW & MODERATE INCOME AREAS
(Over $4 million in 2004 Business Loans)
Ranked by LMI % 2004 Lending

Institution	2003 Total Loans	2004 Total Loans	2003 Low & Moderate Income Areas	2004 Low & Moderate Income Areas	2004 # LMI Loans
TCF NATIONAL BANK	89	94	33.7%	30.9%	29
NORTH SHORE BANK, FSB	61	60	27.9%	30.0%	18
QUAD CITY BANK & TRUST	N/A	54	N/A	27.8%	15
PARK BANK	435	482	21.6%	25.7%	124
LASALLE BANK	13	12	23.1%	25.0%	3
STATE FINANCIAL BANK, NA	602	491	28.1%	23.4%	115
GE CAPITAL FINANCIAL INC.	1,920	1,563	19.6%	23.3%	364
FM BANK - WISCONSIN	65	43	16.9%	20.9%	9
US BANK NORTH DAKOTA	1,799	2,535	20.2%	19.8%	501
TRI CITY NATIONAL BANK	628	711	19.7%	19.7%	140
COMMUNITY BANK TRUST	0	79	0.0%	19.0%	15
WELLS FARGO BANK, NA	N/A	1,136	N/A	18.9%	215
MI MARSHALL ILSLEY BANK	3,802	3,791	18.1%	18.6%	704
US BANK, N.A.	1,041	826	22.1%	18.5%	153
CITIBANK USA, NA	3,939	4,880	16.0%	17.8%	869
THE PITNEY BOWES BANK	805	1,472	20.5%	17.6%	259
JOHNSON BANK	298	327	19.5%	17.4%	57
WELLS FARGO BANK NORTHWEST, NA	N/A	215	N/A	17.2%	37
LINCOLN STATE BANK	N/A	259	N/A	17.0%	44
BANK MUTUAL	39	87	10.3%	16.1%	14
CAPITAL ONE, F.S.B.	7,198	7,748	15.1%	16.0%	1,238
*JPMORGAN CHASE	3,802	373	12.3%	15.5%	58
MID AMERICA BANK, FSB	421	422	17.6%	15.4%	65
ASSOCIATED BANK, N.A.	799	932	13.9%	15.3%	143
AMERICAN EXPRESS CENTURION BNK	526	472	16.3%	14.8%	70
ADVANTA BANK	1,683	1,417	12.4%	13.1%	186
MARINE BANK WISCONSIN	162	99	18.5%	12.1%	12
CHASE MANHATTAN BANK USA, N.A.	481	2,197	13.3%	10.9%	240
MBNA AMERICA (DELAWARE), N.A.	2,864	3,321	12.1%	10.9%	361
ANCHORBANK FSB	118	123	16.1%	8.9%	11
FIRST BANKING CENTER	42	61	11.9%	8.2%	5
WAUKESHA STATE BANK	678	618	6.2%	7.3%	45
NATIONAL EXCHANGE BANK	140	162	4.3%	5.6%	9
OZAUKEE BANK	292	403	5.5%	5.5%	22
CITIZENS BANK OF MUKWONAGO	403	433	3.0%	3.9%	17
FIRST BANK FINANCIAL CENTRE	363	563	1.9%	2.7%	15
WEST BEND SAVINGS BANK	269	253	0.4%	0.4%	1
HORICON STATE BANK	50	71	0.0%	0.0%	0

*Formerly Bank One, NA, Illinois

NOTES

1. The Common Council goals for the City of Milwaukee's Socially Responsible Investment Program.

   A. Liquidity, safety and competitive returns on investments.

   B. Increasing the amount and percentage of home mortgages made by financial institutions to City minority residents.

   C. Increasing the amount and percentage of home mortgages made by financial institutions to City residents in Census tracts identified as eligible for the Targeted Single Family Loan Program Area.

   D. Increasing employment opportunities for minority residents.

   E. Increasing the amount of money available for small business loans in the Targeted Single Family Loan Program Area.

   F. Increasing the amount of money available for student loans to residents of the Targeted Area Single Family Mortgage Loan Program area.

   G. Increasing commitment by financial institutions to provide free technical assistance to potential home buyers and small business owners through existing home buying clinics and business incubators.

2. The TA used in this Report was the City's Targeted Single Family Loan Program Area and includes Census tracts which meet each of the following four criteria: (See list of Census tracts on page 41 and map on page 42).

   A. The median assessed property value of one- and two-family dwellings in the area is less than or equal to 80% of the median assessed property value of one- and two-family dwellings in the City of Milwaukee.

   B. The median family income of the area is less than or equal to 80% of the median family income of the City of Milwaukee.

   C. The proportion of owner-occupied dwellings in the area is less than or equal to 80% of the proportion of owner-occupied dwellings in the City of Milwaukee.

   D. The vacancy rate of dwellings in the area is greater than or equal to 120% of the vacancy rate of dwellings in the City of Milwaukee.

APPENDIX A

FIFTY LARGEST METROPOLITAN AREAS
% OF LOANS DENIED

		2004 DENIAL RATE DISPARITY	2004 White Denial Rates	2004 Non-White Denial Rates	2003 DENIAL RATE DISPARITY	2003 White Denial Rates	2003 Non-White Denial Rates
1	PHILADELPHIA, PA-NJ	2.4	14.2%	33.8%	2.5	11.7%	28.9%
2	**MILWAUKEE, WI**	**2.4**	**10.1%**	**23.8%**	**3.1**	**7.4%**	**23.1%**
3	RALEIGH-DURHAM-CHAPEL HILL	2.1	9.7%	20.7%	2.5	8.0%	20.3%
4	BUFFALO	2.1	16.8%	34.8%	2.5	12.6%	31.4%
5	RICHMOND-PETERSBURG, VA	2.1	11.9%	24.7%	2.3	8.4%	19.2%
6	PITTSBURGH, PA	2.0	19.6%	38.8%	2.0	16.0%	31.8%
7	ST. LOUIS, MO-IL	2.0	13.6%	27.0%	2.1	11.8%	25.2%
8	ATLANTA	1.9	11.5%	21.9%	2.0	9.4%	19.1%
9	WASHINGTON, DC-MD-VA	1.9	8.9%	17.0%	2.0	7.0%	14.0%
10	MEMPHIS, TN-AR-MS	1.9	13.9%	26.3%	2.0	11.8%	23.2%
11	CLEVELAND, OH	1.9	14.1%	26.4%	2.3	11.5%	26.9%
12	HARTFORD, CT	1.9	12.5%	23.2%	2.0	10.4%	20.4%
13	NEW ORLEANS, LA	1.8	15.4%	28.5%	2.0	13.8%	27.6%
14	KANSAS CITY, MO-KS	1.8	13.8%	25.4%	2.0	10.8%	22.0%
15	CHICAGO,IL	1.8	11.6%	21.2%	2.2	9.3%	20.1%
16	CHARLOTTE	1.8	11.7%	21.3%	1.8	12.0%	21.2%
17	NORFOLK-VIRGINIA BEACH-NEWPORT NEWS, VA	1.8	11.7%	21.0%	2.1	9.1%	18.8%
18	BOSTON	1.8	12.6%	22.1%	2.0	10.5%	20.9%
19	MINNEAPOLIS-ST. PAUL, MN-WI	1.7	11.4%	20.0%	2.0	9.3%	18.1%
20	GRAND RAPIDS-MUSKEGON-HOLLAND, MI	1.7	15.3%	26.4%	1.9	13.8%	26.7%
21	GREENSBORO--WINSTON-SALEM--HIGH POINT, NC	1.7	15.4%	26.3%	1.7	15.5%	26.7%
22	DETROIT, MI	1.7	19.0%	31.7%	2.0	18.7%	36.7%
23	DALLAS, TX	1.7	13.9%	23.0%	1.6	12.9%	21.2%
24	ROCHESTER, NY	1.7	16.3%	27.0%	1.9	13.2%	24.7%
25	DENVER, CO	1.6	13.1%	21.3%	1.8	11.5%	20.7%
26	SAN ANTONIO, TX	1.6	16.2%	26.0%	1.8	14.1%	25.6%
27	INDIANAPOLIS, IN	1.6	15.7%	25.2%	1.8	12.4%	22.1%
28	JACKSONVILLE, FL	1.6	14.7%	23.6%	1.6	13.1%	21.4%
29	PROVIDENCE-FALL RIVER-WARWICK, RI-MA	1.6	15.0%	24.0%	1.9	12.9%	24.6%
30	LOUISVILLE, KY-IN	1.6	17.0%	26.9%	1.8	13.8%	24.7%
31	COLUMBUS, OH	1.6	14.3%	22.4%	1.8	11.4%	21.0%
32	AUSTIN-SAN MARCOS, TX	1.6	13.1%	20.4%	1.9	12.2%	23.5%
33	CINCINNATI, OH-KY-IN	1.5	15.4%	23.8%	2.0	13.4%	26.5%
34	SAN FRANCISCO, CA	1.5	12.1%	17.9%	1.6	9.9%	16.3%
35	NASHVILLE, TN	1.5	14.7%	21.9%	1.7	14.0%	23.1%
36	HOUSTON, TX	1.5	16.3%	24.2%	1.6	14.2%	22.9%
37	NEW YORK, NY	1.5	15.1%	22.2%	1.6	13.3%	20.7%
38	WEST PALM BEACH-BOCA RATON, FL	1.5	14.3%	21.1%	1.5	11.4%	17.3%
39	PHOENIX, AZ	1.5	13.3%	19.4%	1.6	12.4%	20.3%
40	OKLAHOMA CITY, OK	1.4	16.4%	23.6%	1.6	14.3%	22.5%
41	ORLANDO, FL	1.4	14.6%	20.5%	1.5	11.6%	17.9%
42	TAMPA-ST. PETERSBURG-CLEARWATER, FL	1.4	15.3%	21.4%	1.5	13.3%	19.5%
43	SEATTLE, WA	1.3	12.0%	16.2%	1.5	10.4%	15.2%
44	LOS ANGELES-LONG BEACH, CA	1.3	14.9%	19.9%	1.5	12.4%	18.5%
45	SACRAMENTO, CA	1.3	14.6%	18.9%	1.3	11.9%	15.7%
46	PORTLAND, OR	1.3	13.8%	17.8%	1.3	12.7%	17.1%
47	LAS VEGAS, NV-AZ	1.3	15.1%	19.5%	1.5	13.1%	19.2%
48	SALT LAKE CITY-OGDEN, UT	1.3	17.0%	21.6%	1.6	13.3%	21.0%
49	SAN DIEGO, CA	1.3	13.9%	17.6%	1.4	11.6%	16.1%
50	MIAMI-HIALEAH, FL	1.2	17.4%	21.0%	1.3	14.7%	18.8%
	50 LARGEST METRO AREA AVG.	**1.6**	**14.2%**	**23.4%**	**1.7**	**11.9%**	**20.7%**
	NATIONAL AGGREGATE	**1.3**	**15.8%**	**20.9%**	**1.6**	**13.8%**	**21.7%**

APPENDIX B

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

2004 MILWAUKEE METROPOLITAN AREA
PERCENTAGE OF RESIDENTIAL LENDING TO TARGET AREA
RANKING BY % OF LENDING TO TARGE AREA
HMDA DATA ONLY (10 LOANS MINIMUM)

	INSTITUTION	TOTAL LOANS	TA LOANS	% TO TA	
1	PROVIDENT BANK	21	11	52.4%	**
2	LEGACY BANK	112	50	44.6%	
3	THE CIT GROUP/CONSUMER FINANCE	26	11	42.3%	**
4	FINANCE AMERICA, LLC	72	24	33.3%	**
5	NORTH MILWAUKEE STATE BANK	10	3	30.0%	
6	ACOUSTIC HOME LOANS, LLC	14	4	28.6%	
7	MITCHELL BANK	69	19	27.5%	
8	CHICAGO BANCORP, INC	15	4	26.7%	
9	COMMUNITY BANK & TRUST	19	5	26.3%	
10	GUARANTY RESIDENTIAL LENDING	41	10	24.4%	
11	WAUWATOSA SAVINGS BANK	960	231	24.1%	
12	PEOPLE'S CHOICE HOME LOAN, INC	17	4	23.5%	**
13	ARGENT MORTGAGE COMPANY	708	163	23.0%	
14	WASHTENAW MORTGAGE COMPANY	19	4	21.1%	
15	AEGIS LENDING CORPORATION	20	4	20.0%	
16	SUMMIT CREDIT UNION	10	2	20.0%	
17	LEHMAN BROTHERS BANK	167	33	19.8%	
18	LONG BEACH MORTGAGE CO.	220	43	19.5%	**
19	CITIFINANCIAL, INC	137	26	19.0%	
20	THRIVENT FINANCIAL BANK	11	2	18.2%	
21	FIRST NATIONAL BANK OF ARIZONA	23	4	17.4%	
22	STATE FINANCIAL BANK, NA	29	5	17.2%	
23	1ST FEDERAL SAVINGS BANK	19	3	15.8%	
24	NEW CENTURY MTG CORPORATION	135	21	15.6%	**
25	WINSTAR MORTGAGE PARTNERS INC	13	2	15.4%	
26	BENEFICIAL	55	8	14.5%	**
27	MILA INC	77	11	14.3%	**
28	NOVASTAR HOME MORTGAGE INC	14	2	14.3%	
29	STATE FARM BANK	21	3	14.3%	
30	MMCU	73	10	13.7%	
31	WELLS FARGO FINL WISCONSIN INC	53	7	13.2%	
32	FREMONT INVESTMENT & LOAN	219	27	12.3%	**
33	WACHOVIA MORTGAGE	57	7	12.3%	
34	HSBC MORTGAGE CORP	25	3	12.0%	
35	BAY VIEW FEDERAL S&L ASSN.	17	2	11.8%	
36	CTX MORTGAGE COMPANY, LLC	239	26	10.9%	
37	PARK BANK	28	3	10.7%	
38	AAMES FUNDING CORPORATION	19	2	10.5%	
39	ABN AMRO MORTGAGE GROUP, INC.	228	24	10.5%	

APPENDIX B

2004 MILWAUKEE METROPOLITAN AREA
PERCENTAGE OF RESIDENTIAL LENDING TO TARGET AREA
RANKING BY % OF LENDING TO TARGE AREA
HMDA DATA ONLY (10 LOANS MINIMUM)

	INSTITUTION	TOTAL LOANS	TA LOANS	% TO TA	
40	FIRST MAGNUS FINANCIAL CORP.	105	11	10.5%	
41	CHARLES SCHWAB BANK, N.A.	10	1	10.0%	
42	CITY 1ST MORTGAGE SERVICES, LC	10	1	10.0%	
43	CONCORDE ACCEPTANCE CORPORATIO	10	1	10.0%	**
44	FIRST BANKING CENTER	10	1	10.0%	
45	PGNF HOME LENDING CORP	10	1	10.0%	
46	TOWN BANK	10	1	10.0%	
47	COUNTRYWIDE HOME LOANS	1,576	151	9.6%	
48	QUICKEN LOANS	32	3	9.4%	
49	M&I MARSHALL & ILSLEY BANK	920	85	9.2%	
50	CHASE MANHATTAN MORTGAGE CORP.	343	31	9.0%	
51	INDYMAC BANK, F.S.B.	56	5	8.9%	
52	EQUIFIRST CORPORATION	45	4	8.9%	**
53	MILWAUKEE WESTERN BANK	34	3	8.8%	
54	UNIVERSITY OF WISCONSIN CU	114	10	8.8%	
55	CONTINENTAL SAVINGS BANK, FSB.	140	12	8.6%	
56	RBC MORTGAGE	47	4	8.5%	
57	SIB MORTGAGE CORP.	24	2	8.3%	
58	STATEN ISLAND BANK & T C/O ICB	24	2	8.3%	
59	NATIONAL CITY BANK, INDIANA	892	73	8.2%	
60	US BANK NORTH DAKOTA	333	27	8.1%	
61	WMC MORTGAGE CORP.	50	4	8.0%	**
62	INTERVALE MORTGAGE	326	26	8.0%	
63	FLAGSTAR BANK	139	11	7.9%	
64	E*TRADE BANK	13	1	7.7%	
65	FIRST GUARANTY MORTGAGE CORP	13	1	7.7%	
66	FIRST NLC FINANCIAL SERVICES	39	3	7.7%	
67	TCF NATIONAL BANK	289	21	7.3%	
68	US BANK, N.A.	1,020	71	7.0%	
69	EMSBLA CREDIT UNION	29	2	6.9%	
70	ACCREDITED HOME LENDERS, INC.	74	5	6.8%	**
71	ALPINE LENDING LLC	15	1	6.7%	
72	THINK FEDERAL CREDIT UNION	15	1	6.7%	
73	SECURITY STATE BANK	260	17	6.5%	
74	ENTERPRISE CU	77	5	6.5%	
75	WASHINGTON MUTUAL BANK, FA	216	14	6.5%	
76	HFC	32	2	6.3%	
77	AMERICAN HOME MORTGAGE	65	4	6.2%	
78	BANK MUTUAL	383	22	5.7%	
79	E-LOAN, INC	35	2	5.7%	
80	AMCORE BANK, N.A.	18	1	5.6%	
81	FIELDSTONE MORTGAGE COMPANY	37	2	5.4%	**
82	EDUCATORS CREDIT UNION	19	1	5.3%	

APPENDIX B

2004 MILWAUKEE METROPOLITAN AREA
PERCENTAGE OF RESIDENTIAL LENDING TO TARGET AREA
RANKING BY % OF LENDING TO TARGE AREA
HMDA DATA ONLY (10 LOANS MINIMUM)

	INSTITUTION	TOTAL LOANS	TA LOANS	% TO TA	
83	LINCOLN STATE BANK	19	1	5.3%	
84	MIDAMERICA BANK	762	40	5.2%	
85	OPTION ONE MORTGAGE CORP.	248	13	5.2%	**
86	SUNTRUST MORTGAGE, INC	77	4	5.2%	
87	CITIMORTGAGE, INC.	78	4	5.1%	
88	NORTH SHORE BANK FSB	356	18	5.1%	
89	PARAGON HOME LENDING, LLC	369	18	4.9%	
90	WELLS FARGO BANK, NA	1,868	90	4.8%	
91	TCF MORTGAGE CORPORATION	42	2	4.8%	
92	JP MORGAN CHASE BANK, NA	233	11	4.7%	
93	CENDANT MORTGAGE	276	13	4.7%	
94	AIG FSB	88	4	4.5%	
95	CORNERSTONE COMMUNITY BANK	22	1	4.5%	
96	CITICORP TRUST BANK, FSB	23	1	4.3%	**
97	SHELTER MORTGAGE COMPANY, LLC	349	15	4.3%	
98	CHASE MANHATTAN BANK USA, NA	24	1	4.2%	**
99	MORTGAGEIT, INC	121	5	4.1%	
100	OHIO SAVINGS BANK	488	20	4.1%	
101	A-B CREDIT UNION	50	2	4.0%	
102	WELLS FARGO FUNDING, INC	353	14	4.0%	
103	ASSOCIATED BANK, N.A.	994	39	3.9%	
104	TREASURY BANK NATIONAL ASSOC.	51	2	3.9%	
105	SUMMIT MORTGAGE CORPORATION	77	3	3.9%	
106	FIRST CONTINENTAL MORTGAGE LTD	26	1	3.8%	
107	FIRST HORIZON HOME LOAN CORP	104	4	3.8%	
108	UNIVERSAL SAVINGS BANK	245	9	3.7%	
109	AMERIQUEST MORTGAGE COMPANY	112	4	3.6%	**
110	MARITIME SAVINGS BANK	141	5	3.5%	
111	PERFORMANCE PLUS LENDING LLC	57	2	3.5%	
112	ALLCO CREDIT UNION	29	1	3.4%	
113	FIRST CHOICE MORTGAGE INC	87	3	3.4%	
114	MERRILL LYNCH CREDIT CORP.	29	1	3.4%	
115	UNIVERSAL MORTGAGE CORP	435	15	3.4%	
116	ST FRANCIS MORTGAGE CORP	31	1	3.2%	
117	JOHNSON BANK	219	7	3.2%	
118	THE EQUITABLE BANK, S.S.B.	852	27	3.2%	
119	WISCONSIN MORTGAGE CORPORATION	1,147	35	3.1%	
120	OAK STREET MORTGAGE	33	1	3.0%	**
121	F&M BANK- WISCONSIN	102	3	2.9%	
122	FIRST FEDERAL CAPITAL BANK	34	1	2.9%	
123	KEYBANK NATIONAL ASSOCIATION	170	5	2.9%	
124	DECISION ONE MORTGAGE	211	6	2.8%	**
125	GMAC BANK	516	14	2.7%	
126	CSMC INC., DBA CENTRAL STATES	370	10	2.7%	

APPENDIX B

2004 MILWAUKEE METROPOLITAN AREA
PERCENTAGE OF RESIDENTIAL LENDING TO TARGET AREA
RANKING BY % OF LENDING TO TARGE AREA
HMDA DATA ONLY (10 LOANS MINIMUM)

	INSTITUTION	TOTAL LOANS	TA LOANS	% TO TA	
127	M&I BANK FSB	37	1	2.7%	
128	THE HUNTINGTON NATIONAL BANK	152	4	2.6%	
129	GREAT MIDWEST BANK, SSB	270	7	2.6%	
130	OZAUKEE BANK	363	9	2.5%	
131	FRANKLIN AMERICAN MORTGAGE CO	82	2	2.4%	
132	SUNSET BANK & SAVINGS	251	6	2.4%	
133	FRANKLIN MORTGAGE FUNDING	313	7	2.2%	
134	BANK OF AMERICA, N.A.	680	15	2.2%	
135	STATE CENTRAL CREDIT UNION	91	2	2.2%	
136	INVESTORSBANK	46	1	2.2%	
137	GB HOME EQUITY, LLC	524	11	2.1%	
138	M&I MORTGAGE CORP	492	10	2.0%	
139	PYRAMAX BANK	551	11	2.0%	
140	WORLD SAVINGS BANK	255	5	2.0%	
141	ASSURED MORTGAGE, INC.	216	4	1.9%	
142	AMERISTAR MORTGAGE CORPORATION	325	6	1.8%	
143	ASSOCIATED MORTGAGE CO, INC	273	5	1.8%	
144	ANCHORBANK FSB	376	6	1.6%	
145	GUARDIAN CREDIT UNION	268	4	1.5%	
146	MORTGAGE SERVICES INC.	73	1	1.4%	
147	LANDMARK CREDIT UNION	877	12	1.4%	
148	PRINCIPAL RESIDENTIAL MORTGAGE	242	3	1.2%	
149	FIRST BANK FINANCIAL CENTRE	86	1	1.2%	
150	CITIZENS BANK OF MUKWONAGO	116	1	0.9%	
151	GMAC MORTGAGE CORPORATION	132	1	0.8%	
152	PORT WASHINGTON STATE BANK	154	1	0.6%	
153	WAUKESHA STATE BANK	275	1	0.4%	
154	AMERICAN MORTGAGE NETWORK, INC	26	0	0.0%	
155	CITIBANK, FSB	15	0	0.0%	
156	COMMUNITY FINANCIAL GROUP MTG	66	0	0.0%	
157	DOLLAR BANK, FSB	33	0	0.0%	
158	ENCORE CREDIT CORP.	19	0	0.0%	
159	EQUITY ONE, INC.	11	0	0.0%	**
160	FIRST CAPITAL FINANCIAL SERVIC	17	0	0.0%	
161	FIRST FEDERAL SVGS BK OF WI	40	0	0.0%	
162	FIRST NATIONAL BANK-HARTFORD	26	0	0.0%	
163	GLACIER HILLS CREDIT UNION	59	0	0.0%	
164	GN MORTGAGE, LLC	14	0	0.0%	
165	GRAFTON STATE BANK	36	0	0.0%	
166	H&R BLOCK MORTGAGE CORPORATION	11	0	0.0%	
167	HARTFORD SAVINGS BANK	100	0	0.0%	
168	HARTLAND MORTGAGE CENTERS INC.	10	0	0.0%	
169	HOMETOWN BANK	10	0	0.0%	
170	HORICON BANK	39	0	0.0%	

APPENDIX B

2004 MILWAUKEE METROPOLITAN AREA
PERCENTAGE OF RESIDENTIAL LENDING TO TARGET AREA
RANKING BY % OF LENDING TO TARGE AREA
HMDA DATA ONLY (10 LOANS MINIMUM)

	INSTITUTION	TOTAL LOANS	TA LOANS	% TO TA	
171	IRWIN MORTGAGE CORP	69	0	0.0%	
172	ISB COMMUNITY BANK	12	0	0.0%	
173	JOURNAL CREDIT UNION	14	0	0.0%	
174	KH FINANCIAL, LP	31	0	0.0%	
175	MIDCOUNTRY MORTGAGE CORP.	27	0	0.0%	
176	MORTGAGE LENDERS NETWORK USA	50	0	0.0%	**
177	NATIONAL CITY BANK	10	0	0.0%	
178	NATIONAL EXCHANGE BANK	34	0	0.0%	
179	NETBANK, INC	10	0	0.0%	
180	NEW STATE MORTGAGE COMPANY	15	0	0.0%	
181	NFCU	19	0	0.0%	
182	NOVASTAR MORTGAGE INC	15	0	0.0%	**
183	PRIMARY RESIDENTIAL MORTGAGE	19	0	0.0%	
184	PROVIDENT FUNDING ASSOCIATES,	25	0	0.0%	
185	RBMG, INC	20	0	0.0%	
186	RIDGESTONE BANK	11	0	0.0%	
187	SEBRING CAPITAL PARTNERS, L.P.	14	0	0.0%	**
188	SIMPLICITY MORTGAGE CORPORATIO	10	0	0.0%	
189	SIRVA MORTGAGE, INC.	19	0	0.0%	
190	SOUTH CENTRAL BANK, N.A.	45	0	0.0%	
191	SOUTHPORT BANK	12	0	0.0%	
192	SOUTHSTAR FUNDING	23	0	0.0%	**
193	STATE BANK OF NEWBURG	42	0	0.0%	
194	UNION PLANTERS BANK	12	0	0.0%	
195	USAA FEDERAL SAVINGS BANK	61	0	0.0%	
196	WEST BEND SAVINGS BANK	267	0	0.0%	
197	WISCONSIN STATE BANK	16	0	0.0%	

Lenders denoted with the symbol ** meet the criteria of Subprime Lender as established by the Department of Housing and Urban Development. Of the 197 lenders that make up Appendix B, 25 (12.7%) meet the definition of subprime.

APPENDIX C- RESIDENTIAL LOANS

HMDA residential lending includes loans originated in the Target Area (TA). The percentages exclude all refinancing loans. Appendix C includes all lenders who made residential loans in the Metropolitan Area.

INSTITUTION	TOTAL LOANS	TA LOANS	% TO TA	$ ALL LOANS	$ TA LOANS	WHITE	NON-WHITE	RACE NOT REPT
1ST ADVANTAGE MORTGAGE L.L.C.	8	1	12.5%	$1,104	$190	7	0	1
1ST FEDERAL SAVINGS BANK	19	3	15.8%	$2,822	$229	15	0	4
21ST MORTGAGE CORPORATION	4	2	50.0%	$136	$92	2	2	0
66 FEDERAL CREDIT UNION	1	0	0.0%	$207	$0	1	0	0
A M COMMUNITY CREDIT UNION	1	0	0.0%	$315	$0	1	0	0
AAMES FUNDING CORPORATION	19	2	10.5%	$1,487	$116	11	4	4
A-B CREDIT UNION	50	2	4.0%	$2,679	$55	46	4	0
ABN AMRO MORTGAGE GROUP, INC.	228	24	10.5%	$37,182	$4,326	207	14	7
ACCREDITED HOME LENDERS, INC.	74	5	6.8%	$8,530	$356	37	25	12
ACOUSTIC HOME LOANS, LLC	14	4	28.6%	$851	$178	9	2	3
AEGIS FUNDING CORPORATION	3	0	0.0%	$210	$0	1	0	2
AEGIS LENDING CORPORATION	20	4	20.0%	$2,326	$336	1	5	14
AEGIS WHOLESALE CORPORATION	1	0	0.0%	$176	$0	0	1	0
AFFINITY FEDERAL CREDIT UNION	1	0	0.0%	$15	$0	0	1	0
AIG FSB	88	4	4.5%	$9,630	$493	56	15	17
ALLCO CREDIT UNION	29	1	3.4%	$4,314	$178	28	1	0
ALPINE LENDING LLC	15	1	6.7%	$1,487	$219	11	0	4
AMCORE BANK, N.A.	18	1	5.6%	$2,993	$142	13	0	5
AMERIBANQ MORTGAGE GROUP LLC	1	0	0.0%	$131	$0	1	0	0
AMERICAN BANK	3	0	0.0%	$380	$0	3	0	0
AMERICAN BUSINESS FINANCIAL	2	1	50.0%	$158	$60	0	2	0
AMERICAN EQUITY MORTGAGE	4	0	0.0%	$755	$0	4	0	0
AMERICAN FIDELITY MORTGAGE	1	0	0.0%	$211	$0	1	0	0
AMERICAN FINANCE HOUSE LARIBA	3	0	0.0%	$623	$0	0	1	2
AMERICAN HOME EQUITY	2	0	0.0%	$238	$0	2	0	0
AMERICAN HOME MORTGAGE	65	4	6.2%	$11,022	$451	55	4	6
AMERICAN MORTGAGE NETWORK, INC	26	0	0.0%	$4,699	$0	25	0	1
AMERIFIRST FINANCIAL CORPORATI	4	0	0.0%	$555	$0	4	0	0
AMERIQUEST MORTGAGE COMPANY	112	4	3.6%	$16,438	$266	79	22	11
AMERISTAR MORTGAGE CORPORATION	325	6	1.8%	$54,382	$533	314	11	0
AMERITRUST MORTGAGE CORPORATIO	1	0	0.0%	$130	$0	1	0	0
AMPRO MORTGAGE CORPORATION	3	0	0.0%	$228	$0	2	1	0
ANCHORBANK FSB	376	6	1.6%	$56,204	$541	334	17	25
APPLETREE CREDIT UNION	5	0	0.0%	$321	$0	5	0	0

APPENDIX C

HMDA residential lending includes loans originated in the Target Area (TA). The percentages exclude all refinancing loans. Appendix C includes all lenders who made residential loans in the Metropolitan Area.

INSTITUTION	TOTAL LOANS	TA LOANS	% TO TA	$ ALL LOANS	$ TA LOANS	WHITE	NON-WHITE	RACE NOT REPT
ARGENT MORTGAGE COMPANY	708	163	23.0%	$73,332	$11,837	393	311	4
ASSOCIATED BANK MINNESOTA, N.A	2	0	0.0%	$50	$0	2	0	0
ASSOCIATED BANK, N.A.	994	39	3.9%	$66,581	$2,903	833	114	47
ASSOCIATED MORTGAGE CO, INC	273	5	1.8%	$42,645	$436	257	13	3
ASSURED MORTGAGE, INC.	216	4	1.9%	$35,189	$703	203	13	0
AUTO CLUB GROUP CREDIT UNION	1	0	0.0%	$6	$0	1	0	0
AXIOM FINANCIAL, INC.	1	0	0.0%	$148	$0	1	0	0
BADGERLAND FARM CREDIT	2	0	0.0%	$432	$0	2	0	0
BANK MUTUAL	383	22	5.7%	$57,967	$7,444	320	52	11
BANK OF AMERICA, N.A.	680	15	2.2%	$99,013	$1,459	618	54	8
BANK OF DEERFIELD	1	0	0.0%	$90	$0	1	0	0
BANK OF MARINGOUIN	7	0	0.0%	$1,063	$0	5	1	1
BANKERS MORTGAGE	1	0	0.0%	$178	$0	1	0	0
BANKUNITED, FSB	2	0	0.0%	$415	$0	1	1	0
BAY NET A COMMUNITY BANK	1	0	0.0%	$280	$0	0	1	0
BAY VIEW FEDERAL S&L ASSN.	17	2	11.8%	$2,092	$554	15	1	1
BEDFORD HOME LOANS, INC.	1	0	0.0%	$140	$0	1	0	0
BELL AMERICA MORTGAGE LLC	2	0	0.0%	$395	$0	2	0	0
BENEFICIAL	55	8	14.5%	$1,097	$237	28	22	5
BESTSOURCE CREDIT UNION	2	0	0.0%	$80	$0	2	0	0
BETHPAGE FEDERAL CREDIT UNION	1	0	0.0%	$30	$0	0	0	1
BRIDGE CAPITAL CORPORATION	2	0	0.0%	$229	$0	0	0	2
BUSEY BANK	1	0	0.0%	$144	$0	1	0	0
C.U. MORTGAGE SERVICES, INC.	1	0	0.0%	$185	$0	0	0	1
CAPITAL ONE, F.S.B.	2	0	0.0%	$97	$0	1	0	1
CASTLE BANK	1	1	100.0%	$159	$159	1	0	0
CENDANT MORTGAGE	276	13	4.7%	$50,534	$1,757	204	24	48
CENTEX HOME EQUITY COMPANY LLC	7	2	28.6%	$363	$57	3	2	2
CHAPEL MORTGAGE	4	0	0.0%	$407	$0	0	2	2
CHARLES SCHWAB BANK, N.A.	10	1	10.0%	$2,372	$273	8	0	2
CHARTER ONE BANK	6	2	33.3%	$727	$88	6	0	0
CHARTWAY FEDERAL CU	2	0	0.0%	$172	$0	1	0	1
CHASE MANHATTAN BANK USA, NA	24	1	4.2%	$804	$38	18	4	2
CHASE MANHATTAN MORTGAGE CORP.	343	31	9.0%	$56,166	$2,416	272	41	30

APPENDIX C

HMDA residential lending includes loans originated in the Target Area (TA). The percentages exclude all refinancing loans. Appendix C includes all lenders who made residential loans in the Metropolitan Area.

INSTITUTION	TOTAL LOANS	TA LOANS	% TO TA	$ ALL LOANS	$ TA LOANS	WHITE	NON-WHITE	RACE NOT REPT
CHERRY CREEK MORTGAGE COMPANY	4	0	0.0%	$822	$0	2	1	1
CHICAGO BANCORP, INC	15	4	26.7%	$2,286	$545	13	1	1
CITIBANK, FSB	15	0	0.0%	$2,128	$0	12	1	2
CITICORP TRUST BANK, FSB	23	1	4.3%	$2,629	$92	14	9	0
CITIFINANCIAL MORTGAGE CO.,INC	5	0	0.0%	$430	$0	4	1	0
CITIFINANCIAL, INC	137	26	19.0%	$4,159	$836	81	38	18
CITIMORTGAGE, INC.	78	4	5.1%	$17,449	$259	55	6	17
CITIZENS BANK OF MUKWONAGO	116	1	0.9%	$18,198	$45	104	3	9
CITIZENS COMMUNITY FEDERAL	1	0	0.0%	$10	$0	0	0	1
CITIZENS STATE BANK	1	0	0.0%	$210	$0	1	0	0
CITIZENSFIRST CREDIT UNION	1	0	0.0%	$238	$0	1	0	0
CITY 1ST MORTGAGE SERVICES, LC	10	1	10.0%	$1,446	$178	9	0	1
COLONIAL BANK, N.A.	4	0	0.0%	$579	$0	2	0	2
COLONIAL SAVINGS, F.A.	9	1	11.1%	$1,336	$44	8	1	0
COLORADO FEDERAL SAVINGS BANK	2	1	50.0%	$263	$69	1	1	0
COLUMBIA HOME LOANS, LLC	1	0	0.0%	$204	$0	0	1	0
COMMERCE BANK, N.A.	1	0	0.0%	$120	$0	1	0	0
COMMERCIAL BANK AND TRUST CO	1	0	0.0%	$1,000	$0	1	0	0
COMMERCIAL STATE BANK	1	0	0.0%	$196	$0	1	0	0
COMMUNITY BANK & TRUST	19	5	26.3%	$4,215	$732	10	1	8
COMMUNITY BANK DELAVAN	2	2	100.0%	$366	$366	2	0	0
COMMUNITY BANK FINANCIAL	1	0	0.0%	$30	$0	1	0	0
COMMUNITY FINANCIAL GROUP MTG	66	0	0.0%	$11,002	$0	58	3	5
COMMUNITY FIRST BANK	1	0	0.0%	$98	$0	0	0	1
COMMUNITY FIRST BANK	3	0	0.0%	$372	$0	3	0	0
COMMUNITY FIRST CREDIT UNION	5	2	40.0%	$396	$195	5	0	0
COMMUNITY STATE BANK	4	0	0.0%	$444	$0	4	0	0
COMPASS MORTGAGE, INC.	1	0	0.0%	$90	$0	1	0	0
COMUNITY LENDING INCORPORATED	2	0	0.0%	$239	$0	2	0	0
CONCORDE ACCEPTANCE CORPORATIO	10	1	10.0%	$970	$67	1	2	7
CONTINENTAL SAVINGS BANK, FSB.	140	12	8.6%	$21,572	$1,274	121	8	11
CORESTAR FINANCIAL GROUP, LLC	2	0	0.0%	$420	$0	2	0	0
CORINTHIAN MORTGAGE CORP	3	1	33.3%	$190	$76	2	1	0
CORNERSTONE COMMUNITY BANK	22	1	4.5%	$2,974	$125	21	0	1

APPENDIX C

HMDA residential lending includes loans originated in the Target Area (TA). The percentages exclude all refinancing loans. Appendix C includes all lenders who made residential loans in the Metropolitan Area.

INSTITUTION	TOTAL LOANS	TA LOANS	% TO TA	$ ALL LOANS	$ TA LOANS	WHITE	NON-WHITE	RACE NOT REPT
CORPORATE AMERICA FAMILY CREDI	1	0	0.0%	$124	$0	1	0	0
COUNTRYWIDE HOME LOANS	1576	151	9.6%	$225,285	$10,509	1,199	284	93
CRESCENT MORTGAGE COMPANY	4	0	0.0%	$698	$0	4	0	0
CSMC INC., DBA CENTRAL STATES	370	10	2.7%	$54,045	$1,369	319	48	3
CTX MORTGAGE COMPANY, LLC	239	26	10.9%	$25,300	$1,473	123	108	8
CUNA CREDIT UNION	2	0	0.0%	$132	$0	2	0	0
DANE COUNTY CREDIT UNION	6	0	0.0%	$289	$0	6	0	0
DECISION ONE MORTGAGE	211	6	2.8%	$16,704	$345	133	48	30
DELTA FUNDING CORPORATION	2	1	50.0%	$234	$166	0	1	1
DMB COMMUNITY BANK	1	0	0.0%	$153	$0	1	0	0
DOLLAR BANK, FSB	33	0	0.0%	$10,838	$0	31	2	0
DOLLAR MORTGAGE CORPORATION	3	2	66.7%	$181	$102	0	3	0
DOMESTIC BANK	3	0	0.0%	$44	$0	2	0	1
E*TRADE BANK	13	1	7.7%	$2,592	$69	6	1	6
EDUCATORS CREDIT UNION	19	1	5.3%	$2,779	$440	16	3	0
E-LOAN, INC	35	2	5.7%	$2,811	$367	23	0	12
EMIGRANT MORTGAGE COMPANY, INC	3	0	0.0%	$2,629	$0	3	0	0
EMSBLA CREDIT UNION	29	2	6.9%	$5,595	$234	22	4	3
ENCORE CREDIT CORP.	19	0	0.0%	$2,507	$0	10	7	2
ENTERPRISE CU	77	5	6.5%	$2,106	$135	65	3	9
ENTRUST MORTGAGE, INC.	3	0	0.0%	$222	$0	1	2	0
EQUIFIRST CORPORATION	45	4	8.9%	$4,833	$241	26	19	0
EQUITY ONE, INC.	11	0	0.0%	$1,859	$0	6	3	2
EQUITY PLUS, INC	2	0	0.0%	$254	$0	1	0	1
EXPRESS CAPITAL LENDING	1	0	0.0%	$156	$0	0	1	0
EXTRACO MORTGAGE	1	0	0.0%	$490	$0	1	0	0
F&M BANK- WISCONSIN	102	3	2.9%	$19,011	$314	99	1	2
FIDELITY BANK	1	1	100.0%	$43	$43	0	1	0
FIELDSTONE MORTGAGE COMPANY	37	2	5.4%	$3,670	$119	25	9	3
FIFTH THIRD MORTGAGE COMPANY	4	1	25.0%	$958	$86	3	1	0
FINANCE AMERICA, LLC	72	24	33.3%	$5,859	$1,412	29	36	7
FIRST AMERICAN CREDIT UNION	1	0	0.0%	$101	$0	1	0	0
FIRST BANK	2	0	0.0%	$833	$0	1	1	0
FIRST BANK FINANCIAL CENTRE	86	1	1.2%	$17,007	$140	79	3	4

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FIRST BANK RICHMOND, NA	1	0	0.0%	$36	$0	1	0	0
FIRST BANKING CENTER	10	1	10.0%	$1,530	$50	10	0	0
FIRST BUSINESS BANK	4	1	25.0%	$1,014	$236	0	0	4
FIRST CAPITAL FINANCIAL SERVIC	17	0	0.0%	$2,314	$0	8	2	7
FIRST CHOICE MORTGAGE INC	87	3	3.4%	$9,538	$167	59	20	8
FIRST CONSOLIDATED MORTGAGE	1	0	0.0%	$100	$0	1	0	0
FIRST CONTINENTAL MORTGAGE LTD	26	1	3.8%	$4,460	$39	20	1	5
FIRST FEDERAL CAPITAL BANK	34	1	2.9%	$4,981	$132	34	0	0
FIRST FEDERAL SVGS BK OF WI	40	0	0.0%	$12,817	$0	37	1	2
FIRST GUARANTY MORTGAGE CORP	13	1	7.7%	$909	$112	5	0	8
FIRST HORIZON HOME LOAN CORP	104	4	3.8%	$18,415	$738	91	8	5
FIRST MAGNUS FINANCIAL CORP.	105	11	10.5%	$13,112	$1,007	43	45	17
FIRST MORTGAGE COMPANY LLC	1	0	0.0%	$115	$0	1	0	0
FIRST NATIONAL BANK OF ARIZONA	23	4	17.4%	$2,726	$304	15	6	2
FIRST NATIONAL BANK OF MCHENRY	1	1	100.0%	$56	$56	1	0	0
FIRST NATIONAL BANK-HARTFORD	26	0	0.0%	$3,693	$0	26	0	0
FIRST NATIONAL BANK-MANITOWOC	3	0	0.0%	$776	$0	3	0	0
FIRST NLC FINANCIAL SERVICES	39	3	7.7%	$3,241	$165	28	11	0
FIRST STATE MORTGAGE CORPORATI	4	0	0.0%	$572	$0	2	2	0
FIRST SUBURBAN MORTGAGE CORP	1	0	0.0%	$177	$0	1	0	0
FIRST TENNESSEE BANK NA	1	0	0.0%	$41	$0	1	0	0
FLAGSTAR BANK	139	11	7.9%	$21,112	$1,770	108	27	4
FLEET NATIONAL BANK	3	0	0.0%	$46	$0	2	1	0
FORTRESS BANK OF WESTBY	1	0	0.0%	$160	$0	1	0	0
FOX VALLEY SAVINGS BANK	2	0	0.0%	$385	$0	1	0	1
FRANKLIN AMERICAN MORTGAGE CO	82	2	2.4%	$13,261	$252	30	51	1
FRANKLIN FINANCIAL	4	1	25.0%	$488	$204	3	0	1
FRANKLIN MORTGAGE FUNDING	313	7	2.2%	$31,033	$456	193	91	29
FRANKLIN SECURITY BANK, FSB	7	0	0.0%	$2,035	$0	6	1	0
FRANKLIN STATE BANK	2	1	50.0%	$190	$65	2	0	0
FREEDOM MORTGAGE CORPORATION	2	0	0.0%	$181	$0	0	0	2
FREMONT INVESTMENT & LOAN	219	27	12.3%	$19,549	$1,751	117	89	13
FRONT ROYAL FCU	1	0	0.0%	$162	$0	1	0	0
GATEWAY MORTGAGE CORPORATION	9	0	0.0%	$1,199	$0	7	0	2

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GB HOME EQUITY, LLC	524	11	2.1%	$15,906	$328	476	31	17
GLACIER HILLS CREDIT UNION	59	0	0.0%	$2,501	$0	40	0	19
GMAC BANK	516	14	2.7%	$86,247	$2,151	448	22	46
GMAC MORTGAGE CORPORATION	132	1	0.8%	$16,968	$41	102	5	25
GN MORTGAGE, LLC	14	0	0.0%	$1,908	$0	12	2	0
GPE INC.	1	1	100.0%	$21	$21	0	0	1
GRAFTON STATE BANK	36	0	0.0%	$4,296	$0	33	1	2
GREAT EAST MORTGAGE, LLC	1	0	0.0%	$287	$0	1	0	0
GREAT MIDWEST BANK, SSB	270	7	2.6%	$36,806	$440	244	14	12
GREEN TREE SERVICING	1	0	0.0%	$34	$0	1	0	0
GREENLIGHT FINANCIAL SERVICES	2	0	0.0%	$165	$0	1	0	1
GREENPOINT MORTGAGE FUNDING	9	0	0.0%	$1,401	$0	8	1	0
GUARANTY RESIDENTIAL LENDING	41	10	24.4%	$4,223	$810	23	12	6
GUARDIAN CREDIT UNION	268	4	1.5%	$17,971	$278	209	20	39
H&R BLOCK MORTGAGE CORPORATION	11	0	0.0%	$1,130	$0	8	2	1
HARBORSIDE FINANCIAL NETWORK	1	0	0.0%	$25	$0	1	0	0
HARRIS BANK ST. CHARLES	1	0	0.0%	$45	$0	1	0	0
HARRIS TRUST AND SAVINGS BANK	4	1	25.0%	$745	$74	3	0	1
HARTFORD SAVINGS BANK	100	0	0.0%	$13,267	$0	85	3	12
HARTLAND MORTGAGE CENTERS INC.	10	0	0.0%	$1,562	$0	9	1	0
HEARTLAND CREDIT UNION	1	0	0.0%	$124	$0	1	0	0
HFC	32	2	6.3%	$1,464	$146	19	7	6
HIBERNIA NATIONAL BANK	2	0	0.0%	$256	$0	0	2	0
HOME EQUITY OF AMERICA	1	0	0.0%	$50	$0	1	0	0
HOME FEDERAL SAVINGS BANK	1	0	0.0%	$165	$0	1	0	0
HOME LOAN CENTER, INC.	6	0	0.0%	$990	$0	0	0	6
HOME LOAN CORPORATION	4	0	0.0%	$317	$0	4	0	0
HOME LOAN EXPRESS, LLC	8	0	0.0%	$2,097	$0	7	1	0
HOME TOWN MORTGAGE, INC.	1	0	0.0%	$224	$0	1	0	0
HOMECOMINGS FINANCIAL NETWORK	8	1	12.5%	$1,103	$276	3	3	2
HOMESTAR BANK	1	0	0.0%	$110	$0	1	0	0
HOMETOWN BANK	10	0	0.0%	$822	$0	10	0	0
HOMETOWN MORTGAGE & FINANCE	3	0	0.0%	$86	$0	3	0	0
HOMETOWN MORTGAGE SERVICES	1	0	0.0%	$180	$0	0	0	1

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HORICON BANK	39	0	0.0%	$5,884	$0	37	0	2
HSBC MORTGAGE CORP	25	3	12.0%	$4,741	$637	23	0	2
IMPAC FUNDING CORP	1	1	100.0%	$66	$66	0	1	0
INDYMAC BANK, F.S.B.	56	5	8.9%	$9,035	$721	39	8	9
ING DIRECT	7	0	0.0%	$1,201	$0	2	1	4
INTERVALE MORTGAGE	326	26	8.0%	$31,290	$1,563	188	85	53
INVESTORSBANK	46	1	2.2%	$14,201	$215	44	2	0
IRWIN MORTGAGE CORP	69	0	0.0%	$10,414	$0	67	2	0
IRWIN UNION BANK & TRUST	9	0	0.0%	$193	$0	9	0	0
IRWIN UNION FSB	1	0	0.0%	$168	$0	1	0	0
ISB COMMUNITY BANK	12	0	0.0%	$3,109	$0	10	0	2
JAMES B. NUTTER & CO.	1	0	0.0%	$166	$0	1	0	0
JOHNSON BANK	219	7	3.2%	$46,168	$1,210	184	30	5
JOURNAL CREDIT UNION	14	0	0.0%	$1,264	$0	11	2	1
JP MORGAN CHASE BANK, NA	233	11	4.7%	$32,214	$805	206	23	4
KEYBANK NATIONAL ASSOCIATION	170	5	2.9%	$1,764	$49	153	17	0
KH FINANCIAL, LP	31	0	0.0%	$4,534	$0	16	0	15
KRAFT FOODS FCU	3	0	0.0%	$155	$0	0	0	3
LANDMARK CREDIT UNION	877	12	1.4%	$116,701	$626	743	60	74
LASALLE BANK NA	2	0	0.0%	$267	$0	1	1	0
LEGACY BANK	112	50	44.6%	$7,104	$2,604	22	43	47
LEHMAN BROTHERS BANK	167	33	19.8%	$18,280	$1,648	94	57	16
LENDSOURCE, INC.	1	0	0.0%	$71	$0	0	1	0
LINCOLN STATE BANK	19	1	5.3%	$1,868	$40	16	0	3
LOAN LINK FINANCIAL SERVICES	4	0	0.0%	$811	$0	3	0	1
LOANCITY.COM	1	0	0.0%	$271	$0	0	0	1
LONG BEACH MORTGAGE CO.	220	43	19.5%	$17,293	$2,366	89	128	3
M&I BANK FSB	37	1	2.7%	$2,837	$17	30	1	6
M&I MARSHALL & ILSLEY BANK	920	85	9.2%	$144,691	$8,704	755	83	82
M&I MORTGAGE CORP	492	10	2.0%	$84,595	$1,093	418	30	44
M&T MORTGAGE CORPORATION	1	0	0.0%	$456	$0	1	0	0
MAC-CLAIR MORTGAGE CORPORATION	1	0	0.0%	$112	$0	0	1	0
MAJESTIC MORTGAGE CORPORATION	4	0	0.0%	$468	$0	4	0	0
MARINE BANK	4	3	75.0%	$156	$56	4	0	0

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MARINE CREDIT UNION	3	0	0.0%	$420	$0	3	0	0
MARITIME SAVINGS BANK	141	5	3.5%	$17,870	$186	129	4	8
MARKET STREET MORTGAGE CORP	5	1	20.0%	$665	$141	3	0	2
MARKETPLACE HOME MORTGAGE, LLC	1	0	0.0%	$443	$0	0	1	0
MBNA AMERICA (DELAWARE), N.A.	2	0	0.0%	$85	$0	1	0	1
MERCANTILE BANK	1	0	0.0%	$91	$0	0	1	0
MERITAGE MORTGAGE CORP.	3	1	33.3%	$176	$36	1	2	0
MERRILL LYNCH CREDIT CORP.	29	1	3.4%	$9,719	$220	24	3	2
METROCITIES MORTGAGE	3	0	0.0%	$1,241	$0	3	0	0
MID AMERICA BANK	1	0	0.0%	$316	$0	1	0	0
MIDAMERICA BANK	762	40	5.2%	$81,459	$2,636	608	127	27
MIDCOUNTRY BANK	1	0	0.0%	$292	$0	1	0	0
MIDCOUNTRY MORTGAGE CORP.	27	0	0.0%	$7,697	$0	22	4	1
MIDDLETON COMMUNITY BANK	1	0	0.0%	$137	$0	1	0	0
MIDFIRST BANK	2	0	0.0%	$106	$0	1	0	1
MIDWEST COMMUNITY BANK	1	0	0.0%	$315	$0	1	0	0
MID-WISCONSIN BANK	2	0	0.0%	$198	$0	2	0	0
MILA INC	77	11	14.3%	$5,868	$699	32	44	1
MILWAUKEE WESTERN BANK	34	3	8.8%	$6,948	$78	22	6	6
MITCHELL BANK	69	19	27.5%	$5,264	$735	60	1	8
MLSG, INC.	3	2	66.7%	$317	$164	3	0	0
MMCU	73	10	13.7%	$4,386	$596	48	19	6
MOLTON, ALLEN & WILLIAMS MTG	1	0	0.0%	$84	$0	0	1	0
MORGAN STANLEY	8	0	0.0%	$1,565	$0	5	0	3
MORTGAGE CAPITAL ASSOCIATES	5	2	40.0%	$728	$333	5	0	0
MORTGAGE LENDERS NETWORK USA	50	0	0.0%	$7,294	$0	32	9	9
MORTGAGE SERVICES INC.	73	1	1.4%	$13,071	$257	64	7	2
MORTGAGEIT, INC	121	5	4.1%	$18,734	$555	94	15	12
MORTON COMMUNITY BANK	1	0	0.0%	$100	$0	1	0	0
MOTOROLA EMPLOYEES CREDIT UNIO	1	0	0.0%	$200	$0	0	1	0
NATIONAL BANK OF COMMERCE	1	0	0.0%	$63	$0	0	0	1
NATIONAL BANK OF INDIANAPOLIS	1	0	0.0%	$447	$0	1	0	0
NATIONAL BANK OF KANSAS CITY	7	2	28.6%	$732	$171	6	0	1
NATIONAL CITY BANK	10	0	0.0%	$347	$0	8	0	2

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NATIONAL CITY BANK OF THE MIDW	1	0	0.0%	$172	$0	1	0	0
NATIONAL CITY BANK, INDIANA	892	73	8.2%	$106,739	$4,917	575	215	102
NATIONAL EXCHANGE BANK	34	0	0.0%	$4,465	$0	31	2	1
NATIONWIDE ADVANTAGE MORTGAGE	7	0	0.0%	$835	$0	6	0	1
NBANK, N.A.	3	0	0.0%	$750	$0	3	0	0
NETBANK, INC	10	0	0.0%	$1,496	$0	7	3	0
NEW CENTURY MTG CORPORATION	135	21	15.6%	$14,953	$1,632	93	37	5
NEW FREEDOM MORTGAGE CORP	1	0	0.0%	$144	$0	0	0	1
NEW STATE MORTGAGE COMPANY	15	0	0.0%	$2,585	$0	15	0	0
NEXSTAR FINANCIAL CORPORATION	8	1	12.5%	$1,276	$40	4	1	3
NFCU	19	0	0.0%	$2,425	$0	5	4	10
NICOLET NATIONAL BANK	1	0	0.0%	$136	$0	1	0	0
NORTH AMERICAN SAVINGS BANK	4	0	0.0%	$889	$0	3	0	1
NORTH MILWAUKEE STATE BANK	10	3	30.0%	$2,058	$935	3	4	3
NORTH SHORE BANK FSB	356	18	5.1%	$69,652	$1,147	310	36	10
NORTHERN TRUST BANK, FSB	7	0	0.0%	$2,803	$0	6	0	1
NOVASTAR HOME MORTGAGE INC	14	2	14.3%	$2,272	$578	7	3	4
NOVASTAR MORTGAGE INC	15	0	0.0%	$2,128	$0	8	5	2
OAK BANK	3	0	0.0%	$570	$0	3	0	0
OAK STREET MORTGAGE	33	1	3.0%	$3,774	$73	19	1	13
OHIO SAVINGS BANK	488	20	4.1%	$80,271	$2,738	453	27	8
OLD SECOND MORTGAGE	1	0	0.0%	$198	$0	1	0	0
OLYMPUS MORTGAGE COMPANY	3	0	0.0%	$694	$0	0	2	1
OOSTBURG STATE BANK	1	0	0.0%	$75	$0	1	0	0
OPTEUM FINANCIAL SERVICES LLC	2	0	0.0%	$173	$0	0	2	0
OPTIMUM MORTGAGE SERVICES, INC	1	0	0.0%	$138	$0	1	0	0
OPTION ONE MORTGAGE CORP.	248	13	5.2%	$23,477	$917	177	48	23
OREGON COMMUNTIY BANK & TRUST	2	0	0.0%	$123	$0	2	0	0
OWNIT MORTGAGE SOLUTIONS INC.	5	0	0.0%	$667	$0	4	0	1
OZAUKEE BANK	363	9	2.5%	$67,878	$1,280	302	8	53
PARAGON HOME LENDING, LLC	369	18	4.9%	$47,128	$1,224	200	81	88
PARK BANK	28	3	10.7%	$6,205	$296	25	0	3
PATELCO CREDIT UNION	1	0	0.0%	$40	$0	0	0	1
PENTAGON FEDERAL CREDIT UNION	4	0	0.0%	$344	$0	3	0	1

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PEOPLE'S CHOICE HOME LOAN, INC	17	4	23.5%	$1,104	$187	0	0	17
PEOPLES STATE BANK	1	0	0.0%	$170	$0	1	0	0
PERFORMANCE PLUS LENDING LLC	57	2	3.5%	$7,174	$110	39	10	8
PGNF HOME LENDING CORP	10	1	10.0%	$875	$34	9	1	0
PINNACLE MORTGAGE GROUP	1	0	0.0%	$156	$0	0	0	1
PIONEER MORTGAGE, INC.	1	0	0.0%	$176	$0	1	0	0
PLATINUM COMMUNITY BANK	1	0	0.0%	$131	$0	1	0	0
PLATINUM HOME MORTGAGE CORP	5	0	0.0%	$905	$0	5	0	0
PNC BANK NA	1	0	0.0%	$29	$0	1	0	0
PORT WASHINGTON STATE BANK	154	1	0.6%	$19,012	$17	147	1	6
PRICELINE MORTGAGE COMPANY LLC	1	0	0.0%	$180	$0	1	0	0
PRIMARY RESIDENTIAL MORTGAGE	19	0	0.0%	$2,610	$0	16	2	1
PRINCIPAL BANK	4	0	0.0%	$69	$0	3	0	1
PRINCIPAL RESIDENTIAL MORTGAGE	242	3	1.2%	$42,429	$482	211	19	12
PROVIDENT BANK	21	11	52.4%	$1,428	$445	5	14	2
PROVIDENT FUNDING ASSOCIATES,	25	0	0.0%	$5,154	$0	22	0	3
PURDUE EMPLOYEES FEDERAL CREDI	1	0	0.0%	$128	$0	1	0	0
PYRAMAX BANK	551	11	2.0%	$76,211	$988	509	39	3
QUICKEN LOANS	32	3	9.4%	$5,972	$590	22	3	7
RBC MORTGAGE	47	4	8.5%	$8,356	$786	39	6	2
RBMG, INC	20	0	0.0%	$2,672	$0	19	1	0
REGIONS BANK	9	0	0.0%	$1,601	$0	9	0	0
REPUBLIC BANK	1	0	0.0%	$196	$0	1	0	0
RESIDENTIAL FINANCE CORPORATIO	9	2	22.2%	$1,282	$203	3	0	6
RESIDENTIAL LOAN CENTERS	5	0	0.0%	$555	$0	2	1	2
RIDGESTONE BANK	11	0	0.0%	$1,629	$0	11	0	0
RIVER CITY MORTGAGE CORP.	5	1	20.0%	$932	$182	2	2	1
RIVER VALLEY STATE BANK	1	0	0.0%	$71	$0	0	1	0
ROYAL BANK	1	0	0.0%	$180	$0	1	0	0
SEBRING CAPITAL PARTNERS, L.P.	14	0	0.0%	$1,657	$0	6	6	2
SECURITY STATE BANK	260	17	6.5%	$28,417	$969	214	39	7
SGB CORPORATION DBA WESTAMERIC	4	0	0.0%	$394	$0	4	0	0
SHAREPLUS FEDERAL	2	0	0.0%	$164	$0	0	2	0
SHELTER MORTGAGE COMPANY, LLC	349	15	4.3%	$58,024	$2,451	274	71	4

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SIB MORTGAGE CORP.	24	2	8.3%	$3,803	$568	23	1	0
SIMPLICITY MORTGAGE CORPORATIO	10	0	0.0%	$1,312	$0	1	1	8
SIRVA MORTGAGE, INC.	19	0	0.0%	$4,700	$0	17	1	1
SKY BANK	1	0	0.0%	$133	$0	1	0	0
SOUTH CENTRAL BANK, N.A.	45	0	0.0%	$522	$0	37	8	0
SOUTHEAST NATIONAL BANK	1	0	0.0%	$199	$0	1	0	0
SOUTHESAST MORTGAGE	2	0	0.0%	$144	$0	2	0	0
SOUTHPORT BANK	12	0	0.0%	$2,731	$0	11	0	1
SOUTHSTAR FUNDING	23	0	0.0%	$2,163	$0	14	5	4
SOVEREIGN BANK	1	0	0.0%	$200	$0	1	0	0
ST FRANCIS MORTGAGE CORP	31	1	3.2%	$1,412	$43	27	4	0
STATE BANK OF HOWARDS GROVE	2	0	0.0%	$62	$0	2	0	0
STATE BANK OF LA CROSSE	1	1	100.0%	$150	$150	1	0	0
STATE BANK OF NEWBURG	42	0	0.0%	$5,443	$0	41	0	1
STATE BANK OF THE LAKES	1	0	0.0%	$180	$0	1	0	0
STATE CENTRAL CREDIT UNION	91	2	2.2%	$11,311	$250	80	11	0
STATE FARM BANK	21	3	14.3%	$3,228	$154	15	6	0
STATE FINANCIAL BANK, NA	29	5	17.2%	$3,631	$221	13	6	10
STATEN ISLAND BANK & T C/O ICB	24	2	8.3%	$3,803	$568	23	1	0
SUMMIT CREDIT UNION	10	2	20.0%	$300	$7	6	4	0
SUMMIT MORTGAGE CORPORATION	77	3	3.9%	$12,156	$407	66	10	1
SUNSET BANK & SAVINGS	251	6	2.4%	$37,305	$829	225	15	11
SUNSET DIRECT LENDING, LLC	2	0	0.0%	$135	$0	2	0	0
SUNTRUST MORTGAGE, INC	77	4	5.2%	$13,066	$377	66	6	5
TAYLOR, BEAN & WHITAKER	1	0	0.0%	$243	$0	1	0	0
TCF MORTGAGE CORPORATION	42	2	4.8%	$6,212	$196	35	6	1
TCF NATIONAL BANK	289	21	7.3%	$9,278	$457	220	59	10
THE BANK OF KAUKAUNA	1	0	0.0%	$184	$0	1	0	0
THE CIT GROUP/CONSUMER FINANCE	26	11	42.3%	$2,717	$735	9	16	1
THE EQUITABLE BANK, S.S.B.	852	27	3.2%	$168,081	$2,396	756	85	11
THE GRANGE BANK	1	0	0.0%	$137	$0	0	0	1
THE HUNTINGTON NATIONAL BANK	152	4	2.6%	$32,651	$716	137	8	7
THE NORTHERN TRUST COMPANY	2	0	0.0%	$745	$0	2	0	0
THE PARK BANK	6	0	0.0%	$1,263	$0	6	0	0

APPENDIX C

HMDA residential lending includes loans originated in the Target Area (TA). The percentages exclude all refinancing loans. Appendix C includes all lenders who made residential loans in the Metropolitan Area.

INSTITUTION	TOTAL LOANS	TA LOANS	% TO TA	$ ALL LOANS	$ TA LOANS	WHITE	NON-WHITE	RACE NOT REPT
THE PEOPLES STATE BANK	1	0	0.0%	$131	$0	1	0	0
THINK FEDERAL CREDIT UNION	15	1	6.7%	$1,407	$12	9	1	5
THRIVENT FINANCIAL BANK	11	2	18.2%	$908	$44	9	0	2
TIERONE BANK	1	0	0.0%	$232	$0	1	0	0
TIME FEDERAL SAVINGS BANK	1	0	0.0%	$279	$0	1	0	0
TOWN BANK	10	1	10.0%	$3,302	$66	6	0	4
TOYOTA FEDERAL CREDIT UNION	1	0	0.0%	$106	$0	1	0	0
TRANE FEDERAL CREDIT UNION	3	0	0.0%	$314	$0	2	1	0
TREASURY BANK NATIONAL ASSOC.	51	2	3.9%	$10,754	$272	45	4	2
UNION FED BK OF INDIANAPOLIS	2	0	0.0%	$102	$0	1	1	0
UNION PLANTERS BANK	12	0	0.0%	$1,831	$0	11	1	0
UNITED FINANCIAL MORTGAGE CORP	5	0	0.0%	$662	$0	3	1	1
UNITED MORTGAGE LENDERS INC.	2	0	0.0%	$235	$0	2	0	0
UNITEDONE CREDIT UNION	2	1	50.0%	$181	$35	1	1	0
UNIVERSAL MORTGAGE CORP	435	15	3.4%	$58,939	$1,630	359	40	36
UNIVERSAL SAVINGS BANK	245	9	3.7%	$33,685	$670	213	31	1
UNIVERSITY OF WISCONSIN CU	114	10	8.8%	$13,843	$1,367	90	15	9
US BANK NORTH DAKOTA	333	27	8.1%	$18,829	$963	230	60	43
US BANK, N.A.	1020	71	7.0%	$153,917	$6,543	811	147	62
USAA FEDERAL SAVINGS BANK	61	0	0.0%	$9,907	$0	40	7	14
VOYAGER BANK	2	0	0.0%	$430	$0	2	0	0
WACHOVIA BANK	3	0	0.0%	$513	$0	2	0	1
WACHOVIA MORTGAGE	57	7	12.3%	$10,791	$710	42	12	3
WASHINGTON MUTUAL BANK, FA	216	14	6.5%	$36,812	$1,608	171	27	18
WASHTENAW MORTGAGE COMPANY	19	4	21.1%	$2,791	$234	17	2	0
WAUKESHA STATE BANK	275	1	0.4%	$38,676	$300	256	5	14
WAUWATOSA SAVINGS BANK	960	231	24.1%	$149,602	$21,183	644	62	254
WEBSTER BANK NA	1	0	0.0%	$128	$0	1	0	0
WEICHERT FINANCIAL SERVICES	2	0	0.0%	$503	$0	2	0	0
WELLS FARGO BANK, NA	1868	90	4.8%	$332,553	$10,601	1,508	232	128
WELLS FARGO FINL WISCONSIN INC	53	7	13.2%	$6,157	$495	27	12	14
WELLS FARGO FUNDING, INC	353	14	4.0%	$59,887	$1,992	313	19	21
WEST BEND SAVINGS BANK	267	0	0.0%	$47,473	$0	255	3	9
WESTERN FEDERAL CREDIT UNION	1	0	0.0%	$270	$0	1	0	0

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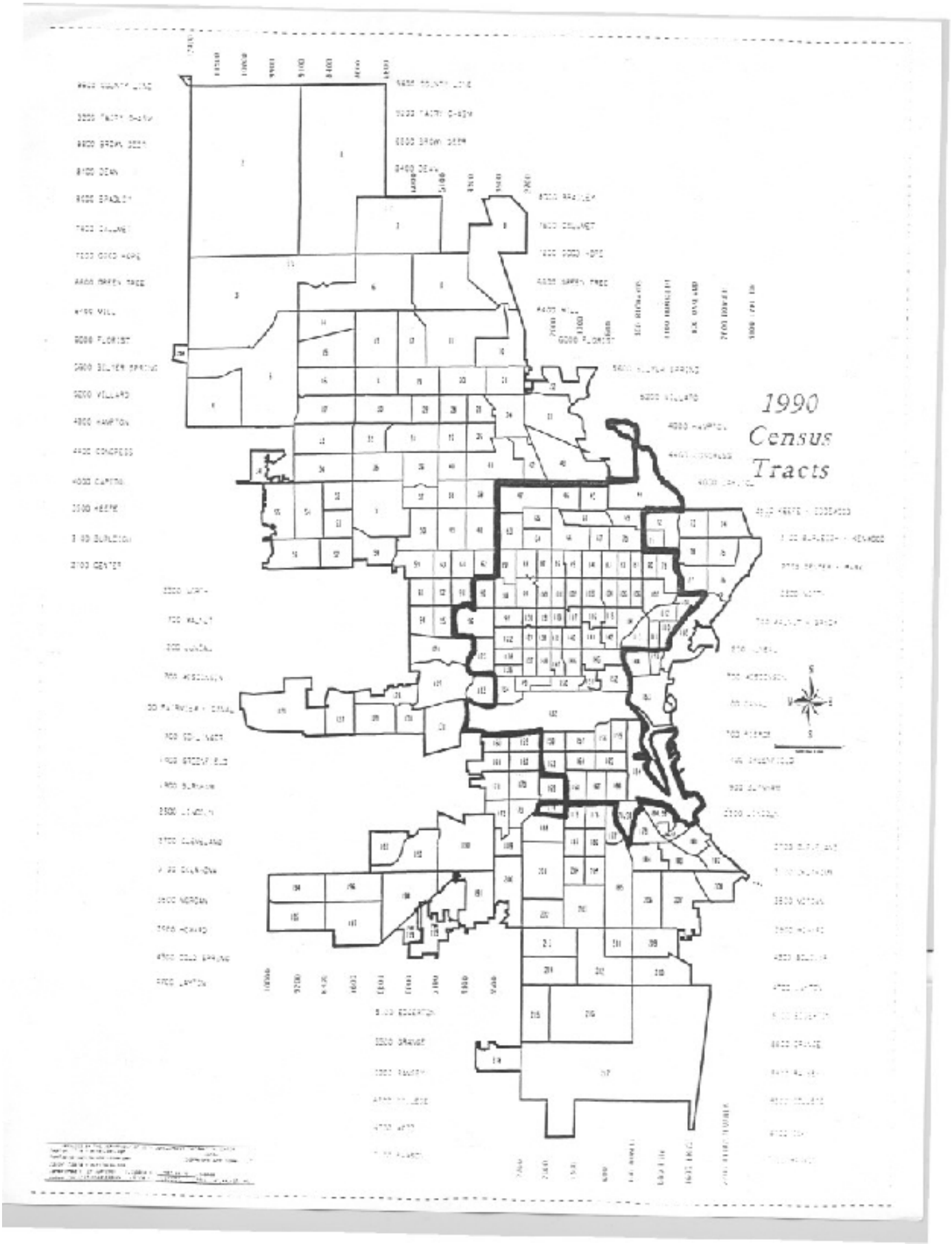
INSTITUTION	TOTAL LOANS	TA LOANS	% TO TA	$ ALL LOANS	$ TA LOANS	WHITE	NON-WHITE	RACE NOT REPT
WHEATON BANK & TRUST COMPANY	2	2	100.0%	$243	$243	0	0	2
WINSTAR MORTGAGE PARTNERS INC	13	2	15.4%	$2,214	$253	12	1	0
WISCONSIN COMMUNITY BANK	3	0	0.0%	$606	$0	3	0	0
WISCONSIN MORTGAGE CORPORATION	1147	35	3.1%	$169,782	$4,672	1,065	80	2
WISCONSIN STATE BANK	16	0	0.0%	$2,227	$0	16	0	0
WMC MORTGAGE CORP.	50	4	8.0%	$5,080	$218	23	20	7
WORLD SAVINGS BANK	255	5	2.0%	$39,916	$702	195	42	18

TRACTS IN CITY TARGET AREA

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


1990
Census
Tracts