



NEW YORK STATE BANKING DEPARTMENT
CONSUMER SERVICES DIVISION
One State Street
New York, NY 10004

PUBLIC SUMMARY

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

Date of Evaluation: December 31, 2002

Institution: Independence Community Bank
195 Montague Street
Brooklyn, NY 11201

Note: This evaluation is not an assessment of the financial condition of this institution. The rating assigned does not represent an analysis, conclusion or opinion of the New York State Banking Department concerning the safety and soundness of this financial institution.

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GENERAL INFORMATION

This document is an evaluation of the Community Reinvestment Act (“CRA”) performance of Independence Community Bank (“Independence”) prepared by the New York State Banking Department. The evaluation represents the Banking Department’s current assessment and rating of the institution’s CRA performance based on an evaluation conducted as of December 31, 2002.

Section 28-b of the New York State Banking Law, as amended, requires that when evaluating certain applications, the Superintendent of Banks shall assess a banking institution’s record of helping to meet the credit needs of its entire community, including low and moderate income (“LMI”) areas, consistent with safe and sound operations.

Part 76 of the General Regulations of the Banking Board implements Section 28-b and further requires that the Banking Department assess the CRA performance records of regulated financial institutions. Part 76 establishes the framework and criteria by which the Department will evaluate the performance. Part 76.5 further provides that the Banking Department will prepare a written report summarizing the results of such assessment and will assign to each institution a numerical CRA rating based on a 1 to 4 scoring system. The numerical scores represent an assessment of CRA performance as follows:

- (1) outstanding record of meeting community credit needs;
- (2) satisfactory record of meeting community credit needs;
- (3) needs to improve record of meeting community credit needs; and
- (4) substantial noncompliance in meeting community credit needs.

Part 76.5 further requires that the CRA rating and the written summary be made available to the public. Evaluations are primarily based on a review of performance tests and standards described in Part 76.7 and detailed in Parts 76.8 – 76.13. The tests and standards incorporate the 12 assessment factors contained in Section 28-b of the New York State Banking Law.

For explanation of technical terms used in this report, please consult the *GLOSSARY* at the back of this document.

OVERVIEW OF INSTITUTION'S PERFORMANCE

Overall Rating

Independence is rated "2," indicating a satisfactory record of helping to meet community credit needs. This rating is based on the following factors:

Lending Test – "High Satisfactory"

- Lending levels reflect excellent responsiveness to assessment area credit needs. For the period under evaluation, the bank originated 1,943 HMDA-reportable and non-reportable modification, extension and consolidation agreements ("MECAs") totaling \$2.3 billion.
- A substantial majority of loans were made in the bank's assessment area. The total assessment area percentages, including the bank's MECA loans, reflect lending of 99.3% and 98.4% in 2001 and 2002, respectively.
- The geographic distribution of loans reflects good penetration throughout the assessment area.
- The distribution by borrower characteristics reflects good penetration among customers of different income levels and businesses of different sizes.
- The institution uses innovative and/or flexible lending practices in serving assessment area credit needs.
- The bank had an excellent level of community development lending. Between June 2000 and December 2002, the bank's community development lending activity totaled \$698.5 million of which \$104.9 million (15%) is considered new money.

Investment Test – "Outstanding"

- Independence has an excellent level of qualified community development investments. During the evaluation period, investments totaled \$27.6 million, with \$23.6 million or 85.6% defined as new money.
- Included in the qualified investments are numerous grants totaling \$4.9 million disbursed to community organizations in the bank's New York State assessment area by Independence Community Foundation ("ICF"), the bank's affiliate.

Service Test – "High Satisfactory"

- Delivery systems are accessible to essentially all portions of the bank's assessment area. Banking offices within and adjacent to LMI census tracts total 47.6%.

- The bank offers *Truly Free Checking*, a consumer checking account that is more beneficial to the consumer than that mandated by New York State Banking Law.
- The bank provides a relatively high level of community development services.

This evaluation was conducted based on a review of the 12 assessment factors set forth in Section 28-b of the New York State Banking Law and Part 76 of the General Regulations of the Banking Board.

PERFORMANCE CONTEXT

Institution's Profile:

Independence is an \$8 billion, publicly owned savings bank, operating 72 banking offices, 38 in New York and 34 in New Jersey. Originally chartered in 1850 as the South Brooklyn Savings Bank, the institution became Independence Community Bank in 1998.

At this evaluation, Independence continues its strategic transition from a savings bank to a commercial bank structure. Although multifamily loans continue to be the bank's primary loan product, commercial and non-residential mortgage loans have grown in importance.

The bank is organized into three primary divisions: consumer banking, commercial real estate and business banking. All divisions contribute to the bank's CRA performance. The small business lending unit was created in January 2001 and is part of the consumer lending division.

The following table illustrates the composition of the bank's loan portfolio for year-ends 2000 through 2002:

Total Gross Loans Outstanding						
Loan Type	12/31/2002		12/31/2001		12/31/2000	
	\$ (000s)	%	\$ (000s)	%	\$ (000s)	%
Multifamily Mortgages	2,543,470	42.78%	2,725,472	46.27%	2,915,013	54.08%
Commercial Real Estate	1,543,064	25.96%	1,019,379	17.31%	805,124	14.94%
1-4 Family Residential Mortgages	765,807	12.88%	994,741	16.89%	1,160,979	21.54%
Other Loans	692,434	11.65%	446,542	7.58%	130,778	2.43%
Commercial & Industrial	227,189	3.82%	512,780	8.71%	271,065	5.03%
Construction and Development	146,026	2.46%	159,090	2.70%	73,787	1.37%
Consumer Loans	26,971	0.45%	32,001	0.54%	33,048	0.61%
Total Gross Loans	5,944,961	100.0%	5,890,005	100.0%	5,389,794	100.0%

The bank competes against numerous institutions, some of which have greater resources and larger branch systems. Combined, the five largest deposit-taking institutions in the bank's assessment area had 1,102 branches, more than \$277 billion in deposits and a market share of 67.3%.

According to the Federal Deposit Insurance Corporation ("FDIC"), the bank's network of branches in New York State held \$3.9 billion in deposits as of June 30, 2002. The bank was the 16th largest deposit-taking institution in its assessment area with 0.94% of the total deposits. The following chart shows the bank's market share and ranking by county:

Independence Market Share by County Based on Deposits as of 6/30/2002					
County	Number of Independence Branches	Deposits (\$000)	Market Share	Ranking	Number of Institutions
Kings	18	2,167,997	7.96%	6	38
Queens	9	897,572	2.82%	9	46
New York	1	74,228	0.03%	62	92
Bronx	1	115,591	1.26%	13	22
Richmond	4	280,639	3.84%	7	9
Westchester	1	14,914	0.07%	29	33
Nassau	3	293,373	0.76%	19	30
Suffolk	1	16,180	0.07%	24	25
Assessment Area	38	3,860,494	0.94%	16	129

At its prior Performance Evaluation as of May 31, 2000 by the New York State Banking Department, the bank received a rating of “2,” reflecting a satisfactory record of helping to meet community credit needs.

There are no known financial or legal impediments that adversely impacted the bank’s ability to meet the credit needs of its community.

Assessment Area:

Independence has delineated the five counties of New York City and Westchester, Nassau and Suffolk counties as its New York State assessment area. Since the prior evaluation, because the bank established one limited service *de novo* branch in each of Westchester and Suffolk counties, these counties in their entirety were added to the assessment area.

Metropolitan Statistical Area (“MSA”) 5600 consists of New York City’s five counties plus Westchester, Rockland and Putnam. Please note that throughout this evaluation, reference to MSA 5600 will refer to an adjusted MSA that excludes Rockland and Putnam counties since these counties are not part of the bank’s assessment area. MSA 5380 comprises Nassau and Suffolk counties.

There are 3,018 census tracts in the assessment area, 27.7% of which are LMI geographies. The following table shows the distribution of census tracts in the assessment area:

Assessment Area Census Tract Income							
County	Zero	Low	Moderate	Middle	Upper	Total	LMI %
Kings	19	114	207	302	147	789	40.7%
Queens	17	7	80	331	238	673	12.9%
New York	11	63	65	33	126	298	43.0%
Bronx	15	126	65	88	61	355	53.8%
Richmond	4	4	2	25	66	101	5.9%
Westchester	2	2	18	35	163	220	9.1%
MSA 5600 Total	68	316	437	814	801	2,436	30.9%
Nassau	3	1	20	180	66	270	7.8%
Suffolk	7	2	59	205	39	312	19.6%
MSA 5380 Total	10	3	79	385	105	582	14.1%
Total	78	319	516	1,199	906	3,018	27.7%
Total AA Percentages	2.6%	10.6%	17.1%	39.7%	30.0%	100.0%	

In 1990, the assessment area had a population of 10.8 million increasing to 11.7 million in 2000. The estimated median family income for the area was \$62.9 thousand in 2001, increasing to \$66.7 thousand in 2002. There were 4.3 million housing units, 49% of which were 1-4 family structures, 48% were multifamily residences and less than 1% were mobile homes. Approximately 6% of the housing units were vacant or boarded up. Rental units were 56% of all housing while 39% were owner-occupied. The weighted-average median housing value was \$196.9 thousand. Approximately 25% of the households received Social Security benefits, 10% received public assistance and 14% were below the poverty level. Approximately 66% of all LMI families resided in LMI geographies.

The bank's assessment area appears reasonable based upon the location of its branches, and its lending patterns. There is no evidence that LMI areas are arbitrarily excluded.

Details of the Assessment Area:

Kings County: Kings County has 789 census tracts of which 2.4% are zero-income, 14.5% low-income, 26.2% moderate-income, 38.3% middle-income and 18.6% upper-income.

According to the U.S. Census Bureau, Kings County had a population of 2.3 million in 1990 increasing by 164.7 thousand, or 7.2%, to 2.5 million in 2000.

In 1990, there were 563.3 thousand families in the county of which 50% were LMI families, including 19.5% whose income was below the poverty level. Approximately 19% were middle-income and 31% were upper-income families. There were 827.7 thousand households in the county of which 21.5% had income below the poverty level. Approximately 62.3% of LMI families lived in LMI census tracts.

There were 873.7 thousand housing units in Kings County, 46.3% of which were 1-4 family units and 52.2% were multifamily units. Only 24.7% of the housing units were owner-occupied and 70.1% were rental units. Approximately 5.6% of all housing units were vacant or boarded up. The median housing value was \$181.4 thousand and the median

age of the housing stock was 44 years.

According to the New York State Department of Labor, the county's average unemployment rate was 6.7% in 2001 and 8.6% in 2002. The county's averages were well above both the state's averages of 4.9% in 2001 and 6.1% in 2002, and the MSA's averages of 5.6% in 2001 and 7.3% in 2002.

Queens County: Queens County has 673 census tracts of which 2.5% are zero-income, 1% low-income, 11.9% moderate-income, 49.2% middle-income and 35.4% upper-income.

Queens County had a population of 1.9 million in 1990, increasing to 2.2 million in 2000.

In 1990, there were 495.6 thousand families in the county, of which 34.6% were LMI and 8.3% had incomes below the poverty level. Middle-income families comprised 21.7% and 43.7% (216.4 thousand) were upper-income families. There were 718.4 thousand households in the county of which 10.8% (77.9 thousand) had income below the poverty level. Approximately 24.4% (41.8 thousand) of LMI families lived in LMI census tracts.

There were 752.7 thousand housing units in Queens County, 56% of which were 1-4 family units and 41.4% were multifamily units. Approximately 40.7% of all housing units were owner-occupied and 55% were rental units. Vacant or boarded up units account for 4.5% of the county's housing stock. The median housing value was \$198.1 thousand and the median age was 41 years.

According to the New York State Department of Labor, the county's average unemployment rate was 4.9% in 2001 and 6.5% in 2002. The county's average was the same as the state's average in 2001 and above the state's average of 6.1% in 2002, but was below the MSA's averages of 5.6% in 2001 and 7.3% in 2002.

New York County: New York County has 298 census tracts including 3.7% zero-income, 21.1% low-income, 21.8% moderate-income, 11.1% middle-income and 42.3% upper-income tracts.

According to the U.S. Census Bureau, New York County had a population of approximately 1.5 million in 1990 and the population remained at this level in 2000, increasing by less than 50 thousand.

In 1990, there were 305.4 thousand families in the county of which 42.6% were LMI families, including 17.4% whose income was below the poverty level. Approximately 14.4% were middle-income and 43% were upper-income families. There were 716.8 thousand households in the county of which 16.8% had income below the poverty level. Approximately 76.5% of the LMI families lived in LMI census tracts.

There were 785.1 thousand housing units in New York County, 2.9% of which were 1-4 family units while the overwhelming majority, 95.7%, were multifamily units. Owner-occupied units represented 16.3% and 75% were rental units. Approximately 9.1% of all

the units were vacant or boarded up. The median housing value was \$212.4 thousand and the median age was 41 years.

According to the New York State Department of Labor, the county's average unemployment rate was 6.7% in 2001 and 8.6% in 2002. These rates were well above the state's averages of 4.9% and 6.1% in 2001 and 2002, and the MSA's averages of 5.6% in 2001 and 7.3% in 2002.

Bronx County: Bronx County has 355 census tracts including 4.2% zero-income, 35.5% low-income, 18.3% moderate-income, 24.8% middle-income and 17.2% upper-income tracts.

Bronx County had a population of 1.2 million in 1990 increasing to 1.3 million in 2000.

In 1990, there were 292 thousand families in the county of which 56.7% were LMI families, including 25.7% whose income was below the poverty level. Approximately 17.9% were middle-income and 25.4% were upper-income families. There were 423.2 thousand households in the county of which 26.9% had income below the poverty level. Approximately 77.2% of the LMI families lived in LMI census tracts.

There were 441 thousand housing units in Bronx County, 23.4% of which were 1-4 family units and 74.7% were multifamily. Approximately 17.2% of the housing units were owner-occupied and 79% were rental units. Approximately 4% of all the housing units were vacant or boarded up. The median housing value was \$130.8 thousand and the median age of the housing was 38 years.

According to the New York State Department of Labor, the county's average unemployment rate was 7.2% in 2001 and 9.3% in 2002. The county's averages were well above both the state's averages of 4.9% in 2001 and 6.1% in 2002, and the MSA's averages of 5.6% in 2000 and 7.3% in 2002.

Richmond County: Richmond County has 101 census tracts including 4% zero-income, 4% low-income, 2% moderate-income, 24.7% middle-income and 65.3% upper-income tracts.

According to the U.S. Census, Richmond County (Staten Island) had a population of 378.9 thousand in 1990 increasing to 443.7 thousand in 2000.

In 1990, there were 99.5 thousand families in the county of which 23.9% were LMI families, including 6.3% whose income was below the poverty level. Approximately 18.5% were middle-income and 57.6% were upper-income families. There were 105.7 thousand households in the county of which 8.4% had income below the poverty level. Approximately 16.1% of the LMI families lived in LMI census tracts.

There were 139.7 thousand housing units in Richmond County, 82.6% of which were 1-4 family units and 14.9% were multifamily units. Approximately 59.5% of all housing units were owner-occupied and 33.9% were rental units. Vacant or boarded up units

represented 6.9%. The median housing value was \$183.4 thousand and the median age was 28 years.

According to the New York State Department of Labor, the county's average unemployment rate was 4.7% in both 2001 and 2002. The county's average rate was below the state's averages of 4.9% in 2001 and 6.1% in 2002, and the MSA's averages of 5.6% in 2001 and 7.3% in 2002.

Westchester County: Westchester County has 220 census tracts including 0.9% zero-income, 0.9% low-income, 8.2% moderate-income, 15.9% middle-income and 74.1% upper-income tracts.

Westchester County had a population of 874.9 thousand in 1990 increasing to 923.5 thousand in 2000.

In 1990, there were 229.5 thousand families in the county of which 20.4% were LMI families, including 4.7% whose income was below the poverty level. Approximately 15.6% were middle-income and 64% were upper-income families. There were 319.7 households, nearly 7% of which had income below the poverty level. Approximately 23.7% of the LMI families lived in LMI census tracts.

There were 336.7 thousand housing units in Westchester County, 65.5% of which were 1-4 family units, and 32.9% multifamily units. Owner-occupied housing units accounted for 56.7% while rental units totaled 38.3%. Approximately 5.1% of the units were vacant or boarded up. The median housing value was \$264.2 thousand, and the median age of housing was 39 years.

According to the New York Department of Labor, the county's average unemployment rate was 3.4% in 2001 and 4.2% in 2002. The county's averages were well below both the state's averages of 4.9% in 2001 and 6.1% in 2002, and the MSA's averages of 5.6% in 2001 and 7.3% in 2002.

Nassau County: Nassau County has 270 census tracts including 1.1% zero-income, 0.4% low-income, 7.4% moderate-income, 66.7% middle-income and 24.4% upper-income tracts.

Nassau County's population was approximately 1.3 million in 1990 and remained about the same in 2000.

In 1990, there were 346.8 thousand families in the county of which 32.2% were LMI families, including 2.5% whose income was below the poverty level. Approximately 25.1% were middle-income and 42.7% were upper-income families. There were 431.1 thousand households in the county of which 4.2% had income below the poverty level. Approximately 12.9% of the LMI families lived in LMI census tracts.

There were 446.3 thousand housing units in Nassau County, 88.3% of which were 1-4

family units and 10.5% multifamily units. Approximately 77.8% of the housing units were owner-occupied and 18.9% were rental units. Approximately 3.4% of total housing units were either vacant or boarded up. The median housing value was \$237 thousand and the median age of houses was 38 years.

According to the New York State Department of Labor, the county's average unemployment rate was 3.1% in 2001 and 4.1% in 2002. The county's averages were below the state's averages of 4.9% in 2001 and 6.1% in 2002. The county's averages were also slightly below the averages for the MSA of 3.3% in 2001 and 4.3% in 2002.

Suffolk County: Suffolk has 312 census tracts including 2.2% zero-income, 0.6% low-income, 18.9% moderate-income, 65.7% middle-income and 12.5% upper-income tracts.

Suffolk County had a population of 1.3 million in 1990 increasing to 1.4 million in 2000.

In 1990, there were 343.6 thousand families in the county of which 39% were LMI families, including 3.3% whose income was below the poverty level. Approximately 27.6% were middle-income and 33.4% were upper-income families. There were 424.6 thousand households in the county of which 4.9% had income below the poverty level. Approximately 29.1% of the LMI families lived in LMI census tracts.

There were 481.3 thousand housing units in Suffolk County, of which 91.2% were 1-4 family residences and 6.6% were multifamily units. Approximately 70.7% of all housing units were owner-occupied and 17.5% were rental units. Approximately 11.9% of all the units were either vacant or boarded up. The median housing value was \$178.4 thousand and the median age of the housing was 27 years.

The county's average unemployment rate was 3.5% in 2001 and 4.4% in 2002. The county's averages were below the state's averages of 4.9% in 2001 and 6.1% in 2002, and slightly above the averages for the MSA of 3.3% in 2001 and 4.3% in 2002.

PERFORMANCE TESTS AND ASSESSMENT FACTORS

The bank's CRA performance is assessed by evaluating its lending, investment and service activities within its assessment area, and applies the lending, investment and service tests as provided for in Parts 76.8, 76.9 and 76.10 of the General Regulations of the Banking Board.

The assessment period includes the years 2001 and 2002, except for community development loans and qualified investments, which cover the period from June 2000 through December 2002.

Products considered for this evaluation include HMDA-reportable 1-4 and multifamily originations, purchases, refinancings and non-reportable MECAs. Small business lending was also considered but not weighted heavily since the volume of originations was relatively low compared to HMDA-reportable loans and MECAs.

Statistics utilized in this public summary were derived from various sources. HMDA and MECA information was submitted by the bank, aggregate data for HMDA-reportable loans was obtained from FFIEC and PCI Services, Inc.'s CRA Wiz©, an external vendor. U.S. census data for 1990 was the basis for geography income levels. The U.S. Department of Housing and Urban Development's ("HUD") estimates of 2001 and 2002 median family incomes were utilized for borrower income levels.

I. Lending Test: - "High Satisfactory"

The bank's lending performance is evaluated pursuant to the following criteria: (1) Lending Activity, (2) Assessment Area Lending, (3) Geographic Distribution, (4) Borrower Characteristics, (5) Community Development Lending and (6) Flexible Lending Practices.

- **Lending Activity**: "Outstanding"

The bank's lending levels reflect excellent responsiveness to assessment area credit needs.

HMDA-Reportable Loans

In 2001 and 2002, the bank originated 235 and 688 HMDA-reportable loans within its assessment area, totaling \$94 million and \$200.7 million, respectively.

The bank ranked 133rd out of 570 lenders in HMDA-reportable originations in 2001 with a market share of 0.09%. For a financial institution such as Independence that is primarily a multifamily loan originator, ranking by dollar volume is more informative. In 2001, Independence ranked 92nd with a market share of 0.18% by dollar volume. In 2002, the bank moved up in rank to 77th in HMDA-reportable loan originations and 61st by dollar volume out of 621 lenders, with a market share of 0.21% and 0.26%, respectively.

MECAs

In 2001 and 2002, the bank extended 365 and 655 MECAs totaling \$700.5 million and \$1.3 billion, respectively. This activity appreciably supported the bank's HMDA-reportable lending activity. During the evaluation period, Independence had a combined total of 1,943 HMDA-reportable originations and MECAs totaling \$2.3 billion.

The bank is a major originator of MECAs, which augment the bank's lending activity. MECA lending is not HMDA-reportable and is not included in market rankings. During the period under review, Independence used MECAs almost exclusively for multifamily lending.

In New York State, loans may be modified, extended or consolidated. In these transactions, the bank will amend an existing loan. As such, MECAs are not considered loan refinancings for HMDA reporting purposes since the existing loan obligations are not satisfied and replaced. While MECA transactions are not technically refinancings, they do achieve a similar result and their exclusion would have a material impact on the bank's CRA performance.

Small Business Loans

In 2001 and 2002, the bank originated 65 and 64 small business loans within the assessment area, totaling \$15.7 million and \$18.3 million, respectively.

- **Assessment Area Concentration: "Outstanding"**

A substantial majority of the bank's loans were made within the assessment area. The table below illustrates the distribution of loans originated inside and outside of the assessment area during 2001 and 2002:

Assessment Area Lending Comparison								
	2001				2002			
	Number	%	\$ (000s)	%	Number	%	\$ (000s)	%
HMDA-Reportable Loans								
IN	235	99.6%	94,018	99.6%	688	98.0%	200,733	98.8%
OUT	1	0.4%	350	0.4%	14	2.0%	2,357	1.2%
Subtotal	236	100.0%	94,368	100.0%	702	100.0%	203,090	100.0%
Small Business Loans								
IN	65	95.6%	15,665	97.1%	64	94.1%	18,307	91.5%
OUT	3	4.4%	474	2.9%	4	5.9%	1,693	8.5%
Subtotal	68	100.0%	16,139	100.0%	68	100.0%	20,000	100.0%
MECAs								
IN	365	99.7%	700,464	99.7%	655	99.2%	1,344,639	99.5%
OUT	1	0.3%	1,760	0.3%	5	0.8%	6,407	0.5%
Subtotal	366	100.0%	702,224	100.0%	660	100.0%	1,351,046	100.0%
Total Loans								
IN	665	99.3%	810,147	99.7%	1,407	98.4%	1,563,679	99.3%
OUT	5	0.7%	2,584	0.3%	23	1.6%	10,457	0.7%
Total	670	100.0%	812,731	100.0%	1,430	100.0%	1,574,136	100.0%

The overall assessment area percentages, including the MECAs, were 99.3% and 98.4% in 2001 and 2002, respectively. The bank originated 99.6% and 98% of its HMDA-reportable loans within the assessment area in 2001 and 2002, respectively. The percentages for small business lending were 95.6% in 2001 and 94.1% in 2002.

- **Geographic Distribution of Loans:** “High Satisfactory”

The geographic distribution of loans reflects good penetration throughout the assessment area.

HMDA-Reportable Loans

The following chart compares the bank’s 2001 and 2002 HMDA-reportable loans with the performance of the aggregate:

Distribution of HMDA-Reportable Loans By Census Tract Income Level								
2001								
Census Tract	Independence				Aggregate			
	Number	%	\$ (000s)	%	Number	%	\$ (000s)	%
Low	18	7.7%	8,566	9.1%	4,845	1.9%	1,267,106	2.4%
Moderate	43	18.3%	25,175	26.8%	29,766	11.8%	5,504,716	10.4%
LMI Total	61	26.0%	33,741	35.9%	34,611	13.7%	6,771,822	12.8%
Middle	80	34.0%	31,917	33.9%	120,391	47.7%	21,220,610	40.0%
Upper	94	40.0%	28,360	30.2%	97,189	38.5%	24,981,492	47.1%
N/A	0	0.0%	-	0.0%	213	0.1%	60,870	0.1%
Total	235	100.0%	94,018	100.0%	252,404	100.0%	53,034,794	100.0%
2002								
Census Tract	Independence				Aggregate			
	Number	%	\$ (000s)	%	Number	%	\$ (000s)	%
Low	20	2.9%	13,866	6.9%	6,603	2.0%	1,831,985	2.4%
Moderate	71	10.3%	34,060	17.0%	38,331	11.7%	7,986,136	10.3%
LMI Total	91	13.2%	47,926	23.9%	44,934	13.7%	9,818,121	12.6%
Middle	245	35.6%	70,978	35.4%	152,628	46.5%	30,288,698	39.0%
Upper	351	51.0%	81,769	40.7%	130,342	39.7%	37,545,516	48.3%
N/A	1	0.1%	60	0.0%	310	0.1%	71,247	0.1%
Total	688	100.0%	200,733	100.0%	328,214	100.0%	77,723,582	100.0%

In 2001, the bank’s LMI area loan penetration rate of 26% was nearly twice that of the aggregate’s ratio of 13.7%. By dollar volume, the bank’s LMI area loan penetration rate of 35.9% was nearly three times the aggregate’s ratio of 12.8%.

In 2002, the bank’s LMI area penetration rates by number and dollar volume declined significantly to 13.2% and 23.9%, respectively. The aggregate’s LMI area penetration level remained constant at 13.7% by number while the penetration rate by dollar volume fell slightly to 12.6%.

HMDA-Reportable Multifamily Lending

The following chart compares the multifamily portion of the bank's HMDA-reportable lending with the aggregate in 2001 and 2002:

Distribution of Multifamily Loans By Census Tract Income Level								
2001								
Census Tract	Independence				Aggregate			
	Number	%	\$ (000s)	%	Number	%	\$ (000s)	%
Low	14	15.7%	8,147	10.8%	431	15.2%	472,071	13.3%
Moderate	34	38.2%	24,592	32.5%	842	29.7%	793,437	22.3%
LMI Total	48	53.9%	32,739	43.3%	1,273	44.9%	1,265,508	35.6%
Middle	26	29.2%	26,754	35.4%	897	31.6%	912,759	25.7%
Upper	15	16.9%	16,174	21.4%	661	23.3%	1,356,869	38.2%
N/A	0	0.0%	-	0.0%	4	0.1%	21,240	0.6%
Total	89	100.0%	75,667	100.0%	2,835	100.0%	3,556,376	100.0%
2002								
Census Tract	Independence				Aggregate			
	Number	%	\$ (000s)	%	Number	%	\$ (000s)	%
Low	14	11.9%	12,863	11.4%	546	16.0%	564,925	12.5%
Moderate	33	28.0%	29,335	26.0%	1,058	31.1%	1,094,623	24.3%
LMI Total	47	39.8%	42,198	37.4%	1,604	47.1%	1,659,548	36.8%
Middle	44	37.3%	41,761	37.0%	1,044	30.7%	949,901	21.1%
Upper	27	22.9%	28,806	25.5%	750	22.0%	1,894,556	42.0%
N/A	0	0.0%	-	0.0%	6	0.2%	7,501	0.2%
Total	118	100.0%	112,765	100.0%	3,404	100.0%	4,511,506	100.0%

In 2001, the bank outperformed the aggregate in both LMI area originations and dollar volume percentage. In 2002, the bank's LMI area penetration ratios declined to 39.8% and 37.4%, respectively. The percentage of LMI area originations was significantly lower than the aggregate while the percentage by dollar volume was slightly higher than the aggregate.

During the evaluation period, 98.9% of the bank's multifamily loan dollar volume was extended in Kings, Queens, New York and Bronx counties, the four counties in the assessment area with the largest number of rental units.

HMDA-Reportable (Excluding Multifamily) Loans

The following chart compares the bank's HMDA-reportable home purchase, refinance and home improvement lending with the aggregate. Independence trailed the aggregate for 2001 and 2002 in both LMI area and middle-income area percentages.

Distribution of Home Purchase, Refinancing & Home Improvement Loans By Census Tract Income Level								
2001								
Census Tract	Independence				Aggregate			
	Number	%	\$ (000s)	%	Number	%	\$ (000s)	%
Low	4	2.7%	419	2.3%	4,414	1.8%	795,035	1.6%
Moderate	9	6.2%	583	3.2%	28,924	11.6%	4,711,279	9.5%
LMI Total	13	8.9%	1,002	5.5%	33,338	13.4%	5,506,314	11.1%
Middle	54	37.0%	5,163	28.1%	119,494	47.9%	20,307,851	41.0%
Upper	79	54.1%	12,186	66.4%	96,528	38.7%	23,624,623	47.7%
N/A	0	0.0%	-	0.0%	209	0.1%	39,630	0.1%
Total	146	100.0%	18,351	100.0%	249,569	100.0%	49,478,418	100.0%
2002								
Census Tract	Independence				Aggregate			
	Number	%	\$ (000s)	%	Number	%	\$ (000s)	%
Low	6	1.1%	1,003	1.1%	6,057	1.9%	1,267,060	1.7%
Moderate	38	6.7%	4,725	5.4%	37,273	11.5%	6,891,513	9.4%
LMI Total	44	7.7%	5,728	6.5%	43,330	13.3%	8,158,573	11.1%
Middle	201	35.3%	29,217	33.2%	151,584	46.7%	29,338,797	40.1%
Upper	324	56.8%	52,963	60.2%	129,592	39.9%	35,650,960	48.7%
N/A	1	0.2%	60	0.1%	304	0.1%	63,746	0.1%
Total	570	100.0%	87,968	100.0%	324,810	100.0%	73,212,076	100.0%

In 2001, the bank did not originate any loans in LMI census tracts in Nassau, Bronx, Richmond or New York counties and originated only one such loan in Queens County. Independence did originate loans in LMI areas of the five aforementioned counties in 2002, but consistently trailed the aggregate's performance.

In 2001, the bank extended 11 loans (19.6%) in LMI census tracts in Kings County, its home county, but trailed the aggregate (30.8%) there by 57.1%. The Kings County percentage deteriorated in 2002 as the bank originated 22 loans (12.5%) compared to the aggregate (31.6%), reflecting a gap of more than 152%.

MECAs

The following chart presents the bank's MECA activity for 2001 and 2002 by census tract income level. Aggregate data for MECAs is not available.

Distribution of MECAs By Census Tract Income Level								
Census Tract	2001				2002			
	Number	%	\$ (000s)	%	Number	%	\$ (000s)	%
Low	33	9.0%	60,750	8.7%	51	7.8%	99,909	7.4%
Moderate	111	30.4%	207,140	29.6%	173	26.4%	297,587	22.1%
LMI Total	144	39.5%	267,890	38.2%	224	34.2%	397,496	29.6%
Middle	127	34.8%	229,218	32.7%	235	35.9%	446,432	33.2%
Upper	93	25.5%	202,756	28.9%	194	29.6%	499,136	37.1%
N/A	1	0.3%	600	0.1%	2	0.3%	1,575	0.1%
Total	365	100.0%	700,464	100.0%	655	100.0%	1,344,639	100.0%

In 2001, the bank extended 39.5% by number and 38.2% by dollar volume of its MECA activity in LMI areas. Although the absolute number of MECAs produced in LMI areas increased 55.6% in 2002, LMI area percentages by both number and dollar volume fell to 34.2% and 29.6%, respectively.

Combined HMDA-Reportable Loans and MECAs

The following chart combines the bank’s HMDA-reportable loans and MECAs:

Distribution of HMDA-Reportable Loans and MECAs By Census Tract Income Level								
Census Tract	2001				2002			
	Number	%	\$ (000s)	%	Number	%	\$ (000s)	%
Low	51	8.5%	69,316	8.7%	71	5.3%	113,775	7.4%
Moderate	154	25.7%	232,315	29.2%	244	18.2%	331,647	21.5%
LMI Total	205	34.2%	301,631	38.0%	315	23.5%	445,422	28.8%
Middle	207	34.5%	261,135	32.9%	480	35.7%	517,410	33.5%
Upper	187	31.2%	231,116	29.1%	545	40.6%	580,905	37.6%
N/A	1	0.2%	600	0.1%	3	0.2%	1,635	0.1%
Total	600	100.0%	794,482	100.0%	1,343	100.0%	1,545,372	100.0%

During the evaluation period, the bank’s combined HMDA-reportable and MECA activity within the assessment area totaled 1,943 transactions with a dollar volume of \$2.3 billion. The lending in LMI census tracts totaled 520 transactions, or 26.8%, with a dollar volume of \$747.1 million, or 31.9%.

Small Business Lending

The bank’s small business lending reflects a good geographic distribution of loans throughout the assessment area. The bank extended 24% by number and 20.9% by dollar volume of its small business loans in LMI areas.

The following chart details the bank’s lending during the evaluation period:

Geographic Distribution of Small Business Loans												
	2001				2002				Total			
	LMI	Middle	Upper	N/A	LMI	Middle	Upper	N/A	LMI	Middle	Upper	N/A
Number of Loans	17	16	31	1	14	28	21	1	31	44	52	2
Loan (%)	26.2%	24.6%	47.7%	1.5%	21.9%	43.8%	32.8%	1.6%	24.0%	34.1%	40.3%	1.6%
\$ (000s)	2,680	4,866	7,884	235	4,404	7,433	6,070	400	7,084	12,299	13,954	635
\$ (%)	17.1%	31.1%	50.3%	1.5%	24.1%	40.6%	33.2%	2.2%	20.9%	36.2%	41.1%	1.9%

- **Borrower Characteristics:** “High Satisfactory”

The distribution of loans by borrower characteristics reflects good penetration among customers of different income levels and businesses of different sizes. This is a marked improvement from the prior evaluation when Independence was rated “needs to improve” in this component of the lending test.

HMDA-Reportable Loans

The following chart compares the bank's 1-4 family residential mortgage originations and refinancings, as well as home improvement loan originations, with the aggregate's performance in 2001 and 2002:

Distribution of Home Purchase, Refinancing & Home Improvement Loans By Borrower Income Level								
Income Category	2001				2002			
	Independence		Aggregate		Independence		Aggregate	
	Number	%	Number	%	Number	%	Number	%
Low	5	3.4%	8,678	3.5%	26	4.5%	11,681	3.6%
Moderate	20	13.7%	35,135	14.1%	99	17.4%	49,349	15.2%
LMI Total	25	17.1%	43,813	17.6%	125	21.9%	61,030	18.8%
Middle	33	22.6%	64,389	25.8%	142	24.9%	82,836	25.5%
Upper	85	58.2%	115,176	46.1%	303	53.2%	149,253	46.0%
N/A	3	2.1%	26,191	10.5%	-	0.0%	31,691	9.8%
Total	146	100.0%	249,569	100.0%	570	100.0%	324,810	100.0%

In 2001, the bank's LMI borrower penetration level of 17.1% was slightly lower than the aggregate's level of 17.6%. In 2002, the bank's LMI borrower penetration level increased to 21.9%, exceeding the 18.8% achieved by the aggregate.

The bank outperformed the aggregate in MSA 5600 with LMI borrower penetration rates of 17.1% and 22.4% in 2001 and 2002, respectively. However, Independence trailed the aggregate in MSA 5380. Independence's strength was in Kings and Queens counties.

Year	Low/Moderate Income		Middle Income		Upper Income	
	Independence	Aggregate	Independence	Aggregate	Independence	Aggregate
2001						
MSA 5600	17.1%	12.5%	18.6%	22.0%	62.0%	54.9%
MSA 5380	17.7%	23.5%	52.9%	30.2%	29.4%	36.0%
2002						
MSA 5600	22.4%	13.3%	25.5%	22.4%	52.1%	54.2%
MSA 5380	19.1%	25.1%	21.4%	29.2%	59.5%	36.4%

Small Business Lending

During the evaluation period, Independence extended 100% of its small business loans to businesses with gross annual revenues of \$1 million or less. By loan size, 39.5% of the bank's small business loans were originated in amounts \$100 thousand or less and 20.2% between \$100 thousand and \$250 thousand.

The following table details the bank's small business lending stratified by loan size:

Independence Business Loans to Firms With Annual Revenues <= \$1 Million									
	2001			2002			Total		
	LS1	LS2	LS3	LS1	LS2	LS3	LS1	LS2	LS3
Number of Loans	26	17	22	25	9	30	51	26	52
Nbr. (%)	40.0%	26.2%	33.8%	39.1%	14.1%	46.9%	39.5%	20.2%	40.3%
\$ (000s)	1,159	2,858	11,648	1,180	1,919	15,208	2,339	4,777	26,856
\$ (%)	7.4%	18.2%	74.4%	6.4%	10.5%	83.1%	6.9%	14.1%	79.1%

LS1= loans \$100 thousand or less
 LS2= loans greater than \$100 thousand and less than \$250 thousand
 LS3 = loans greater than \$250 thousand and less than \$1 million.

- **Community Development Loans: “Outstanding”**

Independence’s level of community development lending is excellent. Between evaluations, the bank’s community development loans totaled \$698.5 million, of which \$104.9 million or 15% is considered new money. While the bank’s initiatives are neither innovative nor complex, the sheer level of activity demonstrates exceptional responsiveness to community development needs.

Approximately 9% of the bank’s community development lending is comprised of HMDA-reportable multifamily loans originated in LMI census tracts. As permitted under the CRA, multifamily loans, although included in the analysis of the geographic distribution of loans, may also qualify as community development loans if these loans finance affordable rental housing. Qualified MECAs also support affordable rental housing and represent more than 80% of community development lending activity. The qualified multifamily loans and MECAs were all extended in MSA 5600. This is reasonable considering the multifamily housing demographics in the bank’s assessment area. The chart below shows the distribution of the bank’s community development loans by category and MSA:

Independence Community Development Lending							
Category	Number of Loans	Commitments (\$000s)	%	New Money (\$000s)	%	MSA 5600	MSA 5380
Affordable Housing	2	11,000	1.6%	11,000	10.5%	45.5%	54.6%
Community Services	11	15,851	2.3%	15,351	14.6%	57.7%	42.3%
Economic Development	2	7,282	1.0%	7,282	6.9%	100.0%	0.0%
Revitalize & Stabilize	6	24,597	3.5%	8,688	8.3%	100.0%	0.0%
Subtotal	21	58,730	8.4%	42,321	40.3%	78.4%	21.6%
Qualified Multifamily Loans	83	62,610	9.0%	62,610	59.7%	100.0%	0.0%
MECAs	329	577,167	82.6%	0	0.0%	100.0%	0.0%
Total	433	698,507	100.0%	104,931	100.0%	98.2%	1.8%

The following are examples of community development loans extended by Independence during the evaluation period:

- The bank is a lead lender in a \$20.8 million construction loan with the Community Preservation Corporation (“CPC”) to finance a garden apartment complex located in Suffolk County. Approximately 200 rental units will be created providing affordable housing to senior citizens under New York State’s Housing Finance Agency guidelines. Independence has committed \$6 million to this project and has funded \$4.8 million to date.
- Independence originated a \$2.4 million loan to Miracle Makers, Inc. (“MMI”) of which \$1.9 million is new money. MMI is a non-profit public benefit corporation formed to provide LMI families in the Bedford Stuyvesant (Kings County) community various social services including daycare, foster care, homeless housing assistance and full day Head Start programs. The loan enabled MMI to purchase property increasing their social service outreach.

- **Product Innovation or Flexibility:** “High Satisfactory”

Independence uses innovative or flexible lending products in serving assessment area credit needs. The bank offers SONYMA loan products, but did not originate any such loans during the evaluation period. The bank originated its own 1-4 family mortgages during the first ten months of 2001, but did not report originating any loans using innovative or flexible underwriting criteria during that timeframe.

As of November 2001, Independence outsourced the processing of its 1-4 family mortgage applications to Cendant Mortgage Corporation. The arrangement with Cendant makes certain flexible loan products available to qualified Independence customers.

Below are brief product descriptions together with originations for the period November 2001 through December 2002:

100/200 Series: The 100/200 Series mortgage program provides up to 100% financing and 105% combined financing of the appraised value of the property. This program is available for the purchase of one-family and two-family homes. The borrower may fund the down payment and/or closing costs through a "Community Second," which is a low interest loan or grant program offered by local not-for-profits or government agencies.

The bank originated 173 of these loans during the evaluation period totaling \$25.5 million.

Landscape Series: These products are designed to evaluate numerous characteristics of an individual loan application through a customized automated loan data intake system. This streamlined process reduces documentation requirements, which may result in cost savings for the borrower. The following are some of the benefits the Landscape suite of products are said to provide:

- Credit Flexibility – Because of system-wide efficiencies, the lender is able to offer borrowers with limited credit histories better pricing than is usually offered to such borrowers.

- For loans exceeding 80% loan-to-value (“LTV”), lender funded mortgage insurance is offered, typically at 25 basis points lower than the cost of standard private mortgage insurance.
- Expanded LTV - Landscape offers up to 100% financing.
- Expanded Debt-To-Income Ratios - The program allows for a borrower's ratio of debt-to-income to be offset by "compensating factors," or circumstances that are unique to the individual, to a greater degree than with standard products. Thus, depending on a borrower's unique circumstances, a higher debt ratio may not negatively affect the outcome of the loan.
- Closing Cost Assistance - For borrowers with limited cash for closing, closing expenses may be added to the total loan package.

During the evaluation period, 211 Landscape Series loans totaling \$41.8 million were originated.

II. Investment Test: “Outstanding”

This test evaluates the bank's record of helping to meet the needs of its assessment area through qualified investments. Qualified investments are evaluated based on their dollar volume, their innovation or complexity, their responsiveness to community development needs, and the degree to which these investments are not routinely provided by private investors.

Independence has an excellent level of qualified community development investments. During the evaluation period, qualified investments, including grants, totaled \$27.6 million, with \$23.6 million (85.6%) considered new money. The bank occasionally uses innovative or complex investments to support community development initiatives.

The following chart summarizes the bank’s qualified investments:

Independence Community Development Investments (\$000s)			
Type	Commitment	New Money	Category
Mortgage Backed Securities	\$10,112	\$10,112	Affordable Housing
Mortgage Backed Securities	\$7,861	\$7,861	Affordable Housing
Equity Fund	\$2,000	\$0	Affordable Housing
Equity Fund	\$1,000	\$0	Affordable Housing
Equity Fund	\$964	\$0	Affordable Housing
Bond	\$500	\$500	Small Business
Equity	\$100	\$100	Small Business
Certificate of Deposit	\$100	\$100	Community Services
Certificate of Deposit	\$50	\$50	Community Services
Grants	\$4,890	\$4,890	Multiple
Total	\$27,577	\$23,613	

Grants

The bank's affiliate, ICF, has responsibility for qualified grant activity. ICF was organized as a private non-profit corporation in March 1998 in conjunction with the conversion of the bank to a public corporation. The stated mission of ICF is to renew neighborhoods by promoting economic growth, educational attainment and housing development. This is accomplished mainly through three categories of grant activity: neighborhood renewal; education, culture and arts; and community quality of life.

ICF ensures that any community organization has the opportunity to apply for grant consideration. Applications and proposal information may be obtained at a street-level office in Brooklyn, all Independence banking offices and on the Internet.

During the evaluation period, ICF disbursed more than 300 qualified grants totaling \$4.9 million to numerous community organizations in the bank's New York State assessment area.

Additionally, ICF in conjunction with the bank established the *Independence 9/11 Fund*, to assist families impacted by the September 11, 2001 terrorist attacks. This fund made grants totaling \$218.6 thousand, including \$31.3 thousand to 25 Kings County firehouses that lost firefighters.

III. **Service Test:** "High Satisfactory"

The service test evaluates the bank's record of helping to meet the credit needs of its assessment area by analyzing both the availability and effectiveness of the bank's systems for delivering retail banking services and the extent and innovativeness of its community development services.

- **Retail Banking Services:** "High Satisfactory"

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the bank's assessment area. Branch offices are conveniently located except in Bronx County where the bank maintains one branch located in a middle-income census tract and in New York County where all offices are located south of 52nd Street.

The following chart reflects the bank's branch locations by census tract income level. It also reflects branches that while physically located in middle- or upper-income areas are adjacent to LMI areas. The inclusion of branches located adjacent to LMI areas increases accessibility for LMI areas from 14.3% to 47.6%.

Independence Branch Locations by County and Census Tract Income Level as of 12/31/2002									
	Low	Moderate	Middle	Upper	N/A	Total	% per County	LMI Adjacent	% LMI & Adjacent
Kings	0	4	11	4	0	19	45.2%	7	57.9%
Queens	0	2	5	2	0	9	21.4%	4	66.7%
New York	0	0	1	3	0	4	9.5%	2	50.0%
Bronx	0	0	1	0	0	1	2.4%	0	0.0%
Richmond	0	0	2	2	0	4	9.5%	0	0.0%
Westchester	0	0	0	1	0	1	2.4%	1	100.0%
MSA 5600 Total	0	6	20	12	0	38	90.5%	14	52.6%
Nassau	0	0	2	1	0	3	7.1%	0	0.0%
Suffolk	0	0	0	1	0	1	2.4%	0	0.0%
MSA 5380 Total	0	0	2	2	0	4	9.5%	0	0.0%
Total	0	6	22	14	0	42	100.0%	14	47.6%
Percentage	0.0%	14.3%	52.4%	33.3%	0.0%	100.0%			

Branch employees are available to assist customers in 24 foreign languages. The languages spoken reflect the community served and include: Hebrew, Turkish, German, Hindi, Urdu, Spanish, Maltese, Farsi, Ukrainian, Cantonese, Greek, Arabic and French.

To enhance the delivery of its retail services, Independence has an on-site ATM network consisting of 64 machines at 38 (90.5%) branches. The branches without ATM service are located in middle- or upper-income census tracts, with one adjacent to an LMI area.

The bank operates off-site ATMs in six locales: four in Kings and two in Richmond counties. None of these off-site ATMs are in LMI areas, but three of the four ATMs in Kings County are located in census tracts adjacent to LMI areas.

All ATMs are connected to the following networks: NYCE, MasterCard, Maestro, Cirrus, Visa, Plus, Pulse, Discover, Quest, American Express and Star.

A toll-free, bank-by-phone service through the bank's call center allows customers to transfer funds, obtain account information and has capabilities for the speech-impaired. The call center is available from 8:00 am to 7:00 pm, Monday through Friday, with additional hours on Saturday and Sunday. In addition to English, call-in customers can conduct banking in Spanish, Italian, Portuguese or Russian. Customers can avail themselves of the bank's automated voice response system at any time.

The bank offers on-line banking whereby customers can pay bills, transfer funds, stop payments and access account information using a secure password.

Changes in Branch Locations

The bank's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies or LMI individuals.

In 2001, the bank opened one branch in Nassau County located in a middle-income census tract that is not adjacent to an LMI area. In 2002, the bank opened four branches: limited

service branches in upper-income areas in Westchester (adjacent to an LMI area) and Suffolk counties (not adjacent to an LMI area); and full service branches in middle-income areas in Richmond (not adjacent to an LMI area) and Kings counties (adjacent to an LMI area).

Independence did not close any branches since the prior evaluation.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Services are tailored to the convenience and needs of the assessment area, particularly LMI geographies and LMI individuals. Independence offers extended-hour service in 39 branches representing more than 90% of all its banking offices. Saturday or Sunday hours, depending on the particular needs of the community, are offered at 37 branches. Walk-up and drive-up service during extended-hours is offered at 11 locations.

The bank offers *Truly Free Checking*, a consumer checking account that is more beneficial to the consumer than the *Basic Banking Account* mandated by New York State Banking Law. The account features no minimum balance, unlimited transactions, free transactions at proprietary ATMs, a free VISA CheckCard and no maintenance or per check fees.

- **Community Development Services:** “High Satisfactory”

Independence provides a relatively high level of community development services, although most of the bank’s current efforts are concentrated in Kings County, where the bank is headquartered. The bank’s participation in community development services includes board memberships, sponsorship of various financial literacy presentations for LMI individuals, small business educational workshops and making meeting space available at bank branches. Examples of the bank’s involvement throughout 2001 and 2002 are summarized below:

- ◆ The bank’s senior management is involved as board members in many non-profit community development entities and area chambers of commerce. These entities include:
 - ◆ Bedford Stuyvesant Restoration Corporation
 - ◆ New York Women’s Foundation
 - ◆ Habitat for Humanity
 - ◆ Brooklyn Navy Yard Development Corp.
 - ◆ Neighborhood Housing Services of East Flatbush
 - ◆ The Partnership of New York City/NYC Housing Partnership
 - ◆ Staten Island Economic Development Corporation
 - ◆ The Broadway-Astoria Merchants and Professionals
 - ◆ Flatbush Development Corporation
 - ◆ Concord Family Services
 - ◆ Brooklyn Alliance, Inc.
 - ◆ Jackson Heights Development Corporation

- ◆ The bank provides meeting space at a Richmond County branch to the SBA-sponsored Service Corps of Retired Executives (“SCORE”). SCORE and its volunteers provide business or management expertise for present and prospective small business owners. Assistance is provided in developing marketing skills, planning for growth and expansion, one-on-one counseling, and workshops on specialized business subjects. Bank employees advise and conduct workshops for small businesses that utilize SCORE services.
- ◆ As a Federal Home Loan Bank of New York (FHLBNY) member bank, Independence provided technical assistance in the preparation and submission of the FHLBNY AHP Application. This resulted in the allocation of five affordable housing grant subsidies totaling \$432 thousand, benefiting 30 low-income families in Kings and Bronx counties. This application supported Habitat for Humanity of New York, the program sponsor. Throughout 2001 and 2002, the bank provided project accounting, monitored performance through site-visits and managed disbursements of subsidy allocations.
- ◆ Independence hosts monthly finance informational meetings at its Red Hook (Kings County) branch for the Red Hook Houses Tenants’ Association. Topics presented by bank employees include personal savings, investment and small business seminars.
- ◆ The bank presented two “First Home Club Homebuyers” educational seminars through the Neighborhood Housing Services of East Flatbush.
- ◆ Independence donated 450 used computers to the New York City Public School's Computer Desktop Design Program, community colleges and various not-for-profit agencies. The Desktop Design Program was created for city schools serving LMI students. The Program was created to teach youngsters how to build computer applications from basic resources.
- ◆ Independence, in concert with Ifetayo Cultural Arts Facility, Inc. (“ICAF”) presented four financial literacy workshops. ICAF is an arts and cultural organization dedicated to supporting educational and vocational development of youth and families of African descent in the Flatbush community and surrounding area. The bank hosts the monthly finance committee meeting ICAF and an Independence vice president serves as ICAF’s finance committee chairperson.
- ◆ Independence and ICF partnered with the Fifth Avenue Committee (“FAC”) to create a pilot Individual Development Account (“IDA”) program. FAC is a 25-year-old non-profit organization based in South Brooklyn, founded to preserve and strengthen economic diversity. IDAs are matched savings accounts intended to enable LMI individuals to accumulate assets for specific long-term goals. The FAC vocational training graduates are encouraged to use their IDA accounts for advanced skills training. Independence provides enrollees in the program financial literacy training and counseling. Approximately 50 individuals are enrolled in the program.

- ◆ The bank, in concert with the Brooklyn Wide Inter-Agency Council, provided financial seminars featuring Money Smart, a training program designed by the FDIC to help adults, particularly people with little or no banking experience, enhance their money skills. The program fosters financial stability for individuals and seeks to increase their savings, home-buying knowledge, and improve their financial health and well-being. The Money Smart curriculum helps individuals build financial knowledge, develop financial confidence and use banking services effectively.
- ◆ Independence in concert with the Federal Reserve Bank of New York, the FDIC, New York City Department of Employment and other financial institutions offered a summer program entitled “Banking on Youth.” The program is designed to teach young people financial management and organizational skills.
- ◆ The bank conducted financial literacy presentations to senior citizens that were held at the convenience of the elderly. Some of the locations include: The Brooklyn Public Library, United Senior Citizens Center, Saint Gabriel’s Hospital and Elmhurst Hospital.
- ◆ Independence continues to participate in Quest and the Electronics Benefits Transfer Program (“EBTP”). The EBTP allows food stamp recipients to access their benefits through the bank’s ATMs at no cost.

IV. Discrimination or Other Illegal Practices

Any practices intended to discourage applications for types of credit set forth in the banking institution’s CRA Public File.

No practices intended to discourage applications for the types of credit offered by the institution were noted.

Evidence of prohibited discriminatory or other illegal credit practices.

The most recent regulatory compliance and fair lending examinations, conducted concurrently with this evaluation, indicate satisfactory performance in terms of adherence to anti-discrimination or other applicable laws and regulations. No evidence of prohibited discrimination or other illegal credit practices was noted.

V. Process Factors

Activities conducted by the banking institution to ascertain the credit needs of its community, including the extent of the banking institution’s efforts to communicate with members of its community regarding the credit services being provided by the banking institution.

The bank’s ascertainment efforts consist of maintaining relationships with affordable housing organizations, local merchant associations and chambers of commerce. The

groups are located primarily in Kings County. Examples of the above groups include: Red Hook Residents for Community Reinvestment, Carroll Gardens Assoc., Red Hook Civil Assoc., Red Hooks Tenants Assoc., Good Shepherd Services and Community Board 6.

The extent of the banking institution's marketing and special credit-related programs to make members of the community aware of the credit services offered by the banking institution.

The bank's marketing program includes increasing the community's awareness of its loans and retail products. It participates in housing expos and fairs, and members of the bank visit senior centers to make the residents aware of the types of retail products that the bank offers.

Advertising includes print media such as newspapers, business publications and magazines. Direct mail, telemarketing and targeted promotional offers are also utilized. Advertisements in print media are diverse, and utilize a variety of national, local, community and ethnic newspapers as well as business, professional and student publications.

The extent of participation by the banking institution's board of directors in formulating the banking institution's policies and reviewing its performance with respect to the purposes of the Community Reinvestment Act.

The institution has a standing CRA Committee, which includes the president. This committee meets quarterly to review CRA lending, investment and service goals established by management. This committee presented their minutes to the board of directors once in 2001 and twice in 2002. The CRA officer has established an internal CRA committee with representatives of the bank's three divisions: Consumer Banking, Commercial Real Estate and Business Banking. This committee meets monthly to examine trend analysis of HMDA-reportable loans, small business loans and MECA activity.

VI. Other Factors

Other factors that in the judgment of the Superintendent and Banking Board bear upon the extent to which a banking institution is helping to meet the credit needs of its entire community.

ICF made 731 grants totaling \$5.1 million from June 2000 to December 2002 that were awarded to many organizations that do not have a primary purpose of community development. Nonetheless, many of these organizations contribute to the quality of life for the community and are remarkably diverse.

These organizations include:

- 651 ARTS
- Brooklyn Arts Exchange

- Congregation Beth Elohim
- Dancing in the Streets
- Staten Island Children's Museum
- Alliance of Queens Artists
- Central Brooklyn Jazz Consortium
- Queens Gays and Lesbians United, Inc.
- St. Nicholas Greek Orthodox Joy Group
- American Museum of the Moving Image
- Amateur Athletic Club of New York, Inc.

HMDA LOAN ORIGINATIONS -- YEAR 2001
GEOGRAPHY INCOME LEVEL DISTRIBUTION -- NUMBER OF LOANS

MSA/County/Area % of Total A/A Lending	Geography Income Level	Home Purchase				Refinancing				Home Improvement				Multifamily				Total			
		Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %
Nassau	low	0	0.00	1	0.01	0	0.00	1	0.00	0	0.00	0	0.00	0	-	0	0.00	0	0.00	2	0.00
	moderate	0	0.00	1,233	7.89	0	0.00	1,688	6.06	0	0.00	202	6.04	0	-	13	24.07	0	0.00	3,136	6.69
	middle	2	100.00	10,749	68.79	4	66.67	20,158	72.32	1	33.33	2,458	73.46	0	-	36	66.67	7	63.64	33,401	71.22
	upper	0	0.00	3,641	23.30	2	33.33	6,025	21.61	2	66.67	686	20.50	0	-	5	9.26	4	36.36	10,357	22.08
	zero & NAs	0	0.00	2	0.01	0	0.00	3	0.01	0	0.00	0	0.00	0	-	0	0.00	0	0.00	5	0.01
4.7 total		2	100.00	15,626	100.00	6	100.00	27,875	100.00	3	100.00	3,346	100.00	0	-	54	100.00	11	100.00	46,901	100.00
Suffolk	low	0	0.00	31	0.14	0	0.00	38	0.09	0	0.00	6	0.10	0	-	0	0.00	0	0.00	75	0.11
	moderate	1	33.33	5,356	24.51	0	0.00	7,325	18.08	0	0.00	1,222	19.98	0	-	15	31.91	1	16.67	13,918	20.31
	middle	1	33.33	14,002	64.07	2	100.00	28,288	69.84	1	100.00	4,185	68.43	0	-	27	57.45	4	66.67	46,502	67.87
	upper	1	33.33	2,444	11.18	0	0.00	4,834	11.93	0	0.00	701	11.46	0	-	5	10.64	1	16.67	7,984	11.65
	zero & NAs	0	0.00	20	0.09	0	0.00	20	0.05	0	0.00	2	0.03	0	-	0	0.00	0	0.00	42	0.06
2.6 total		3	100.00	21,853	100.00	2	100.00	40,505	100.00	1	100.00	6,116	100.00	0	-	47	100.00	6	100.00	68,521	100.00
MSA 5380	low	0	0.00	32	0.09	0	0.00	39	0.06	0	0.00	6	0.06	0	-	0	0.00	0	0.00	77	0.07
	moderate	1	20.00	6,589	17.58	0	0.00	9,013	13.18	0	0.00	1,424	15.05	0	-	28	27.72	1	5.88	17,054	14.78
	middle	3	60.00	24,751	66.04	6	75.00	48,446	70.85	2	50.00	6,643	70.21	0	-	63	62.38	11	64.71	79,903	69.23
	upper	1	20.00	6,085	16.24	2	25.00	10,859	15.88	2	50.00	1,387	14.66	0	-	10	9.90	5	29.41	18,341	15.89
	zero & NAs	0	0.00	22	0.06	0	0.00	23	0.03	0	0.00	2	0.02	0	-	0	0.00	0	0.00	47	0.04
7.2 total		5	100.00	37,479	100.00	8	100.00	68,380	100.00	4	100.00	9,462	100.00	0	-	101	100.00	17	100.00	115,422	100.00
Bronx	low	0	0.00	601	15.07	0	-	428	10.71	0	-	117	17.16	7	41.18	168	47.32	7	38.89	1,314	14.56
	moderate	0	0.00	487	12.21	0	-	542	13.56	0	-	112	16.42	7	41.18	94	26.48	7	38.89	1,235	13.69
	middle	1	100.00	1,394	34.95	0	-	1,484	37.13	0	-	262	38.42	3	17.65	75	21.13	4	22.22	3,215	35.63
	upper	0	0.00	1,504	37.70	0	-	1,541	38.55	0	-	187	27.42	0	0.00	18	5.07	0	0.00	3,250	36.02
	zero & NAs	0	0.00	3	0.08	0	-	2	0.05	0	-	4	0.59	0	0.00	0	0.00	0	0.00	9	0.10
7.7 total		1	100.00	3,989	100.00	0	-	3,997	100.00	0	-	682	100.00	17	100.00	355	100.00	18	100.00	9,023	100.00
Kings	low	1	11.11	1,199	9.60	2	8.70	872	6.57	1	4.17	156	8.34	5	13.89	134	14.96	9	9.78	2,361	8.28
	moderate	0	0.00	2,714	21.73	2	8.70	3,055	23.03	5	20.83	512	27.38	15	41.67	341	38.06	22	23.91	6,622	23.22
	middle	3	33.33	5,371	43.00	9	39.13	5,680	42.81	14	58.33	771	41.23	12	33.33	329	36.72	38	41.30	12,151	42.60
	upper	5	55.56	3,166	25.35	10	43.48	3,631	27.37	4	16.67	425	22.73	4	11.11	90	10.04	23	25.00	7,312	25.63
	zero & NAs	0	0.00	41	0.33	0	0.00	29	0.22	0	0.00	6	0.32	0	0.00	2	0.22	0	0.00	78	0.27
39.1 total		9	100.00	12,491	100.00	23	100.00	13,267	100.00	24	100.00	1,870	100.00	36	100.00	896	100.00	92	100.00	28,524	100.00
New York	low	0	0.00	299	3.24	0	0.00	180	2.31	0	0.00	35	11.59	2	12.50	127	15.70	2	6.45	641	3.53
	moderate	0	0.00	634	6.86	0	0.00	464	5.94	0	0.00	68	22.52	6	37.50	204	25.22	6	19.35	1,370	7.55
	middle	0	0.00	609	6.59	1	8.33	538	6.89	0	0.00	20	6.62	1	6.25	83	10.26	2	6.45	1,250	6.89
	upper	1	100.00	7,680	83.15	11	91.67	6,619	84.77	2	100.00	177	58.61	7	43.75	393	48.58	21	67.74	14,869	81.90
	zero & NAs	0	0.00	14	0.15	0	0.00	7	0.09	0	0.00	2	0.66	0	0.00	2	0.25	0	0.00	25	0.14
13.2 total		1	100.00	9,236	100.00	12	100.00	7,808	100.00	2	100.00	302	100.00	16	100.00	809	100.00	31	100.00	18,155	100.00

MSA/County/Area % of Total A/A Lending	Geography Income Level	Home Purchase				Refinancing				Home Improvement				Multifamily				Total			
		Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %
Queens	low	0	0.00	69	0.38	0	0.00	79	0.44	0	0.00	14	0.67	0	0.00	0	0.00	0	0.00	162	0.42
	moderate	0	0.00	1,300	7.14	0	0.00	1,112	6.18	1	9.09	166	7.96	6	33.33	134	27.92	7	17.07	2,712	7.00
	middle	2	33.33	8,928	49.03	3	50.00	8,611	47.89	7	63.64	1,056	50.62	9	50.00	274	57.08	21	51.22	18,869	48.69
	upper	4	66.67	7,886	43.31	3	50.00	8,153	45.34	3	27.27	847	40.60	3	16.67	72	15.00	13	31.71	16,958	43.76
	zero & NAs	0	0.00	26	0.14	0	0.00	25	0.14	0	0.00	3	0.14	0	0.00	0	0.00	0	0.00	54	0.14
17.4	total	6	100.00	18,209	100.00	6	100.00	17,980	100.00	11	100.00	2,086	100.00	18	100.00	480	100.00	41	100.00	38,755	100.00
Richmond	low	0	0.00	106	1.71	0	0.00	120	1.62	0	0.00	14	1.27	0	0.00	2	6.67	0	0.00	242	1.64
	moderate	0	0.00	48	0.77	0	0.00	50	0.67	0	0.00	6	0.54	0	0.00	3	10.00	0	0.00	107	0.72
	middle	0	0.00	1,145	18.42	0	0.00	1,164	15.67	3	14.29	161	14.60	0	0.00	9	30.00	3	8.57	2,479	16.78
	upper	6	100.00	4,916	79.10	7	100.00	6,092	82.04	18	85.71	922	83.59	1	100.00	16	53.33	32	91.43	11,946	80.86
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
14.9	total	6	100.00	6,215	100.00	7	100.00	7,426	100.00	21	100.00	1,103	100.00	1	100.00	30	100.00	35	100.00	14,774	100.00
Westchester	low	0	-	23	0.19	0	-	13	0.09	0	-	12	0.76	0	0.00	0	0.00	0	0.00	48	0.17
	moderate	0	-	300	2.46	0	-	272	1.97	0	-	56	3.56	0	0.00	38	23.17	0	0.00	666	2.40
	middle	0	-	1,194	9.78	0	-	1,094	7.93	0	-	172	10.95	1	100.00	64	39.02	1	100.00	2,524	9.10
	upper	0	-	10,695	87.58	0	-	12,425	90.01	0	-	1,331	84.72	0	0.00	62	37.80	0	0.00	24,513	88.33
	zero & NAs	0	-	0	0.00	0	-	0	0.00	0	-	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
0.4	total	0	-	12,212	100.00	0	-	13,804	100.00	0	-	1,571	100.00	1	100.00	164	100.00	1	100.00	27,751	100.00
MSA 5600	low	1	4.35	2,297	3.68	2	4.17	1,692	2.63	1	1.72	348	4.57	14	15.73	431	15.76	18	8.26	4,768	3.48
	moderate	0	0.00	5,483	8.79	2	4.17	5,495	8.55	6	10.34	920	12.08	34	38.20	814	29.77	42	19.27	12,712	9.28
	middle	6	26.09	18,641	29.90	13	27.08	18,571	28.89	24	41.38	2,442	32.07	26	29.21	834	30.50	69	31.65	40,488	29.56
	upper	16	69.57	35,847	57.49	31	64.58	38,461	59.83	27	46.55	3,889	51.08	15	16.85	651	23.81	89	40.83	78,848	57.56
	zero & NAs	0	0.00	84	0.13	0	0.00	63	0.10	0	0.00	15	0.20	0	0.00	4	0.15	0	0.00	166	0.12
92.8	total	23	100.00	62,352	100.00	48	100.00	64,282	100.00	58	100.00	7,614	100.00	89	100.00	2,734	100.00	218	100.00	136,982	100.00
NYS A/A TOTAL	low	1	3.57	2,329	2.33	2	3.57	1,731	1.30	1	1.61	354	2.07	14	15.73	431	15.20	18	7.66	4,845	1.92
	moderate	1	3.57	12,072	12.09	2	3.57	14,508	10.94	6	9.68	2,344	13.73	34	38.20	842	29.70	43	18.30	29,766	11.79
	middle	9	32.14	43,392	43.47	19	33.93	67,017	50.52	26	41.94	9,085	53.20	26	29.21	897	31.64	80	34.04	120,391	47.70
	upper	17	60.71	41,932	42.00	33	58.93	49,320	37.18	29	46.77	5,276	30.90	15	16.85	661	23.32	94	40.00	97,189	38.51
	zero & NAs	0	0.00	106	0.11	0	0.00	86	0.06	0	0.00	17	0.10	0	0.00	4	0.14	0	0.00	213	0.08
100.0	total	28	100.00	99,831	100.00	56	100.00	132,662	100.00	62	100.00	17,076	100.00	89	100.00	2,835	100.00	235	100.00	252,404	100.00

HMDA LOAN ORIGINATIONS -- YEAR 2002
GEOGRAPHY INCOME LEVEL DISTRIBUTION -- NUMBER OF LOANS

MSA/County/Area % of Total A/A Lending	Geography Income Level	Home Purchase				Refinancing				Home Improvement				Multifamily				Total			
		Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %
Nassau	low	0	0.00	0	0.00	0	0.00	2	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	2	0.00
	moderate	0	0.00	1,277	7.65	3	7.69	2,468	6.02	0	0.00	218	5.63	0	0.00	15	22.39	3	4.62	3,978	6.46
	middle	14	82.35	11,244	67.39	19	48.72	28,735	70.10	5	71.43	2,810	72.55	2	100.00	47	70.15	40	61.54	42,836	69.52
	upper	3	17.65	4,164	24.96	17	43.59	9,781	23.86	2	28.57	845	21.82	0	0.00	5	7.46	22	33.85	14,795	24.01
	zero & NAs	0	0.00	1	0.01	0	0.00	3	0.01	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	4	0.01
9.4	total	17	100.00	16,686	100.00	39	100.00	40,989	100.00	7	100.00	3,873	100.00	2	100.00	67	100.00	65	100.00	61,615	100.00
Suffolk	low	0	0.00	23	0.10	0	0.00	42	0.07	0	-	6	0.08	0	-	0	0.00	0	0.00	71	0.08
	moderate	1	16.67	5,629	24.57	2	13.33	11,236	19.13	0	-	1,477	20.92	0	-	21	42.00	3	14.29	18,363	20.69
	middle	5	83.33	14,818	64.67	8	53.33	40,301	68.62	0	-	4,730	67.00	0	-	26	52.00	13	61.90	59,875	67.46
	upper	0	0.00	2,422	10.57	5	33.33	7,101	12.09	0	-	846	11.98	0	-	3	6.00	5	23.81	10,372	11.69
	zero & NAs	0	0.00	21	0.09	0	0.00	51	0.09	0	-	1	0.01	0	-	0	0.00	0	0.00	73	0.08
3.1	total	6	100.00	22,913	100.00	15	100.00	58,731	100.00	0	-	7,060	100.00	0	-	50	100.00	21	100.00	88,754	100.00
MSA 5380	low	0	0.00	23	0.06	0	0.00	44	0.04	0	0.00	6	0.05	0	0.00	0	0.00	0	0.00	73	0.05
	moderate	1	4.35	6,906	17.44	5	9.26	13,704	13.74	0	0.00	1,695	15.50	0	0.00	36	30.77	6	6.98	22,341	14.86
	middle	19	82.61	26,062	65.81	27	50.00	69,036	69.23	5	71.43	7,540	68.97	2	100.00	73	62.39	53	61.63	102,711	68.31
	upper	3	13.04	6,586	16.63	22	40.74	16,882	16.93	2	28.57	1,691	15.47	0	0.00	8	6.84	27	31.40	25,167	16.74
	zero & NAs	0	0.00	22	0.06	0	0.00	54	0.05	0	0.00	1	0.01	0	0.00	0	0.00	0	0.00	77	0.05
12.5	total	23	100.00	39,599	100.00	54	100.00	99,720	100.00	7	100.00	10,933	100.00	2	100.00	117	100.00	86	100.00	150,369	100.00
Bronx	low	0	0.00	702	16.40	0	0.00	601	10.09	0	0.00	119	20.03	5	35.71	176	43.78	5	19.23	1,598	14.23
	moderate	0	0.00	554	12.94	1	20.00	771	12.95	1	50.00	84	14.14	3	21.43	127	31.59	5	19.23	1,536	13.68
	middle	5	100.00	1,570	36.67	2	40.00	2,205	37.03	1	50.00	190	31.99	4	28.57	78	19.40	12	46.15	4,043	36.00
	upper	0	0.00	1,450	33.87	2	40.00	2,370	39.81	0	0.00	199	33.50	2	14.29	20	4.98	4	15.38	4,039	35.96
	zero & NAs	0	0.00	5	0.12	0	0.00	7	0.12	0	0.00	2	0.34	0	0.00	1	0.25	0	0.00	15	0.13
3.8	total	5	100.00	4,281	100.00	5	100.00	5,954	100.00	2	100.00	594	100.00	14	100.00	402	100.00	26	100.00	11,231	100.00
Kings	low	0	0.00	1,630	12.00	2	1.94	1,271	6.68	1	3.33	149	7.90	3	6.00	215	17.34	6	2.65	3,265	9.14
	moderate	1	2.33	3,051	22.46	15	14.56	4,326	22.74	3	10.00	487	25.81	17	34.00	482	38.87	36	15.93	8,346	23.35
	middle	26	60.47	5,660	41.66	42	40.78	7,975	41.92	14	46.67	760	40.28	22	44.00	431	34.76	104	46.02	14,826	41.49
	upper	15	34.88	3,209	23.62	44	42.72	5,394	28.35	12	40.00	489	25.91	8	16.00	111	8.95	79	34.96	9,203	25.75
	zero & NAs	1	2.33	35	0.26	0	0.00	58	0.30	0	0.00	2	0.11	0	0.00	1	0.08	1	0.44	96	0.27
32.8	total	43	100.00	13,585	100.00	103	100.00	19,024	100.00	30	100.00	1,887	100.00	50	100.00	1,240	100.00	226	100.00	35,736	100.00
New York	low	0	0.00	507	4.31	1	1.30	277	1.89	0	0.00	18	6.77	6	16.67	150	15.20	7	5.74	952	3.44
	moderate	0	0.00	732	6.22	2	2.60	747	5.10	1	100.00	55	20.68	6	16.67	244	24.72	9	7.38	1,778	6.42
	middle	0	0.00	946	8.04	8	10.39	1,053	7.18	0	0.00	28	10.53	8	22.22	109	11.04	16	13.11	2,136	7.72
	upper	8	100.00	9,557	81.21	66	85.71	12,565	85.73	0	0.00	162	60.90	16	44.44	480	48.63	90	73.77	22,764	82.25
	zero & NAs	0	0.00	26	0.22	0	0.00	15	0.10	0	0.00	3	1.13	0	0.00	4	0.41	0	0.00	48	0.17
17.7	total	8	100.00	11,768	100.00	77	100.00	14,657	100.00	1	100.00	266	100.00	36	100.00	987	100.00	122	100.00	27,678	100.00

MSA/County/Area % of Total A/A Lending	Geography Income Level	Home Purchase				Refinancing				Home Improvement				Multifamily				Total			
		Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %
Queens	low	0	0.00	91	0.48	0	0.00	119	0.46	0	0.00	14	0.65	0	0.00	1	0.21	0	0.00	225	0.47
	moderate	2	5.71	1,400	7.35	2	4.17	1,621	6.21	3	21.43	138	6.45	7	46.67	135	28.42	14	12.50	3,294	6.90
	middle	11	31.43	9,150	48.04	21	43.75	12,412	47.57	5	35.71	1,055	49.32	8	53.33	280	58.95	45	40.18	22,897	47.95
	upper	22	62.86	8,375	43.97	25	52.08	11,909	45.64	6	42.86	930	43.48	0	0.00	59	12.42	53	47.32	21,273	44.55
	zero & NAs	0	0.00	32	0.17	0	0.00	32	0.12	0	0.00	2	0.09	0	0.00	0	0.00	0	0.00	66	0.14
16.3	total	35	100.00	19,048	100.00	48	100.00	26,093	100.00	14	100.00	2,139	100.00	15	100.00	475	100.00	112	100.00	47,755	100.00
Richmond	low	1	4.00	247	3.87	1	2.13	175	1.58	0	0.00	10	0.95	0	-	3	7.50	2	2.08	435	2.34
	moderate	0	0.00	102	1.60	0	0.00	99	0.89	1	4.17	13	1.23	0	-	5	12.50	1	1.04	219	1.18
	middle	1	4.00	1,141	17.86	9	19.15	1,649	14.85	4	16.67	156	14.80	0	-	17	42.50	14	14.58	2,963	15.94
	upper	23	92.00	4,898	76.65	37	78.72	9,177	82.65	19	79.17	875	83.02	0	-	15	37.50	79	82.29	14,965	80.51
	zero & NAs	0	0.00	2	0.03	0	0.00	3	0.03	0	0.00	0	0.00	0	-	0	0.00	0	0.00	5	0.03
14.0	total	25	100.00	6,390	100.00	47	100.00	11,103	100.00	24	100.00	1,054	100.00	0	-	40	100.00	96	100.00	18,587	100.00
Westchester	low	0	0.00	32	0.26	0	0.00	21	0.09	0	-	1	0.06	0	0.00	1	0.70	0	0.00	55	0.15
	moderate	0	0.00	334	2.71	0	0.00	409	1.80	0	-	45	2.78	0	0.00	29	20.28	0	0.00	817	2.22
	middle	0	0.00	1,234	10.02	1	7.69	1,611	7.07	0	-	151	9.34	0	0.00	56	39.16	1	5.00	3,052	8.28
	upper	6	100.00	10,718	87.00	12	92.31	20,737	91.03	0	-	1,419	87.81	1	100.00	57	39.86	19	95.00	32,931	89.35
	zero & NAs	0	0.00	1	0.01	0	0.00	2	0.01	0	-	0	0.00	0	0.00	0	0.00	0	0.00	3	0.01
2.9	total	6	100.00	12,319	100.00	13	100.00	22,780	100.00	0	-	1,616	100.00	1	100.00	143	100.00	20	100.00	36,858	100.00
MSA 5600	low	1	0.82	3,209	4.76	4	1.37	2,464	2.47	1	1.41	311	4.12	14	12.07	546	16.61	20	3.32	6,530	3.67
	moderate	3	2.46	6,173	9.16	20	6.83	7,973	8.00	9	12.68	822	10.88	33	28.45	1,022	31.09	65	10.80	15,990	8.99
	middle	43	35.25	19,701	29.23	83	28.33	26,905	27.01	24	33.80	2,340	30.97	42	36.21	971	29.54	192	31.89	49,917	28.07
	upper	74	60.66	38,207	56.69	186	63.48	62,152	62.39	37	52.11	4,074	53.92	27	23.28	742	22.57	324	53.82	105,175	59.14
	zero & NAs	1	0.82	101	0.15	0	0.00	117	0.12	0	0.00	9	0.12	0	0.00	6	0.18	1	0.17	233	0.13
87.5	total	122	100.00	67,391	100.00	293	100.00	99,611	100.00	71	100.00	7,556	100.00	116	100.00	3,287	100.00	602	100.00	177,845	100.00
NYS A/A TOTAL	low	1	0.69	3,232	3.02	4	1.15	2,508	1.26	1	1.28	317	1.71	14	11.86	546	16.04	20	2.91	6,603	2.01
	moderate	4	2.76	13,079	12.22	25	7.20	21,677	10.87	9	11.54	2,517	13.61	33	27.97	1,058	31.08	71	10.32	38,331	11.68
	middle	62	42.76	45,763	42.77	110	31.70	95,941	48.13	29	37.18	9,880	53.44	44	37.29	1,044	30.67	245	35.61	152,628	46.50
	upper	77	53.10	44,793	41.87	208	59.94	79,034	39.65	39	50.00	5,765	31.18	27	22.88	750	22.03	351	51.02	130,342	39.71
	zero & NAs	1	0.69	123	0.11	0	0.00	171	0.09	0	0.00	10	0.05	0	0.00	6	0.18	1	0.15	310	0.09
100.0	total	145	100.00	106,990	100.00	347	100.00	199,331	100.00	78	100.00	18,489	100.00	118	100.00	3,404	100.00	688	100.00	328,214	100.00

HMDA LOAN ORIGINATIONS -- YEAR 2001
GEOGRAPHY INCOME LEVEL DISTRIBUTION -- VOLUME OF LOANS IN THOUSANDS OF DOLLARS

MSA/County/Area % of Total A/A Lending	Geography Income Level	Home Purchase				Refinancing				Home Improvement				Multifamily				Total			
		Bank \$	Bank %	Agg. \$	Agg. %	Bank \$	Bank %	Agg. \$	Agg. %	Bank \$	Bank %	Agg. \$	Agg. %	Bank \$	Bank %	Agg. \$	Agg. %	Bank \$	Bank %	Agg. \$	Agg. %
Nassau	low	0	0.00	1,250	0.03	0	0.00	610	0.01	0	0.00	0	0.00	0	-	0	0.00	0	0.00	1,860	0.02
	moderate	0	0.00	218,141	5.93	0	0.00	261,100	4.98	0	0.00	10,248	4.59	0	-	5,579	12.12	0	0.00	495,068	5.38
	middle	425	100.00	2,198,972	59.73	536	55.31	3,310,049	63.12	51	15.89	145,672	65.24	0	-	35,881	77.95	1,012	59.01	5,690,574	61.89
	upper	0	0.00	1,262,631	34.30	433	44.69	1,671,924	31.88	270	84.11	67,368	30.17	0	-	4,570	9.93	703	40.99	3,006,493	32.70
	zero & NAs	0	0.00	445	0.01	0	0.00	649	0.01	0	0.00	0	0.00	0	-	0	0.00	0	0.00	1,094	0.01
1.8	total	425	100.00	3,681,439	100.00	969	100.00	5,244,332	100.00	321	100.00	223,288	100.00	0	-	46,030	100.00	1,715	100.00	9,195,089	100.00
Suffolk	low	0	0.00	4,259	0.10	0	0.00	4,543	0.07	0	0.00	314	0.10	0	-	0	0.00	0	0.00	9,116	0.08
	moderate	150	32.40	881,694	20.23	0	0.00	1,060,807	15.92	0	0.00	50,963	16.56	0	-	40,000	34.52	150	17.71	2,033,464	17.77
	middle	195	42.12	2,766,715	63.49	349	100.00	4,546,094	68.24	35	100.00	202,666	65.85	0	-	70,720	61.03	579	68.36	7,586,195	66.29
	upper	118	25.49	702,423	16.12	0	0.00	1,047,779	15.73	0	0.00	53,772	17.47	0	-	5,150	4.44	118	13.93	1,809,124	15.81
	zero & NAs	0	0.00	2,887	0.07	0	0.00	2,509	0.04	0	0.00	49	0.02	0	-	0	0.00	0	0.00	5,445	0.05
0.9	total	463	100.00	4,357,978	100.00	349	100.00	6,661,732	100.00	35	100.00	307,764	100.00	0	-	115,870	100.00	847	100.00	11,443,344	100.00
MSA 5380	low	0	0.00	5,509	0.07	0	0.00	5,153	0.04	0	0.00	314	0.06	0	-	0	0.00	0	0.00	10,976	0.05
	moderate	150	16.89	1,099,835	13.68	0	0.00	1,321,907	11.10	0	0.00	61,211	11.53	0	-	45,579	28.15	150	5.85	2,528,532	12.25
	middle	620	69.82	4,965,687	61.77	885	67.15	7,856,143	65.98	86	24.16	348,338	65.59	0	-	106,601	65.84	1,591	62.10	13,276,769	64.33
	upper	118	13.29	1,965,054	24.44	433	32.85	2,719,703	22.84	270	75.84	121,140	22.81	0	-	9,720	6.00	821	32.05	4,815,617	23.33
	zero & NAs	0	0.00	3,332	0.04	0	0.00	3,158	0.03	0	0.00	49	0.01	0	-	0	0.00	0	0.00	6,539	0.03
2.7	total	888	100.00	8,039,417	100.00	1,318	100.00	11,906,064	100.00	356	100.00	531,052	100.00	0	-	161,900	100.00	2,562	100.00	20,638,433	100.00
Bronx	low	0	0.00	117,759	16.41	0	-	63,880	9.92	0	-	3,322	13.79	3,689	31.88	157,959	42.62	3,689	31.81	342,920	19.53
	moderate	0	0.00	92,613	12.91	0	-	89,062	13.84	0	-	3,322	13.79	5,444	47.04	110,534	29.83	5,444	46.95	295,531	16.83
	middle	24	100.00	239,078	33.32	0	-	235,741	36.63	0	-	9,145	37.96	2,439	21.08	79,237	21.38	2,463	21.24	563,201	32.08
	upper	0	0.00	267,197	37.24	0	-	254,357	39.52	0	-	8,263	34.30	0	0.00	22,866	6.17	0	0.00	552,683	31.48
	zero & NAs	0	0.00	804	0.11	0	-	590	0.09	0	-	41	0.17	0	0.00	0	0.00	0	0.00	1,435	0.08
12.3	total	24	100.00	717,451	100.00	0	-	643,630	100.00	0	-	24,093	100.00	11,572	100.00	370,596	100.00	11,596	100.00	1,755,770	100.00
Kings	low	200	14.59	258,117	9.16	200	5.28	145,449	5.71	19	1.44	6,426	6.42	2,550	11.97	38,950	7.26	2,969	10.68	448,942	7.48
	moderate	0	0.00	616,855	21.89	119	3.14	546,408	21.47	276	20.91	22,310	22.28	7,588	35.60	153,468	28.60	7,983	28.73	1,339,041	22.32
	middle	329	24.00	1,175,230	41.71	1,452	38.35	1,094,147	42.99	735	55.68	45,230	45.17	9,800	45.98	276,063	51.45	12,316	44.32	2,590,670	43.18
	upper	842	61.42	757,347	26.88	2,015	53.22	753,132	29.59	290	21.97	25,879	25.85	1,374	6.45	65,330	12.18	4,521	16.27	1,601,688	26.70
	zero & NAs	0	0.00	9,961	0.35	0	0.00	5,915	0.23	0	0.00	283	0.28	0	0.00	2,765	0.52	0	0.00	18,924	0.32
29.6	total	1,371	100.00	2,817,510	100.00	3,786	100.00	2,545,051	100.00	1,320	100.00	100,128	100.00	21,312	100.00	536,576	100.00	27,789	100.00	5,999,265	100.00
New York	low	0	0.00	80,783	2.30	0	0.00	46,499	1.69	0	0.00	1,367	3.79	1,908	9.83	265,441	14.19	1,908	8.04	394,090	4.82
	moderate	0	0.00	142,363	4.05	0	0.00	107,664	3.92	0	0.00	2,121	5.89	4,820	24.84	315,002	16.84	4,820	20.31	567,150	6.94
	middle	0	0.00	185,773	5.29	90	2.38	164,864	6.00	0	0.00	3,639	10.10	625	3.22	209,693	11.21	715	3.01	563,969	6.90
	upper	400	100.00	3,101,085	88.27	3,697	97.62	2,427,221	88.32	140	100.00	28,879	80.15	12,050	62.10	1,062,187	56.78	16,287	68.63	6,619,372	81.04
	zero & NAs	0	0.00	3,262	0.09	0	0.00	1,931	0.07	0	0.00	25	0.07	0	0.00	18,475	0.99	0	0.00	23,693	0.29
25.2	total	400	100.00	3,513,266	100.00	3,787	100.00	2,748,179	100.00	140	100.00	36,031	100.00	19,403	100.00	1,870,798	100.00	23,730	100.00	8,168,274	100.00

MSA/County/Area % of Total A/A Lending	Geography Income Level	Home Purchase				Refinancing				Home Improvement				Multifamily				Total			
		Bank \$	Bank %	Agg. \$	Agg. %	Bank \$	Bank %	Agg. \$	Agg. %	Bank \$	Bank %	Agg. \$	Agg. %	Bank \$	Bank %	Agg. \$	Agg. %	Bank \$	Bank %	Agg. \$	Agg. %
Queens	low	0	0.00	11,575	0.33	0	0.00	11,096	0.36	0	0.00	363	0.33	0	0.00	0	0.00	0	0.00	23,034	0.32
	moderate	0	0.00	275,671	7.82	0	0.00	206,074	6.72	38	9.97	7,232	6.66	6,740	30.04	129,828	30.61	6,778	27.90	618,805	8.69
	middle	80	13.56	1,713,293	48.58	514	58.14	1,438,944	46.95	260	68.24	49,832	45.87	13,450	59.94	195,524	46.09	14,304	58.88	3,397,593	47.69
	upper	510	86.44	1,521,181	43.13	370	41.86	1,403,866	45.81	83	21.78	51,011	46.95	2,250	10.03	98,828	23.30	3,213	13.22	3,074,886	43.16
	zero & NAs	0	0.00	5,338	0.15	0	0.00	4,730	0.15	0	0.00	211	0.19	0	0.00	0	0.00	0	0.00	10,279	0.14
25.8	total	590	100.00	3,527,058	100.00	884	100.00	3,064,710	100.00	381	100.00	108,649	100.00	22,440	100.00	424,180	100.00	24,295	100.00	7,124,597	100.00
Richmond	low	0	0.00	15,328	1.25	0	0.00	15,590	1.31	0	0.00	686	1.22	0	0.00	9,721	22.68	0	0.00	41,325	1.64
	moderate	0	0.00	7,278	0.59	0	0.00	6,547	0.55	0	0.00	359	0.64	0	0.00	25,964	60.58	0	0.00	40,148	1.60
	middle	0	0.00	207,466	16.92	0	0.00	173,631	14.57	88	12.87	6,803	12.12	0	0.00	1,723	4.02	88	2.44	389,623	15.48
	upper	1,445	100.00	996,070	81.24	977	100.00	995,664	83.57	596	87.13	48,304	86.02	500	100.00	5,454	12.72	3,518	97.56	2,045,492	81.28
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
3.8	total	1,445	100.00	1,226,142	100.00	977	100.00	1,191,432	100.00	684	100.00	56,152	100.00	500	100.00	42,862	100.00	3,606	100.00	2,516,588	100.00
Westchester	low	0	-	3,745	0.12	0	-	1,704	0.05	0	-	370	0.37	0	0.00	0	0.00	0	0.00	5,819	0.09
	moderate	0	-	52,587	1.63	0	-	47,866	1.43	0	-	1,994	2.01	0	0.00	13,062	8.74	0	0.00	115,509	1.69
	middle	0	-	195,818	6.07	0	-	192,225	5.72	0	-	6,824	6.87	440	100.00	43,918	29.38	440	100.00	438,785	6.42
	upper	0	-	2,972,348	92.18	0	-	3,116,827	92.80	0	-	90,095	90.75	0	0.00	92,484	61.88	0	0.00	6,271,754	91.80
	zero & NAs	0	-	0	0.00	0	-	0	0.00	0	-	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
0.5	total	0	-	3,224,498	100.00	0	-	3,358,622	100.00	0	-	99,283	100.00	440	100.00	149,464	100.00	440	100.00	6,831,867	100.00
MSA 5600	low	200	5.22	487,307	3.24	200	2.12	284,218	2.10	19	0.75	12,534	2.95	8,147	10.77	472,071	13.91	8,566	9.37	1,256,130	3.88
	moderate	0	0.00	1,187,367	7.90	119	1.26	1,003,621	7.41	314	12.44	37,338	8.80	24,592	32.50	747,858	22.03	25,025	27.36	2,976,184	9.19
	middle	433	11.31	3,716,658	24.73	2,056	21.79	3,299,552	24.35	1,083	42.89	121,473	28.63	26,754	35.36	806,158	23.75	30,326	33.16	7,943,841	24.52
	upper	3,197	83.47	9,615,228	63.99	7,059	74.83	8,951,067	66.05	1,109	43.92	252,431	59.49	16,174	21.38	1,347,149	39.69	27,539	30.11	20,165,875	62.25
	zero & NAs	0	0.00	19,365	0.13	0	0.00	13,166	0.10	0	0.00	560	0.13	0	0.00	21,240	0.63	0	0.00	54,331	0.17
97.3	total	3,830	100.00	15,025,925	100.00	9,434	100.00	13,551,624	100.00	2,525	100.00	424,336	100.00	75,667	100.00	3,394,476	100.00	91,456	100.00	32,396,361	100.00
NYS A/A TOTAL	low	200	4.24	492,816	2.14	200	1.86	289,371	1.14	19	0.66	12,848	1.34	8,147	10.77	472,071	13.27	8,566	9.11	1,267,106	2.39
	moderate	150	3.18	2,287,202	9.92	119	1.11	2,325,528	9.13	314	10.90	98,549	10.32	24,592	32.50	793,437	22.31	25,175	26.78	5,504,716	10.38
	middle	1,053	22.32	8,682,345	37.64	2,941	27.35	11,155,695	43.82	1,169	40.58	469,811	49.17	26,754	35.36	912,759	25.67	31,917	33.95	21,220,610	40.01
	upper	3,315	70.26	11,580,282	50.21	7,492	69.68	11,670,770	45.84	1,379	47.87	373,571	39.10	16,174	21.38	1,356,869	38.15	28,360	30.16	24,981,492	47.10
	zero & NAs	0	0.00	22,697	0.10	0	0.00	16,324	0.06	0	0.00	609	0.06	0	0.00	21,240	0.60	0	0.00	60,870	0.11
100.0	total	4,718	100.00	23,065,342	100.00	10,752	100.00	25,457,688	100.00	2,881	100.00	955,388	100.00	75,667	100.00	3,556,376	100.00	94,018	100.00	53,034,794	100.00

HMDA LOAN ORIGINATIONS -- YEAR 2002

GEOGRAPHY INCOME LEVEL DISTRIBUTION -- VOLUME OF LOANS IN THOUSANDS OF DOLLARS

MSA/County/Area % of Total A/A Lending	Geography Income Level	Home Purchase				Refinancing				Home Improvement				Multifamily				Total			
		Bank \$	Bank %	Agg. \$	Agg. %	Bank \$	Bank %	Agg. \$	Agg. %	Bank \$	Bank %	Agg. \$	Agg. %	Bank \$	Bank %	Agg. \$	Agg. %	Bank \$	Bank %	Agg. \$	Agg. %
Nassau	low	0	0.00	0	0.00	0	0.00	750	0.01	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	750	0.01
	moderate	0	0.00	251,076	5.49	426	5.83	413,099	4.83	0	0.00	8,476	3.02	0	0.00	12,113	10.18	426	3.38	684,764	5.07
	middle	3,030	77.08	2,680,629	58.63	3,541	48.45	5,183,504	60.65	259	70.19	179,785	64.00	1,000	100.00	52,672	44.26	7,830	62.10	8,096,590	59.89
	upper	901	22.92	1,640,004	35.87	3,341	45.72	2,949,292	34.51	110	29.81	92,662	32.98	0	0.00	54,226	45.56	4,352	34.52	4,736,184	35.03
	zero & NAs	0	0.00	194	0.00	0	0.00	276	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	470	0.00
6.3	total	3,931	100.00	4,571,903	100.00	7,308	100.00	8,546,921	100.00	369	100.00	280,923	100.00	1,000	100.00	119,011	100.00	12,608	100.00	13,518,758	100.00
Suffolk	low	0	0.00	3,437	0.06	0	0.00	6,462	0.06	0	-	273	0.07	0	-	0	0.00	0	0.00	10,172	0.06
	moderate	300	20.52	1,123,843	20.76	537	15.72	1,863,932	16.58	0	-	63,227	16.21	0	-	26,405	32.29	837	17.16	3,077,407	17.97
	middle	1,162	79.48	3,477,676	64.25	1,808	52.93	7,552,288	67.19	0	-	252,517	64.76	0	-	48,761	59.63	2,970	60.89	11,331,242	66.17
	upper	0	0.00	803,687	14.85	1,071	31.35	1,810,967	16.11	0	-	73,765	18.92	0	-	6,600	8.07	1,071	21.96	2,695,019	15.74
	zero & NAs	0	0.00	3,667	0.07	0	0.00	6,999	0.06	0	-	171	0.04	0	-	0	0.00	0	0.00	10,837	0.06
2.4	total	1,462	100.00	5,412,310	100.00	3,416	100.00	11,240,648	100.00	0	-	389,953	100.00	0	-	81,766	100.00	4,878	100.00	17,124,677	100.00
MSA 5380	low	0	0.00	3,437	0.03	0	0.00	7,212	0.04	0	0.00	273	0.04	0	0.00	0	0.00	0	0.00	10,922	0.04
	moderate	300	5.56	1,374,919	13.77	963	8.98	2,277,031	11.51	0	0.00	71,703	10.69	0	0.00	38,518	19.18	1,263	7.22	3,762,171	12.28
	middle	4,192	77.73	6,158,305	61.68	5,349	49.88	12,735,792	64.36	259	70.19	432,302	64.44	1,000	100.00	101,433	50.52	10,800	61.76	19,427,832	63.40
	upper	901	16.71	2,443,691	24.48	4,412	41.14	4,760,259	24.06	110	29.81	166,427	24.81	0	0.00	60,826	30.30	5,423	31.01	7,431,203	24.25
	zero & NAs	0	0.00	3,861	0.04	0	0.00	7,275	0.04	0	0.00	171	0.03	0	0.00	0	0.00	0	0.00	11,307	0.04
8.7	total	5,393	100.00	9,984,213	100.00	10,724	100.00	19,787,569	100.00	369	100.00	670,876	100.00	1,000	100.00	200,777	100.00	17,486	100.00	30,643,435	100.00
Bronx	low	0	0.00	147,432	17.82	0	0.00	98,020	9.22	0	0.00	3,283	13.75	4,930	31.08	247,022	51.77	4,930	28.77	495,757	20.73
	moderate	0	0.00	116,441	14.08	30	3.77	141,137	13.27	10	25.00	2,670	11.19	2,580	16.27	131,791	27.62	2,620	15.29	392,039	16.39
	middle	438	100.00	276,092	33.38	250	31.45	386,579	36.36	30	75.00	7,273	30.47	4,450	28.06	73,290	15.36	5,168	30.16	743,234	31.08
	upper	0	0.00	286,017	34.58	515	64.78	436,109	41.02	0	0.00	10,631	44.54	3,900	24.59	24,779	5.19	4,415	25.77	757,536	31.68
	zero & NAs	0	0.00	1,162	0.14	0	0.00	1,438	0.14	0	0.00	11	0.05	0	0.00	225	0.05	0	0.00	2,836	0.12
8.5	total	438	100.00	827,144	100.00	795	100.00	1,063,283	100.00	40	100.00	23,868	100.00	15,860	100.00	477,107	100.00	17,133	100.00	2,391,402	100.00
Kings	low	0	0.00	415,880	11.80	368	2.15	242,532	6.08	30	2.48	6,289	5.75	1,003	2.27	94,776	14.18	1,401	2.02	759,477	9.16
	moderate	288	4.18	835,541	23.70	2,395	14.01	862,896	21.61	115	9.51	23,193	21.19	15,855	35.94	216,453	32.38	18,653	26.91	1,938,083	23.37
	middle	3,501	50.78	1,386,191	39.33	6,898	40.36	1,678,834	42.05	594	49.13	48,621	44.43	24,238	54.94	274,385	41.05	35,231	50.83	3,388,031	40.85
	upper	3,045	44.17	877,860	24.91	7,429	43.47	1,196,193	29.96	470	38.88	31,038	28.36	3,019	6.84	82,503	12.34	13,963	20.15	2,187,594	26.37
	zero & NAs	60	0.87	9,319	0.26	0	0.00	11,701	0.29	0	0.00	295	0.27	0	0.00	263	0.04	60	0.09	21,578	0.26
34.5	total	6,894	100.00	3,524,791	100.00	17,090	100.00	3,992,156	100.00	1,209	100.00	109,436	100.00	44,115	100.00	668,380	100.00	69,308	100.00	8,294,763	100.00
New York	low	0	0.00	150,294	3.11	300	2.08	81,707	1.52	0	0.00	457	2.05	6,930	16.34	217,443	8.33	7,230	12.33	449,901	3.50
	moderate	0	0.00	188,219	3.90	159	1.10	169,886	3.15	18	100.00	2,203	9.87	5,895	13.90	596,910	22.87	6,072	10.36	957,218	7.45
	middle	0	0.00	357,830	7.41	1,355	9.40	430,393	7.99	0	0.00	1,813	8.13	7,910	18.65	240,271	9.21	9,265	15.80	1,030,307	8.02
	upper	1,768	100.00	4,120,701	85.39	12,604	87.42	4,700,184	87.28	0	0.00	17,783	79.71	21,687	51.12	1,548,463	59.33	36,059	61.51	10,387,131	80.87
	zero & NAs	0	0.00	8,852	0.18	0	0.00	2,968	0.06	0	0.00	54	0.24	0	0.00	7,013	0.27	0	0.00	18,887	0.15
29.2	total	1,768	100.00	4,825,896	100.00	14,418	100.00	5,385,138	100.00	18	100.00	22,310	100.00	42,422	100.00	2,610,100	100.00	58,626	100.00	12,843,444	100.00

MSA/County/Area % of Total A/A Lending	Geography Income Level	Home Purchase				Refinancing				Home Improvement				Multifamily				Total			
		Bank \$	Bank %	Agg. \$	Agg. %	Bank \$	Bank %	Agg. \$	Agg. %	Bank \$	Bank %	Agg. \$	Agg. %	Bank \$	Bank %	Agg. \$	Agg. %	Bank \$	Bank %	Agg. \$	Agg. %
Queens	low	0	0.00	17,408	0.43	0	0.00	18,409	0.37	0	0.00	671	0.56	0	0.00	520	0.15	0	0.00	37,008	0.39
	moderate	102	2.13	312,588	7.72	235	3.35	339,271	6.86	85	19.06	7,018	5.91	5,005	54.59	68,077	19.28	5,427	25.36	726,954	7.68
	middle	1,457	30.47	1,908,263	47.14	3,316	47.32	2,349,003	47.49	184	41.26	52,956	44.57	4,163	45.41	197,520	55.95	9,120	42.61	4,507,742	47.62
	upper	3,223	67.40	1,802,275	44.52	3,456	49.32	2,231,677	45.12	177	39.69	58,136	48.93	0	0.00	86,888	24.61	6,856	32.03	4,178,976	44.15
	zero & NAs	0	0.00	7,848	0.19	0	0.00	7,677	0.16	0	0.00	23	0.02	0	0.00	0	0.00	0	0.00	15,548	0.16
10.7	total	4,782	100.00	4,048,382	100.00	7,007	100.00	4,946,037	100.00	446	100.00	118,804	100.00	9,168	100.00	353,005	100.00	21,403	100.00	9,466,228	100.00
Richmond	low	153	3.07	40,142	2.76	152	2.23	24,253	1.21	0	0.00	381	0.63	0	-	3,564	12.50	305	2.39	68,340	1.93
	moderate	0	0.00	17,439	1.20	0	0.00	14,599	0.73	25	2.58	601	1.00	0	-	9,978	34.99	25	0.20	42,617	1.20
	middle	171	3.43	296,909	20.45	1,022	14.97	284,952	14.21	162	16.74	6,870	11.38	0	-	7,046	24.71	1,355	10.60	595,777	16.80
	upper	4,660	93.50	1,097,107	75.56	5,653	82.80	1,681,295	83.84	781	80.68	52,528	87.00	0	-	7,932	27.81	11,094	86.81	2,838,862	80.05
	zero & NAs	0	0.00	407	0.03	0	0.00	333	0.02	0	0.00	0	0.00	0	-	0	0.00	0	0.00	740	0.02
6.4	total	4,984	100.00	1,452,004	100.00	6,827	100.00	2,005,432	100.00	968	100.00	60,380	100.00	0	-	28,520	100.00	12,779	100.00	3,546,336	100.00
Westchester	low	0	0.00	5,766	0.16	0	0.00	3,206	0.05	0	-	8	0.01	0	0.00	1,600	0.92	0	0.00	10,580	0.10
	moderate	0	0.00	61,251	1.65	0	0.00	71,227	1.09	0	-	1,680	1.31	0	0.00	32,896	18.95	0	0.00	167,054	1.59
	middle	0	0.00	224,434	6.05	39	1.83	309,412	4.74	0	-	5,973	4.64	0	0.00	55,956	32.23	39	0.98	595,775	5.65
	upper	1,668	100.00	3,420,680	92.14	2,091	98.17	6,139,370	94.11	0	-	120,999	94.05	200	100.00	83,165	47.90	3,959	99.02	9,764,214	92.66
	zero & NAs	0	0.00	153	0.00	0	0.00	198	0.00	0	-	0	0.00	0	0.00	0	0.00	0	0.00	351	0.00
2.0	total	1,668	100.00	3,712,284	100.00	2,130	100.00	6,523,413	100.00	0	-	128,660	100.00	200	100.00	173,617	100.00	3,998	100.00	10,537,974	100.00
MSA 5600	low	153	0.75	776,922	4.22	820	1.70	468,127	1.96	30	1.12	11,089	2.39	12,863	11.51	564,925	13.11	13,866	7.57	1,821,063	3.87
	moderate	390	1.90	1,531,479	8.33	2,819	5.84	1,599,016	6.69	253	9.44	37,365	8.06	29,335	26.25	1,056,105	24.50	32,797	17.90	4,223,965	8.97
	middle	5,567	27.11	4,449,719	24.20	12,880	26.68	5,439,173	22.74	970	36.18	123,506	26.65	40,761	36.47	848,468	19.68	60,178	32.84	10,860,866	23.07
	upper	14,364	69.95	11,604,640	63.10	31,748	65.78	16,384,828	68.51	1,428	53.26	291,115	62.81	28,806	25.77	1,833,730	42.54	76,346	41.66	30,114,313	63.96
	zero & NAs	60	0.29	27,741	0.15	0	0.00	24,315	0.10	0	0.00	383	0.08	0	0.00	7,501	0.17	60	0.03	59,940	0.13
91.3	total	20,534	100.00	18,390,501	100.00	48,267	100.00	23,915,459	100.00	2,681	100.00	463,458	100.00	111,765	100.00	4,310,729	100.00	183,247	100.00	47,080,147	100.00
NYS A/A TOTAL	low	153	0.59	780,359	2.75	820	1.39	475,339	1.09	30	0.98	11,362	1.00	12,863	11.41	564,925	12.52	13,866	6.91	1,831,985	2.36
	moderate	690	2.66	2,906,398	10.24	3,782	6.41	3,876,047	8.87	253	8.30	109,068	9.62	29,335	26.01	1,094,623	24.26	34,060	16.97	7,986,136	10.28
	middle	9,759	37.64	10,608,024	37.39	18,229	30.90	18,174,965	41.59	1,229	40.30	555,808	49.00	41,761	37.03	949,901	21.06	70,978	35.36	30,288,698	38.97
	upper	15,265	58.88	14,048,331	49.51	36,160	61.30	21,145,087	48.38	1,538	50.43	457,542	40.34	28,806	25.55	1,894,556	41.99	81,769	40.74	37,545,516	48.31
	zero & NAs	60	0.23	31,602	0.11	0	0.00	31,590	0.07	0	0.00	554	0.05	0	0.00	7,501	0.17	60	0.03	71,247	0.09
100.0	total	25,927	100.00	28,374,714	100.00	58,991	100.00	43,703,028	100.00	3,050	100.00	1,134,334	100.00	112,765	100.00	4,511,506	100.00	200,733	100.00	77,723,582	100.00

1-4 FAMILY HMDA LOAN ORIGINATIONS -- YEAR 2001

BORROWER INCOME LEVEL DISTRIBUTION -- NUMBER OF LOANS

MSA/County/Area % of Total A/A Lending	Borrower Income Level	Home Purchase				Refinancing				Home Improvement				Total			
		Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %
Nassau	low	0	0.00	419	2.68	0	0.00	1,106	3.97	0	0.00	213	6.37	0	0.00	1,738	3.71
	moderate	1	50.00	2,180	13.95	0	0.00	4,454	15.98	0	0.00	530	15.84	1	9.09	7,164	15.29
	middle	1	50.00	4,618	29.55	3	50.00	8,158	29.27	1	33.33	956	28.57	5	45.45	13,732	29.31
	upper	0	0.00	6,726	43.04	3	50.00	11,058	39.67	2	66.67	1,318	39.39	5	45.45	19,102	40.78
	zero & NAs	0	0.00	1,683	10.77	0	0.00	3,099	11.12	0	0.00	329	9.83	0	0.00	5,111	10.91
7.5	total	2	100.00	15,626	100.00	6	100.00	27,875	100.00	3	100.00	3,346	100.00	11	100.00	46,847	100.00
Suffolk	low	0	0.00	1,134	5.19	0	0.00	2,262	5.58	0	0.00	502	8.21	0	0.00	3,898	5.69
	moderate	1	33.33	4,687	21.45	1	50.00	8,329	20.56	0	0.00	1,246	20.37	2	33.33	14,262	20.83
	middle	2	66.67	6,568	30.06	1	50.00	12,545	30.97	1	100.00	1,962	32.08	4	66.67	21,075	30.78
	upper	0	0.00	7,289	33.35	0	0.00	13,151	32.47	0	0.00	2,003	32.75	0	0.00	22,443	32.78
	zero & NAs	0	0.00	2,175	9.95	0	0.00	4,218	10.41	0	0.00	403	6.59	0	0.00	6,796	9.92
4.1	total	3	100.00	21,853	100.00	2	100.00	40,505	100.00	1	100.00	6,116	100.00	6	100.00	68,474	100.00
MSA 5380	low	0	0.00	1,553	4.14	0	0.00	3,368	4.93	0	0.00	715	7.56	0	0.00	5,636	4.89
	moderate	2	40.00	6,867	18.32	1	12.50	12,783	18.69	0	0.00	1,776	18.77	3	17.65	21,426	18.58
	middle	3	60.00	11,186	29.85	4	50.00	20,703	30.28	2	50.00	2,918	30.84	9	52.94	34,807	30.18
	upper	0	0.00	14,015	37.39	3	37.50	24,209	35.40	2	50.00	3,321	35.10	5	29.41	41,545	36.03
	zero & NAs	0	0.00	3,858	10.29	0	0.00	7,317	10.70	0	0.00	732	7.74	0	0.00	11,907	10.33
11.6	total	5	100.00	37,479	100.00	8	100.00	68,380	100.00	4	100.00	9,462	100.00	17	100.00	115,321	100.00
Bronx	low	0	0.00	150	3.76	0	-	157	3.93	0	-	58	8.50	0	0.00	365	4.21
	moderate	1	100.00	675	16.92	0	-	572	14.31	0	-	156	22.87	1	100.00	1,403	16.19
	middle	0	0.00	1,134	28.43	0	-	1,141	28.55	0	-	220	32.26	0	0.00	2,495	28.78
	upper	0	0.00	1,702	42.67	0	-	1,589	39.75	0	-	217	31.82	0	0.00	3,508	40.47
	zero & NAs	0	0.00	328	8.22	0	-	538	13.46	0	-	31	4.55	0	0.00	897	10.35
0.7	total	1	100.00	3,989	100.00	0	-	3,997	100.00	0	-	682	100.00	1	100.00	8,668	100.00
Kings	low	0	0.00	246	1.97	0	0.00	468	3.53	4	16.67	158	8.45	4	7.14	872	3.16
	moderate	4	44.44	1,347	10.78	3	13.04	1,569	11.83	1	4.17	341	18.24	8	14.29	3,257	11.79
	middle	1	11.11	2,933	23.48	5	21.74	3,353	25.27	4	16.67	542	28.98	10	17.86	6,828	24.71
	upper	4	44.44	6,455	51.68	14	60.87	5,985	45.11	15	62.50	679	36.31	33	58.93	13,119	47.48
	zero & NAs	0	0.00	1,510	12.09	1	4.35	1,892	14.26	0	0.00	150	8.02	1	1.79	3,552	12.86
38.4	total	9	100.00	12,491	100.00	23	100.00	13,267	100.00	24	100.00	1,870	100.00	56	100.00	27,628	100.00
New York	low	0	0.00	53	0.57	0	0.00	28	0.36	0	0.00	25	8.28	0	0.00	106	0.61
	moderate	0	0.00	342	3.70	0	0.00	199	2.55	0	0.00	36	11.92	0	0.00	577	3.33
	middle	0	0.00	883	9.56	2	16.67	707	9.05	0	0.00	46	15.23	2	13.33	1,636	9.43
	upper	1	100.00	7,526	81.49	8	66.67	6,303	80.72	2	100.00	172	56.95	11	73.33	14,001	80.72
	zero & NAs	0	0.00	432	4.68	2	16.67	571	7.31	0	0.00	23	7.62	2	13.33	1,026	5.91
10.3	total	1	100.00	9,236	100.00	12	100.00	7,808	100.00	2	100.00	302	100.00	15	100.00	17,346	100.00

MSA/County/Area % of Total A/A Lending	Borrower Income Level	Home Purchase				Refinancing				Home Improvement				Total			
		Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %
Queens	low	1	16.67	441	2.42	0	0.00	550	3.06	0	0.00	148	7.09	1	4.35	1,139	2.98
	moderate	2	33.33	2,400	13.18	2	33.33	2,435	13.54	2	18.18	364	17.45	6	26.09	5,199	13.58
	middle	0	0.00	5,045	27.71	0	0.00	4,827	26.85	4	36.36	598	28.67	4	17.39	10,470	27.35
	upper	3	50.00	8,288	45.52	4	66.67	7,547	41.97	5	45.45	749	35.91	12	52.17	16,584	43.33
	zero & NAs	0	0.00	2,035	11.18	0	0.00	2,621	14.58	0	0.00	227	10.88	0	0.00	4,883	12.76
	15.8 total	6	100.00	18,209	100.00	6	100.00	17,980	100.00	11	100.00	2,086	100.00	23	100.00	38,275	100.00
Richmond	low	0	0.00	79	1.27	0	0.00	164	2.21	0	0.00	29	2.63	0	0.00	272	1.84
	moderate	0	0.00	657	10.57	0	0.00	778	10.48	2	9.52	134	12.15	2	5.88	1,569	10.64
	middle	0	0.00	1,806	29.06	4	57.14	1,995	26.87	4	19.05	311	28.20	8	23.53	4,112	27.89
	upper	6	100.00	3,035	48.83	3	42.86	3,614	48.67	15	71.43	537	48.69	24	70.59	7,186	48.74
	zero & NAs	0	0.00	638	10.27	0	0.00	875	11.78	0	0.00	92	8.34	0	0.00	1,605	10.89
	23.3 total	6	100.00	6,215	100.00	7	100.00	7,426	100.00	21	100.00	1,103	100.00	34	100.00	14,744	100.00
Westchester	low	0	-	140	1.15	0	-	103	0.75	0	-	45	2.86	0	-	288	1.04
	moderate	0	-	945	7.74	0	-	647	4.69	0	-	112	7.13	0	-	1,704	6.18
	middle	0	-	1,919	15.71	0	-	1,860	13.47	0	-	262	16.68	0	-	4,041	14.65
	upper	0	-	8,330	68.21	0	-	9,897	71.70	0	-	1,006	64.04	0	-	19,233	69.72
	zero & NAs	0	-	878	7.19	0	-	1,297	9.40	0	-	146	9.29	0	-	2,321	8.41
	0.0 total	0	-	12,212	100.00	0	-	13,804	100.00	0	-	1,571	100.00	0	-	27,587	100.00
MSA 5600	low	1	4.35	1,109	1.78	0	0.00	1,470	2.29	4	6.90	463	6.08	5	3.88	3,042	2.27
	moderate	7	30.43	6,366	10.21	5	10.42	6,200	9.65	5	8.62	1,143	15.01	17	13.18	13,709	10.21
	middle	1	4.35	13,720	22.00	11	22.92	13,883	21.60	12	20.69	1,979	25.99	24	18.60	29,582	22.04
	upper	14	60.87	35,336	56.67	29	60.42	34,935	54.35	37	63.79	3,360	44.13	80	62.02	73,631	54.85
	zero & NAs	0	0.00	5,821	9.34	3	6.25	7,794	12.12	0	0.00	669	8.79	3	2.33	14,284	10.64
	88.4 total	23	100.00	62,352	100.00	48	100.00	64,282	100.00	58	100.00	7,614	100.00	129	100.00	134,248	100.00
NYS A/A TOTAL	low	1	3.57	2,662	2.67	0	0.00	4,838	3.65	4	6.45	1,178	6.90	5	3.42	8,678	3.48
	moderate	9	32.14	13,233	13.26	6	10.71	18,983	14.31	5	8.06	2,919	17.09	20	13.70	35,135	14.08
	middle	4	14.29	24,906	24.95	15	26.79	34,586	26.07	14	22.58	4,897	28.68	33	22.60	64,389	25.80
	upper	14	50.00	49,351	49.43	32	57.14	59,144	44.58	39	62.90	6,681	39.13	85	58.22	115,176	46.15
	zero & NAs	0	0.00	9,679	9.70	3	5.36	15,111	11.39	0	0.00	1,401	8.20	3	2.05	26,191	10.49
	100.0 total	28	100.00	99,831	100.00	56	100.00	132,662	100.00	62	100.00	17,076	100.00	146	100.00	249,569	100.00

1-4 FAMILY HMDA LOAN ORIGINATIONS -- YEAR 2002
BORROWER INCOME LEVEL DISTRIBUTION -- NUMBER OF LOANS

MSA/County/Area % of Total A/A Lending	Borrower Income Level	Home Purchase				Refinancing				Home Improvement				Total			
		Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %
Nassau	low	0	0.00	406	2.43	2	5.13	1,598	3.90	0	0.00	222	5.73	2	3.17	2,226	3.61
	moderate	5	29.41	2,504	15.01	5	12.82	7,137	17.41	1	14.29	622	16.06	11	17.46	10,263	16.66
	middle	3	17.65	4,654	27.89	8	20.51	11,705	28.56	2	28.57	1,101	28.43	13	20.63	17,460	28.34
	upper	9	52.94	7,460	44.71	24	61.54	16,568	40.42	4	57.14	1,501	38.76	37	58.73	25,529	41.43
	zero & NAs	0	0.00	1,662	9.96	0	0.00	3,981	9.71	0	0.00	427	11.03	0	0.00	6,137	9.96
11.1	total	17	100.00	16,686	100.00	39	100.00	40,989	100.00	7	100.00	3,873	100.00	63	100.00	61,615	100.00
Suffolk	low	1	16.67	1,073	4.68	0	0.00	3,488	5.94	0	-	612	8.67	1	4.76	5,173	5.83
	moderate	1	16.67	5,055	22.06	1	6.67	13,481	22.95	0	-	1,574	22.29	2	9.52	20,110	22.67
	middle	2	33.33	6,772	29.56	3	20.00	17,409	29.64	0	-	2,166	30.68	5	23.81	26,347	29.70
	upper	2	33.33	7,965	34.76	11	73.33	18,997	32.35	0	-	2,147	30.41	13	61.90	29,109	32.82
	zero & NAs	0	0.00	2,048	8.94	0	0.00	5,356	9.12	0	-	561	7.95	0	0.00	7,965	8.98
3.7	total	6	100.00	22,913	100.00	15	100.00	58,731	100.00	0	-	7,060	100.00	21	100.00	88,704	100.00
MSA 5380	low	1	4.35	1,479	3.73	2	3.70	5,086	5.10	0	0.00	834	7.63	3	3.57	7,399	4.92
	moderate	6	26.09	7,559	19.09	6	11.11	20,618	20.68	1	14.29	2,196	20.09	13	15.48	30,373	20.21
	middle	5	21.74	11,426	28.85	11	20.37	29,114	29.20	2	28.57	3,267	29.88	18	21.43	43,807	29.16
	upper	11	47.83	15,425	38.95	35	64.81	35,565	35.66	4	57.14	3,648	33.37	50	59.52	54,638	36.36
	zero & NAs	0	0.00	3,710	9.37	0	0.00	9,337	9.36	0	0.00	988	9.04	0	0.00	14,035	9.34
14.7	total	23	100.00	39,599	100.00	54	100.00	99,720	100.00	7	100.00	10,933	100.00	84	100.00	150,252	100.00
Bronx	low	1	20.00	174	4.06	0	0.00	250	4.20	0	0.00	61	10.27	1	8.33	485	4.48
	moderate	2	40.00	734	17.15	1	20.00	1,012	17.00	1	50.00	138	23.23	4	33.33	1,884	17.40
	middle	2	40.00	1,312	30.65	1	20.00	1,826	30.67	0	0.00	166	27.95	3	25.00	3,304	30.51
	upper	0	0.00	1,676	39.15	3	60.00	2,225	37.37	1	50.00	187	31.48	4	33.33	4,088	37.75
	zero & NAs	0	0.00	385	8.99	0	0.00	641	10.77	0	0.00	42	7.07	0	0.00	1,068	9.86
2.1	total	5	100.00	4,281	100.00	5	100.00	5,954	100.00	2	100.00	594	100.00	12	100.00	10,829	100.00
Kings	low	2	4.65	327	2.41	5	4.85	722	3.80	4	13.33	204	10.81	11	6.25	1,253	3.63
	moderate	11	25.58	1,538	11.32	16	15.53	2,554	13.43	6	20.00	340	18.02	33	18.75	4,432	12.85
	middle	13	30.23	3,216	23.67	30	29.13	5,117	26.90	2	6.67	490	25.97	45	25.57	8,823	25.58
	upper	17	39.53	6,812	50.14	52	50.49	8,099	42.57	18	60.00	675	35.77	87	49.43	15,586	45.18
	zero & NAs	0	0.00	1,692	12.45	0	0.00	2,532	13.31	0	0.00	178	9.43	0	0.00	4,402	12.76
30.9	total	43	100.00	13,585	100.00	103	100.00	19,024	100.00	30	100.00	1,887	100.00	176	100.00	34,496	100.00
New York	low	0	0.00	50	0.42	1	1.30	87	0.59	0	0.00	28	10.53	1	1.16	165	0.62
	moderate	0	0.00	473	4.02	5	6.49	474	3.23	1	100.00	40	15.04	6	6.98	987	3.70
	middle	2	25.00	1,247	10.60	12	15.58	1,282	8.75	0	0.00	34	12.78	14	16.28	2,563	9.60
	upper	6	75.00	9,485	80.60	59	76.62	11,809	80.57	0	0.00	140	52.63	65	75.58	21,434	80.30
	zero & NAs	0	0.00	513	4.36	0	0.00	1,005	6.86	0	0.00	24	9.02	0	0.00	1,542	5.78
15.1	total	8	100.00	11,768	100.00	77	100.00	14,657	100.00	1	100.00	266	100.00	86	100.00	26,691	100.00

MSA/County/Area % of Total A/A Lending	Borrower Income Level	Home Purchase				Refinancing				Home Improvement				Total			
		Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %
Queens	low	2	5.71	498	2.61	2	4.17	887	3.40	0	0.00	121	5.66	4	4.12	1,506	3.19
	moderate	8	22.86	2,752	14.45	10	20.83	3,879	14.87	7	50.00	389	18.19	25	25.77	7,020	14.85
	middle	7	20.00	5,333	28.00	18	37.50	7,618	29.20	3	21.43	592	27.68	28	28.87	13,543	28.64
	upper	18	51.43	8,271	43.42	18	37.50	10,403	39.87	4	28.57	771	36.04	40	41.24	19,445	41.13
	zero & NAs	0	0.00	2,194	11.52	0	0.00	3,306	12.67	0	0.00	266	12.44	0	0.00	5,766	12.20
	17.0	total	35	100.00	19,048	100.00	48	100.00	26,093	100.00	14	100.00	2,139	100.00	97	100.00	47,280
Richmond	low	0	0.00	104	1.63	5	10.64	295	2.66	1	4.17	47	4.46	6	6.25	446	2.40
	moderate	3	12.00	797	12.47	10	21.28	1,418	12.77	4	16.67	123	11.67	17	17.71	2,338	12.61
	middle	13	52.00	1,928	30.17	11	23.40	3,182	28.66	8	33.33	300	28.46	32	33.33	5,410	29.17
	upper	9	36.00	2,961	46.34	21	44.68	5,039	45.38	11	45.83	490	46.49	41	42.71	8,490	45.78
	zero & NAs	0	0.00	600	9.39	0	0.00	1,169	10.53	0	0.00	94	8.92	0	0.00	1,863	10.04
	16.8	total	25	100.00	6,390	100.00	47	100.00	11,103	100.00	24	100.00	1,054	100.00	96	100.00	18,547
Westchester	low	0	0.00	198	1.61	0	0.00	186	0.82	0	-	43	2.66	0	0.00	427	1.16
	moderate	0	0.00	1,078	8.75	1	7.69	1,114	4.89	0	-	123	7.61	1	5.26	2,315	6.31
	middle	0	0.00	1,944	15.78	2	15.38	3,182	13.97	0	-	260	16.09	2	10.53	5,386	14.67
	upper	6	100.00	8,264	67.08	10	76.92	16,304	71.57	0	-	1,004	62.13	16	84.21	25,572	69.65
	zero & NAs	0	0.00	835	6.78	0	0.00	1,994	8.75	0	-	186	11.51	0	0.00	3,015	8.21
	3.3	total	6	100.00	12,319	100.00	13	100.00	22,780	100.00	0	-	1,616	100.00	19	100.00	36,715
MSA 5600	low	5	4.10	1,351	2.00	13	4.44	2,427	2.44	5	7.04	504	6.67	23	4.73	4,282	2.45
	moderate	24	19.67	7,372	10.94	43	14.68	10,451	10.49	19	26.76	1,153	15.26	86	17.70	18,976	10.87
	middle	37	30.33	14,980	22.23	74	25.26	22,207	22.29	13	18.31	1,842	24.38	124	25.51	39,029	22.36
	upper	56	45.90	37,469	55.60	163	55.63	53,879	54.09	34	47.89	3,267	43.24	253	52.06	94,615	54.20
	zero & NAs	0	0.00	6,219	9.23	0	0.00	10,647	10.69	0	0.00	790	10.46	0	0.00	17,656	10.11
	85.3	total	122	100.00	67,391	100.00	293	100.00	99,611	100.00	71	100.00	7,556	100.00	486	100.00	174,558
NYS A/A TOTAL	low	6	4.14	2,830	2.65	15	4.32	7,513	3.77	5	6.41	1,338	7.24	26	4.56	11,681	3.60
	moderate	30	20.69	14,931	13.96	49	14.12	31,069	15.59	20	25.64	3,349	18.11	99	17.37	49,349	15.19
	middle	42	28.97	26,406	24.68	85	24.50	51,321	25.75	15	19.23	5,109	27.63	142	24.91	82,836	25.50
	upper	67	46.21	52,894	49.44	198	57.06	89,444	44.87	38	48.72	6,915	37.40	303	53.16	149,253	45.95
	zero & NAs	0	0.00	9,929	9.28	0	0.00	19,984	10.03	0	0.00	1,778	9.62	0	0.00	31,691	9.76
	100.0	total	145	100.00	106,990	100.00	347	100.00	199,331	100.00	78	100.00	18,489	100.00	570	100.00	324,810

* Partial county in assessment area

Sources of data: Bank (assessment area); JPMorgan Chase Bank (bank loans); FFIEC (aggregate loans); and 1990 Census (geography income levels)

¹ These figures exclude bank's purchased loans from its affiliates.

GLOSSARY

Aggregate

The cumulative lending by all HMDA-reporting lenders in the same geographic area under evaluation.

Community Development

The term “community development” is defined to mean:

1. Affordable housing (including multifamily housing) for low- or moderate-income (“LMI”) individuals;
2. Community services targeted to LMI individuals;
3. Activities that promote economic development by financing business or farms that meet the size eligibility standards of the United States Small Business Administration (“SBA”) Development Company or Small Business Investment Company programs, or have gross annual incomes of \$1 million or less;
4. Activities that revitalize or stabilize LMI geographies; and
5. Activities that seek to prevent defaults and/or foreclosures in loans included in (1) and (3), above.

A “community development loan” is defined as a loan that has as its *primary purpose* community development. This includes but is not limited to loans to:

- Borrowers for affordable housing rehabilitation and construction, including construction and permanent financing for multifamily rental property serving low or moderate income (“LMI”) persons;
- Nonprofit organizations serving primarily LMI or other community development needs;
- Borrowers to construct or rehabilitate community facilities that are located in LMI areas or that primarily serve LMI individuals;
- Financial intermediaries including community development financial institutions, community development corporations, minority- and women-owned financial institutions, community loan funds or pools, micro-finance institutions, and low-income or community development credit unions that primarily lend or facilitate lending to promote community development;
- Local, state and tribal governments for community development activities; and
- Borrowers to finance environmental clean-up or redevelopment of an industrial site as part of an effort to revitalize the LMI community in which the property is located.

A “qualified investment” is defined as a lawful investment, deposit, membership share or grant that has as its *primary purpose* community development. This includes but is not limited to investments, deposits, membership shares or grants in or to:

- Financial intermediaries (including community development financial institutions,

community development corporations, minority- and women-owned financial institutions, community loan funds, micro-finance institutions and low-income or community development credit unions) that primarily lend or facilitate lending in LMI areas or to LMI individuals in order to promote community development;

- Organizations engaged in affordable housing rehabilitation and construction;
- Organizations, including, for example, small business investment corporations that promote economic development by financing small businesses;
- Facilities that promote community development in LMI areas or LMI individuals, such as youth programs, homeless centers, soup kitchens, health care facilities, battered women's centers, and alcohol and drug recovery centers;
- Projects eligible for low-income housing tax credits;
- State and municipal obligations, such as revenue bonds that specifically support affordable housing or other community development needs;
- Organizations serving LMI housing or other community development needs, such as counseling for credit, home ownership, home maintenance, and other financial services education; and
- Organizations supporting activities essential to the capacity of LMI individuals or geographies to utilize credit to sustain economic development, such as day care operations and job training programs that facilitate access to permanent jobs.

A "community development service" is defined as a service that has as its *primary purpose* community development, is related to the provision of financial services, and has not been considered in the evaluation of the banking institution's retail banking services. This includes but is not limited to:

- Providing technical assistance on financial matters to nonprofit, tribal or government organizations serving LMI housing or economic revitalization and development needs;
- Providing technical assistance on financial matters to small businesses or community development organizations;
- Lending employees to provide financial services for organizations facilitating affordable housing construction and rehabilitation or development of affordable housing;
- Providing credit counseling, home buyers and home maintenance counseling, financial planning or other financial services education to promote community development and affordable housing;
- Establishing school savings programs for LMI individuals;
- Providing seminars for LMI persons on banking and bank account record-keeping;
- Making ATM "Training Machines" available for extended periods at LMI community sites or at community facilities that serve LMI individuals; and
- Technical assistance activities to community development organizations such as:
 - ❖ Serving on a loan review committee;
 - ❖ Developing loan application and underwriting standards;
 - ❖ Developing loan processing systems;
 - ❖ Developing secondary market vehicles or programs;
 - ❖ Assisting in marketing financial services, including the development of advertising and promotions, publications, workshops and conferences;

- ❖ Furnishing financial services training for staff and management;
- ❖ Contributing accounting/bookkeeping services; and
- ❖ Assisting in fund raising, including soliciting or arranging investments.

Demand-Adjusted Penetration Rate

The number of owner-occupied loans made by the institution (or aggregate as appropriate) in a geographic area per thousand owner-occupied housing units in that area. Mathematically, it is arrived at by dividing the number of owner-occupied housing units into the number of loans made and then multiplying by 1,000.

Demand-Adjusted Penetration Ratio

A ratio that depicts geographic penetration of loans by comparing demand-adjusted lending in LMI areas with non-LMI areas. Mathematically, it is arrived at by dividing the demand-adjusted penetration rate in non-LMI areas into the demand-adjusted penetration rate in LMI areas and then expressed as a percentage.

A ratio of 100% means that the institution (or aggregate as appropriate) made an equal number of loans proportionally in LMI and non-LMI areas. Less than 100% would indicate less lending in LMI areas on the same basis compared to non-LMI areas, whereas over 100% would indicate a greater level of lending in LMI areas versus non-LMI areas.

Home Mortgage Disclosure Act (“HMDA”)

The Home Mortgage Disclosure Act, enacted by Congress in 1975, and subsequently amended, requires institutions to annually report data about applications for residential (including multifamily) financing.

Loans to Small Businesses

Small business loans to businesses with gross annual revenues of \$1 million or less.

Low or Moderate Income (“LMI”) Geographies

Those census tracts or block numbering areas (“BNAs”), where according to the 1990 US Census, the median family income is less than 80% of the area median family income. In the case of tracted areas that are part of a Metropolitan Statistical Area (“MSA”) or Primary Metropolitan Statistical Area (“PMSA”), this would relate to the median family income for the MSA or PMSA in which the tracts are located. In the case of BNAs and tracted areas that are not part of a MSA or PMSA, the area median family income would be the statewide non-metropolitan median family income.

LMI Borrowers

Borrowers whose income, as reported on the loan application which the lender relied upon

in making the credit decision, is less than 80% of the area median family income. In the case where the residential property is located in a MSA or PMSA, this would relate to the median family income for that MSA or PMSA. Otherwise, the area median family income would be the statewide non-metropolitan median family income. In all instances, the area median family incomes used to measure borrower income levels are updated annually by the U.S. Department of Housing and Urban Development (“HUD”).

LMI Individuals/Persons

Those individuals, whose income is less than 80% of the area median family income. In the case where the individual resides in a MSA or PMSA, this would relate to the median family income for that MSA or PMSA. Otherwise, the area median family income would be the statewide non-metropolitan median family income. In all instances, the area median family incomes used to measure individual income levels are updated annually by HUD.

Small Business Loans

Loans to businesses with original amounts of \$1 million or less.