



**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, 2004

**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, 2004.

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 areas (“LMI”), 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 an institution’s performance. Section 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.

Section 76.5 further requires that the CRA rating and written summary (“evaluation”) be made available to the public. Evaluations are primarily based on a review of performance tests and standards described in Section 76.7 and detailed in Sections 76.8 through 76.13 of the regulation. These 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 "1," indicating an outstanding record of helping to meet community credit needs.

### **Lending Test: "Outstanding"**

- Independence's level of lending reflects excellent responsiveness to the credit needs of the assessment area. During the evaluation period, the bank originated a combined total of 4,054 HMDA-reportable loans, small business loans and MECAs.<sup>1</sup> Additionally, Independence's lending activity has increased 96.0% since the previous evaluation period, attributable largely to the bank's acquisition of Staten Island Bancorp.
- An overwhelming majority (98.9%) of Independence's loans were made inside the assessment area.
- Independence's geographic distribution of loans reflects a good penetration throughout the assessment area, especially in LMI areas. The distribution compares favorably to aggregate data for the assessment area and is reasonable based on local economic and demographic characteristics.
- Independence's lending distribution reflects good penetration among LMI customers and businesses with revenues of \$1 million or less.
- Independence's community development lending shows a high level of responsiveness to local credit needs. During the evaluation period, the bank originated community development loans totaling \$2.0 billion.
- Independence makes extensive use of innovative and flexible lending practices in serving the assessment area's credit needs. During the evaluation period, the bank originated five SBA-guaranteed loans totaling \$4.4 million and 443 home mortgage loans totaling \$87.6 million under its "Landscape" program.

### **Investment Test: "Outstanding"**

- Independence is a leader in making qualified community development investments. As of December 31, 2004, the bank's qualified community development investments and grants totaled \$130.5 million, including \$118.4 million (90.7%) in new money.

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<sup>1</sup> A MECA is a Modification, Extension and Consolidation Agreement. These agreements allow a lender and a borrower to modify the terms of an existing loan. A MECA does not involve lending additional money and is not reportable under the Home Mortgage Disclosure Act ("HMDA"), but achieves the same results as a loan refinancing and thus is treated in the same manner when evaluating an institution's CRA performance.

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### **Services Test: “High Satisfactory”**

- Independence Community Bank’s network of 72 retail branches is accessible to essentially to all portions of the assessment area. Included within Independence’s network are 12 branches (16.7%) in LMI areas and 20 branches (27.8%) in non-LMI census tracts that are adjacent to LMI areas.
- Independence offers a variety of alternative delivery systems to its customers. The service systems are also accessible to essentially all portions of the assessment area.
- Independence’s record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and for LMI individuals.
- Independence’s hours of service are tailored to the convenience and needs of consumers within the assessment area, including LMI individuals.
- Independence is a leader in providing qualified 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 Profile

Independence Community Bank was originally chartered in 1850 as The South Brooklyn Savings Bank. In 1975, the bank changed its name to Independence Savings Bank and in 1998, to its current name. In 1992, the bank became a wholly-owned subsidiary of a newly formed mutual holding company. In 1997, the mutual holding company converted to a stock form corporation under the name Independence Community Bank Corp. ("ICBC"). In 1998, ICBC formed the Independence Community Foundation to demonstrate the company's ongoing commitment to LMI neighborhoods. In 2004, ICBC acquired Staten Island Bancorp, which resulted in ICBC's acquisition of approximately \$7.15 billion in assets. Independence Community Bank remains a full-service, community-oriented bank.

The Federal Deposit Insurance Corporation's most recent deposit market share report, compiled as of June 30, 2004, showed that Independence ranked 12<sup>th</sup> among 128 deposit taking institutions within the assessment area based on a market share of 1.33%. The report also showed that Independence obtained 72.7% of its total deposits from within its New York State assessment area.

Competition for deposits within the assessment area is very high. Specifically, the bank's three largest competitors account for 29.0% of the branches and hold more than 61.0% of total deposits within the assessment area.

The following table depicts Independence Community Bank's deposit market share on a county-by-county basis as of June 30, 2004:

<b>Independence Community Bank Deposit Market Share Based on County</b>						
<b>County</b>	<b>As of June 30, 2004</b>					<b># of Institutions Present</b>
	<b># of Offices</b>	<b>Deposits \$000</b>	<b>% of Total</b>	<b>Market Share</b>	<b>Rank</b>	
Kings (Brooklyn)	23	2,695,351	38.3	8.93	5	39
Richmond (Staten Island)	23	2,539,342	36.1	32.2	1	10
Queens	10	853,223	12.1	2.43	12	47
New York (Manhattan)	9	507,462	7.2	0.15	29	94
Nassau	4	270,389	3.8	0.59	21	31
Bronx	1	101,904	1.5	1.03	14	23
Suffolk	1	52,059	0.7	0.18	22	26
Westchester	1	17,447	0.3	0.07	34	37
<b>Assessment Area</b>	<b>72</b>	<b>7,037,177</b>	<b>100.0</b>	<b>1.33</b>	<b>12</b>	<b>128</b>

On its year-end regulatory Call Report for 2004, Independence reported total assets of \$17.7 billion, deposits of \$9.4 billion and gross loans of \$11.4 billion. Due to its acquisition of Staten Island Bancorp in 2004, Independence's total assets increased 121.6% during the evaluation period. For the same reason, the bank's deposits increased 91.2% and its gross loans increased 91.1%.

Independence is primarily a multi-family, commercial and one- to four-family residential mortgage lender. As of December 31, 2004, gross loans outstanding comprised 33.7% multi-family mortgage loans, 28.2% commercial mortgage loans and 26.2% residential mortgage loans. As depicted in the table below, the bank reduced its emphasis on multi-family mortgages during the evaluation period and increased its lending on one- to four-family residential properties. To be specific, multi-family mortgage loans dropped from 42.8% of total loans in 2002 to 33.7% in 2004, while mortgage loans backed by one- to four-family residences increased from 12.9% to 26.2% of the portfolio.

The following table depicts Independence’s gross loans outstanding as of the end of calendar years 2002 through 2004:

Total Gross Loans Outstanding						
Loan Type	2002		2003		2004	
	\$000	%	\$000	%	\$000	%
1-4 Family Residential Mortgages	765,807	12.9	584,040	9.4	2,980,535	26.2
Commercial Mortgage Loans	1,543,064	26.0	1,777,249	28.7	3,200,627	28.2
Commercial and Industrial Loans	227,189	3.8	321,709	5.2	498,683	4.4
Multi-family Mortgages	2,543,470	42.8	2,824,941	45.6	3,823,199	33.7
Consumer Loans	26,971	0.5	27,539	0.4	47,816	0.4
Construction Loans	146,026	2.5	125,766	2.0	150,016	1.3
Other Loans	692,434	11.6	527,254	8.7	659,942	5.8
<b>Total Gross Loans</b>	<b>5,944,961</b>	<b>100.0</b>	<b>6,188,498</b>	<b>100.0</b>	<b>11,360,818</b>	<b>100.0</b>

Source: Schedule RC-C of the bank’s year-end Call Reports, as filed with the FDIC.

At its previous Performance Evaluation, conducted by the New York State Banking Department as of December 31, 2002, Independence received a rating of “2.” This rating reflected the bank’s satisfactory record of addressing the credit needs of its community.

There are no known financial or legal impediments affecting Independence Community Bank’s ability to meet the credit needs of the assessment area.

### Assessment Area

The assessment area comprises the following counties in their entirety: Kings (Brooklyn), Queens, New York (Manhattan), Bronx, Richmond (Staten Island), Westchester, Nassau and Suffolk Counties. The counties of Kings, Queens, New York, Bronx, Richmond and Westchester constitute a portion of Metropolitan Division 35644 (“MD 35644”) as defined by the U.S. Office of Management and Budget (“OMB”). Nassau and Suffolk Counties represent Metropolitan Division 35004 (“MD 35004”) in its entirety.

There are 3,035 census tracts within the assessment area. The distribution of these census tracts by geographic income level is presented on a county-by-county basis in the table below:

Distribution of Census Tracts within the Assessment Area (Based on Data from the 2000 U.S. Census as Published in 2003)								
County	Low	Moderate	Middle	Upper	N/A	Total	LMI	
	#	#	#	#	#	#	#	%
Kings	100	271	250	147	15	783	371	47.4
Queens	12	107	298	238	18	673	119	17.7
New York	47	68	26	146	9	296	115	38.9
Bronx	117	99	72	53	14	355	216	60.8
Westchester	2	17	37	161	4	221	19	8.6
Richmond	3	7	25	73	2	110	10	9.1
<b>MD 35644</b>	<b>281</b>	<b>569</b>	<b>708</b>	<b>818</b>	<b>62</b>	<b>2,438</b>	<b>850</b>	<b>34.9</b>
Suffolk	2	65	196	49	8	320	67	20.9
Nassau	2	20	179	68	8	277	22	7.9
<b>MD 35004</b>	<b>4</b>	<b>85</b>	<b>375</b>	<b>117</b>	<b>16</b>	<b>597</b>	<b>89</b>	<b>14.9</b>
<b>Total</b>	<b>285</b>	<b>654</b>	<b>1,083</b>	<b>935</b>	<b>78</b>	<b>3,035</b>	<b>939</b>	<b>30.9</b>

Based on data from the 2000 U.S. Census, the assessment area's 3,035 census tracts can be grouped by geographic income level, as follows: 9.4% low-income tracts; 21.5% moderate-income tracts; 35.7% middle-income tracts; 30.8% upper-income tracts; and 2.6% zero-income census tracts.

Distribution of Census Tracts within the Assessment Area (Based on OMB Revisions Effective in 2004)								
County	Low	Moderate	Middle	Upper	N/A	Total	LMI	
	#	#	#	#	#	#	#	%
Kings	119	297	235	117	15	783	416	53.1
Queens	12	148	310	185	18	673	160	23.8
New York	60	59	24	144	9	296	119	40.2
Bronx	132	98	65	46	14	355	230	64.8
Westchester	4	21	39	153	4	221	25	11.3
Richmond	3	11	29	65	2	110	14	12.7
<b>MD 35644</b>	<b>330</b>	<b>634</b>	<b>702</b>	<b>710</b>	<b>62</b>	<b>2,438</b>	<b>964</b>	<b>39.5</b>
Suffolk	2	64	197	49	8	320	66	20.6
Nassau	2	20	178	69	8	277	22	7.9
<b>MD 35004</b>	<b>4</b>	<b>84</b>	<b>375</b>	<b>118</b>	<b>16</b>	<b>597</b>	<b>88</b>	<b>14.7</b>
<b>Total</b>	<b>334</b>	<b>718</b>	<b>1,077</b>	<b>828</b>	<b>78</b>	<b>3,035</b>	<b>1,052</b>	<b>34.7</b>

Based on OMB revisions implemented in 2004, the distribution of census tracts with the assessment area changed as follows: 11.0% low-income; 23.7% moderate-income; 35.5% middle-income; 27.2% upper-income; and 2.6% zero-income census tracts.

### Details of the Assessment Area

The demographic data for this evaluation were taken from the 2000 U.S. Census. Updated median family income ("MFI") figures for 2003 and 2004 were obtained from U.S. Department of Housing and Urban Development ("HUD") estimates.

The Metropolitan Statistical Area (“MSA”) and Metropolitan Division (“MD”) median family income values based on 2000 Census data were recalculated by the OMB in 2003 and new geographic classifications were released for use beginning in 2004.

The tables at the end of this section of the report provide county-by-county demographic and economic data as identified below:

Based on OMB Revisions in 2004

Chart #1: Population and Income

Chart #2: Housing Demographics

Chart #3: Business Demographics

Based on 2000 U.S. Census

Chart #1: Population and Income

Chart #2: Housing Demographics

Chart #3: Business Demographics

Unemployment Rates

The annual unemployment rates for the counties comprising the assessment area are provided below, together with the comparable statewide and MD/MSA rates:

<b>County, Statewide and Metropolitan Area Unemployment Rates</b>											
Year	Statewide	MD 35644 (Partial)	MD 35004	Kings County	Queens County	New York County	Suffolk County	Bronx County	Nassau County	Westchester County	Richmond County
2004	5.8	6.4	4.6	7.7	6.4	6.2	4.7	9.1	4.5	4.5	6.3
2003	6.4	7.4	4.8	9.0	7.4	7.5	4.8	10.4	4.7	4.6	7.3

MD 35644 is the New York-Wayne-White Plains, NY-NJ Metropolitan Division. MD 35004 includes only Nassau and Suffolk Counties.

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

CHART #1 for 2004

<b>ASSESSMENT AREA POPULATION AND INCOME CHARACTERISTICS BY COUNTY</b>																						
COUNTY	Total Population**	Age 65 and over		Age 16 and less		Median Family Income(MFI)	HUD MSA MFI	# of Households		# of HH below poverty level		Total Families	Low income		Moderate income		Middle income		Upper income		LMI families in LMI tracts	
		#	%	#	%			#	%	#	%		#	%	#	%	#	%	#	%	#	%
<b>Kings</b>	2,465,326	282,658	11.5	587,575	23.8	39,349	57,000	881,006	211,538	24.0	588,870	211,549	35.9	103,997	17.7	99,118	16.8	174,206	29.6	233,373	74.0	
<b>Queens</b>	2,229,379	283,042	12.7	453,930	20.4	49,815	57,000	782,646	110,462	14.1	542,804	123,580	22.8	94,780	17.5	108,206	19.9	216,238	39.8	84,937	38.9	
<b>New York</b>	1,537,195	186,776	12.2	229,772	14.9	71,629	57,000	739,167	123,037	16.6	306,220	89,281	29.2	40,700	13.3	38,804	12.7	137,435	44.9	100,358	77.2	
<b>Suffolk</b>	1,419,369	167,558	11.8	332,521	23.4	74,455	87,400	469,535	26,498	5.6	362,857	70,052	19.3	72,922	20.1	91,882	25.3	128,001	35.3	44,099	30.8	
<b>Nassau</b>	1,334,544	200,841	15.0	293,128	22.0	85,752	87,400	447,803	23,537	5.3	349,694	58,413	16.7	59,669	17.1	80,471	23.0	151,141	43.2	17,024	14.4	
<b>Bronx</b>	1,332,650	133,948	10.1	356,895	26.8	33,099	57,000	463,242	134,404	29.0	317,248	133,175	42.0	58,715	18.5	51,854	16.3	73,504	23.2	163,697	85.3	
<b>Westchester</b>	923,459	128,964	14.0	207,207	22.4	89,228	57,000	337,486	28,554	8.5	237,010	30,205	12.7	24,729	10.4	33,274	14.0	148,802	62.8	14,189	25.8	
<b>Richmond</b>	443,728	51,433	11.6	100,675	22.7	64,545	57,000	156,416	15,815	10.1	114,667	17,182	15.0	13,876	12.1	20,679	18.0	62,930	54.9	5,893	19.0	
<b>TOTAL A/A*</b>	<b>11,685,650</b>	<b>1,435,220</b>	<b>12.3</b>	<b>2,561,703</b>	<b>21.9</b>	<b>59,658</b>	<b>62,980</b>	<b>4,277,301</b>	<b>673,845</b>	<b>15.8</b>	<b>2,819,370</b>	<b>733,437</b>	<b>26.0</b>	<b>469,388</b>	<b>16.6</b>	<b>524,288</b>	<b>18.6</b>	<b>1,092,257</b>	<b>38.7</b>	<b>663,570</b>	<b>55.2</b>	

\* Assessment Area \*\* In thousands

CHART #2 for 2004

<b>ASSESSMENT AREA HOUSING CHARACTERISTICS BY COUNTY</b>																			
COUNTY	Total Housing Units	1-4 family Units		Multifamily Units		Owner-Occupied Units (O-O)		O-O Units in Low-income Tracts		O-O Units in Mod-income Tracts		O-O Units in Mid-income Tracts		O-O Units in Upp-income Tracts		Rental Units		Vacant/ Boarded-up Units	
		#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
<b>Kings</b>	930,866	455,859	48.97	474,122	50.93	238,290	25.60	13,368	5.61	77,659	32.59	92,885	38.98	54,378	22.82	670,996	72.08	50,139	5.39
<b>Queens</b>	817,250	494,122	60.46	322,175	39.42	334,894	40.98	1,005	0.3	43,101	12.87	162,122	48.41	128,633	38.41	462,179	56.55	34,586	4.23
<b>New York</b>	798,144	28,178	3.53	769,392	96.40	148,695	18.63	3,881	2.61	12,773	8.59	7,108	4.78	124,934	84.02	616,053	77.19	59,500	7.45
<b>Suffolk</b>	522,323	478,870	91.68	37,980	7.27	374,371	71.67	936	0.25	72,591	19.39	237,988	63.57	62,819	16.78	101,107	19.36	53,024	10.15
<b>Nassau</b>	458,151	408,695	89.21	48,950	10.68	359,257	78.41	647	0.18	16,993	4.73	247,420	68.87	94,197	26.22	91,345	19.94	10,764	2.35
<b>Bronx</b>	490,659	132,650	27.04	357,495	72.86	90,522	18.45	11,370	12.56	20,802	22.98	33,285	36.77	25,066	27.69	391,918	79.88	27,447	5.59
<b>Westchester</b>	349,445	237,122	67.86	112,117	32.08	202,765	58.02	507	0.25	4,887	2.41	20,824	10.27	176,547	87.07	140,169	40.11	12,303	3.52
<b>Richmond</b>	163,993	141,014	85.99	22,645	13.81	99,732	60.81	489	0.49	3,790	3.8	18,391	18.44	77,063	77.27	59,962	36.56	7,652	4.67
<b>TOTAL A/A*</b>	<b>4,530,831</b>	<b>2,376,510</b>	<b>52.45</b>	<b>2,144,876</b>	<b>47.34</b>	<b>1,848,526</b>	<b>40.80</b>	<b>32,201</b>	<b>1.74</b>	<b>252,594</b>	<b>13.66</b>	<b>820,023</b>	<b>44.36</b>	<b>743,637</b>	<b>40.23</b>	<b>2,533,729</b>	<b>55.92</b>	<b>255,415</b>	<b>5.64</b>

\* Assessment Area

CHART #3 for 2004

<b>BUSINESS DEMOGRAPHICS BY COUNTY</b>											
COUNTY AND ASSESSMENT AREA(A/A)	Number of Businesses	Businesses with Rev. of \$1 million or less		Businesses with Rev. of more than \$1 million		Businesses with no revenues reported		Businesses with less than 50 employees		Operating from a single location	
		#	%	#	%	#	%	#	%	#	%
<b>Kings</b>	108,807	72,127	66.29	5,368	4.93	31,312	28.78	80,804	74.26	101,940	93.69
<b>Queens</b>	103,066	67,271	65.27	5,460	5.30	30,335	29.43	75,894	73.64	95,959	93.10
<b>New York</b>	220,439	132,311	60.02	23,072	10.47	65,056	29.51	164,325	74.54	190,968	86.63
<b>Suffolk</b>	124,910	83,555	66.89	7,544	6.04	33,811	27.07	96,025	76.88	114,803	91.91
<b>Nassau</b>	127,869	84,137	65.80	7,272	5.69	36,460	28.51	95,607	74.77	118,453	92.64
<b>Bronx</b>	38,751	25,391	65.52	1,865	4.81	11,495	29.66	28,775	74.26	35,601	91.87
<b>Westchester</b>	77,584	52,180	67.26	4,769	6.15	20,635	26.60	60,079	77.44	70,460	90.82
<b>Richmond</b>	23,276	15,751	67.67	908	3.90	6,617	28.43	17,470	75.06	21,724	93.33
<b>Total A/A</b>	<b>824,702</b>	<b>532,723</b>	<b>64.60</b>	<b>56,258</b>	<b>6.82</b>	<b>235,721</b>	<b>28.58</b>	<b>618,979</b>	<b>75.05</b>	<b>749,908</b>	<b>90.93</b>

CHART #1 for 2003

<b>ASSESSMENT AREA POPULATION AND INCOME CHARACTERISTICS BY COUNTY</b>																					
COUNTY	Total Population**	Age 65 and over		Age 16 and less		Median Family Income(MFI)	HUD MSA MFI	# of Households			Total Families	Low income		Moderate income		Middle income		Upper income		LMI families in LMI tracts	
		#	%	#	%			#	%	#		%	#	%	#	%	#	%	#	%	#
<b>Kings</b>	2,465,326	282,658	11.5	587,575	23.8	39,349	51,900	881,006	211,538	24.0	588,870	199,851	33.9	100,237	17.0	98,099	16.7	190,683	32.4	206,724	68.9
<b>Queens</b>	2,229,379	283,042	12.7	453,930	20.4	49,815	51,900	782,646	110,462	14.1	542,804	114,175	21.0	88,789	16.4	104,945	19.3	234,895	43.3	62,219	30.7
<b>New York</b>	1,537,195	186,776	12.2	229,772	14.9	71,629	51,900	739,167	123,037	16.6	306,220	84,445	27.6	39,739	13.0	38,302	12.5	143,734	46.9	95,683	77.0
<b>Suffolk</b>	1,419,369	167,558	11.8	332,521	23.4	74,455	83,700	469,535	26,498	5.6	362,857	70,052	19.3	72,922	20.1	91,882	25.3	128,001	35.3	44,577	31.2
<b>Nassau</b>	1,334,544	200,841	15.0	293,128	22.0	85,752	83,700	447,803	23,537	5.3	349,694	58,413	16.7	59,669	17.1	80,471	23.0	151,141	43.2	17,024	14.4
<b>Bronx</b>	1,332,650	133,948	10.1	356,895	26.8	33,099	51,900	463,242	134,404	29.0	317,248	126,457	39.9	57,091	18.0	51,600	16.3	82,100	25.9	150,948	82.2
<b>Westchester</b>	923,459	128,964	14.0	207,207	22.4	89,228	51,900	337,486	28,554	8.5	237,010	27,809	11.7	23,056	9.7	31,267	13.2	154,878	65.3	11,113	21.8
<b>Richmond</b>	443,728	51,433	11.6	100,675	22.7	64,545	51,900	156,416	15,815	10.1	114,667	15,965	13.9	12,568	11.0	19,274	16.8	66,860	58.3	4,983	17.5
<b>TOTAL A/A*</b>	11,685,650	1,435,220	12.3	2,561,703	21.9	59,658	58,155	4,277,301	673,845	15.8	2,819,370	697,167	24.7	454,071	16.1	515,840	18.3	1,152,292	40.9	593,271	51.5

\* Assessment Area \*\* In thousands

CHART #2 for 2003

<b>ASSESSMENT AREA HOUSING CHARACTERISTICS BY COUNTY</b>																			
COUNTY	Total Housing Units	1-4 family Units		Multifamily Units		Owner-Occupied Units (O-O)		O-O Units in Low-income Tracts		O-O Units in Mod-income Tracts		O-O Units in Mid-income Tracts		O-O Units in Upp-income Tracts		Rental Units		Vacant/ Boarded-up Units	
		#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
<b>Kings</b>	930,866	455,859	48.97	474,122	50.93	238,290	25.60	10,032	4.21	67,293	28.24	94,577	39.69	66,388	27.86	670,996	72.08	50,139	5.39
<b>Queens</b>	817,250	494,122	60.46	322,175	39.42	334,894	40.98	1,005	0.3	27,763	8.29	144,708	43.21	161,419	48.20	462,179	56.55	34,586	4.23
<b>New York</b>	798,144	28,178	3.53	769,392	96.40	148,695	18.63	2,587	1.74	13,115	8.82	7,717	5.19	125,261	84.24	616,053	77.19	59,500	7.45
<b>Suffolk</b>	522,323	478,870	91.68	37,980	7.27	374,371	71.67	936	0.25	73,789	19.71	236,790	63.25	62,819	16.78	101,107	19.36	53,024	10.15
<b>Nassau</b>	458,151	408,695	89.21	48,950	10.68	359,257	78.41	647	0.18	16,993	4.73	248,821	69.26	92,796	25.83	91,345	19.94	10,764	2.35
<b>Bronx</b>	490,659	132,650	27.04	357,495	72.86	90,522	18.45	8,799	9.72	19,571	21.62	33,575	37.09	28,569	31.56	391,918	79.88	27,447	5.59
<b>Westchester</b>	349,445	237,122	67.86	112,117	32.08	202,765	58.02	203	0.10	3,366	1.66	18,087	8.92	181,110	89.32	140,169	40.11	12,303	3.52
<b>Richmond</b>	163,993	141,014	85.99	22,645	13.81	99,732	60.81	489	0.49	3,162	3.17	11,958	11.99	84,114	84.34	59,962	36.56	7,652	4.67
<b>TOTAL A/A*</b>	<b>4,530,831</b>	<b>2,376,510</b>	<b>52.45</b>	<b>2,144,876</b>	<b>47.34</b>	<b>1,848,526</b>	<b>40.80</b>	<b>24,697</b>	<b>1.34</b>	<b>225,050</b>	<b>12.17</b>	<b>796,232</b>	<b>43.07</b>	<b>802,475</b>	<b>43.41</b>	<b>2,533,729</b>	<b>55.92</b>	<b>255,415</b>	<b>5.64</b>

\* Assessment Area

CHART #3 for 2003

<b>BUSINESS DEMOGRAPHICS BY COUNTY</b>											
<b>COUNTY AND ASSESSMENT AREA(A/A)</b>	<b>Number of Businesses</b>	<b>Businesses with Rev. of \$1 million or less</b>		<b>Businesses with Rev. of more than \$1 million</b>		<b>Businesses with no revenues reported</b>		<b>Businesses with less than 50 employees</b>		<b>Operating from a single location</b>	
		<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
<b>Kings</b>	106,517	69,497	65.24	5,235	4.91	31,785	29.84	77,928	73.16	99,599	93.51
<b>Queens</b>	101,919	65,521	64.29	5,435	5.33	30,963	30.38	73,999	72.61	94,685	92.90
<b>New York</b>	221,146	131,056	59.26	23,366	10.57	66,724	30.17	163,025	73.72	190,918	86.33
<b>Suffolk</b>	125,372	83,000	66.20	7,496	5.98	34,876	27.82	95,192	75.93	115,150	91.85
<b>Nassau</b>	126,926	81,945	64.56	7,198	5.67	37,783	29.77	92,972	73.25	117,386	92.48
<b>Bronx</b>	37,871	24,644	65.07	1,855	4.90	11,372	30.03	27,926	73.74	34,750	91.76
<b>Westchester</b>	77,247	51,184	66.26	4,737	6.13	21,326	27.61	59,091	76.50	70,034	90.66
<b>Richmond</b>	22,945	14,953	65.17	882	3.84	7,110	30.99	16,838	73.38	21,392	93.23
<b>Total A/A</b>	<b>819,943</b>	<b>521,800</b>	<b>63.64</b>	<b>56,204</b>	<b>6.85</b>	<b>241,939</b>	<b>29.51</b>	<b>606,971</b>	<b>74.03</b>	<b>743,914</b>	<b>90.73</b>

## **PERFORMANCE TESTS AND ASSESSMENT FACTORS**

*The Banking Department assesses a Large Bank's CRA performance by evaluating its lending, investment and service activities using the lending, investment and service tests provided for in Parts 76.8, 76.9 and 76.10 of the General Regulations of the Banking Board. This evaluation covers years 2003 and 2004.*

Statistics utilized in this evaluation were derived from various sources. In addition to bank-specific loan information submitted by the institution, aggregate data for HMDA-reportable and small business loans was obtained from the FFIEC and PCI Services, Inc. CRA Wiz, an external vendor.

### **I. Lending Test: "Outstanding"**

*Independence's lending performance was evaluated pursuant to the following criteria: (1) Lending Activity; (2) Geographic Distribution; (3) Borrower Characteristics; (4) Community Development Lending; and (5) Innovative or Flexible Lending Practices. The analysis of factors (1), (2), (3) and (4) above focused primarily on Independence's HMDA-reportable, small business loans and MECAs.*

#### **Lending Activity: "Outstanding"**

The volume of Independence's HMDA-reportable, MECAs and small business loans reflects an excellent responsiveness to the credit needs of the bank's assessment area. During the evaluation period, HMDA-reportable, small business loans and MECAs totaled 4,054, of which, 48.5% were MECAs, 48.1% were HMDA-reportable and 3.4% were small business loans. Overall, total HMDA-reportable, small business loans and MECAs increased 93.0% from the previous evaluation.

#### **HMDA-reportable Loans**

In 2003, Independence originated 976 HMDA-reportable loans, of which 61.7% were refinancing, 15.7% home improvement, 12.8% home purchase and 9.8% multifamily loans. Additionally, Independence originated 85.5% of its HMDA-reportable loans in MD 35644 and the remaining 14.5% in MD 35004. Further, HMDA-reportable loan originations increased 39.0% in 2003 from 2002 and 315.3% from 2001.

Independence ranked 74<sup>th</sup> among 636 HMDA-reporting lenders within the assessment area in 2003, obtaining a market share of 0.22%.

The following table contains additional details concerning Independence's HMDA lending activity during the evaluation period:

2003 HMDA Lending Activity										
County/Area	Home Purchase		Refinancing		Home Improvement		Multifamily		Total	
	#	\$000	#	\$000	#	\$000	#	\$000	#	\$000
Nassau	8	2,017	79	13,500	14	682	3	1,750	104	17,949
Suffolk	12	2,613	24	3,547	0	0	2	6,850	38	13,010
<b>MSA 35004</b>	<b>20</b>	<b>4,630</b>	<b>103</b>	<b>17,047</b>	<b>14</b>	<b>682</b>	<b>5</b>	<b>8,600</b>	<b>142</b>	<b>30,959</b>
Bronx	4	330	5	467	4	275	18	13,777	31	14,849
Kings	40	7,797	178	26,004	47	2,397	41	37,110	306	73,308
New York	6	1,952	103	19,756	3	170	17	23,370	129	45,248
Queens	30	3,402	97	11,706	29	1,420	11	18,915	167	35,443
Richmond	19	4,152	95	11,385	55	3,056	0	0	169	18,593
Westchester	6	1,232	21	3,769	1	20	4	12,600	32	17,621
<b>MD 35644</b>	<b>105</b>	<b>18,865</b>	<b>499</b>	<b>73,087</b>	<b>139</b>	<b>7,338</b>	<b>91</b>	<b>105,772</b>	<b>834</b>	<b>205,062</b>
<b>A/A Total</b>	<b>125</b>	<b>23,495</b>	<b>602</b>	<b>90,134</b>	<b>153</b>	<b>8,020</b>	<b>96</b>	<b>114,372</b>	<b>976</b>	<b>236,021</b>

In 2004, MD 35644 accounted for a substantial majority of HMDA-reportable loan originations. Refinancing in the assessment area decreased 43.0% from 2003, but comprised the largest number of loans, 35.2%. Home improvement and multifamily loans increased 64.7% and 125%, respectively. Independence obtained a market share of 0.31% in 2004 and ranked 56<sup>th</sup> among 627 HMDA reporting lenders inside the assessment area.

2004 HMDA Lending Activity										
County/Area	Home Purchase		Refinancing		Home Improvement		Multifamily		Total	
	#	\$000	#	\$000	#	\$000	#	\$000	#	\$000
Nassau	10	2,955	32	6,415	17	1,409	0	0	59	10,779
suffolk	5	1,407	13	1,849	2	150	2	1,200	22	4,606
<b>MSA 35004</b>	<b>15</b>	<b>4,362</b>	<b>45</b>	<b>8,264</b>	<b>19</b>	<b>1,559</b>	<b>2</b>	<b>1,200</b>	<b>81</b>	<b>15,385</b>
Bronx	7	783	8	931	3	210	36	38,093	54	40,017
Kings	55	9,647	98	13,596	61	3,735	66	67,737	280	94,715
New York	8	1,890	27	6,168	6	322	73	115,857	114	124,237
Queens	36	5,801	50	6,120	29	2,055	30	41,093	145	55,069
Richmond	42	9,117	107	14,813	132	6,654	1	450	282	31,034
Westchester	1	598	8	1,503	2	409	8	5,610	19	8,120
<b>MD 35644</b>	<b>149</b>	<b>27,836</b>	<b>298</b>	<b>43,131</b>	<b>233</b>	<b>13,385</b>	<b>214</b>	<b>268,840</b>	<b>894</b>	<b>353,192</b>
<b>A/A Total</b>	<b>164</b>	<b>32,198</b>	<b>343</b>	<b>51,395</b>	<b>252</b>	<b>14,944</b>	<b>216</b>	<b>270,040</b>	<b>975</b>	<b>368,577</b>

## MECAs

During the evaluation period, Independence enhanced its lending activity inside the assessment area with 1,966 MECAs totaling \$4.7 billion, a significant increase from 1,020 MECAs totaling \$2.1 billion at the previous evaluation. Of the total MECAs made by Independence during this evaluation, 90.9% by number and 99.1% by dollar volume were multifamily loans.

The following table illustrates the details of Independence's MECAs:

MECAs										
Loan Purpose	2003				2004				Total	
	#	%	\$000	%	#	%	\$000	%	#	\$000
	Refinance	114	10.2	26,585	1.1	68	8.0	16,829	0.7	182
Multifamily	1,007	89.8	2,293,295	98.9	777	92.0	2,403,431	99.3	1,784	4,696,726
<b>A/A Total</b>	<b>1,121</b>	<b>100.0</b>	<b>2,319,880</b>	<b>100.0</b>	<b>845</b>	<b>100.0</b>	<b>2,420,260</b>	<b>100.0</b>	<b>1,966</b>	<b>4,740,140</b>

### Small Business Loans

In 2003, the number of small business loans originated by Independence decreased approximately 15% and 14% from 2001 and 2002, respectively. However, in 2004, small business loan originations increased 49.1%, to 82 loans from 2003.

### **Assessment Area Concentration: "Outstanding"**

During the evaluation period, Independence originated a substantial majority of its loans inside the assessment area. Of the total HMDA-reportable, small business loans and MECAs, 98.9% were originated inside the assessment area.

The following table depicts the distribution of Independence's HMDA-reportable, small business loans and MECAs inside and outside the assessment area:

Distribution of Loans Inside and Outside of the Assessment Area										
Loan Type	Number of Loans					Loans in Dollars				
	Inside		Outside		Total	Inside		Outside		Total \$000
	#	%	#	%		\$000	%	\$000	%	
<b>HMDA-Reportable Loans</b>										
2003	976	98.0	20	2.0	996	236,021	98.7	3,069	1.3	239,090
2004	975	98.6	14	1.4	989	368,577	97.2	10,640	2.8	379,217
<b>Subtotal</b>	<b>1,951</b>	<b>98.3</b>	<b>34</b>	<b>1.7</b>	<b>1,985</b>	<b>604,598</b>	<b>97.8</b>	<b>13,709</b>	<b>2.2</b>	<b>618,307</b>
<b>Small Business Loans</b>										
2003	55	93.2	4	6.8	59	15,116	91.5	1,400	8.5	16,516
2004	82	98.8	1	1.2	83	23,267	99.6	85	0.4	23,352
<b>Subtotal</b>	<b>137</b>	<b>96.5</b>	<b>5</b>	<b>3.5</b>	<b>142</b>	<b>38,383</b>	<b>96.3</b>	<b>1,485</b>	<b>3.7</b>	<b>39,868</b>
<b>MECA</b>										
2003	1,121	99.7	3	0.3	1,124	2,319,880	99.8	5,600	0.2	2,325,480
2004	845	99.8	2	0.2	847	2,420,260	99.4	14,740	0.6	2,435,000
<b>Subtotal</b>	<b>1,966</b>	<b>99.7</b>	<b>5</b>	<b>0.3</b>	<b>1,971</b>	<b>4,740,140</b>	<b>99.6</b>	<b>20,340</b>	<b>0.4</b>	<b>4,760,480</b>
<b>Total Lending</b>										
2003 Total	2,152	98.8	27	1.2	2,179	2,571,017	99.6	10,069	0.4	2,581,086
2004 Total	1,902	99.1	17	0.9	1,919	2,812,104	99.1	25,465	0.9	2,837,569
<b>Grand Total</b>	<b>4,054</b>	<b>98.9</b>	<b>44</b>	<b>1.1</b>	<b>4,098</b>	<b>5,383,121</b>	<b>99.3</b>	<b>35,534</b>	<b>0.7</b>	<b>5,418,655</b>

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

The geographic distribution of Independence’s loans reflects a good penetration throughout the assessment area, especially in LMI areas.<sup>2</sup> In light of the assessment area’s demographic characteristics, the distribution of loans is reasonable and compares favorably to the aggregate loan data.

### HMDA-Reportable Loans

Independence has a good distribution of HMDA-reportable loans in LMI census tracts. Its level of distribution in these areas compares well to aggregate’s lending distribution and performance context data.

Based on the number of loans, Independence achieved an LMI penetration rate of 13.9%, 1.3% in low and 12.6% in moderate-income areas in 2003. This compared well to the aggregate’s 1.6% in low and 13.7% in moderate-income areas. Additionally, Independence’s LMI penetration rate indicated a close correlation to the 13.5% distribution of owner occupied housing units in LMI census tracts.

In 2003, Kings County had 31.4% of the total HMDA-reportable originations and obtained an LMI penetration rate of 24.5%. Richmond County, with the next largest number of originations at 17.3%, had LMI penetration rate of 3.0%. New York County accounted for 13.2% of HMDA reported originations and showed an LMI penetration rate of 8.5%. In light of the assessment area’s economic and demographic characteristics distribution of Independence’s loans is reasonable for each county.

In 2004, Independence’s LMI penetration rate increased to 21.5%, which compared favorably to the aggregate’s 22.1% LMI penetration rate. Compared to the 15.4% owner occupied housing units in LMI census tracts, Independence’s performance in LMI areas was excellent.

In 2004, Richmond and Kings Counties accounted for 28.9% and 28.7% of total HMDA-reportable originations, respectively. Kings County’s LMI penetration rate was 35.0% while Richmond’s was 3.9%. Bronx County had the highest LMI penetration rate of 74.1% with only a 5.5% share of total HMDA-reportable loans. Independence’s performance across the counties and the overall assessment area compares favorably with the prevailing economic and demographic factors.

The following table depicts the bank’s distribution of HMDA-reportable loans by geography income level:

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<sup>2</sup>For additional details regarding the bank’s geographic distribution of loans refer to Section 5: For HMDA Loans see exhibits 5-1.1; 5-2.1; 5-3.1; 5-4.1.

Distribution of HMDA-Reportable Loans by Geographic Income Level*								
Geographic Income Level	2003							
	Bank				Aggregate			
	#	%	\$000	%	#	%	\$000	%
Low	13	1.3	6,137	2.6	6,854	1.6	1,957,290	1.8
Moderate	123	12.6	50,906	21.6	60,036	13.7	13,551,494	12.4
<b>LMI</b>	<b>136</b>	<b>13.9</b>	<b>57,043</b>	<b>24.2</b>	<b>66,890</b>	<b>15.3</b>	<b>15,508,784</b>	<b>14.2</b>
Middle	326	33.4	75,804	32.1	190,148	43.3	40,829,331	37.2
Upper	512	52.5	100,009	42.4	181,319	41.3	52,951,289	48.3
N/A	2	0.2	3,165	1.3	773	0.1	417,487	0.3
<b>Total</b>	<b>976</b>	<b>100.0</b>	<b>236,021</b>	<b>100.0</b>	<b>439,130</b>	<b>100.0</b>	<b>109,706,891</b>	<b>100.0</b>
Geographic Income Level	2004**							
	Bank				Aggregate			
	#	%	\$000	%	#	%	\$000	%
Low	42	4.3	40,233	10.9	9,390	3.0	3,200,237	3.5
Moderate	168	17.2	105,460	28.6	59,474	19.1	15,409,208	16.9
<b>LMI</b>	<b>210</b>	<b>21.5</b>	<b>145,693</b>	<b>39.5</b>	<b>68,864</b>	<b>22.1</b>	<b>18,609,445</b>	<b>20.4</b>
Middle	321	32.9	81,190	22.0	140,045	44.9	35,430,489	39.0
Upper	443	45.5	141,574	38.4	102,415	32.9	36,776,227	40.4
N/A	1	0.1	120	0.1	310	0.1	140,585	0.2
<b>Total</b>	<b>975</b>	<b>100.0</b>	<b>368,577</b>	<b>100.0</b>	<b>311,634</b>	<b>100.0</b>	<b>90,956,746</b>	<b>100.0</b>

\* Geography income level is based upon 2000 Census data on median family income figure for the MSA of the mortgaged property. Low-income is defined as <50% of the MSA median, moderate-income is 50% to <80% of the MSA median income, middle-income is 80% to <120% and upper-income is at least 120%.

\*\* Based on 2004 OMB revisions.

## HMDA-Reportable Multi-family Loans

Independence achieved a good distribution of HMDA-reportable multifamily loans in LMI areas.

In 2003, Independence distributed 48.9% of its HMDA-reportable multifamily loans in LMI census tracts, slightly less than the aggregate's 49.8%. Additionally, Independence's LMI penetration rate was about four percentage points greater than the level of multifamily housing units in LMI areas.

In 2004, Independence HMDA-reportable multifamily loans extended in LMI areas increased marginally to 49.5%, consistent with the percentage of multifamily housing units in these areas. However, Independence's LMI penetration rate was below the aggregate's 57.3%.

The following chart shows the distribution of Independence's HMDA-reportable multifamily loans by geography income level:

Distribution of HMDA-reportable Multifamily Loans by Geography Income Level*								
Geographic Income Level	2003							
	Bank				Aggregate			
	#	%	\$000	%	#	%	\$000	%
Low	8	8.3	5,508	4.8	519	13.6	548,920	9.2
Moderate	39	40.6	40,056	35.0	1,377	36.2	1,529,174	25.5
<b>LMI</b>	<b>47</b>	<b>48.9</b>	<b>45,564</b>	<b>39.8</b>	<b>1,896</b>	<b>49.8</b>	<b>2,078,094</b>	<b>34.7</b>
Middle	25	26.0	38,391	33.6	930	24.4	1,233,941	20.6
Upper	23	24.1	27,417	24.0	967	25.4	2,661,730	44.4
N/A	1	1.0	3,000	2.6	14	0.4	22,544	0.3
<b>Total</b>	<b>96</b>	<b>100.0</b>	<b>114,372</b>	<b>100.0</b>	<b>3,807</b>	<b>100.0</b>	<b>5,996,309</b>	<b>100.0</b>
Geographic Income Level	2004**							
	Bank				Aggregate			
	#	%	\$000	%	#	%	\$000	%
Low	34	15.7	39,004	14.4	814	19.4	1,089,606	16.2
Moderate	73	33.8	96,063	35.6	1,589	37.9	1,900,875	28.3
<b>LMI</b>	<b>107</b>	<b>49.5</b>	<b>135,067</b>	<b>50.0</b>	<b>2,403</b>	<b>57.3</b>	<b>2,990,481</b>	<b>44.5</b>
Middle	43	19.9	46,608	17.3	787	18.8	1,441,258	21.5
Upper	66	30.6	88,365	32.7	996	23.8	2,275,290	33.9
N/A	0	0.0	0	0.0	3	0.1	7,420	0.1
<b>Total</b>	<b>216</b>	<b>100.0</b>	<b>270,040</b>	<b>100.0</b>	<b>4,189</b>	<b>100.0</b>	<b>6,714,449</b>	<b>100.0</b>

\*Geography income level is based upon 2000 Census data on median family income figure for the MSA of the mortgaged property. Low-income is defined as <50% of the MSA median, moderate-income is 50% to <80% of the MSA median income, middle-income is 80% to <120%, and upper-income is at least 120%.

\*\* Based on 2004 OMB revisions.

### HMDA-Reportable One- to Four-Family Loans

The distribution of loans in LMI areas reflects an adequate response by Independence to the assessment area's needs for home mortgage credit.

In 2003, of the total HMDA-reportable 1-4 family loans, Independence extended 10.1% in LMI geographies within the assessment area. Independence's LMI penetration rate was below the aggregate's 14.9% as well as the percentage of owner occupied housing units of 13.5% in LMI areas.

In 2004, Independence's LMI penetration rate increased to 13.6%, which was reasonable compared to the 15.4% of owner occupied housing units located in LMI areas. However, the aggregate's performance improved in 2004, with an LMI penetration rate of 21.6%, an eight-percentage point margin over Independence's performance.

The following table shows the distribution of Independence's HMDA-reportable 1-4 family loans by geography income level:

Distribution of HMDA-reportable 1-4 Family Loans by Geography Income Level*								
Geography Income Level	2003							
	Bank				Aggregate			
	#	%	\$000	%	#	%	\$000	%
Low	5	0.6	629	0.5	6,335	1.5	1,408,370	1.4
Moderate	84	9.5	10,850	8.9	58,659	13.5	12,022,320	11.6
<b>LMI</b>	<b>89</b>	<b>10.1</b>	<b>11,479</b>	<b>9.4</b>	<b>64,994</b>	<b>14.9</b>	<b>13,430,690</b>	<b>13.0</b>
Middle	301	34.3	37,413	30.8	189,219	43.5	39,595,390	38.2
Upper	489	55.6	72,592	59.7	180,352	41.4	50,289,559	48.5
N/A	1	0.1	165	0.1	759	0.2	394,943	0.3
<b>Total</b>	<b>880</b>	<b>43.9</b>	<b>121,649</b>	<b>100.0</b>	<b>435,324</b>	<b>100.0</b>	<b>103,710,582</b>	<b>100.0</b>
Geography Income Level**	2004							
	Bank				Aggregate			
	#	%	\$000	%	#	%	\$000	%
Low	8	1.1	1,229	1.2	8,576	2.8	2,110,631	2.5
Moderate	95	12.5	9,397	9.5	57,885	18.8	13,508,333	16.0
<b>LMI</b>	<b>103</b>	<b>13.6</b>	<b>10,626</b>	<b>10.7</b>	<b>66,461</b>	<b>21.6</b>	<b>15,618,964</b>	<b>18.5</b>
Middle	278	36.6	34,582	35.1	139,258	45.3	33,989,231	40.3
Upper	377	49.7	53,209	54.1	101,419	33.0	34,500,937	41.0
N/A	1	0.1	120	0.1	307	0.1	133,165	0.2
<b>Total</b>	<b>759</b>	<b>100.0</b>	<b>98,537</b>	<b>100.0</b>	<b>307,445</b>	<b>100.0</b>	<b>84,242,297</b>	<b>100.0</b>

\*Geography income level is based upon 2000 Census data on median family income figure for the MSA of the mortgaged property. Low-income is defined as <50% of the MSA median, moderate-income is 50% to <80% of the MSA median income, middle-income is 80% to <120%, and upper-income is at least 120%.

\*\* Based on 2004 OMB revisions.

## MECAs

Independence had a good distribution of MECAs especially in LMI areas. In 2003, of the total MECAs, 34.6% were made in LMI census tracts in the assessment area. In 2004, the number of MECAs originated in LMI areas increased to 46.7%. Aggregate lending data were not available for MECAs.

The following table shows the distribution of Independence's MECAs by geography income level:

Distribution of MECAs by Geography Income Level								
Census Tract Income Level	2003				2004			
	#	%	\$000	%	#	%	\$000	%
Low	80	7.1	111,395	4.8	112	13.3	296,911	12.3
Moderate	308	27.5	568,877	24.5	282	33.4	820,962	33.9
<b>LMI</b>	<b>388</b>	<b>34.6</b>	<b>680,272</b>	<b>29.3</b>	<b>394</b>	<b>46.7</b>	<b>1,117,873</b>	<b>46.2</b>
Middle	285	25.4	574,992	24.8	153	18.1	458,587	18.9
Upper	444	39.6	1,054,566	45.5	296	35.0	841,200	34.8
N/A	4	0.4	10,050	0.4	2	0.2	2,600	0.1
<b>Total</b>	<b>1121</b>	<b>100.0</b>	<b>2,319,880</b>	<b>100.0</b>	<b>845</b>	<b>100.0</b>	<b>2,420,260</b>	<b>100.0</b>

## Small Business Loans

The geographic distribution of small business loans reflects a good distribution throughout the assessment area, including the LMI census tracts.

In 2003, the distribution of Independence's small business loans in LMI areas was 7.2 percentage points higher than the rate achieved by the aggregate and 5.4 percentage points over the level of businesses in LMI census tracts.

In 2004, the distribution of Independence's small business loans in LMI areas decreased slightly to 22.0%, but remained above the 20.1% level achieved by aggregate lenders. The proportion of small business loans originated in LMI areas and the level of businesses in LMI areas are almost the same.

The following table shows the distribution of Independence's small business loans by geography income level:

Distribution of Small Business Loans by Geography Income Level								
Geography Income Level	2003							
	Bank				Aggregate			
	#	%	\$000	%	#	%	\$000	%
Low	3	5.5	315	2.1	10,575	3.4	277,445	3.1
Moderate	11	20.0	3,561	23.6	46,681	14.9	1,270,274	14.2
<b>LMI</b>	<b>14</b>	<b>25.5</b>	<b>3,876</b>	<b>25.7</b>	<b>57,256</b>	<b>18.3</b>	<b>1,547,719</b>	<b>17.3</b>
Middle	19	34.5	6,258	41.4	110,936	35.4	2,934,060	32.7
Upper	21	38.2	4,907	32.4	142,984	45.5	4,349,511	48.5
N/A	1	1.8	75	0.5	2,495	0.8	132,912	1.5
<b>Total</b>	<b>55</b>	<b>100.0</b>	<b>15,116</b>	<b>100.0</b>	<b>313,671</b>	<b>100.0</b>	<b>8,964,202</b>	<b>100.0</b>
Geography Income Level	2004							
	Bank				Aggregate			
	#	%	\$000	%	#	%	\$000	%
Low	4	4.9	1,906	8.2	13,054	4.1	403,745	4.1
Moderate	14	17.1	4,411	19.0	50,503	16.0	1,541,298	15.5
<b>LMI</b>	<b>18</b>	<b>22.0</b>	<b>6,317</b>	<b>27.2</b>	<b>63,557</b>	<b>20.1</b>	<b>1,945,043</b>	<b>19.6</b>
Middle	30	36.5	8,508	36.5	112,130	35.5	3,187,671	32.1
Upper	34	41.5	8,442	36.3	137,908	43.7	4,677,874	47.0
N/A	0	0.0	0	0.0	2,239	0.7	133,206	1.3
<b>Total</b>	<b>82</b>	<b>100.0</b>	<b>23,267</b>	<b>100.0</b>	<b>315,834</b>	<b>100.0</b>	<b>9,943,794</b>	<b>100.0</b>

## Borrower Characteristics: “High Satisfactory”

Independence’s distribution of loans reflects good penetration among LMI customers and businesses with revenues of \$1 million or less.<sup>3</sup>

### HMDA-Reportable One- to Four-Family Loans

During the evaluation period, the bank achieved a good penetration of loans among LMI customers.

Independence achieved an LMI penetration rate of 18.0% in 2003, outperforming the aggregate’s 14.2%. Its performance among LMI borrowers was evidently good when compared to the 40.8% LMI families inside the assessment area.

In 2004, Independence distributed 18.3% of 1-4 family HMDA loans among LMI borrowers inside the assessment area, compared with the aggregate’s LMI penetration rate of 14.9%. Its performance was more than reasonable compared to the level of LMI families inside the assessment area.

The following table shows the distribution of Independence’s HMDA-reportable 1-4 family loans by borrower income level:

Distribution of HMDA-Reportable Loans by Borrower Income Level*				
Borrower Income Level	2003			
	Bank		Aggregate	
	#	%	#	%
Low	31	3.5	11,097	2.5
Moderate	127	6.3	50,886	11.7
<b>LMI</b>	<b>158</b>	<b>18.0</b>	<b>61,983</b>	<b>14.2</b>
Middle	240	27.3	98,713	22.7
Upper	480	54.5	233,013	53.5
N/A	2	0.2	41,614	9.6
<b>Total</b>	<b>880</b>	<b>100.0</b>	<b>435,323</b>	<b>100.0</b>
Borrower Income Level	2004			
	Bank		Aggregate	
	#	%	#	%
Low	46	6.1	8,254	2.7
Moderate	93	12.3	37,521	12.2
<b>LMI</b>	<b>139</b>	<b>18.3</b>	<b>45,775</b>	<b>14.9</b>
Middle	190	25.0	77,251	25.1
Upper	426	56.1	162,350	52.8
N/A	4	0.5	22,069	7.2
<b>Total</b>	<b>759</b>	<b>100.0</b>	<b>307,445</b>	<b>100.0</b>

\* One- to Four-Family HMDA-Reportable Loans Only

<sup>3</sup> For additional details regarding borrower distribution of loans, refer to Section 5. For 1-4 Family HMDA originations, see Exhibit 5-5.1

## Small Business Loans

The following table shows the distribution of Independence's small business loans based on business revenue size:

Distribution of Small Business Loans by Business Revenue Size										
Gross Annual Revenues	2003					2004				
	Aggregate (% by #)	Independence				Aggregate (% by #)	Independence			
		#	%	\$000	%		#	%	\$000	%
<=\$1 million	39.3	55	100.0	15,116	100.0	38.8	73	89.1	19,973	85.8
>\$1 million	Unknown	0	0.0	0	0.0	Unknown	2	2.4	517	2.3
Unknown	Unknown	N/A	N/A	N/A	N/A	Unknown	7	8.5	2,777	11.9
<b>Total</b>	<b>39.3</b>	<b>55</b>	<b>100.0</b>	<b>15,116</b>	<b>100.0</b>	<b>38.8</b>	<b>82</b>	<b>100.0</b>	<b>23,267</b>	<b>100.0</b>

Independence had an excellent penetration of loans to businesses with revenues of \$1 million or less. In 2003, Independence extended 100.0% of small business loans to businesses with revenues of \$1 million or less. The aggregate's performance among businesses in this income category was 39.3%. In 2004, Independence originated 89.1% of small businesses loans to businesses with revenues of \$1 million or less. Its consistent high distribution of loans to small businesses indicates that Independence's focus is on the credit needs of small and medium sized businesses.

## Community Development Lending: "Outstanding"

Independence has a significant level of qualified community development loans. As of December 31, 2004, its community development loans totaled \$2.0 billion, of which 98.1% were new money.

HMDA-reportable multifamily loans and MECAs comprise 98.0% of Independence's community development loans, supporting affordable housing. The remainder of the funds was extended to groups focusing on revitalization or stabilization, economic development, community development services and affordable housing.

The following table depicts Independence's qualified community development lending:

Qualified Community Development Lending										
Category	Affordable Housing		Revitalization/ Stabilization		Community Service		Economic Development		Total	
	#	\$000	#	\$000	#	\$000	#	\$000	#	\$000
Various	1	5,000	4	27,350	13	16,413	2	5,979	20	54,742
MECAs	705	1,632,011	0	0	0	0	0	0	705	1,632,011
HMDA Multi-family	275	308,343	0	0	0	0	0	0	275	308,343
<b>Total</b>	<b>981</b>	<b>1,945,354</b>	<b>4</b>	<b>27,350</b>	<b>13</b>	<b>16,413</b>	<b>2</b>	<b>5,979</b>	<b>1,000</b>	<b>1,995,096</b>

Examples of Independence's community development loans are described below:

- Brooklyn Bureau of Community Services (“BBCS”) provides a wide range of services to the community. These services include: job training for disabled individuals; supportive housing services for individuals with severe and persistent mental illness; and a residential facility for homeless women with serious mental, social and economic difficulties. In 2004, Independence extended \$1.5 million to BBCS.
- Certified Development Company (“CDC”) is a nonprofit corporation set up to facilitate the economic development of its community. CDC works with the U.S. Small Business Administration and private sector lenders to provide financing to small businesses. In 2003, Independence originated a \$2.6 million commercial loan to Mocha Realty, under the CDC/504 program. The CDC/504 loan program is a long-term financing tool for economic development within the community.
- Pro Bono Net, Inc., is a nonprofit organization that provides legal services to LMI individuals. In 2003, Independence originated a \$250 thousand revolving line of credit to this organization.

### **Innovative/Flexible Lending**

Independence makes extensive use of innovative and/or flexible lending practices in serving the assessment area’s credit needs. During the evaluation period, it originated 448 loans totaling \$92.0 million, using special lending products and programs. This performance was an improvement from the previous evaluation period.

The following paragraphs summarize Independence’s lending activities under various special programs during the evaluation period:

- SBA Loan Guaranty Program was established to assist credit worthy small businesses in obtaining financing on reasonable terms. Independence is a preferred lender of this program. SBA loans provide long-term repayment schedules, which mean lower and affordable monthly payments. During the evaluation period, Independence originated five SBA guaranteed loans totaling \$4.4 million.
- “Landscape” underwriting model features streamline documentation processes. Credit decisions can be made on the initial call and the customers are made aware of documentation needed for closing at the same time. Some important benefits of “Landscape” underwriting include the following: lower rates than standard programs; borrowers with limited credit histories are not subjected to “B” paper pricing and private mortgage insurance is not required. Landscape pricing also includes lenient self-employed guidelines, expanded LTV guidelines and drive-by or no appraisal, saving the borrower up to four hundred dollars. During the evaluation period, the bank had 443 mortgage loans totaling \$87.6 million under the “Landscape” program.

## **II. Investment Test: “Outstanding”**

*Independence’s investment performance is evaluated pursuant to the following criteria: 1) the dollar amount of qualified investments; 2) the innovativeness or complexity of qualified investments; 3) the responsiveness of qualified investments to credit and community development needs; and 4) the degree to which the qualified investments are not routinely provided by private investors.*

Independence is a leader in making qualified investments. As of December 31, 2004, qualified investments, including grants totaled \$130.5 million, of which \$118.4 million were new money. Its record showed that 86.9% of total qualified investments were allocated for economic development initiatives and 13.1% for affordable housing development.

In 2004, Independence Community Commercial Reinvestment Corporation (“ICCRC”), a wholly owned subsidiary of Independence was awarded \$113 million in New Markets Tax Credits (“NMTC”) by the U.S. Treasury Department’s CDFI Fund. The NMTC program was designed to spur the investment of new private capital into Community Development Entities (“CDE”) by providing investors with a 39% federal income tax benefit. The program requires that 85% of the proceeds be used to lend to qualified active low-income community businesses where the median income is below 80% of the greater statewide median or metropolitan area income or the poverty rate exceeds 20%. The \$113 million was among the largest awards given to any applicant nationwide. As this was a new community development investment program undertaken by the bank, information on the amount of investment dollars allocated inside the bank’s New York State assessment area was not available as of the evaluation period.

## **III. Service Test: “High Satisfactory”**

*The service test evaluates Independence’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**

Independence’s delivery systems are accessible to essentially all portions of the assessment area.

Independence operates 72 full-service branch offices, 65 in MD 35644 and seven in MD 35004. Of the total number of branches, 16.7% are located in LMI areas and 27.8% located in middle and upper-income areas that are adjacent to LMI areas.

The following table shows the location and geography of the each of the branches.

Independence Community Bank Locations										
County	Low	Moderate	Middle	Upper	Total	Cty. %	LMI		Adjacent	
							#	%	#	%
Kings	1	7	7	5	20	27.8	8	40.0	7	35.0
Queens	0	3	4	4	11	15.3	3	27.3	4	36.4
New York	0	0	1	9	10	13.9	0	0.0	4	40.0
Richmond	0	0	8	14	22	30.6	0	0.0	4	18.2
Westchester	0	0	0	1	1	1.4	0	0.0	1	100.0
Bronx	0	1	0	0	1	1.4	1	100.0	0	0.0
<b>MD 35644</b>	<b>1</b>	<b>11</b>	<b>20</b>	<b>33</b>	<b>65</b>	<b>90.3</b>	<b>12</b>	<b>18.5</b>	<b>20</b>	<b>30.8</b>
Nassau	0	0	4	1	5	6.9	0	0.0	0	0.0
Suffolk	0	0	0	2	2	2.8	0	0.0	0	0.0
<b>MD 35004</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>3</b>	<b>7</b>	<b>9.7</b>	<b>0.0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>
<b>Total</b>	<b>1</b>	<b>11</b>	<b>24</b>	<b>36</b>	<b>72</b>	<b>100.0</b>	<b>12</b>	<b>16.7</b>	<b>20</b>	<b>27.8</b>

### Alternative Delivery Systems

Independence's alternative delivery systems are accessible to essentially all portions of the assessment area, as described below:

- Automated Teller Machines ("ATMs") - Independence has a network of on-site ATMs located at 69 branches and seven off-site ATMs.
- Bank by Mail – Independence's customers can make deposits or withdrawals from checking or savings accounts by mail. Postage paid envelopes are provided to customers upon request.
- Direct Deposit - Federal recurring payments, including Social Security checks can be deposited directly to any checking or savings account. Independence's staff is available to assist the customer in completing the federal direct deposit form.
- Interactive Voice Response - Independence offers interactive voice response service (telephone banking) to its customers 24 hours, seven days a week. Customers can obtain account balance/transaction history information and arrange funds transfers (including loan payments) between accounts with Independence using a toll free number.
- On-Line Banking - Customers with access to a personal computer may use Independence's free Online Banking service to view account information (current balance and account history), transfer funds between accounts with Independence, place stop payments on checks, re-order checks and view monthly account statements.
- On-Line Bill Payment - Customers using Independence's Online Banking system can receive and pay bills on-line using the free Online Bill Pay program. The system allows customers to schedule and pay multiple bills, schedule repetitive payments such as loan or credit card payments.

### Changes in Branch Locations

Independence's record of opening and closing branches has not adversely affected the accessibility of its delivery systems within the assessment area, particularly the LMI geographies.

During the evaluation period, Independence opened 13 new branches, nine of which are located in New York County, two in Queens County and two in Nassau County. Additionally, Independence's merger with Staten Island Savings Bank resulted in the acquisition of 22 branches; eighteen are located in Richmond County, one in Queens County and three in Kings County. During the evaluation period, two branches located in moderate-income areas in Kings County were closed. Although none of the new branches are located in LMI areas, two are adjacent to LMI geographies in New York County.

### Reasonableness of Business Hours and Services

Business hours including services are tailored to the convenience and needs of the assessment area, particularly LMI geographies and/or LMI individuals.

Of the 72 branches of Independence, 69 branches offer extended hours, of which 61 are open on Saturdays and three on Sundays. Furthermore, Independence offers a drive through or walk-up service at 21 branches.

Independence offers several deposit account programs for the convenience of its customers. Some examples of these programs include: Holiday Club Savings Account, Truly Free Checking, Business Checking Account and Small Business Checking.

Additionally, Independence's employees represent almost the entire language groups in the assessment area, thereby, ensuring accessibility and convenience of delivery systems.

### **Community Development Services: "Outstanding"**

Independence is a leader in providing qualified community development services.

In 2004, Independence launched a new service initiative that links workforce development and financial education for LMI individuals with active recruitment opportunities for the bank. This new initiative allows Independence to collaborate with grantees of Independence Community Foundation's ("ICF"), its own foundation, to deliver training and other types of support around banking and finance issues. In several cases, the relationships have led to actual employment in Independence's branch systems. Below are some examples of Independence's recent partnerships in the assessment area:

- In 2004, Independence helped the Vocational Foundation Inc. ("VFI") create a teller-training curriculum for a workforce development program targeted at underprivileged young adults. Independence's staff continues working with VFI to refine the program

with the goal of qualifying participants for future employment opportunities at Independence.

- Independence works with the New York City Financial Services Program for Youth (“NYCFSPY”), a collaborative venture of New York City Financial institutions and community-based organizations. The partnership runs a workforce development program that trains, mentors, and provides jobs and retention services for underprivileged young adults from community-based organizations for specific teller and clerical jobs in the financial services sector. Independence’s staff has provided input to the program, focused on improving the curriculum. This relationship has led to actual employment opportunities at Independence for several program participants.
- Several participants in FoodChange’s (formerly the Community Food Resource Center) Tax Academy program are given the opportunity to work as tax preparers at Independence’s free tax assistance site in downtown Brooklyn. The Tax Academy program teaches tax preparation skills and related subjects to New Yorkers, enabling them to provide income tax assistance to LMI individual, and putting them on the road to gainful employment and self-sufficiency. Independence has begun exploring additional employment opportunities for the tax academy graduates.

During the 2002/2003 tax preparation season, Independence established the Taxpayer Assistance Program to provide LMI taxpayers that may qualify for Federal and State Earned Income and Child Care Tax Credits with free tax preparation assistance, one-on-one bank product counseling, direct deposit of tax refunds into low-cost savings accounts and personal financial management education.

In addition to Independence’s initiative programs, its directors, trustees, officers and employees provide community development services through their involvement in non-profit community development entities. Some examples of qualified community development services in which directors, trustees, officers or employees of Independence participated are as follows:

- A senior executive of Independence is Chairman of the Brooklyn Navy Yard Development (“BNYD”). BNYD is a not-for-profit corporation responsible for managing, leasing and overseeing the ongoing modernization and infrastructure development within the Brooklyn Navy Yard. BNYD also manages the Brooklyn Navy Yard Economic Development Zone.
- A senior executive of Independence is Chairman of The Partnership of New York City, New York City Housing Partnership and New York City Investment Fund.

The Partnership of New York City’s mission is to enhance the economy of the five boroughs of New York City and maintain the city’s position as the global center of commerce, culture and innovation. The New York City Housing Partnership is a not-for-profit organization that works with the New York City Department of Housing Preservation and Development and the NYS Affordable Housing Corporation, to

promote the development of affordable housing and revitalization of neighborhoods. The New York Investment Fund mobilizes the city's world financial and business leaders to help build a stronger and more diversified local economy. The fund provides funding for projects that stimulate business development, job creation and economic growth in the city and its neighborhoods.

- A board member of Independence is a member of the board of directors of Local Initiatives Support Corp ("LISC"). LISC helps resident-led community-based development organizations stabilize or revitalize distressed communities by providing capital, technical expertise and training. The goal of the organization includes economic development, community service and developing affordable housing.

#### **IV. Discrimination or Other Illegal Practices**

*Any practices intended to discourage applications for types of credit set forth in the banking institutions CRA Public File.*

There were no practices noted that were intended to discourage applications for the types of credit offered by Independence.

*Evidence of Prohibited discriminatory of other illegal practices.*

The most recent regulatory compliance report conducted concurrently with this assessment indicates a 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 institution to ascertain the credit needs of its community, including the extent of the bank's efforts to communicate with members of its community regarding the credit services being provided by the institution.*

Independence ascertains the credit needs of the assessment area by actively reaching out to not-for-profit organizations, state and federal agencies, merchants associations, chamber of commerce and faith-based institutions. Additionally, Independence has formalized its procedures for acquiring information about its assessment area, outlining the demographics, resources, and credit needs of the community.

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

Independence uses a wide cross section of both formal and informal media to inform the public, including LMI individuals, of its special credit related programs. These media are

primarily printed and include news papers, lobby flyers, posters, brochures and banners.

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

Independence's board of directors has established a CRA Committee, which meets quarterly to review its CRA-related lending, investment and service activities. The committee's responsibilities include recommending the adoption of policies and procedures, approving CRA lending, investment and service initiatives and reviewing Independence's annual lending performance relative to its peers. The CRA Committee minutes are presented to the full board.

## **VI. Other Factors**

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

None noted.

HMDA LOAN ORIGINATIONS <sup>1</sup>																					
YEAR 2003																					
GEOGRAPHY INCOME LEVEL DISTRIBUTION -- NUMBER OF LOANS																					
County/Area	Geography Income Level	Home Purchase				Refinancing				Home Improvement				Mlt ifamily				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	71	0.41	0	0.00	154	0.25	0	0.00	1	0.05	0	0.00	3	5.36	0	0.00	229	0.29
	moderate	0	0.00	1,330	7.66	2	2.53	3,587	5.91	0	0.00	128	6.40	0	0.00	8	14.29	2	1.92	5,053	6.31
	middle	5	62.50	11,809	68.02	48	60.76	42,067	69.30	13	92.86	1,588	79.44	3	100.00	39	69.64	69	66.35	55,503	69.27
	upper	3	37.50	4,151	23.91	29	36.71	14,899	24.54	1	7.14	282	14.11	0	0.00	6	10.71	33	31.73	19,338	24.14
	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
	<b>10.7 total</b>	<b>8</b>	<b>100.00</b>	<b>17,361</b>	<b>100.00</b>	<b>79</b>	<b>100.00</b>	<b>60,707</b>	<b>100.00</b>	<b>14</b>	<b>100.00</b>	<b>1,999</b>	<b>100.00</b>	<b>3</b>	<b>100.00</b>	<b>56</b>	<b>100.00</b>	<b>104</b>	<b>100.00</b>	<b>80,123</b>	<b>100.00</b>
Suffolk	low	0	0.00	122	0.49	0	0.00	237	0.27	0	-	15	0.33	0	0.00	0	0.00	0	0.00	374	0.32
	moderate	4	33.33	6,650	26.72	4	16.67	17,648	20.40	0	-	1,165	25.35	0	0.00	9	19.57	8	21.05	25,472	21.95
	middle	7	58.33	14,789	59.42	17	70.83	55,736	64.41	0	-	2,960	64.42	1	50.00	34	73.91	25	65.79	73,519	63.35
	upper	1	8.33	3,327	13.37	3	12.50	12,908	14.92	0	-	455	9.90	1	50.00	3	6.52	5	13.16	16,693	14.38
	zero & NAs	0	0.00	0	0.00	0	0.00	1	0.00	0	-	0	0.00	0	0.00	0	0.00	0	0.00	1	0.00
	<b>3.9 total</b>	<b>12</b>	<b>100.00</b>	<b>24,888</b>	<b>100.00</b>	<b>24</b>	<b>100.00</b>	<b>86,530</b>	<b>100.00</b>	<b>0</b>	<b>-</b>	<b>4,595</b>	<b>100.00</b>	<b>2</b>	<b>100.00</b>	<b>46</b>	<b>100.00</b>	<b>38</b>	<b>100.00</b>	<b>116,059</b>	<b>100.00</b>
MSA 35004	low	0	0.00	193	0.46	0	0.00	391	0.27	0	0.00	16	0.24	0	0.00	3	2.94	0	0.00	603	0.31
	moderate	4	20.00	7,980	18.89	6	5.83	21,235	14.42	0	0.00	1,293	19.61	0	0.00	17	16.67	10	7.04	30,525	15.56
	middle	12	60.00	26,598	62.96	65	63.11	97,803	66.43	13	92.86	4,548	68.97	4	80.00	73	71.57	94	66.20	129,022	65.77
	upper	4	20.00	7,478	17.70	32	31.07	27,807	18.89	1	7.14	737	11.18	1	20.00	9	8.82	38	26.76	36,031	18.37
	zero & NAs	0	0.00	0	0.00	0	0.00	1	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	1	0.00
	<b>14.5 total</b>	<b>20</b>	<b>100.00</b>	<b>42,249</b>	<b>100.00</b>	<b>103</b>	<b>100.00</b>	<b>147,237</b>	<b>100.00</b>	<b>14</b>	<b>100.00</b>	<b>6,594</b>	<b>100.00</b>	<b>5</b>	<b>100.00</b>	<b>102</b>	<b>100.00</b>	<b>142</b>	<b>100.00</b>	<b>196,182</b>	<b>100.00</b>
Bronx	low	0	0.00	660	12.77	0	0.00	937	9.70	0	0.00	59	13.98	8	44.44	217	40.56	8	25.81	1,873	11.87
	moderate	2	50.00	1,345	26.03	1	20.00	2,052	21.24	1	25.00	110	26.07	9	50.00	236	44.11	13	41.94	3,743	23.71
	middle	0	0.00	1,570	30.39	2	40.00	3,250	33.64	3	75.00	148	35.07	0	0.00	64	11.96	5	16.13	5,032	31.88
	upper	2	50.00	1,586	30.69	2	40.00	3,410	35.30	0	0.00	103	24.41	1	5.56	16	2.99	5	16.13	5,115	32.41
	zero & NAs	0	0.00	6	0.12	0	0.00	11	0.11	0	0.00	2	0.47	0	0.00	2	0.37	0	0.00	21	0.13
	<b>3.2 total</b>	<b>4</b>	<b>100.00</b>	<b>5,167</b>	<b>100.00</b>	<b>5</b>	<b>100.00</b>	<b>9,660</b>	<b>100.00</b>	<b>4</b>	<b>100.00</b>	<b>422</b>	<b>100.00</b>	<b>18</b>	<b>100.00</b>	<b>535</b>	<b>100.00</b>	<b>31</b>	<b>100.00</b>	<b>15,784</b>	<b>100.00</b>
Kings	low	0	0.00	1,231	8.16	4	2.25	1,662	5.21	0	0.00	60	5.12	0	0.00	193	14.76	4	1.31	3,146	6.36
	moderate	5	12.50	4,654	30.86	36	20.22	9,032	28.33	9	19.15	338	28.84	21	51.22	637	48.70	71	23.20	14,661	29.65
	middle	21	52.50	4,998	33.14	55	30.90	11,077	34.74	24	51.06	474	40.44	12	29.27	315	24.08	112	36.60	16,864	34.10
	upper	14	35.00	4,157	27.56	82	46.07	10,020	31.42	14	29.79	299	25.51	7	17.07	160	12.23	117	38.24	14,636	29.60
	zero & NAs	0	0.00	42	0.28	1	0.56	96	0.30	0	0.00	1	0.09	1	2.44	3	0.23	2	0.65	142	0.29
	<b>31.4 total</b>	<b>40</b>	<b>100.00</b>	<b>15,082</b>	<b>100.00</b>	<b>178</b>	<b>100.00</b>	<b>31,887</b>	<b>100.00</b>	<b>47</b>	<b>100.00</b>	<b>1,172</b>	<b>100.00</b>	<b>41</b>	<b>100.00</b>	<b>1,308</b>	<b>100.00</b>	<b>306</b>	<b>100.00</b>	<b>49,449</b>	<b>100.00</b>
New York	low	0	0.00	310	2.29	1	0.97	295	1.24	0	0.00	13	6.95	0	0.00	97	8.67	1	0.78	715	1.85
	moderate	1	16.67	956	7.07	3	2.91	1,456	6.13	1	33.33	46	24.60	5	29.41	252	22.52	10	7.75	2,710	7.02
	middle	0	0.00	813	6.01	4	3.88	994	4.19	1	33.33	14	7.49	2	11.76	129	11.53	7	5.43	1,950	5.05
	upper	5	83.33	11,293	83.51	95	92.23	20,653	86.96	1	33.33	105	56.15	10	58.82	632	56.48	111	86.05	32,683	84.72
	zero & NAs	0	0.00	151	1.12	0	0.00	351	1.48	0	0.00	9	4.81	0	0.00	9	0.80	0	0.00	520	1.35
	<b>13.2 total</b>	<b>6</b>	<b>100.00</b>	<b>13,523</b>	<b>100.00</b>	<b>103</b>	<b>100.00</b>	<b>23,749</b>	<b>100.00</b>	<b>3</b>	<b>100.00</b>	<b>187</b>	<b>100.00</b>	<b>17</b>	<b>100.00</b>	<b>1,119</b>	<b>100.00</b>	<b>129</b>	<b>100.00</b>	<b>38,578</b>	<b>100.00</b>
Queens	low	0	0.00	128	0.60	0	0.00	149	0.36	0	0.00	9	0.58	0	0.00	1	0.20	0	0.00	287	0.44
	moderate	2	6.67	2,351	11.09	6	6.19	3,692	8.85	2	6.90	114	7.36	3	27.27	179	36.02	13	7.78	6,336	9.75
	middle	18	60.00	9,760	46.04	50	51.55	18,274	43.80	15	51.72	727	46.96	5	45.45	268	53.92	88	52.69	29,029	44.69
	upper	10	33.33	8,935	42.15	41	42.27	19,568	46.90	12	41.38	696	44.96	3	27.27	49	9.86	66	39.52	29,248	45.02
	zero & NAs	0	0.00	23	0.11	0	0.00	37	0.09	0	0.00	2	0.13	0	0.00	0	0.00	0	0.00	62	0.10
	<b>17.1 total</b>	<b>30</b>	<b>100.00</b>	<b>21,197</b>	<b>100.00</b>	<b>97</b>	<b>100.00</b>	<b>41,720</b>	<b>100.00</b>	<b>29</b>	<b>100.00</b>	<b>1,548</b>	<b>100.00</b>	<b>11</b>	<b>100.00</b>	<b>497</b>	<b>100.00</b>	<b>167</b>	<b>100.00</b>	<b>64,962</b>	<b>100.00</b>

HMDA LOAN ORIGINATIONS <sup>1</sup>																					
YEAR 2003																					
GEOGRAPHY INCOME LEVEL DISTRIBUTION -- NUMBER OF LOANS																					
County/Area % of Total A/A Loans	Geography Income Level	Home Purchase				Refinancing				Home Improvement				Mul ifamily				Total			
		Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %
Richmond	low	0	0.00	53	0.78	0	0.00	108	0.61	0	0.00	1	0.12	0	-	2	6.25	0	0.00	164	0.65
	moderate	0	0.00	382	5.64	3	3.16	573	3.26	2	3.64	27	3.20	0	-	7	21.88	5	2.96	989	3.92
	middle	3	15.79	1,133	16.73	10	10.53	2,387	13.57	4	7.27	106	12.57	0	-	10	31.25	17	10.06	3,636	14.41
	upper	16	84.21	5,206	76.85	82	86.32	14,521	82.54	49	89.09	709	84.10	0	-	13	40.63	147	86.98	20,449	81.02
	zero & NAs	0	0.00	0	0.00	0	0.00	3	0.02	0	0.00	0	0.00	0	-	0	0.00	0	0.00	3	0.01
<b>17.3</b>	<b>total</b>	<b>19</b>	<b>100.00</b>	<b>6,774</b>	<b>100.00</b>	<b>95</b>	<b>100.00</b>	<b>17,592</b>	<b>100.00</b>	<b>55</b>	<b>100.00</b>	<b>843</b>	<b>100.00</b>	<b>0</b>	<b>-</b>	<b>32</b>	<b>100.00</b>	<b>169</b>	<b>100.00</b>	<b>25,241</b>	<b>100.00</b>
Westchester	low	0	0.00	29	0.23	0	0.00	29	0.08	0	0.00	2	0.21	0	0.00	6	2.80	0	0.00	66	0.13
	moderate	0	0.00	339	2.70	0	0.00	660	1.87	0	0.00	24	2.53	1	25.00	49	22.90	1	3.13	1,072	2.19
	middle	1	16.67	1,438	11.47	0	0.00	2,994	8.50	0	0.00	112	11.79	2	50.00	71	33.18	3	9.38	4,615	9.43
	upper	5	83.33	10,726	85.52	21	100.00	31,531	89.51	1	100.00	812	85.47	1	25.00	88	41.12	28	87.50	43,157	88.19
	zero & NAs	0	0.00	10	0.08	0	0.00	14	0.04	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	24	0.05
<b>3.3</b>	<b>total</b>	<b>6</b>	<b>100.00</b>	<b>12,542</b>	<b>100.00</b>	<b>21</b>	<b>100.00</b>	<b>35,228</b>	<b>100.00</b>	<b>1</b>	<b>100.00</b>	<b>950</b>	<b>100.00</b>	<b>4</b>	<b>100.00</b>	<b>214</b>	<b>100.00</b>	<b>32</b>	<b>100.00</b>	<b>48,934</b>	<b>100.00</b>
MSA 35644*	low	0	0.00	2,411	3.25	5	1.00	3,180	1.99	0	0.00	144	2.81	8	8.79	516	13.93	13	1.56	6,251	2.57
	moderate	10	9.52	10,027	13.50	49	9.82	17,465	10.93	15	10.79	659	12.87	39	42.86	1,360	36.71	113	13.55	29,511	12.15
	middle	43	40.95	19,712	26.54	121	24.25	38,976	24.38	47	33.81	1,581	30.87	21	23.08	857	23.13	232	27.82	61,126	25.16
	upper	52	49.52	41,903	56.41	323	64.73	99,703	62.38	77	55.40	2,724	53.18	22	24.18	958	25.86	474	56.83	145,288	59.80
	zero & NAs	0	0.00	232	0.31	1	0.20	512	0.32	0	0.00	14	0.27	1	1.10	14	0.38	2	0.24	772	0.32
<b>85.5</b>	<b>total</b>	<b>105</b>	<b>100.00</b>	<b>74,285</b>	<b>100.00</b>	<b>499</b>	<b>100.00</b>	<b>159,836</b>	<b>100.00</b>	<b>139</b>	<b>100.00</b>	<b>5,122</b>	<b>100.00</b>	<b>91</b>	<b>100.00</b>	<b>3,705</b>	<b>100.00</b>	<b>834</b>	<b>100.00</b>	<b>242,948</b>	<b>100.00</b>
A/A Total	low	0	0.00	2,604	2.23	5	0.83	3,571	1.16	0	0.00	160	1.37	8	8.33	519	13.63	13	1.33	6,854	1.56
	moderate	14	11.20	18,007	15.45	55	9.14	38,700	12.60	15	9.80	1,952	16.66	39	40.63	1,377	36.17	123	12.60	60,036	13.67
	middle	55	44.00	46,310	39.74	186	30.90	136,779	44.54	60	39.22	6,129	52.31	25	26.04	930	24.43	326	33.40	190,148	43.30
	upper	56	44.80	49,381	42.37	355	58.97	127,510	41.52	78	50.98	3,461	29.54	23	23.96	967	25.40	512	52.46	181,319	41.29
	zero & NAs	0	0.00	232	0.20	1	0.17	513	0.17	0	0.00	14	0.12	1	1.04	14	0.37	2	0.20	773	0.18
<b>100.0</b>	<b>total</b>	<b>125</b>	<b>100.00</b>	<b>116,534</b>	<b>100.00</b>	<b>602</b>	<b>100.00</b>	<b>307,073</b>	<b>100.00</b>	<b>153</b>	<b>100.00</b>	<b>11,716</b>	<b>100.00</b>	<b>96</b>	<b>100.00</b>	<b>3,807</b>	<b>100.00</b>	<b>976</b>	<b>100.00</b>	<b>439,130</b>	<b>100.00</b>

\* The bank takes only that part of the county or MSA in its assessment area.

<sup>1</sup> Bank numbers include originated and purchased; Aggregate numbers include originated only.

Sources of data: Bank (bank loans and assessment area); and 2000 Census.

### HMDA LOAN ORIGINATIONS<sup>1</sup> YEAR 2004

#### GEOGRAPHY INCOME LEVEL DISTRIBUTION -- NUMBER OF LOANS

County/Area	Geography Income Level	Home Purchase				Refinancing				Home Improvement				Mul ifamily				Total			
		Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %
Nassau	low	-	-	88	0.45	-	-	138	0.50	-	-	14	0.37	-	-	9	10.34	-	-	249	0.49
	moderate	-	-	1,793	9.08	3	9.38	2,701	9.76	-	-	311	8.18	-	-	20	22.99	3	5.08	4,825	9.41
	middle	7	70.00	13,346	67.62	21	65.63	19,719	71.25	11	64.71	2,928	77.05	-	-	52	59.77	39	66.10	36,045	70.26
	upper	3	30.00	4,508	22.84	8	25.00	5,112	18.47	6	35.29	546	14.37	-	-	6	6.90	17	28.81	10,172	19.83
	zero & NAs	-	-	1	0.01	-	-	7	0.03	-	-	1	0.03	-	-	-	-	-	-	9	0.02
	<b>6.1 total</b>	<b>10</b>	<b>100.00</b>	<b>19,736</b>	<b>100.00</b>	<b>32</b>	<b>100.00</b>	<b>27,677</b>	<b>100.00</b>	<b>17</b>	<b>100.00</b>	<b>3,800</b>	<b>100.00</b>	<b>87</b>	<b>100.00</b>	<b>59</b>	<b>100.00</b>	<b>51,300</b>	<b>100.00</b>		
Suffolk	low	-	-	154	0.58	-	-	182	0.42	-	-	20	0.26	-	-	1	2.22	-	-	357	0.46
	moderate	1	20.00	7,325	27.48	1	7.69	11,553	26.51	1	50.00	2,074	26.58	1	50.00	15	33.33	4	18.18	20,967	26.85
	middle	4	80.00	15,854	59.47	7	53.85	27,278	62.60	1	50.00	4,912	62.94	1	50.00	27	60.00	13	59.09	48,071	61.57
	upper	-	-	3,323	12.47	5	38.46	4,558	10.46	-	-	797	10.21	-	-	2	4.44	5	22.73	8,680	11.12
	zero & NAs	-	-	1	0.00	-	-	4	0.01	-	-	1	0.01	-	-	-	-	-	-	6	0.01
	<b>2.3 total</b>	<b>5</b>	<b>100.00</b>	<b>26,657</b>	<b>100.00</b>	<b>13</b>	<b>100.00</b>	<b>43,575</b>	<b>100.00</b>	<b>2</b>	<b>100.00</b>	<b>7,804</b>	<b>100.00</b>	<b>2</b>	<b>100.00</b>	<b>45</b>	<b>100.00</b>	<b>22</b>	<b>100.00</b>	<b>78,081</b>	<b>100.00</b>
MSA 35004	low	-	-	242	0.52	-	-	320	0.45	-	-	34	0.29	-	-	10	7.58	-	-	606	0.47
	moderate	1	6.67	9,118	19.65	4	8.89	14,254	20.01	1	5.26	2,385	20.55	1	50.00	35	26.52	7	8.64	25,792	19.93
	middle	11	73.33	29,200	62.94	28	62.22	46,997	65.96	12	63.16	7,840	67.56	1	50.00	79	59.85	52	64.20	84,116	65.01
	upper	3	20.00	7,831	16.88	13	28.89	9,670	13.57	6	31.58	1,343	11.57	-	-	8	6.06	22	27.16	18,852	14.57
	zero & NAs	-	-	2	0.00	-	-	11	0.02	-	-	2	0.02	-	-	-	-	-	-	15	0.01
	<b>8.3 total</b>	<b>15</b>	<b>100.00</b>	<b>46,393</b>	<b>100.00</b>	<b>45</b>	<b>100.00</b>	<b>71,252</b>	<b>100.00</b>	<b>19</b>	<b>100.00</b>	<b>11,604</b>	<b>100.00</b>	<b>2</b>	<b>100.00</b>	<b>132</b>	<b>100.00</b>	<b>81</b>	<b>100.00</b>	<b>129,381</b>	<b>100.00</b>
Bronx	low	-	-	1,015	15.69	-	-	1,132	15.33	1	33.33	194	19.78	18	50.00	339	52.97	19	35.19	2,680	17.32
	moderate	3	42.86	1,871	28.93	4	50.00	2,122	28.73	1	33.33	253	25.79	13	36.11	220	34.38	21	38.89	4,466	28.86
	middle	2	28.57	1,933	29.89	3	37.50	2,481	33.60	1	33.33	349	35.58	1	2.78	51	7.97	7	12.96	4,814	31.11
	upper	2	28.57	1,632	25.23	1	12.50	1,646	22.29	-	-	184	18.76	4	11.11	30	4.69	7	12.96	3,492	22.57
	zero & NAs	-	-	17	0.26	-	-	4	0.05	-	-	1	0.10	-	-	-	-	-	-	22	0.14
	<b>5.5 total</b>	<b>7</b>	<b>100.00</b>	<b>6,468</b>	<b>100.00</b>	<b>8</b>	<b>100.00</b>	<b>7,385</b>	<b>100.00</b>	<b>3</b>	<b>100.00</b>	<b>981</b>	<b>100.00</b>	<b>36</b>	<b>100.00</b>	<b>640</b>	<b>100.00</b>	<b>54</b>	<b>100.00</b>	<b>15,474</b>	<b>100.00</b>
Kings	low	2	3.64	1,935	10.83	1	1.02	1,890	9.35	1	1.64	187	8.65	9	13.64	299	20.95	13	4.64	4,311	10.34
	moderate	4	7.27	6,367	35.62	25	25.51	7,706	38.12	25	40.98	852	39.43	31	46.97	745	52.21	85	30.36	15,670	37.60
	middle	30	54.55	5,840	32.67	43	43.88	6,827	33.77	24	39.34	731	33.83	13	19.70	233	16.33	110	39.29	13,631	32.70
	upper	19	34.55	3,693	20.66	28	28.57	3,774	18.67	11	18.03	387	17.91	13	19.70	148	10.37	71	25.36	8,002	19.20
	zero & NAs	-	-	40	0.22	1	1.02	20	0.10	-	-	4	0.19	-	-	2	0.14	1	0.36	66	0.16
	<b>28.7 total</b>	<b>55</b>	<b>100.00</b>	<b>17,875</b>	<b>100.00</b>	<b>98</b>	<b>100.00</b>	<b>20,217</b>	<b>100.00</b>	<b>61</b>	<b>100.00</b>	<b>2,161</b>	<b>100.00</b>	<b>66</b>	<b>100.00</b>	<b>1,427</b>	<b>100.00</b>	<b>280</b>	<b>100.00</b>	<b>41,680</b>	<b>100.00</b>
New York	low	-	-	587	4.05	1	3.70	227	2.91	1	16.67	34	6.49	7	9.59	150	13.23	9	7.89	998	4.17
	moderate	2	25.00	999	6.90	-	-	666	8.54	-	-	89	16.98	15	20.55	248	21.87	17	14.91	2,002	8.36
	middle	1	12.50	645	4.46	2	7.41	329	4.22	1	16.67	28	5.34	7	9.59	95	8.38	11	9.65	1,097	4.58
	upper	5	62.50	12,192	84.22	24	88.89	6,547	83.94	4	66.67	370	70.61	44	60.27	640	56.44	77	67.54	19,749	82.51
	zero & NAs	-	-	54	0.37	-	-	31	0.40	-	-	3	0.57	-	-	1	0.09	-	-	89	0.37
	<b>11.7 total</b>	<b>8</b>	<b>100.00</b>	<b>14,477</b>	<b>100.00</b>	<b>27</b>	<b>100.00</b>	<b>7,800</b>	<b>100.00</b>	<b>6</b>	<b>100.00</b>	<b>524</b>	<b>100.00</b>	<b>73</b>	<b>100.00</b>	<b>1,134</b>	<b>100.00</b>	<b>114</b>	<b>100.00</b>	<b>23,935</b>	<b>100.00</b>
Queens	low	-	-	201	0.81	-	-	147	0.58	-	-	16	0.57	-	-	-	-	-	-	364	0.68
	moderate	3	8.33	4,220	17.10	7	14.00	3,854	15.10	5	17.24	366	12.96	8	26.67	262	46.45	23	15.86	8,702	16.24
	middle	24	66.67	12,539	50.81	23	46.00	13,312	52.17	17	58.62	1,519	53.79	19	63.33	246	43.62	83	57.24	27,616	51.54
	upper	9	25.00	7,678	31.11	20	40.00	8,173	32.03	7	24.14	922	32.65	3	10.00	56	9.93	39	26.90	16,829	31.41
	zero & NAs	-	-	41	0.17	-	-	33	0.13	-	-	1	0.04	-	-	-	-	-	-	75	0.14
	<b>14.9 total</b>	<b>36</b>	<b>100.00</b>	<b>24,679</b>	<b>100.00</b>	<b>50</b>	<b>100.00</b>	<b>25,519</b>	<b>100.00</b>	<b>29</b>	<b>100.00</b>	<b>2,824</b>	<b>100.00</b>	<b>30</b>	<b>100.00</b>	<b>564</b>	<b>100.00</b>	<b>145</b>	<b>100.00</b>	<b>53,586</b>	<b>100.00</b>

HMDA LOAN ORIGINATIONS <sup>1</sup>																						
YEAR 2004																						
GEOGRAPHY INCOME LEVEL DISTRIBUTION -- NUMBER OF LOANS																						
County/Area % of Total A/A Loans	Geography Income Level	Home Purchase				Refinancing				Home Improvement				Mul ifamily				Total				
		Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	
Richmond	low	1	2.38	87	1.14	-	-	101	1.15	-	-	13	0.96	-	-	1	4.35	1	0.35	202	1.13	
	moderate	3	7.14	662	8.68	5	4.67	587	6.66	2	1.52	70	5.19	-	-	4	17.39	10	3.55	1,323	7.43	
	middle	9	21.43	2,002	26.26	24	22.43	2,181	24.74	22	16.67	319	23.66	1	100.00	10	43.48	56	19.86	4,512	25.33	
	upper	29	69.05	4,867	63.84	78	72.90	5,945	67.43	108	81.82	946	70.18	-	-	8	34.78	215	76.24	11,766	66.06	
	zero & NAs	-	-	6	0.08	-	-	3	0.03	-	-	-	-	-	-	-	-	-	-	-	9	0.05
	<b>28.9</b>	<b>total</b>	<b>42</b>	<b>100.00</b>	<b>7,624</b>	<b>100.00</b>	<b>107</b>	<b>100.00</b>	<b>8,817</b>	<b>100.00</b>	<b>132</b>	<b>100.00</b>	<b>1,348</b>	<b>100.00</b>	<b>1</b>	<b>100.00</b>	<b>23</b>	<b>100.00</b>	<b>282</b>	<b>100.00</b>	<b>17,812</b>	<b>100.00</b>
Westchester	low	-	-	113	0.82	-	-	90	0.64	-	-	11	0.69	-	-	15	5.58	-	-	229	0.77	
	moderate	-	-	609	4.40	-	-	748	5.33	-	-	87	5.42	5	62.50	75	27.88	5	26.32	1,519	5.10	
	middle	-	-	1,892	13.66	1	12.50	2,058	14.65	-	-	236	14.71	1	12.50	73	27.14	2	10.53	4,259	14.31	
	upper	1	100.00	11,217	81.01	7	87.50	11,132	79.25	2	100.00	1,270	79.18	2	25.00	106	39.41	12	63.16	23,725	79.71	
	zero & NAs	-	-	16	0.12	-	-	18	0.13	-	-	-	-	-	-	-	-	-	-	-	34	0.11
	<b>1.9</b>	<b>total</b>	<b>1</b>	<b>100.00</b>	<b>13,847</b>	<b>100.00</b>	<b>8</b>	<b>100.00</b>	<b>14,046</b>	<b>100.00</b>	<b>2</b>	<b>100.00</b>	<b>1,604</b>	<b>100.00</b>	<b>8</b>	<b>100.00</b>	<b>269</b>	<b>100.00</b>	<b>19</b>	<b>100.00</b>	<b>29,766</b>	<b>100.00</b>
MSA 35644*	low	3	2.01	3,938	4.63	2	0.67	3,587	4.28	3	1.29	455	4.82	34	15.89	804	19.82	42	4.70	8,784	4.82	
	moderate	15	10.07	14,728	17.33	41	13.76	15,683	18.72	33	14.16	1,717	18.18	72	33.64	1,554	38.30	161	18.01	33,682	18.48	
	middle	66	44.30	24,851	29.25	96	32.21	27,188	32.45	65	27.90	3,182	33.70	42	19.63	708	17.45	269	30.09	55,929	30.69	
	upper	65	43.62	41,279	48.58	158	53.02	37,217	44.42	132	56.65	4,079	43.20	66	30.84	988	24.35	421	47.09	83,563	45.85	
	zero & NAs	-	-	174	0.20	1	0.34	109	0.13	-	-	9	0.10	-	-	3	0.07	1	0.11	295	0.16	
	<b>91.7</b>	<b>total</b>	<b>149</b>	<b>100.00</b>	<b>84,970</b>	<b>100.00</b>	<b>298</b>	<b>100.00</b>	<b>83,784</b>	<b>100.00</b>	<b>233</b>	<b>100.00</b>	<b>9,442</b>	<b>100.00</b>	<b>214</b>	<b>100.00</b>	<b>4,057</b>	<b>100.00</b>	<b>894</b>	<b>100.00</b>	<b>182,253</b>	<b>100.00</b>
A/A Total	low	3	1.83	4,180	3.18	2	0.58	3,907	2.52	3	1.19	489	2.32	34	15.74	814	19.43	42	4.31	9,390	3.01	
	moderate	16	9.76	23,846	18.15	45	13.12	29,937	19.31	34	13.49	4,102	19.49	73	33.80	1,589	37.93	168	17.23	59,474	19.08	
	middle	77	46.95	54,051	41.15	124	36.15	74,185	47.85	77	30.56	11,022	52.37	43	19.91	787	18.79	321	32.92	140,045	44.94	
	upper	68	41.46	49,110	37.38	171	49.85	46,887	30.24	138	54.76	5,422	25.76	66	30.56	996	23.78	443	45.44	102,415	32.86	
	zero & NAs	-	-	176	0.13	1	0.29	120	0.08	-	-	11	0.05	-	-	3	0.07	1	0.10	310	0.10	
	<b>100.0</b>	<b>total</b>	<b>164</b>	<b>100.00</b>	<b>131,363</b>	<b>100.00</b>	<b>343</b>	<b>100.00</b>	<b>155,036</b>	<b>100.00</b>	<b>252</b>	<b>100.00</b>	<b>21,046</b>	<b>100.00</b>	<b>216</b>	<b>100.00</b>	<b>4,189</b>	<b>100.00</b>	<b>975</b>	<b>100.00</b>	<b>311,634</b>	<b>100.00</b>

\* The bank takes only that part of the county or MD/MSA in its assessment area.

<sup>1</sup> Bank numbers include originated and purchased; Aggregate numbers include originated only.

Sources of data: Bank (bank loans and assessment area); and 2000 Census with 2004 OMB revisions.

HMDA LOAN ORIGINATIONS <sup>1</sup>																					
YEAR 2003																					
GEOGRAPHY INCOME LEVEL DISTRIBUTION -- VOLUME OF LOANS IN THOUSANDS OF DOLLARS																					
County/Area % of Total A/A Loans	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	14,420	0.28	0	0.00	28,986	0.21	0	0.00	15	0.01	0	0.00	11,450	10.07	0	0.00	54,871	0.29
	moderate	0	0.00	294,204	5.64	215	1.59	665,363	4.90	0	0.00	5,001	3.64	0	0.00	41,306	36.31	215	1.20	1,005,874	5.28
	middle	867	42.98	3,094,425	59.34	7,428	55.02	8,327,898	61.35	642	94.13	102,838	74.77	1,750	100.00	53,989	47.46	10,687	59.54	11,579,150	60.81
	upper	1,150	57.02	1,811,864	34.74	5,857	43.39	4,551,616	33.53	40	5.87	29,677	21.58	0	0.00	7,013	6.16	7,047	39.26	6,400,170	33.61
	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
	<b>7.6 total</b>	<b>2,017</b>	<b>100.00</b>	<b>5,214,913</b>	<b>100.00</b>	<b>13,500</b>	<b>100.00</b>	<b>13,573,863</b>	<b>100.00</b>	<b>682</b>	<b>100.00</b>	<b>137,531</b>	<b>100.00</b>	<b>1,750</b>	<b>100.00</b>	<b>113,758</b>	<b>100.00</b>	<b>17,949</b>	<b>100.00</b>	<b>19,040,065</b>	<b>100.00</b>
Suffolk	low	0	0.00	22,976	0.34	0	0.00	36,136	0.21	0	-	750	0.34	0	0.00	0	0.00	0	0.00	59,862	0.25
	moderate	823	31.50	1,450,324	21.74	507	14.29	3,132,059	18.02	0	-	46,906	21.24	0	0.00	15,955	13.46	1,330	10.22	4,645,244	19.04
	middle	1,495	57.21	4,023,426	60.31	2,560	72.17	10,983,464	63.19	0	-	140,121	63.44	6,500	94.89	101,385	85.51	10,555	81.13	15,248,396	62.51
	upper	295	11.29	1,174,664	17.61	480	13.53	3,228,779	18.58	0	-	33,106	14.99	350	5.11	1,230	1.04	1,125	8.65	4,437,779	18.19
	zero & NAs	0	0.00	0	0.00	0	0.00	350	0.00	0	-	0	0.00	0	0.00	0	0.00	0	0.00	350	0.00
	<b>5.5 total</b>	<b>2,613</b>	<b>100.00</b>	<b>6,671,390</b>	<b>100.00</b>	<b>3,547</b>	<b>100.00</b>	<b>17,380,788</b>	<b>100.00</b>	<b>0</b>	<b>-</b>	<b>220,883</b>	<b>100.00</b>	<b>6,850</b>	<b>100.00</b>	<b>118,570</b>	<b>100.00</b>	<b>13,010</b>	<b>100.00</b>	<b>24,391,631</b>	<b>100.00</b>
MSA 35004	low	0	0.00	37,396	0.31	0	0.00	65,122	0.21	0	0.00	765	0.21	0	0.00	11,450	4.93	0	0.00	114,733	0.26
	moderate	823	17.78	1,744,528	14.68	722	4.24	3,797,422	12.27	0	0.00	51,907	14.48	0	0.00	57,261	24.65	1,545	4.99	5,651,118	13.01
	middle	2,362	51.02	7,117,851	59.88	9,988	58.59	19,311,362	62.39	642	94.13	242,959	67.79	8,250	95.93	155,374	66.88	21,242	68.61	26,827,546	61.77
	upper	1,445	31.21	2,986,528	25.13	6,337	37.17	7,780,395	25.13	40	5.87	62,783	17.52	350	4.07	8,243	3.55	8,172	26.40	10,837,949	24.95
	zero & NAs	0	0.00	0	0.00	0	0.00	350	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	350	0.00
	<b>13.1 total</b>	<b>4,630</b>	<b>100.00</b>	<b>11,886,303</b>	<b>100.00</b>	<b>17,047</b>	<b>100.00</b>	<b>30,954,651</b>	<b>100.00</b>	<b>682</b>	<b>100.00</b>	<b>358,414</b>	<b>100.00</b>	<b>8,600</b>	<b>100.00</b>	<b>232,328</b>	<b>100.00</b>	<b>30,959</b>	<b>100.00</b>	<b>43,431,696</b>	<b>100.00</b>
Bronx	low	0	0.00	157,195	13.90	0	0.00	180,989	9.50	0	0.00	2,165	11.91	5,508	39.98	279,745	36.50	5,508	37.09	620,094	16.23
	moderate	122	36.97	271,247	23.99	35	7.49	401,693	21.07	20	7.27	3,856	21.22	7,869	57.12	375,130	48.95	8,046	54.19	1,051,926	27.53
	middle	0	0.00	347,060	30.70	107	22.91	640,090	33.58	255	92.73	6,586	36.24	0	0.00	92,190	12.03	362	2.44	1,085,926	28.42
	upper	208	63.03	353,666	31.28	325	69.59	681,184	35.74	0	0.00	5,552	30.55	400	2.90	16,356	2.13	933	6.28	1,056,758	27.66
	zero & NAs	0	0.00	1,378	0.12	0	0.00	2,092	0.11	0	0.00	15	0.08	0	0.00	3,000	0.39	0	0.00	6,485	0.17
	<b>6.3 total</b>	<b>330</b>	<b>100.00</b>	<b>1,130,546</b>	<b>100.00</b>	<b>467</b>	<b>100.00</b>	<b>1,906,048</b>	<b>100.00</b>	<b>275</b>	<b>100.00</b>	<b>18,174</b>	<b>100.00</b>	<b>13,777</b>	<b>100.00</b>	<b>766,421</b>	<b>100.00</b>	<b>14,849</b>	<b>100.00</b>	<b>3,821,189</b>	<b>100.00</b>
Kings	low	0	0.00	344,745	8.13	501	1.93	353,479	4.93	0	0.00	4,806	4.55	0	0.00	105,809	11.66	501	0.68	808,839	6.51
	moderate	1,158	14.85	1,275,003	30.07	4,964	19.09	1,966,154	27.43	517	21.57	24,770	23.47	19,137	51.57	422,285	46.54	25,776	35.16	3,688,212	29.70
	middle	3,250	41.68	1,301,892	30.71	8,547	32.87	2,446,793	34.14	1,303	54.36	46,791	44.33	11,041	29.75	235,160	25.92	24,141	32.93	4,030,636	32.45
	upper	3,389	43.47	1,304,741	30.78	11,827	45.48	2,379,562	33.20	577	24.07	28,851	27.34	3,932	10.60	140,480	15.48	19,725	26.91	3,853,634	31.03
	zero & NAs	0	0.00	13,116	0.31	165	0.63	21,169	0.30	0	0.00	323	0.31	3,000	8.08	3,575	0.39	3,165	4.32	38,183	0.31
	<b>31.1 total</b>	<b>7,797</b>	<b>100.00</b>	<b>4,239,497</b>	<b>100.00</b>	<b>26,004</b>	<b>100.00</b>	<b>7,167,157</b>	<b>100.00</b>	<b>2,397</b>	<b>100.00</b>	<b>105,541</b>	<b>100.00</b>	<b>37,110</b>	<b>100.00</b>	<b>907,309</b>	<b>100.00</b>	<b>73,308</b>	<b>100.00</b>	<b>12,419,504</b>	<b>100.00</b>
New York	low	0	0.00	80,714	1.48	128	0.65	80,215	1.02	0	0.00	991	4.90	0	0.00	138,731	4.33	128	0.28	300,651	1.82
	moderate	189	9.68	272,213	5.00	639	3.23	379,420	4.80	50	29.41	2,702	13.37	5,450	23.32	442,291	13.80	6,328	13.99	1,096,626	6.62
	middle	0	0.00	222,937	4.10	700	3.54	218,213	2.76	45	26.47	1,074	5.31	3,400	14.55	345,971	10.80	4,145	9.16	788,195	4.76
	upper	1,763	90.32	4,741,895	87.18	18,289	92.57	7,007,917	88.70	75	44.12	11,808	58.41	14,520	62.13	2,261,040	70.57	34,647	76.57	14,022,660	84.66
	zero & NAs	0	0.00	121,422	2.23	0	0.00	215,141	2.72	0	0.00	3,640	18.01	0	0.00	15,969	0.50	0	0.00	356,172	2.15
	<b>19.2 total</b>	<b>1,952</b>	<b>100.00</b>	<b>5,439,181</b>	<b>100.00</b>	<b>19,756</b>	<b>100.00</b>	<b>7,900,906</b>	<b>100.00</b>	<b>170</b>	<b>100.00</b>	<b>20,215</b>	<b>100.00</b>	<b>23,370</b>	<b>100.00</b>	<b>3,204,002</b>	<b>100.00</b>	<b>45,248</b>	<b>100.00</b>	<b>16,564,304</b>	<b>100.00</b>
Queens	low	0	0.00	29,172	0.56	0	0.00	27,375	0.32	0	0.00	432	0.54	0	0.00	8,500	1.49	0	0.00	65,479	0.45
	moderate	193	5.67	601,958	11.56	872	7.45	846,817	9.92	25	1.76	5,952	7.39	6,100	32.25	156,563	27.42	7,190	20.29	1,611,290	11.19
	middle	1,986	58.38	2,350,625	45.15	5,752	49.14	3,713,261	43.50	815	57.39	33,850	42.05	4,800	25.38	289,699	50.74	13,353	37.67	6,387,435	44.37
	upper	1,223	35.95	2,220,022	42.64	5,082	43.41	3,940,974	46.17	580	40.85	40,042	49.75	8,015	42.37	116,166	20.35	14,900	42.04	6,317,204	43.89
	zero & NAs	0	0.00	5,046	0.10	0	0.00	7,655	0.09	0	0.00	215	0.27	0	0.00	0	0.00	0	0.00	12,916	0.09
	<b>15.0 total</b>	<b>3,402</b>	<b>100.00</b>	<b>5,206,823</b>	<b>100.00</b>	<b>11,706</b>	<b>100.00</b>	<b>8,536,082</b>	<b>100.00</b>	<b>1,420</b>	<b>100.00</b>	<b>80,491</b>	<b>100.00</b>	<b>18,915</b>	<b>100.00</b>	<b>570,928</b>	<b>100.00</b>	<b>35,443</b>	<b>100.00</b>	<b>14,394,324</b>	<b>100.00</b>

HMDA LOAN ORIGINATIONS <sup>1</sup>																					
YEAR 2003																					
GEOGRAPHY INCOME LEVEL DISTRIBUTION -- VOLUME OF LOANS IN THOUSANDS OF DOLLARS																					
County/Area % of Total A/A Loans	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. %
Richmond	low	0	0.00	10,753	0.64	0	0.00	19,348	0.56	0	0.00	35	0.06	0	-	1,468	3.67	0	0.00	31,604	0.61
	moderate	0	0.00	76,806	4.56	411	3.61	91,122	2.65	110	3.60	1,307	2.08	0	-	14,929	37.31	521	2.80	184,164	3.53
	middle	445	10.72	241,198	14.30	861	7.56	413,932	12.06	305	9.98	6,587	10.48	0	-	16,974	42.42	1,611	8.66	678,691	13.00
	upper	3,707	89.28	1,357,398	80.50	10,113	88.83	2,908,023	84.71	2,641	86.42	54,945	87.39	0	-	6,642	16.60	16,461	88.53	4,327,008	82.86
	zero & NAs	0	0.00	0	0.00	0	0.00	549	0.02	0	0.00	0	0.00	0	-	0	0.00	0	0.00	549	0.01
<b>7.9 total</b>	<b>4,152</b>	<b>100.00</b>	<b>1,686,155</b>	<b>100.00</b>	<b>11,385</b>	<b>100.00</b>	<b>3,432,974</b>	<b>100.00</b>	<b>3,056</b>	<b>100.00</b>	<b>62,874</b>	<b>100.00</b>	<b>0</b>	<b>-</b>	<b>40,013</b>	<b>100.00</b>	<b>18,593</b>	<b>100.00</b>	<b>5,222,016</b>	<b>100.00</b>	
Westchester	low	0	0.00	6,623	0.16	0	0.00	6,038	0.06	0	0.00	12	0.02	0	0.00	3,217	1.17	0	0.00	15,890	0.11
	moderate	0	0.00	71,025	1.76	0	0.00	135,199	1.43	0	0.00	1,219	1.56	1,500	11.90	60,715	22.05	1,500	8.51	268,158	1.94
	middle	50	4.06	309,198	7.68	0	0.00	618,613	6.53	0	0.00	4,518	5.80	10,900	86.51	98,573	35.80	10,950	62.14	1,030,902	7.44
	upper	1,182	95.94	3,636,898	90.36	3,769	100.00	8,714,196	91.96	20	100.00	72,179	92.62	200	1.59	112,803	40.97	5,171	29.35	12,536,076	90.49
	zero & NAs	0	0.00	1,269	0.03	0	0.00	1,563	0.02	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	2,832	0.02
<b>7.5 total</b>	<b>1,232</b>	<b>100.00</b>	<b>4,025,013</b>	<b>100.00</b>	<b>3,769</b>	<b>100.00</b>	<b>9,475,609</b>	<b>100.00</b>	<b>20</b>	<b>100.00</b>	<b>77,928</b>	<b>100.00</b>	<b>12,600</b>	<b>100.00</b>	<b>275,308</b>	<b>100.00</b>	<b>17,621</b>	<b>100.00</b>	<b>13,853,858</b>	<b>100.00</b>	
MSA 35644*	low	0	0.00	629,202	2.90	629	0.86	667,444	1.74	0	0.00	8,441	2.31	5,508	5.21	537,470	9.32	6,137	2.99	1,842,557	2.78
	moderate	1,662	8.81	2,568,252	11.82	6,921	9.47	3,820,405	9.94	722	9.84	39,806	10.90	40,056	37.87	1,471,913	25.54	49,361	24.07	7,900,376	11.92
	middle	5,731	30.38	4,772,910	21.97	15,967	21.85	8,050,902	20.96	2,723	37.11	99,406	27.22	30,141	28.50	1,078,567	18.71	54,562	26.61	14,001,785	21.13
	upper	11,472	60.81	13,614,620	62.66	49,405	67.60	25,631,856	66.72	3,893	53.05	213,377	58.42	27,067	25.59	2,653,487	46.04	91,837	44.78	42,113,340	63.54
	zero & NAs	0	0.00	142,231	0.65	165	0.23	248,169	0.65	0	0.00	4,193	1.15	3,000	2.84	22,544	0.39	3,165	1.54	417,137	0.63
<b>86.9 total</b>	<b>18,865</b>	<b>100.00</b>	<b>21,727,215</b>	<b>100.00</b>	<b>73,087</b>	<b>100.00</b>	<b>38,418,776</b>	<b>100.00</b>	<b>7,338</b>	<b>100.00</b>	<b>365,223</b>	<b>100.00</b>	<b>105,772</b>	<b>100.00</b>	<b>5,763,981</b>	<b>100.00</b>	<b>205,062</b>	<b>100.00</b>	<b>66,275,195</b>	<b>100.00</b>	
A/A Total	low	0	0.00	666,598	1.98	629	0.70	732,566	1.06	0	0.00	9,206	1.27	5,508	4.82	548,920	9.15	6,137	2.60	1,957,290	1.78
	moderate	2,485	10.58	4,312,780	12.83	7,643	8.48	7,617,827	10.98	722	9.00	91,713	12.67	40,056	35.02	1,529,174	25.50	50,906	21.57	13,551,494	12.35
	middle	8,093	34.45	11,890,761	35.37	25,955	28.80	27,362,264	39.44	3,365	41.96	342,365	47.31	38,391	33.57	1,233,941	20.58	75,804	32.12	40,829,331	37.22
	upper	12,917	54.98	16,601,148	49.39	55,742	61.84	33,412,251	48.16	3,933	49.04	276,160	38.16	27,417	23.97	2,661,730	44.39	100,009	42.37	52,951,289	48.27
	zero & NAs	0	0.00	142,231	0.42	165	0.18	248,519	0.36	0	0.00	4,193	0.58	3,000	2.62	22,544	0.38	3,165	1.34	417,487	0.38
<b>100.0 total</b>	<b>23,495</b>	<b>100.00</b>	<b>33,613,518</b>	<b>100.00</b>	<b>90,134</b>	<b>100.00</b>	<b>69,373,427</b>	<b>100.00</b>	<b>8,020</b>	<b>100.00</b>	<b>723,637</b>	<b>100.00</b>	<b>114,372</b>	<b>100.00</b>	<b>5,996,309</b>	<b>100.00</b>	<b>236,021</b>	<b>100.00</b>	<b>109,706,891</b>	<b>100.00</b>	

\* The bank takes only that part of the county or MSA in its assessment area  
<sup>1</sup> Bank numbers include originated and purchased; Aggregate numbers include originated only.  
 Sources of data: Bank (bank loans and assessment area); and 2000 Census.

HMDA LOAN ORIGINATIONS <sup>1</sup>																					
YEAR 2004																					
GEOGRAPHY INCOME LEVEL DISTRIBUTION -- VOLUME OF LOANS IN THOUSANDS OF DOLLARS																					
County/Area	Geography	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	-	-	20,162	0.32	-	-	29,840	0.41	-	-	1,207	0.24	-	-	21,297	12.95	-	-	72,506	0.51
	moderate	-	-	419,700	6.58	304	4.74	595,331	8.25	-	-	43,403	8.60	-	-	24,221	14.73	304	2.82	1,082,655	7.59
	middle	1,922	65.04	3,753,404	58.84	3,751	58.47	4,657,502	64.55	934	66.29	361,769	71.70	-	-	108,146	65.78	6,607	61.30	8,880,821	62.26
	upper	1,033	34.96	2,185,814	34.26	2,360	36.79	1,930,761	26.76	475	33.71	98,045	19.43	-	-	10,738	6.53	3,868	35.88	4,225,358	29.62
	zero & NAs	-	-	185	0.00	-	-	1,830	0.03	-	-	153	0.03	-	-	-	-	-	-	-	2,168
<b>2.9</b>	<b>total</b>	<b>2,955</b>	<b>100.00</b>	<b>6,379,265</b>	<b>100.00</b>	<b>6,415</b>	<b>100.00</b>	<b>7,215,264</b>	<b>100.00</b>	<b>1,409</b>	<b>100.00</b>	<b>504,577</b>	<b>100.00</b>	<b>-</b>	<b>-</b>	<b>164,402</b>	<b>100.00</b>	<b>10,779</b>	<b>100.00</b>	<b>14,263,508</b>	<b>100.00</b>
Suffolk	low	-	-	30,191	0.38	-	-	32,413	0.33	-	-	2,261	0.26	-	-	995	0.62	-	-	65,860	0.35
	moderate	270	19.19	1,710,313	21.72	140	7.57	2,254,699	22.69	85	56.67	204,316	23.81	600	50.00	79,134	49.23	1,095	23.77	4,248,462	22.56
	middle	1,137	80.81	4,891,902	62.12	895	48.40	6,341,938	63.83	65	43.33	535,811	62.44	600	50.00	79,945	49.74	2,697	58.55	11,849,596	62.93
	upper	-	-	1,242,689	15.78	814	44.02	1,306,061	13.15	-	-	115,691	13.48	-	-	666	0.41	814	17.67	2,665,107	14.15
	zero & NAs	-	-	250	0.00	-	-	591	0.01	-	-	35	0.00	-	-	-	-	-	-	-	876
<b>1.2</b>	<b>total</b>	<b>1,407</b>	<b>100.00</b>	<b>7,875,345</b>	<b>100.00</b>	<b>1,849</b>	<b>100.00</b>	<b>9,935,702</b>	<b>100.00</b>	<b>150</b>	<b>100.00</b>	<b>858,114</b>	<b>100.00</b>	<b>1,200</b>	<b>100.00</b>	<b>160,740</b>	<b>100.00</b>	<b>4,606</b>	<b>100.00</b>	<b>18,829,901</b>	<b>100.00</b>
MSA 35004	low	-	-	50,353	0.35	-	-	62,253	0.36	-	-	3,468	0.25	-	-	22,292	6.86	-	-	138,366	0.42
	moderate	270	6.19	2,130,013	14.94	444	5.37	2,850,030	16.62	85	5.45	247,719	18.18	600	50.00	103,355	31.79	1,399	9.09	5,331,117	16.11
	middle	3,059	70.13	8,645,306	60.65	4,646	56.22	10,999,440	64.13	999	64.08	897,580	65.87	600	50.00	188,091	57.85	9,304	60.47	20,730,417	62.64
	upper	1,033	23.68	3,428,503	24.05	3,174	38.41	3,236,822	18.87	475	30.47	213,736	15.68	-	-	11,404	3.51	4,682	30.43	6,890,465	20.82
	zero & NAs	-	-	435	0.00	-	-	2,421	0.01	-	-	188	0.01	-	-	-	-	-	-	-	3,044
<b>4.2</b>	<b>total</b>	<b>4,362</b>	<b>100.00</b>	<b>14,254,610</b>	<b>100.00</b>	<b>8,264</b>	<b>100.00</b>	<b>17,150,966</b>	<b>100.00</b>	<b>1,559</b>	<b>100.00</b>	<b>1,362,691</b>	<b>100.00</b>	<b>1,200</b>	<b>100.00</b>	<b>325,142</b>	<b>100.00</b>	<b>15,385</b>	<b>100.00</b>	<b>33,093,409</b>	<b>100.00</b>
Bronx	low	-	-	260,337	17.33	-	-	251,616	14.88	100	47.62	16,954	16.24	15,785	41.44	471,631	42.66	15,885	39.70	1,000,538	22.72
	moderate	177	22.61	383,912	25.55	205	22.02	468,083	27.67	45	21.43	27,586	26.42	9,368	24.59	307,320	27.80	9,795	24.48	1,186,901	26.95
	middle	130	16.60	456,098	30.36	641	68.85	595,093	35.18	65	30.95	40,116	38.42	250	0.66	286,139	25.88	1,086	2.71	1,377,446	31.28
	upper	476	60.79	398,103	26.50	85	9.13	375,856	22.22	-	-	19,752	18.92	12,690	33.31	40,405	3.65	13,251	33.11	834,116	18.94
	zero & NAs	-	-	4,021	0.27	-	-	744	0.04	-	-	6	0.01	-	-	-	-	-	-	-	4,771
<b>10.9</b>	<b>total</b>	<b>783</b>	<b>100.00</b>	<b>1,502,471</b>	<b>100.00</b>	<b>931</b>	<b>100.00</b>	<b>1,691,392</b>	<b>100.00</b>	<b>210</b>	<b>100.00</b>	<b>104,414</b>	<b>100.00</b>	<b>38,093</b>	<b>100.00</b>	<b>1,105,495</b>	<b>100.00</b>	<b>40,017</b>	<b>100.00</b>	<b>4,403,772</b>	<b>100.00</b>
Kings	low	597	6.19	532,717	9.97	55	0.40	487,122	9.08	200	5.35	30,691	8.95	14,209	20.98	222,719	20.51	15,061	15.90	1,273,249	10.49
	moderate	463	4.80	1,864,819	34.91	3,172	23.33	2,040,642	38.02	1,451	38.85	133,262	38.87	34,019	50.22	532,856	49.07	39,105	41.29	4,571,579	37.66
	middle	4,091	42.41	1,661,033	31.09	5,723	42.09	1,770,526	32.99	1,515	40.56	114,619	33.43	11,204	16.54	204,751	18.86	22,533	23.79	3,750,929	30.90
	upper	4,496	46.61	1,273,870	23.84	4,526	33.29	1,064,067	19.83	569	15.23	63,688	18.58	8,305	12.26	122,165	11.25	17,896	18.89	2,523,790	20.79
	zero & NAs	-	-	9,877	0.18	120	0.88	4,614	0.09	-	-	604	0.18	-	-	3,420	0.31	120	0.13	18,515	0.15
<b>25.7</b>	<b>total</b>	<b>9,647</b>	<b>100.00</b>	<b>5,342,316</b>	<b>100.00</b>	<b>13,596</b>	<b>100.00</b>	<b>5,366,971</b>	<b>100.00</b>	<b>3,735</b>	<b>100.00</b>	<b>342,864</b>	<b>100.00</b>	<b>67,737</b>	<b>100.00</b>	<b>1,085,911</b>	<b>100.00</b>	<b>94,715</b>	<b>100.00</b>	<b>12,138,062</b>	<b>100.00</b>
New York	low	-	-	159,876	2.24	60	0.97	75,530	2.32	35	10.87	5,124	3.25	9,010	7.78	363,259	11.62	9,105	7.33	603,789	4.42
	moderate	399	21.11	303,518	4.25	-	-	196,301	6.04	-	-	9,905	6.29	33,518	28.93	541,906	17.34	33,917	27.30	1,051,630	7.69
	middle	297	15.71	197,186	2.76	380	6.16	86,405	2.66	69	21.43	7,037	4.47	12,458	10.75	375,858	12.03	13,204	10.63	666,486	4.87
	upper	1,194	63.17	6,429,482	90.01	5,728	92.87	2,861,961	88.09	218	67.70	135,128	85.78	60,871	52.54	1,840,553	58.89	68,011	54.74	11,267,024	82.39
	zero & NAs	-	-	52,622	0.74	-	-	28,753	0.89	-	-	342	0.22	-	-	4,000	0.13	-	-	85,717	0.63
<b>33.7</b>	<b>total</b>	<b>1,890</b>	<b>100.00</b>	<b>7,142,684</b>	<b>100.00</b>	<b>6,168</b>	<b>100.00</b>	<b>3,248,850</b>	<b>100.00</b>	<b>322</b>	<b>100.00</b>	<b>157,536</b>	<b>100.00</b>	<b>115,857</b>	<b>100.00</b>	<b>3,125,576</b>	<b>100.00</b>	<b>124,237</b>	<b>100.00</b>	<b>13,674,646</b>	<b>100.00</b>
Queens	low	-	-	50,542	0.78	-	-	32,301	0.52	-	-	1,122	0.30	-	-	-	-	-	-	83,965	0.61
	moderate	426	7.34	1,139,582	17.58	805	13.15	1,044,251	16.83	172	8.37	55,257	14.74	15,048	36.62	311,494	44.05	16,451	29.87	2,550,584	18.53
	middle	3,624	62.47	3,190,942	49.23	2,856	46.67	3,182,826	51.30	997	48.52	195,835	52.24	20,846	50.73	295,363	41.76	28,323	51.43	6,864,966	49.86
	upper	1,751	30.18	2,087,192	32.20	2,459	40.18	1,937,244	31.22	886	43.11	122,625	32.71	5,199	12.65	100,360	14.19	10,295	18.69	4,247,421	30.85
	zero & NAs	-	-	13,531	0.21	-	-	7,827	0.13	-	-	8	0.00	-	-	-	-	-	-	-	21,366
<b>14.9</b>	<b>total</b>	<b>5,801</b>	<b>100.00</b>	<b>6,481,789</b>	<b>100.00</b>	<b>6,120</b>	<b>100.00</b>	<b>6,204,449</b>	<b>100.00</b>	<b>2,055</b>	<b>100.00</b>	<b>374,847</b>	<b>100.00</b>	<b>41,093</b>	<b>100.00</b>	<b>707,217</b>	<b>100.00</b>	<b>55,069</b>	<b>100.00</b>	<b>13,768,302</b>	<b>100.00</b>

HMDA LOAN ORIGINATIONS <sup>1</sup>																					
YEAR 2004																					
GEOGRAPHY INCOME LEVEL DISTRIBUTION -- VOLUME OF LOANS IN THOUSANDS OF DOLLARS																					
County/Area % of Total A/A Loans	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. %
Richmond	low	182	2.00	19,139	0.95	-	-	20,445	1.02	-	-	1,451	1.00	-	-	626	3.22	182	0.59	41,661	0.99
	moderate	527	5.78	143,558	7.11	666	4.50	118,936	5.92	90	1.35	7,913	5.46	-	-	2,936	15.08	1,283	4.13	273,343	6.52
	middle	1,862	20.42	470,807	23.32	2,659	17.95	447,916	22.28	862	12.95	33,555	23.15	450	100.00	10,945	56.22	5,833	18.80	963,223	22.97
	upper	6,546	71.80	1,383,829	68.54	11,488	77.55	1,422,278	70.75	5,702	85.69	102,046	70.39	-	-	4,961	25.48	23,736	76.48	2,913,114	69.47
	zero & NAs	-	-	1,618	0.08	-	-	585	0.03	-	-	-	-	-	-	-	-	-	-	-	2,203
<b>8.4</b>	<b>total</b>	<b>9,117</b>	<b>100.00</b>	<b>2,018,951</b>	<b>100.00</b>	<b>14,813</b>	<b>100.00</b>	<b>2,010,160</b>	<b>100.00</b>	<b>6,654</b>	<b>100.00</b>	<b>144,965</b>	<b>100.00</b>	<b>450</b>	<b>100.00</b>	<b>19,468</b>	<b>100.00</b>	<b>31,034</b>	<b>100.00</b>	<b>4,193,544</b>	<b>100.00</b>
Westchester	low	-	-	26,577	0.54	-	-	21,885	0.53	-	-	1,128	0.44	-	-	9,079	2.63	-	-	58,669	0.61
	moderate	-	-	145,206	2.95	-	-	183,901	4.41	-	-	13,939	5.39	3,510	62.57	101,008	29.22	3,510	43.23	444,054	4.58
	middle	-	-	448,827	9.13	107	7.12	514,568	12.35	-	-	33,516	12.97	800	14.26	80,111	23.18	907	11.17	1,077,022	11.12
	upper	598	100.00	4,291,236	87.32	1,396	92.88	3,443,811	82.66	409	100.00	209,808	81.20	1,300	23.17	155,442	44.97	3,703	45.60	8,100,297	83.64
	zero & NAs	-	-	2,673	0.05	-	-	2,296	0.06	-	-	-	-	-	-	-	-	-	-	-	4,969
<b>2.2</b>	<b>total</b>	<b>598</b>	<b>100.00</b>	<b>4,914,519</b>	<b>100.00</b>	<b>1,503</b>	<b>100.00</b>	<b>4,166,461</b>	<b>100.00</b>	<b>409</b>	<b>100.00</b>	<b>258,391</b>	<b>100.00</b>	<b>5,610</b>	<b>100.00</b>	<b>345,640</b>	<b>100.00</b>	<b>8,120</b>	<b>100.00</b>	<b>9,685,011</b>	<b>100.00</b>
MSA 35644*	low	779	2.80	1,049,188	3.83	115	0.27	888,899	3.92	335	2.50	56,470	4.08	39,004	14.51	1,067,314	16.70	40,233	11.39	3,061,871	5.29
	moderate	1,992	7.16	3,980,595	14.53	4,848	11.24	4,052,114	17.86	1,758	13.13	247,862	17.92	95,463	35.51	1,797,520	28.13	104,061	29.46	10,078,091	17.42
	middle	10,004	35.94	6,424,893	23.45	12,366	28.67	6,597,334	29.08	3,508	26.21	424,678	30.71	46,008	17.11	1,253,167	19.61	71,886	20.35	14,700,072	25.40
	upper	15,061	54.11	15,863,712	57.89	25,682	59.54	11,105,117	48.95	7,784	58.15	653,047	47.22	88,365	32.87	2,263,886	35.43	136,892	38.76	29,885,762	51.65
	zero & NAs	-	-	84,342	0.31	120	0.28	44,819	0.20	-	-	960	0.07	-	-	7,420	0.12	120	0.03	137,541	0.24
<b>95.8</b>	<b>total</b>	<b>27,836</b>	<b>100.00</b>	<b>27,402,730</b>	<b>100.00</b>	<b>43,131</b>	<b>100.00</b>	<b>22,688,283</b>	<b>100.00</b>	<b>13,385</b>	<b>100.00</b>	<b>1,383,017</b>	<b>100.00</b>	<b>268,840</b>	<b>100.00</b>	<b>6,389,307</b>	<b>100.00</b>	<b>353,192</b>	<b>100.00</b>	<b>57,863,337</b>	<b>100.00</b>
A/A Total	low	779	2.42	1,099,541	2.64	115	0.22	951,152	2.39	335	2.24	59,938	2.18	39,004	14.44	1,089,606	16.23	40,233	10.92	3,200,237	3.52
	moderate	2,262	7.03	6,110,608	14.67	5,292	10.30	6,902,144	17.32	1,843	12.33	495,581	18.05	96,063	35.57	1,900,875	28.31	105,460	28.61	15,409,208	16.94
	middle	13,063	40.57	15,070,199	36.18	17,012	33.10	17,596,774	44.17	4,507	30.16	1,322,258	48.16	46,608	17.26	1,441,258	21.47	81,190	22.03	35,430,489	38.95
	upper	16,094	49.98	19,292,215	46.31	28,856	56.15	14,341,939	36.00	8,259	55.27	866,783	31.57	88,365	32.72	2,275,290	33.89	141,574	38.41	36,776,227	40.43
	zero & NAs	-	-	84,777	0.20	120	0.23	47,240	0.12	-	-	1,148	0.04	-	-	7,420	0.11	120	0.03	140,585	0.15
<b>100.0</b>	<b>total</b>	<b>32,198</b>	<b>100.00</b>	<b>41,657,340</b>	<b>100.00</b>	<b>51,395</b>	<b>100.00</b>	<b>39,839,249</b>	<b>100.00</b>	<b>14,944</b>	<b>100.00</b>	<b>2,745,708</b>	<b>100.00</b>	<b>270,040</b>	<b>100.00</b>	<b>6,714,449</b>	<b>100.00</b>	<b>368,577</b>	<b>100.00</b>	<b>90,956,746</b>	<b>100.00</b>

\* The bank takes only that part of the county or MD/MSA in its assessment area.  
<sup>1</sup> Bank numbers include originated and purchased; Aggregate numbers include originated only.  
 Sources of data: Bank (bank loans and assessment area); and 2000 Census with OMB revisions.

**1-4 FAMILY HMDA LOAN ORIGINATIONS<sup>1</sup>**

**YEAR 2003**

**BORROWER INCOME LEVEL DISTRIBUTION -- NUMBER OF LOANS**

County/Area % of Total A/A Loans	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	1	12.50	342	1.97	3	3.80	2,173	3.58	2	14.29	129	6.45	6	5.94	2,644	3.30
	moderate	2	25.00	2,179	12.55	12	15.19	10,658	17.56	3	21.43	416	20.81	17	16.83	13,253	16.55
	middle	5	62.50	5,269	30.35	32	40.51	17,934	29.54	4	28.57	665	33.27	41	40.59	23,868	29.81
	upper	0	0.00	8,049	46.36	32	40.51	24,031	39.59	5	35.71	722	36.12	37	36.63	32,802	40.97
	zero & NAs	0	0.00	1,522	8.77	0	0.00	5,911	9.74	0	0.00	67	3.35	0	0.00	7,500	9.37
	<b>11.5</b>	<b>total</b>	<b>8</b>	<b>100.00</b>	<b>17,361</b>	<b>100.00</b>	<b>79</b>	<b>100.00</b>	<b>60,707</b>	<b>100.00</b>	<b>14</b>	<b>100.00</b>	<b>1,999</b>	<b>100.00</b>	<b>101</b>	<b>100.00</b>	<b>80,067</b>
Suffolk	low	1	8.33	853	3.43	0	0.00	4,922	5.69	0	-	479	10.42	1	2.78	6,254	5.39
	moderate	5	41.67	4,629	18.60	7	29.17	19,655	22.71	0	-	1,071	23.31	12	33.33	25,355	21.86
	middle	4	33.33	7,897	31.73	9	37.50	26,469	30.59	0	-	1,648	35.87	13	36.11	36,014	31.04
	upper	2	16.67	9,181	36.89	7	29.17	27,441	31.71	0	-	1,264	27.51	9	25.00	37,886	32.66
	zero & NAs	0	0.00	2,328	9.35	1	4.17	8,043	9.30	0	-	133	2.89	1	2.78	10,504	9.05
	<b>4.1</b>	<b>total</b>	<b>12</b>	<b>100.00</b>	<b>24,888</b>	<b>100.00</b>	<b>24</b>	<b>100.00</b>	<b>86,530</b>	<b>100.00</b>	<b>0</b>	<b>-</b>	<b>4,595</b>	<b>100.00</b>	<b>36</b>	<b>100.00</b>	<b>116,013</b>
MSA 35004	low	2	10.00	1,195	2.83	3	2.91	7,095	4.82	2	14.29	608	9.22	7	5.11	8,898	4.54
	moderate	7	35.00	6,808	16.11	19	18.45	30,313	20.59	3	21.43	1,487	22.55	29	21.17	38,608	19.69
	middle	9	45.00	13,166	31.16	41	39.81	44,403	30.16	4	28.57	2,313	35.08	54	39.42	59,882	30.54
	upper	2	10.00	17,230	40.78	39	37.86	51,472	34.96	5	35.71	1,986	30.12	46	33.58	70,688	36.05
	zero & NAs	0	0.00	3,850	9.11	1	0.97	13,954	9.48	0	0.00	200	3.03	1	0.73	18,004	9.18
	<b>15.6</b>	<b>total</b>	<b>20</b>	<b>100.00</b>	<b>42,249</b>	<b>100.00</b>	<b>103</b>	<b>100.00</b>	<b>147,237</b>	<b>100.00</b>	<b>14</b>	<b>100.00</b>	<b>6,594</b>	<b>100.00</b>	<b>137</b>	<b>100.00</b>	<b>196,080</b>
Bronx	low	0	0.00	73	1.41	1	20.00	168	1.74	0	0.00	27	6.40	1	7.69	268	1.76
	moderate	1	25.00	436	8.44	1	20.00	739	7.65	1	25.00	62	14.69	3	23.08	1,237	8.11
	middle	2	50.00	1,074	20.79	1	20.00	2,300	23.81	1	25.00	116	27.49	4	30.77	3,490	22.89
	upper	1	25.00	3,136	60.69	2	40.00	5,470	56.63	2	50.00	198	46.92	5	38.46	8,804	57.73
	zero & NAs	0	0.00	448	8.67	0	0.00	983	10.18	0	0.00	19	4.50	0	0.00	1,450	9.51
	<b>1.5</b>	<b>total</b>	<b>4</b>	<b>100.00</b>	<b>5,167</b>	<b>100.00</b>	<b>5</b>	<b>100.00</b>	<b>9,660</b>	<b>100.00</b>	<b>4</b>	<b>100.00</b>	<b>422</b>	<b>100.00</b>	<b>13</b>	<b>100.00</b>	<b>15,249</b>
Kings	low	0	0.00	112	0.74	5	2.81	487	1.53	3	6.38	44	3.75	8	3.02	643	1.34
	moderate	8	20.00	759	5.03	18	10.11	2,148	6.74	9	19.15	105	8.96	35	13.21	3,012	6.26
	middle	11	27.50	2,405	15.95	53	29.78	6,374	19.99	14	29.79	251	21.42	78	29.43	9,030	18.76
	upper	21	52.50	10,157	67.35	102	57.30	19,200	60.21	21	44.68	704	60.07	144	54.34	30,061	62.44
	zero & NAs	0	0.00	1,649	10.93	0	0.00	3,678	11.53	0	0.00	68	5.80	0	0.00	5,395	11.21
	<b>30.1</b>	<b>total</b>	<b>40</b>	<b>100.00</b>	<b>15,082</b>	<b>100.00</b>	<b>178</b>	<b>100.00</b>	<b>31,887</b>	<b>100.00</b>	<b>47</b>	<b>100.00</b>	<b>1,172</b>	<b>100.00</b>	<b>265</b>	<b>100.00</b>	<b>48,141</b>
New York	low	0	0.00	13	0.10	1	0.97	62	0.26	0	0.00	7	3.74	1	0.89	82	0.22
	moderate	1	16.67	226	1.67	7	6.80	419	1.76	2	66.67	25	13.37	10	8.93	670	1.79
	middle	0	0.00	1,028	7.60	7	6.80	1,579	6.65	1	33.33	24	12.83	8	7.14	2,631	7.02
	upper	5	83.33	11,640	86.08	88	85.44	19,941	83.97	0	0.00	126	67.38	93	83.04	31,707	84.64
	zero & NAs	0	0.00	616	4.56	0	0.00	1,748	7.36	0	0.00	5	2.67	0	0.00	2,369	6.32
	<b>12.7</b>	<b>total</b>	<b>6</b>	<b>100.00</b>	<b>13,523</b>	<b>100.00</b>	<b>103</b>	<b>100.00</b>	<b>23,749</b>	<b>100.00</b>	<b>3</b>	<b>100.00</b>	<b>187</b>	<b>100.00</b>	<b>112</b>	<b>100.00</b>	<b>37,459</b>
Queens	low	2	6.67	130	0.61	3	3.09	572	1.37	0	0.00	58	3.75	5	3.21	760	1.18
	moderate	9	30.00	1,260	5.94	15	15.46	3,139	7.52	7	24.14	160	10.34	31	19.87	4,559	7.07
	middle	10	33.33	4,188	19.76	31	31.96	9,213	22.08	8	27.59	401	25.90	49	31.41	13,802	21.41
	upper	9	30.00	13,111	61.85	47	48.45	23,960	57.43	14	48.28	849	54.84	70	44.87	37,920	58.82
	zero & NAs	0	0.00	2,508	11.83	1	1.03	4,836	11.59	0	0.00	80	5.17	1	0.64	7,424	11.52
	<b>17.7</b>	<b>total</b>	<b>30</b>	<b>100.00</b>	<b>21,197</b>	<b>100.00</b>	<b>97</b>	<b>100.00</b>	<b>41,720</b>	<b>100.00</b>	<b>29</b>	<b>100.00</b>	<b>1,548</b>	<b>100.00</b>	<b>156</b>	<b>100.00</b>	<b>64,465</b>

**1-4 FAMILY HMDA LOAN ORIGINATIONS<sup>1</sup>**

**YEAR 2003**

**BORROWER INCOME LEVEL DISTRIBUTION -- NUMBER OF LOANS**

County/Area % of Total A/A Loans	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. %
Richmond	low	0	0.00	23	0.34	5	5.26	175	0.99	4	7.27	18	2.14	9	5.33	216	0.86
	moderate	4	21.05	269	3.97	6	6.32	1,029	5.85	8	14.55	52	6.17	18	10.65	1,350	5.36
	middle	7	36.84	1,263	18.64	28	29.47	3,536	20.10	9	16.36	157	18.62	44	26.04	4,956	19.66
	upper	8	42.11	4,639	68.48	56	58.95	10,909	62.01	34	61.82	584	69.28	98	57.99	16,132	63.99
	zero & NAs	0	0.00	580	8.56	0	0.00	1,943	11.04	0	0.00	32	3.80	0	0.00	2,555	10.14
	<b>19.2 total</b>		<b>19</b>	<b>100.00</b>	<b>6,774</b>	<b>100.00</b>	<b>95</b>	<b>100.00</b>	<b>17,592</b>	<b>100.00</b>	<b>55</b>	<b>100.00</b>	<b>843</b>	<b>100.00</b>	<b>169</b>	<b>100.00</b>	<b>25,209</b>
Westchester	low	0	0.00	69	0.55	0	0.00	148	0.42	0	0.00	13	1.37	0	0.00	230	0.47
	moderate	0	0.00	555	4.43	1	4.76	856	2.43	0	0.00	39	4.11	1	3.57	1,450	2.98
	middle	1	16.67	1,547	12.33	2	9.52	3,254	9.24	0	0.00	121	12.74	3	10.71	4,922	10.10
	upper	5	83.33	9,603	76.57	18	85.71	27,362	77.67	1	100.00	736	77.47	24	85.71	37,701	77.38
	zero & NAs	0	0.00	768	6.12	0	0.00	3,608	10.24	0	0.00	41	4.32	0	0.00	4,417	9.07
	<b>3.2 total</b>		<b>6</b>	<b>100.00</b>	<b>12,542</b>	<b>100.00</b>	<b>21</b>	<b>100.00</b>	<b>35,228</b>	<b>100.00</b>	<b>1</b>	<b>100.00</b>	<b>950</b>	<b>100.00</b>	<b>28</b>	<b>100.00</b>	<b>48,720</b>
MSA 35644*	low	2	1.90	420	0.57	15	3.01	1,612	1.01	7	5.04	167	3.26	24	3.23	2,199	0.92
	moderate	23	21.90	3,505	4.72	48	9.62	8,330	5.21	27	19.42	443	8.65	98	13.19	12,278	5.13
	middle	31	29.52	11,505	15.49	122	24.45	26,256	16.43	33	23.74	1,070	20.89	186	25.03	38,831	16.23
	upper	49	46.67	52,286	70.39	313	62.73	106,842	66.84	72	51.80	3,197	62.42	434	58.41	162,325	67.85
	zero & NAs	0	0.00	6,569	8.84	1	0.20	16,796	10.51	0	0.00	245	4.78	1	0.13	23,610	9.87
	<b>84.4 total</b>		<b>105</b>	<b>100.00</b>	<b>74,285</b>	<b>100.00</b>	<b>499</b>	<b>100.00</b>	<b>159,836</b>	<b>100.00</b>	<b>139</b>	<b>100.00</b>	<b>5,122</b>	<b>100.00</b>	<b>743</b>	<b>100.00</b>	<b>239,243</b>
A/A Total	low	4	3.20	1,615	1.39	18	2.99	8,707	2.84	9	5.88	775	6.61	31	3.52	11,097	2.55
	moderate	30	24.00	10,313	8.85	67	11.13	38,643	12.58	30	19.61	1,930	16.47	127	14.43	50,886	11.69
	middle	40	32.00	24,671	21.17	163	27.08	70,659	23.01	37	24.18	3,383	28.88	240	27.27	98,713	22.68
	upper	51	40.80	69,516	59.65	352	58.47	158,314	51.56	77	50.33	5,183	44.24	480	54.55	233,013	53.53
	zero & NAs	0	0.00	10,419	8.94	2	0.33	30,750	10.01	0	0.00	445	3.80	2	0.23	41,614	9.56
	<b>100.0 total</b>		<b>125</b>	<b>100.00</b>	<b>116,534</b>	<b>100.00</b>	<b>602</b>	<b>100.00</b>	<b>307,073</b>	<b>100.00</b>	<b>153</b>	<b>100.00</b>	<b>11,716</b>	<b>100.00</b>	<b>880</b>	<b>100.00</b>	<b>435,323</b>

\* The bank takes only that part of the county or MSA in its assessment area.

<sup>1</sup> Bank numbers include originated and purchased; Home purchase, refinancing and home improvement includes one-to-four family and manufactured housing.

Sources of data: Bank (bank loans and assessment area); and 2003 HUD estimates.

1-4 FAMILY HMDA LOAN ORIGINATIONS <sup>1</sup>																	
YEAR 2004																	
BORROWER INCOME LEVEL DISTRIBUTION -- NUMBER OF LOANS																	
County/Area	Geography 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	-	-	329	1.67	3	9.38	1,120	4.05	-	-	248	6.53	3	5.08	1,697	3.31
	moderate	-	-	2,137	10.83	5	15.63	5,409	19.54	-	-	771	20.29	5	8.47	8,317	16.24
	middle	4	40.00	6,324	32.04	14	43.75	9,089	32.84	7	41.18	1,323	34.82	25	42.37	16,736	32.68
	upper	6	60.00	9,669	48.99	10	31.25	9,601	34.69	10	58.82	1,348	35.47	26	44.07	20,618	40.26
	zero & NAs	-	-	1,277	6.47	-	-	2,458	8.88	-	-	110	2.89	-	-	3,845	7.51
	<b>7.8 total</b>	<b>10</b>	<b>100.00</b>	<b>19,736</b>	<b>100.00</b>	<b>32</b>	<b>100.00</b>	<b>27,677</b>	<b>100.00</b>	<b>17</b>	<b>100.00</b>	<b>3,800</b>	<b>100.00</b>	<b>59</b>	<b>100.00</b>	<b>51,213</b>	<b>100.00</b>
Suffolk	low	-	-	726	2.72	1	7.69	2,938	6.74	-	-	667	8.55	1	5.00	4,331	5.55
	moderate	-	-	4,082	15.31	6	46.15	11,045	25.35	1	50.00	1,953	25.03	7	35.00	17,080	21.89
	middle	3	60.00	9,130	34.25	1	7.69	14,296	32.81	-	-	2,719	34.84	4	20.00	26,145	33.50
	upper	2	40.00	10,953	41.09	5	38.46	12,055	27.66	1	50.00	2,276	29.16	8	40.00	25,284	32.40
	zero & NAs	-	-	1,766	6.62	-	-	3,241	7.44	-	-	189	2.42	-	-	5,196	6.66
	<b>2.6 total</b>	<b>5</b>	<b>100.00</b>	<b>26,657</b>	<b>100.00</b>	<b>13</b>	<b>100.00</b>	<b>43,575</b>	<b>100.00</b>	<b>2</b>	<b>100.00</b>	<b>7,804</b>	<b>100.00</b>	<b>20</b>	<b>100.00</b>	<b>78,036</b>	<b>100.00</b>
MSA 35004	low	-	-	1,055	2.27	4	8.89	4,058	5.70	-	-	915	7.89	4	5.06	6,028	4.66
	moderate	-	-	6,219	13.41	11	24.44	16,454	23.09	1	5.26	2,724	23.47	12	15.19	25,397	19.65
	middle	7	46.67	15,454	33.31	15	33.33	23,385	32.82	7	36.84	4,042	34.83	29	36.71	42,881	33.18
	upper	8	53.33	20,622	44.45	15	33.33	21,656	30.39	11	57.89	3,624	31.23	34	43.04	45,902	35.51
	zero & NAs	-	-	3,043	6.56	-	-	5,699	8.00	-	-	299	2.58	-	-	9,041	7.00
	<b>10.4 total</b>	<b>15</b>	<b>100.00</b>	<b>46,393</b>	<b>100.00</b>	<b>45</b>	<b>100.00</b>	<b>71,252</b>	<b>100.00</b>	<b>19</b>	<b>100.00</b>	<b>11,604</b>	<b>100.00</b>	<b>79</b>	<b>100.00</b>	<b>129,249</b>	<b>100.00</b>
Bronx	low	2	28.57	105	1.62	1	12.50	151	2.04	-	-	56	5.71	3	16.67	312	2.10
	moderate	1	14.29	570	8.81	-	-	745	10.09	2	66.67	135	13.76	3	16.67	1,450	9.77
	middle	2	28.57	1,412	21.83	3	37.50	1,927	26.09	-	-	279	28.44	5	27.78	3,618	24.39
	upper	2	28.57	4,019	62.14	4	50.00	4,017	54.39	1	33.33	479	48.83	7	38.89	8,515	57.40
	zero & NAs	-	-	362	5.60	-	-	545	7.38	-	-	32	3.26	-	-	939	6.33
	<b>2.4 total</b>	<b>7</b>	<b>100.00</b>	<b>6,468</b>	<b>100.00</b>	<b>8</b>	<b>100.00</b>	<b>7,385</b>	<b>100.00</b>	<b>3</b>	<b>100.00</b>	<b>981</b>	<b>100.00</b>	<b>18</b>	<b>100.00</b>	<b>14,834</b>	<b>100.00</b>
Kings	low	2	3.64	138	0.77	11	11.22	453	2.24	8	13.11	89	4.12	21	9.81	680	1.69
	moderate	10	18.18	994	5.56	12	12.24	1,817	8.99	8	13.11	264	12.22	30	14.02	3,075	7.64
	middle	14	25.45	3,008	16.83	26	26.53	4,952	24.49	12	19.67	562	26.01	52	24.30	8,522	21.17
	upper	29	52.73	12,368	69.19	48	48.98	11,100	54.90	32	52.46	1,131	52.34	109	50.93	24,599	61.11
	zero & NAs	-	-	1,367	7.65	1	1.02	1,895	9.37	1	1.64	115	5.32	2	0.93	3,377	8.39
	<b>28.2 total</b>	<b>55</b>	<b>100.00</b>	<b>17,875</b>	<b>100.00</b>	<b>98</b>	<b>100.00</b>	<b>20,217</b>	<b>100.00</b>	<b>61</b>	<b>100.00</b>	<b>2,161</b>	<b>100.00</b>	<b>214</b>	<b>100.00</b>	<b>40,253</b>	<b>100.00</b>
New York	low	-	-	21	0.15	-	-	43	0.55	-	-	10	1.91	-	-	74	0.32
	moderate	-	-	294	2.03	-	-	215	2.76	1	16.67	44	8.40	1	2.44	553	2.43
	middle	3	37.50	1,130	7.81	3	11.11	618	7.92	2	33.33	72	13.74	8	19.51	1,820	7.98
	upper	5	62.50	12,477	86.18	23	85.19	6,178	79.21	3	50.00	381	72.71	31	75.61	19,036	83.49
	zero & NAs	-	-	555	3.83	1	3.70	746	9.56	-	-	17	3.24	1	2.44	1,318	5.78
	<b>5.4 total</b>	<b>8</b>	<b>100.00</b>	<b>14,477</b>	<b>100.00</b>	<b>27</b>	<b>100.00</b>	<b>7,800</b>	<b>100.00</b>	<b>6</b>	<b>100.00</b>	<b>524</b>	<b>100.00</b>	<b>41</b>	<b>100.00</b>	<b>22,801</b>	<b>100.00</b>
Queens	low	2	5.56	174	0.71	2	4.00	477	1.87	3	10.34	111	3.93	7	6.09	762	1.44
	moderate	7	19.44	1,553	6.29	5	10.00	2,482	9.73	6	20.69	363	12.85	18	15.65	4,398	8.29
	middle	7	19.44	4,832	19.58	15	30.00	6,715	26.31	9	31.03	795	28.15	31	26.96	12,342	23.28
	upper	20	55.56	16,273	65.94	28	56.00	13,544	53.07	11	37.93	1,412	50.00	59	51.30	31,229	58.90
	zero & NAs	-	-	1,847	7.48	-	-	2,301	9.02	-	-	143	5.06	-	-	4,291	8.09
	<b>15.2 total</b>	<b>36</b>	<b>100.00</b>	<b>24,679</b>	<b>100.00</b>	<b>50</b>	<b>100.00</b>	<b>25,519</b>	<b>100.00</b>	<b>29</b>	<b>100.00</b>	<b>2,824</b>	<b>100.00</b>	<b>115</b>	<b>100.00</b>	<b>53,022</b>	<b>100.00</b>

1-4 FAMILY HMDA LOAN ORIGINATIONS <sup>1</sup>																	
YEAR 2004																	
BORROWER INCOME LEVEL DISTRIBUTION -- NUMBER OF LOANS																	
County/Area % of Total A/A Loans	Geography Income Level	Home Purchase				Refinancing				Home Improvement				Total			
		Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %
Richmond	low	1	2.38	40	0.52	6	5.61	118	1.34	4	3.03	25	1.85	11	3.91	183	1.03
	moderate	5	11.90	368	4.83	13	12.15	747	8.47	10	7.58	121	8.98	28	9.96	1,236	6.95
	middle	12	28.57	1,682	22.06	22	20.56	2,159	24.49	30	22.73	347	25.74	64	22.78	4,188	23.54
	upper	24	57.14	5,091	66.78	66	61.68	5,139	58.29	88	66.67	826	61.28	178	63.35	11,056	62.15
	zero & NAs	-	-	443	5.81	-	-	654	7.42	-	-	29	2.15	-	-	1,126	6.33
<b>37.0</b>	<b>total</b>	<b>42</b>	<b>100.00</b>	<b>7,624</b>	<b>100.00</b>	<b>107</b>	<b>100.00</b>	<b>8,817</b>	<b>100.00</b>	<b>132</b>	<b>100.00</b>	<b>1,348</b>	<b>100.00</b>	<b>281</b>	<b>100.00</b>	<b>17,789</b>	<b>100.00</b>
Westchester	low	-	-	98	0.71	-	-	93	0.66	-	-	24	1.50	-	-	215	0.73
	moderate	-	-	699	5.05	1	12.50	622	4.43	-	-	91	5.67	1	9.09	1,412	4.79
	middle	-	-	1,779	12.85	1	12.50	1,871	13.32	-	-	230	14.34	1	9.09	3,880	13.15
	upper	1	100.00	10,647	76.89	5	62.50	10,167	72.38	2	100.00	1,199	74.75	8	72.73	22,013	74.63
	zero & NAs	-	-	624	4.51	1	12.50	1,293	9.21	-	-	60	3.74	1	9.09	1,977	6.70
<b>1.4</b>	<b>total</b>	<b>1</b>	<b>100.00</b>	<b>13,847</b>	<b>100.00</b>	<b>8</b>	<b>100.00</b>	<b>14,046</b>	<b>100.00</b>	<b>2</b>	<b>100.00</b>	<b>1,604</b>	<b>100.00</b>	<b>11</b>	<b>100.00</b>	<b>29,497</b>	<b>100.00</b>
MSA 35644*	low	7	4.70	576	0.68	20	6.71	1,335	1.59	15	6.44	315	3.34	42	6.18	2,226	1.25
	moderate	23	15.44	4,478	5.27	31	10.40	6,628	7.91	27	11.59	1,018	10.78	81	11.91	12,124	6.80
	middle	38	25.50	13,843	16.29	70	23.49	18,242	21.77	53	22.75	2,285	24.20	161	23.68	34,370	19.29
	upper	81	54.36	60,875	71.64	174	58.39	50,145	59.85	137	58.80	5,428	57.49	392	57.65	116,448	65.35
	zero & NAs	-	-	5,198	6.12	3	1.01	7,434	8.87	1	0.43	396	4.19	4	0.59	13,028	7.31
<b>89.6</b>	<b>Total</b>	<b>149</b>	<b>100.00</b>	<b>84,970</b>	<b>100.00</b>	<b>298</b>	<b>100.00</b>	<b>83,784</b>	<b>100.00</b>	<b>233</b>	<b>100.00</b>	<b>9,442</b>	<b>100.00</b>	<b>680</b>	<b>100.00</b>	<b>178,196</b>	<b>100.00</b>
A/A Total	low	7	4.27	1,631	1.24	24	7.00	5,393	3.48	15	5.95	1,230	5.84	46	6.06	8,254	2.68
	moderate	23	14.02	10,697	8.14	42	12.24	23,082	14.89	28	11.11	3,742	17.78	93	12.25	37,521	12.20
	middle	45	27.44	29,297	22.30	85	24.78	41,627	26.85	60	23.81	6,327	30.06	190	25.03	77,251	25.13
	upper	89	54.27	81,497	62.04	189	55.10	71,801	46.31	148	58.73	9,052	43.01	426	56.13	162,350	52.81
	zero & NAs	-	-	8,241	6.27	3	0.87	13,133	8.47	1	0.40	695	3.30	4	0.53	22,069	7.18
<b>100.0</b>	<b>Total</b>	<b>164</b>	<b>100.00</b>	<b>131,363</b>	<b>100.00</b>	<b>343</b>	<b>100.00</b>	<b>155,036</b>	<b>100.00</b>	<b>252</b>	<b>100.00</b>	<b>21,046</b>	<b>100.00</b>	<b>759</b>	<b>100.00</b>	<b>307,445</b>	<b>100.00</b>

\* The bank takes only that part of the county or MD/MSA in its assessment area.

<sup>1</sup> Bank numbers include originated and purchased; Aggregate numbers include originated only; 1-4 family includes manufactured housing. Sources of data: Bank (bank loans and assessment area); and 2004 HUD estimates.

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## 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:

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- 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 percent would indicate less lending in LMI areas on the same basis compared to non-LMI areas, whereas over 100 percent 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.

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### **Low or Moderate Income (“LMI”) Geographies**

Those census tracts or block numbering areas (“BNAs”), where according to the 2000 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 nonmetropolitan 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 nonmetropolitan 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 nonmetropolitan 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.