Comptroller of the Currency
Administrator of National Banks

LARGE BANK

Public Disclosure

December 31, 1999

Community Reinvestment Act Performance Evaluation

Bank One, Illinois, N.A.
Charter Number: 23237

One East Old State Capital Plaza
Springfield, Illinois 62701

Office of the Comptroller of the Currency

Large Bank Division
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NOTE: This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

Table of Contents

Overall CRA Rating

Institution's CRA Rating: This institution is rated **Satisfactory.**

The following table indicates the performance level of Bank One, Illinois, N.A. (BOI) with respect to the Lending, Investment, and Service Tests:

	Bank One, Illinois, N.A. Performance Tests		
Performance Levels	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory		X	
Low Satisfactory	X		X
Needs to Improve			
Substantial Noncompliance			

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

Lending Test

- An adequate level of lending. A good volume of small loans to businesses and an adequate volume of mortgage lending was noted. The bank extended a minimal volume of home purchase loans, but the volume of home improvement and refinance loans was adequate. The volume of community development lending was modest and did not positively influence our conclusion regarding the volume of lending.

- An adequate distribution of loans by income level of geography. The distribution of small loans to businesses was adequate overall but poor in the Chicago assessment area. The bank's home mortgage lending had a good distribution. The distribution of home improvement loans was excellent and the distribution of refinance loans was adequate. Home purchase lending was not given significant weight in the evaluation because of the nominal volume of loans and the fact that home purchase lending is not a significant part of the bank's business strategy.

- A good distribution of lending by borrower income. The distribution of home mortgage lending was excellent, but that performance was tempered by the lack of information in this area for small loans to businesses.

- Product innovation and flexibility in order to meet the needs of low- and moderate-income individuals or geographies was adequate.

Investment Test

- A good volume of qualified investments. The volume of investments in the Chicago assessment area was excellent but poor in Champaign. The bank's investments were responsive to needs in the bank's communities and a moderate level of complexity was noted.

Service Test

- Access to the bank's services was adequate. The source of the bank's deposits in the Chicago assessment area being primarily suburban was a significant factor in this conclusion. The reasonableness of banking hours and services was adequate and there were no branch closings in low- or moderate-income areas.

General Information

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

*This document is an evaluation of the CRA performance of **Bank One, Illinois, N.A.** prepared by the **Office of the Comptroller of the Currency (OCC)**, the institution's supervisory agency, as of **December 31, 1999**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.*

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this Performance Evaluation. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

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

Block Numbering Area (BNA) - Statistical subdivisions of counties in which census tracts have not been established. BNAs have been established by the United States Census Bureau in conjunction with state agencies.

Census Tract (CT) - Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the United States Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per ten year census and an average population of 4,000.

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

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

Full-Scope Review - Performance under the Lending, Investment and Service Tests is analyzed considering fully understood performance context, quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution) and qualitative factors (e.g., innovation, complexity).

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

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

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

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

Low-Income - Income levels that are less than 50% of the median family income.

Median Family Income (MFI) - The median income determined by the United States Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Statistical Area (MSA) - Area defined by the Director of the United States Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

Middle-Income - Income levels that are at least 80% and less than 120% of the MFI.

Moderate-Income - Income levels that are at least 50% and less than 80% of the MFI.

Operating Subsidiary - Corporations, limited liability corporations or similar entities in which the bank has control through 50% or greater ownership. Bank's may establish or acquire such entities to conduct activities which are part of or incidental to the business of banking.

Small Business Loans - Loans with original amounts of $1 million or less that are: (1) secured by nonfarm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

Small Farm Loans - Loans with original amounts of $500 thousand or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

Tier 1 Capital - The total of common shareholders' equity, perpetual preferred shareholders' equity with noncumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income - Income levels that are 120% or more of the MFI.

Description of Institution

Bank One, Illinois (BOI), headquartered in Springfield, Illinois, is a wholly-owned subsidiary of Bank One Corporation (BOC), which is headquartered in Chicago, Illinois. As of December 31, 1999, BOC had total assets of $269 billion, making it the fifth largest bank holding company in the United States. BOC provides a full range of consumer and commercial financial products and services, and operates banking offices in 14 states: Arizona, Colorado, Florida, Illinois, Indiana, Kentucky, Louisiana, Michigan, Ohio, Oklahoma, Texas, Utah, West Virginia, and Wisconsin. The Corporation operates more than 2,000 banking centers and 6,000 automated teller machines (ATM's) nation-wide. It has subsidiaries in 33 states and international offices on five continents.

As of December 31, 1999, BOI reported total assets of $4.1 billion, total loans of $2.0 billion, and a loan-to-deposit ratio of 102%. Tier 1 capital totals $410 million. BOI operates 30 banking centers and 53 ATM's throughout the state of Illinois. As of December 31, 1999, BOI's loan portfolio consisted of 39% real estate loans, 42% consumer loans, 13% commercial loans, and 1% agricultural loans.

In determining the size and capacity of BOI for CRA evaluation purposes, we specifically considered operating subsidiaries of the bank. None of the bank's operating subsidiaries contributes to the CRA performance of the bank. In addition, none of the bank's operating subsidiaries hindered or impeded the bank's capacity or ability to lend or invest in its communities.

There were four affiliated, non-bank entities and one affiliated bank that contributed to the bank's CRA performance. Refer to Appendix A for identification of the entities and the activities they contributed.

There are no significant financial barriers limiting BOI's ability to meet the identified credit needs within its assessment areas.

During the evaluation period, BOI delineated fifteen separate assessment areas for CRA purposes. The assessment areas included parts of seven Metropolitan Statistical Areas (MSAs) and two non-metropolitan areas in Illinois. The bank's assessment areas included:

1) The western part of the Bloomington-Normal MSA.
2) The entire Champaign MSA.
3) Seven separate assessment areas in the Chicago MSA contained within Cook, DuPage, Will, and Kane counties.
4) A portion of the Davenport-Moline-Rock Island multi-state MSA, which

includes two census tracts in west Henry County, IL, all of Rock Island County, IL, and the southeast portion of Scott County, IA.

5) The entire Peoria-Pekin MSA.
6) The entire Rockford MSA.
7) The entire Springfield MSA.
8) The central portion of Christian County.
9) The County of Piatt.

The Davenport-Moline-Rock Island MSA is a multi-state MSA, but the bank's branches are within the Illinois portion of the MSA. The result of that configuration is that the Davenport-Moline-Rock Island MSA is not treated as a multi-state MSA for the purposes of this evaluation and was not assigned a rating separate from the rating for the State of Illinois. Consequently, BOI was evaluated as an intrastate bank.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The last evaluation of the bank was dated December 31, 1994. At that time, the bank was a state-chartered financial institution named Bank One Springfield. The current evaluation assesses the bank's performance from January 1, 1995 to December 31, 1999. Under the Lending Test, we considered home purchase, home improvement, refinance, small business, small farm, and community development loan data beginning January 1, 1996 through December 31, 1999. January 1, 1996, is the day all large banks were required to begin collecting and maintaining small business and farm lending data. For the Investment and Service Tests, we considered activity from January 1, 1995 through December 31, 1999.

In February 1997, Bank One Bloomington, Bank One Champaign, Bank One Chicago, Bank One Peoria, and Bank One Rockford were merged into BO Springfield and the name of the bank was changed to BOI. Bank One Quad Cities merged with BOI in January of 1998. Each of the mergers resulted in new assessment areas being added for BOI. Lending data from the assessment areas added in February of 1997 was considered beginning January 1, 1997. Data from the assessment area added through the merger with Bank One Quad Cities was considered from January 1, 1998 forward.

In September of 1999, BOI transferred its branches in the Chicago area to an affiliate, Bank One, NA (Illinois). As a result of the transfer, the seven Chicago MSA assessment areas were dropped by BOI. However, since the assessment areas existed for the major portion of the evaluation period, the bank's performance in these assessment areas is part of this evaluation.

We also expanded the bank's assessment areas in Chicago for evaluation purposes to encompass all of Cook, DuPage, Kane, and Will counties. The bank had delineated seven separate assessment areas that encompassed parts of these counties and centered around the bank's branches. However, we noted that only 42% of the bank's lending in the Chicago area was contained within the seven assessment areas. HMDA lending was the biggest factor in the low percentage of lending within the assessment areas with only 31% of the bank's loans contained within the seven assessment areas. By expanding the delineation to the full four counties, we captured 92% of the bank's lending within that assessment area. The expanded delineation more accurately reflects the scope of the bank's lending activities.

It is acknowledged that the use of seven smaller assessment areas appeared more reasonable when the source of the bank's deposits was analyzed. Only a small portion of the city of Chicago was captured by the seven assessment area delineations, and only 2.5% of the bank's deposits were derived from the city of Chicago. The source of deposits is not a substitute for analysis of a bank's lending activities in delineating assessment areas, but it was a performance context issue considered in the Service Test. Our analysis acknowledged the bank's primarily suburban branch network and the presence of two affiliate banks in the Chicago MSA.

Another adjustment the reader should be aware of occurred in the non-metropolitan assessment areas. The bank sold its branches in Christian and Piatt counties in early 1999. As a result of this transaction, we only evaluated the bank's performance in the non-metropolitan areas through December 31, 1998.

The reader should also be aware that BOI elected to take credit for the mortgage lending activities of the affiliated Bank One Mortgage Company (BOMC) in some assessment areas, but not others. Affiliate mortgage lending was not attributed to BOI in the Chicago and Rockford assessment areas because other affiliates, American National Bank and Trust Company of Chicago, took credit for lending in those assessment areas. BOMC was considered in the other BOI assessment areas. The regulation permits the bank to select affiliate activity to be considered in an evaluation on an assessment area by assessment area basis.

Data Integrity

The scope of this examination included a review of the accuracy of the bank data analyzed to develop our conclusions and ratings. The data tested for accuracy includes data made available to the public in accordance with the Home Mortgage Disclosure Act (HMDA) and the CRA regulation. Public data includes home mortgage lending, small loans to businesses, and small loans to farms. We also reviewed the accuracy of non-public data for qualified investments, community development loans, and community development services.

The following significant errors were noted in the bank's HMDA and small loans to businesses reporting.

1. Subsequent to the bank's 1999 submission of HMDA data, management identified a significant over-reporting of loans. A total of 11,081 loans were reported, but 6,637 of them had also been reported by affiliated entities. Management has corrected their submission by removing the duplicate loans, but due to the timing of the amended submission, the amended numbers will not be reflected in the 1999 data for all reporting entities released by the government. Our analysis uses the corrected numbers.

2. A 10% error rate was noted in the revenue data reported in 1999 for small loans to businesses. Higher error rates for revenue data had been noted in previous years. The other reported data for these loans was accurate. We used the small loans to business data reported by the bank, but did not consider the revenue data in the evaluation. As a result of this exclusion we did not develop a conclusion regarding the distribution of small loans to businesses by income level of borrower.

3. The bank's 1998 small loans to businesses submission contained 52 guidance lines of credit totaling $12.6 million that were not eligible for reporting. The ineligible loans represented 3.4% of the number of loans and 7.4% of the dollar total reported by the bank. We were able to remove these loans from the 1998 bank data used in our evaluation, but management was unable to identify the number of guidance lines of credit reported in the bank's 1996 or 1997 data. We still used the 1996 and 1997 data in our evaluation, but considered this over-reporting when developing our conclusion regarding the volume lending.

4. Commercial leases were incorrectly reported as small loans to businesses in 1998. The ineligible leases represented 1.9% of the number of loans reported. Management was able to remove the leases from the data provided to examiners for the evaluation.

The bank's qualified investments, community development loans and community development services information was found to be accurate.

Selection of Areas for Full-Scope Review

We selected a sample of bank assessment areas for full-scope reviews and the remaining assessment areas were reviewed in a more limited manner. The data contained in the tables in Appendix C was evaluated for each bank assessment area. However, for full-scope assessment areas additional information was developed concerning credit and community development needs and opportunities for community development activities. The analysis in full-scope areas also included a detailed analysis of the geographic distribution of lending to determine if there were any significant, unexplained gaps in the bank's lending. Additionally, individual community development loans and services and qualified investments were reviewed to assess qualitative factors such as complexity, innovation, leadership, and responsiveness to identified needs. The Service Test analysis in full scope areas included analysis of the location of bank branches to gauge accessibility.

We selected the Springfield, Champaign, and Chicago assessment areas for full scope reviews as they contain 19.9%, 6.5%, and 41.1% of the bank's deposits respectively. All are metropolitan statistical areas. The bank's overall rating is based, to a large extent, on these areas since they contain 68% of the bank's deposits. The Chicago assessment area contains the largest portion of the bank's deposits and the bank's performance in this area was given the most weight in developing our conclusions. Performance in the areas reviewed using limited scope procedures was also considered, but did not carry as much relative weight. Assessment areas receiving limited-scope reviews were the Bloomington, Davenport-Moline-Rock Island, Peoria and Rockford MSAs, and the non-metropolitan areas of Christian and Piatt County

Fair Lending Review

We reviewed BOI's HMDA data to determine whether any potentially discriminatory lending patterns were apparent that would warrant more detailed comparative loan file reviews. We analyzed the disposition of Black and Hispanic home mortgage applications the bank received in 1998 and 1999 in each of the bank's eight assessment areas. We used the 1998 aggregate HMDA data for all mortgage lenders in these areas to compare to BOI's data. The 1999 aggregate HMDA data had not been released at the time of this review. We also took the demographic characteristics of each assessment area into account. We considered the following factors in our analysis and analyzed these factors separately for each HMDA product in each assessment area.

- We compared the bank's loan market rank and loan market share for each HMDA product to the bank's deposit market rank and deposit market share in order to gauge the volume of lending in relation to the bank's size.

- Using 1998 aggregate HMDA data, we compared the market share of the number of loans the bank made to Blacks and Hispanics in each HMDA product to the bank's overall market share in that HMDA product. We considered a minority market share that was near or exceeded the overall market share a positive indicator.

- Using bank only 1999 HMDA data, we compared the percentage of loans the bank made to Blacks and Hispanics in each HMDA product to the percentage each minority group represented in the assessment area's population. If the percentage of loans to Blacks and Hispanics was near or exceeded the percentage of each group in the population, we considered that a positive indicator.

- Using 1998 aggregate HMDA data, we compared the bank's denial rates for Blacks and Hispanics to the denial rates generated by all other reporting lenders. We also determined a denial disparity ratio for all reporting lenders combined for each minority group by dividing the denial rate for the group by the denial rate for Whites. If the bank's denial disparity ratio was lower than the one calculated for all lenders in a specific product, we considered that a positive indicator.

- Using bank only 1999 HMDA data, we compared the bank's denial rate for Blacks and Hispanics to the bank's 1998 denial rates. We also calculated the 1999 denial disparity ratio for each group and compared it to the 1998 bank and aggregate ratios. If the bank's denial rates decreased from the previous year, we considered that a positive factor. If the bank's denial disparity ratios decreased from the previous year or remained below the 1998 aggregate ratios, we considered that a positive factor.

- If BOI had five or fewer minority denials in any HMDA product in an assessment area, we considered that insufficient data on which to base a conclusion that potentially disparate treatment may have occurred, regardless of the other factors reviewed.

Conclusions

We did not find lending patterns that indicated potential discriminatory lending practices were employed in the disposition of Black and Hispanic applications for home mortgage loans.

- BOI did not have a significant market share in any home mortgage product in any of its assessment areas compared to its deposit market share in the assessment area.

- BOI had an insufficient number of home purchase applications from Blacks or Hispanics to determine whether disparate lending practices occurred. Over the two year period reviewed, the bank received 16 applications for home purchase loans from Blacks and ten from Hispanics in all of its assessment areas.

- The bank's 1998 market share of home improvement and refinance loans to Blacks and Hispanics consistently exceeded the overall market share for each product in each assessment area with one exception. In Rockford, the bank's market share of home improvement loans to Blacks was very near the overall home improvement market share.

- In 1999, the percentage of home improvement and refinance loans the bank made to Blacks and Hispanics generally exceeded the percentage each minority group represented in the population of the assessment area. If the percentage of loans to a minority group was significantly below that group's representation in the population it was mitigated by either an insufficient volume of applications on which to conclude or denial disparity ratios that matched or were below those found in the aggregate of reporting lenders.

- In 1998, the bank's Black and Hispanic denial rates for home improvement and refinance applications were generally substantially higher than those found for the same groups and same products among the aggregate of reporting lenders. The bank's Black and Hispanic denial rates for these products typically remained high in 1999. We also noted the bank's denial rate for Whites was two to three times the White denial rate for the aggregate of reporting lenders.

- In 1998, the denial disparity ratios for Black applicants in home improvement and refinance lending were lower than, and in one instance the same as, the denial disparity ratios generated in the aggregate. In some instances, the denial disparity ratios for Blacks increased in 1999, but the increases were exaggerated by the small number of applications the bank received.

- In 1998, the denial disparity ratios for Hispanic applicants in home improvement lending was lower than the denial disparity ratio generated in the aggregate, except in Rockford where the disparity ratio was higher. The disparity ratio in Rockford resulted from a small number of applications received (7). In several instances, the denial disparity ratios for Hispanics increased in 1999. In those cases, the increase was associated with a small number of applications which can cause significant fluctuations in denial rates.

- In 1998, the denial disparity ratios for Hispanic applicants in refinance lending were lower in Chicago and Bloomington and higher in Davenport, Peoria, and Rockford. No Hispanics applied for refinance loans in Champaign and Springfield. In Davenport, the disparity ratio was influenced by a high denial rate resulting from rejecting two of seven applications received. The disparity ratio declined significantly in 1999. In Rockford, the denial disparity ratio for Hispanic applicants was higher than the aggregate, but decreased significantly in 1999 and fell below the levels seen in the 1998 aggregate.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Overall performance under the Lending Test is adequate. This conclusion is based on good performance in Champaign and Springfield, and adequate performance in Chicago. The bank's performance in Chicago was given the greatest consideration due to the large percentage of bank deposits originating in that area.

Lending Activity

Refer to Tables 1 - 5 in Appendix C for the data used in this analysis.

The volume of lending is adequate. Lending activity is good in Champaign and adequate in Chicago and Springfield. The bank's volume of lending is generally adequate across the various loan products. The exceptions were home purchase lending with poor volume of lending and small loans to businesses with good volume.

The bank's overall volume of home mortgage lending is adequate. Champaign, Chicago, and Springfield all show overall adequate lending volumes. However, a poor volume of home purchase loans is noted in Chicago and Springfield. In these two assessment areas, home purchase market rank and market share is significantly lower than the bank's deposit market rank and market share. The bank's volume of home improvement and refinance loans is adequate in each of the three focus areas. Loan market ranks and market shares for these products are somewhat lower than the bank's deposit market rank and market share in each focus area, but adequate.

Small business lending volume is excellent in Champaign, good in Chicago and adequate in Springfield. Small farm lending volume is excellent in Champaign and adequate in both Chicago and Springfield. In areas where market ranks for small business and small farm loans are higher than the bank's deposit market rank indicates excellent lending volumes. Good volume is reflected when market rank and market share is slightly lower than the bank's overall deposit market rank and market share. Adequate volume is noted when market rank and market share are lower, but not significantly lower, than the bank's overall deposit market rank and market share.

There are no community development loans in Champaign, a low volume in Chicago and a good volume in Springfield. There is one community development loan in Chicago, another that benefits the larger Chicago metropolitan area, and two in Springfield. Community development loans represent 0.75% of Tier 1 capital in Chicago, and 3.73% in Springfield. The volume of loans as a percentage of Tier 1 capital helps to gauge the volume of community development lending within each focus area. Tier 1 capital was allocated to assessment areas based on the percentage of bank deposits originating in an assessment area.

Distribution of Loans by Income Level of Geography

The overall distribution of loans by income level of geography is adequate. The geographic distribution of lending is good in Champaign, poor in Chicago and good in Springfield. Home mortgage loans overall reflect a good distribution, with good distributions in Champaign and Chicago, and an excellent distribution in Springfield. Small business and small farm loans reflect adequate geographic distributions. The distribution of small loans to businesses is adequate in Champaign, poor in Chicago and good in Springfield. The distribution of small farm loans is excellent in Champaign, poor in Chicago, and poor in Springfield.

Several gaps in the geographic distribution of bank lending were initially noted within the full scope areas reviewed. Most of the gaps were in the Chicago area and related to home mortgage and small business lending. Adequate explanations related to limited lending opportunities were noted for the real estate lending gaps, but the gaps were a factor in the conclusion that the distribution of small loans to businesses is poor.

The reader should note that in developing our conclusions, more consideration was given to the percentage distribution of loans than to market share data. The emphasis on the percentage distribution data results from the fact that the lending data used in this calculation covered the entire evaluation period, whereas market share data was only for 1998.

Home Mortgage Loans

Refer to Tables 2, 3, and 4 in Appendix C for the data used in this analysis.

The geographic distribution of home purchase loans is excellent in Springfield as the percentage of loans in low- and moderate-income areas exceeds the percentage of owner-occupied units in that area. Market share data also reflected excellent performance with the bank’s market share in low-income areas exceeding its overall market share and equaling it in moderate-income areas. In Champaign, the distribution of home purchase loans is good. The percentage of loans in low-income areas is adequate being somewhat lower than the percentage of owner-occupied units in low-income areas. However, the percentage of bank loans in moderate-income areas exceeds the percentage of owner-occupied units in those areas and is excellent. The market share indicators are somewhat consistent with the percentage distribution information. In low-income areas the bank’s market share is significantly lower than the bank's overall market share and considered poor. In moderate-income areas, the bank’s market share exceeds the bank's overall market share and is excellent. In Chicago the geographic distribution is poor as no home purchase loans were made in low-income areas and only one loan was made in moderate-income areas. The percentage of loans in both low- and moderate-income areas is significantly lower than the percentage of owner-occupied units in those areas, reflecting poor performance. The market share measurement was not meaningful due to the lack of volume in 1998. Note that in the Chicago assessment area, the lending activities of the corporation’s mortgage lending subsidiary were attributed to an affiliate bank.

Chicago and Springfield reflect an excellent geographic distribution of home improvement loans. The percentage of home improvement loans in low- and moderate-income areas exceeds the percentage of owner-occupied units therein. Market share data indicates similar performance in these areas as the bank’s market share approximates or exceeds the bank's overall market share, except in low-income geographies in Chicago. Champaign reflects a poor geographic distribution. The percentage of home improvement loans in low- and moderate-income areas is significantly lower than the percentage of owner-occupied units in those areas. Market share data reflected similar performance.

Excellent geographic distributions are reflected in refinance loans in Champaign and Springfield. The percentage of bank loans in both low- and moderate-income areas exceeds the percentage of owner-occupied units in those areas. The bank's market share is excellent, in both assessment areas also. The market shares in low- and moderate-income areas exceed the bank's overall market share for refinance loans. In Chicago, the distribution is adequate. In low-income areas, the percentage of loans is adequate and somewhat lower than the percentage of owner-occupied units in those areas. In moderate-income areas, the percentage of

loans is good and approaches the percentage of owner-occupied units. Market share information indicates similar performance. In Chicago, market share in low-income areas is only adequate, as the bank's share is somewhat lower than its overall market share. Market share in moderate-income areas is excellent as its share equals the overall market share in Chicago.

Small Business Loans

Refer to Table 5 in Appendix C for the data used in this analysis.

The geographic distribution of small loans to businesses is good in Springfield, adequate in Champaign, and poor in Chicago. In Springfield, the percentage of small loans to businesses in low-income areas is excellent and exceeds the percentage of businesses in low-income areas, and in moderate-income areas is good being slightly lower than the percentage of businesses in moderate-income areas. The bank's market share information reflects the same pattern. In Champaign, the percentage of loans in low-income areas is poor and significantly lower, and in moderate-income areas is good and slightly lower than the percentage of businesses in those areas. It is noted that a significantly higher proportion of the community's businesses are located in moderate-income areas, so performance in those areas was given more weight. Market share in low-income areas is good and slightly lower, and in moderate-income areas is excellent and nearly equal to the bank's overall market share in Champaign. In Chicago, the distribution of small loans to businesses is poor. The percentage of loans in both low- and moderate-income areas is substantially lower than the percentage of businesses in those areas. Market share information indicated slightly stronger performance in moderate-income areas, but was not enough to change the conclusion.

Small Farm Loans

Refer to Table 6 in Appendix C for the data used in this analysis.

The geographic distribution of small farm loans is excellent in Champaign. The distribution of loans in low- and moderate-income areas exceeds the percentage of farms in those areas. Market share in both low- and moderate-income areas is also excellent as the percentages substantially exceed the bank's overall market share. In Chicago, the distribution of farm loans is poor, with only four farm loans made. The bank originated four small farm loans, all in upper-income areas. In Springfield, the distribution of farm loans is also poor as no farm loans were originated in low- and moderate-income areas. However, it should be noted that there are few farms in low- and moderate-income areas in both Springfield and Chicago.

Distribution of Loans by Income Level of the Borrower

Overall, the distribution of loans by income level of borrower is good. The bank's distribution of loans is good in each of the focus areas. The distribution of home mortgage loans by income level of borrower is excellent, with excellent distributions in Champaign and Springfield, and a good distribution in Chicago. As noted earlier, we did not have the information to analyze the distribution of small loans to businesses or farms by income level of borrower. This omission tempered the performance in home mortgage lending and resulted in the overall conclusion stated above.

The reader should note that our analysis of lending by borrower income level took into account the percentage of individuals within an assessment area living below the poverty level and the affordability of housing. These variables impacted our expectations regarding the level of lending to low-income borrowers.

Home Mortgage Loans

Refer to Tables 7, 8 and 9 in Appendix C for the data used in this analysis.

Borrower distribution for home purchase loans is excellent in Springfield. The percentage of loans to both low- and moderate-income borrowers compares very favorably to the percentage of families in those income categories. The bank's market share in both low- and moderate-income areas also exceeds the bank's overall market share. In Champaign and Chicago, borrower distribution is good. In both assessment areas, the percentage of loans to low-income borrowers is adequate, but the percentage of loans to moderate-income borrowers is excellent and exceeds the percentage of moderate-income families. The market share information for home purchase loans was inconsistent for low-income borrowers in Champaign and could not be measured in Chicago due to the lack of volume. Therefore, primary emphasis was put on the percentage lending distribution. While the bank's performance measured by market share was not considered, the low volume of home purchase lending overall reduced the weight given to the generally strong percentage distribution data.

In Champaign, Chicago and Springfield, the percentage distribution of home improvement loans by borrower income level is excellent. The percentage of bank loans to moderate-income borrowers significantly exceeded the percentage of families in that income category. The percentage of loans to low-income borrowers was excellent also. The market share measures for Champaign confirmed that conclusion. The market share data for Springfield and Chicago also reflected excellent performance for moderate-income borrowers as the bank’s market share of loans to those borrowers equaled or exceeded the bank’s overall market share. Lending to low-income borrowers was somewhat less and is considered adequate.

The bank’s refinance lending in Champaign and Springfield reflects excellent borrower distribution. Excellent performance is noted in lending to both low- and moderate-income borrowers. The percentage of loans to moderate-income exceeds the percentage of families in that category and the percentage of loans to low-income borrowers is excellent also. Chicago reflects an adequate borrower distribution for refinance loans. The percentage of bank lending to moderate-income borrowers is excellent, but the percentage of loans to low-income borrowers is significantly lower than the percentage of low-income families and reflects poor performance. In Champaign, Springfield, and Chicago, market shares to low- and moderate-income borrowers are excellent. In these income categories, the bank's market share equals or exceeds the bank's overall market share in their respective assessment areas. In Chicago, this data factored into the conclusion that the bank’s performance was adequate overall.

Small Business Loans

Refer to Table 10 in Appendix C for the data used in this analysis.

A conclusion was not developed for this aspect of the bank's lending performance. This situation is the result of data integrity issues noted earlier. We did note in all assessment areas that a moderate to high percentage of the bank's small business loans were in amounts of $100,000 or less. However, loan size is not a reliable indicator of the extent that the bank's small loans to businesses were made to small businesses.

Small Farm Loans

Refer to Table 11 in Appendix C for the data used in this analysis.

For the same reasons stated under small business loans above, this aspect of the bank's lending performance was not developed. We did note that in all areas, a moderate to high percentage of the bank's small farm loans were in amounts of $100,000 or less. However, loan size is not a reliable indicator of the extent that the bank's small loans to farms were made to small farms.

Community Development Lending

The bank's community development lending had a neutral impact on the overall Lending Test rating. The volume of community development lending in Chicago is poor. One loan was made in the bank's assessment area and another loan that benefited the larger Chicago metropolitan area, but was not inside the bank's assessment area, was considered. The volume of community development lending in Springfield was adequate. The bank made two loans in this assessment area. There were no community development loans in the Champaign market. The dollar

total of community development loans made in Chicago and Springfield represent 0.8% and 3.7% respectively, of the amount of Tier 1 capital allocated to those areas. The capital allocation is based on the percentage of bank deposits originating in these areas.

In both assessment areas, the bank's community development lending was entirely for the development of affordable rental housing. This is an identified credit need in each of the assessment areas reviewed using full-scope procedures. During the evaluation period, the bank's loans helped to create or retain 227 affordable rental housing units.

Examples of some of the bank's CD loans follow:

Howard Street Limited Partnership
This project involved the renovation of a historic theatre into 40 units of affordable housing in the Rogers Park neighborhood of Chicago. The bank provided the bridge loan for development as well as an equity investment. The project used low income housing tax credits, historic tax credits, city funds, and an affordable housing program grant for funding. The use of tax credits and grant funds as well as the involvement of the city make this loan moderately complex. The development is located in a tax increment financing district in Chicago and is also part of a City of Chicago Special Service Area marked for revitalization.

King's Court
This loan was to renovate a 44-unit motel into 22 affordable apartments in Springfield, IL. The previous owner, upon default of his loan, had abandoned the property to the bank. It was sold to a local church. The Banc One CDC (Community Development Corporation) assisted the church with the tax credit application. Funding for the project was also received from Federal Home Loan Bank, Illinois Housing Development Authority, and the Illinois Department of

Veteran's Affairs. The use of these funding sources and the involvement of a less experienced non-profit developer make this loan moderately complex. The project had significant impact on the community since the vacant building had been a haven for crime. Additional redevelopment has been initiated in the neighborhood since the start of this project. The bank provided equity funding for the project through the purchase of the tax credits, as well as technical assistance to the developer in the tax credit application process.

Product Innovation and Flexibility

BOI efforts to provide flexible lending products is adequate and this performance criteria has a neutral impact on the overall Lending Test rating. In addition to offering an array of consumer and business loan products, the bank offers two products that specifically target low- and moderate-income individuals or areas.

The first is the Bank One Affordable Dream Mortgage introduced in late 1999. The program is geared to low- and moderate-income borrowers with incomes at or below 80% of medium income who have little cash for the down payment and closing costs. The program requires a minimum investment of $500 or one percent of the home's sale price be made by the borrower with the remaining amount of down payment and closing costs allowed to be paid from other sources. The minimum down payment is three percent, but private mortgage insurance is not required. This program is offered throughout the Bank One Corporation. It is a relatively new program and information regarding its impact on low- and moderate-areas or individuals is not yet available. The second flexible product is offered in conjunction with the City of Peoria Rental Rehab Program. Properties needing rehabilitation must be located in low- or moderate-income areas. A maximum loan amount of $26,000 is available for any one building structure, with a four percent interest rate, and closing costs totaling approximately $100. The borrower must agree to rent the rehabilitated units to low- and moderate-income individuals or families. To date, the bank has originated 66 loans totaling $644,445.

The bank offers the Capital Access Program and SBA's Express, Low-Doc, 504, and 7A programs. However, information could not be provided on how these programs resulted in lending to low- and moderate-income areas or individuals.

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited scope reviews, the bank's performance under the Lending Test in Bloomington, Davenport, Peoria, and Rockford is stronger than the bank's overall Low Satisfactory Lending Test performance. In Bloomington, stronger performance is due to an excellent geographic distribution of home mortgage loans and small loans to businesses, and an excellent borrower distribution of home mortgage loans. In Davenport, stronger performance is due to an excellent home mortgage loan geographic distribution and a good small loans to businesses geographic distribution. In Peoria, stronger performance is due to excellent geographic distributions of home mortgage loans and small loans to businesses. In Rockford, stronger performance is due to an excellent geographic distribution of small loans to businesses, which make up a significant portion of the area's loans. The stronger performance in these areas had a modest impact on the overall Lending Test rating because these are all proportionally smaller markets for the bank than those where full scope reviews were performed. The bank's performance in non-metropolitan areas is not inconsistent with the bank's overall Low Satisfactory Lending Test performance.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 12 in Appendix C for the facts and data used to evaluate the bank's level of qualified investments.

BOI's performance under the Investment Test was good. In the Chicago and Springfield assessment areas the bank's performance was good, and in the Champaign assessment area performance was poor. The bank's investment performance in the areas receiving limited-scope reviews was not a factor in this rating due to the small percentage of deposits in these areas.

Dollar Amount of Qualified Investments

The volume of qualified investments by the bank is good in Chicago, adequate in Springfield, and poor in Champaign. To assist in gauging the volume of investments in each assessment area, Tier 1 capital was allocated among the assessment areas based upon the percentage distribution of bank deposits. The investments made in the Chicago, Springfield, and Champaign assessment areas represent 6.6%, 3.8%, and 0.3% of Tier 1 capital respectively.

The majority (73 of 77) of the investments in the Chicago assessment area were made indirectly through the National Equity Fund, the Chicago Equity Fund, and INROADS, a Small Business Investment Company (SBIC). Prior period investments accounted for 72% of the total investments in the Chicago assessment area.

Innovativeness or Complexity of Qualified Investments

Investments with complex characteristics were noted in the Chicago and Springfield assessment areas. There were two projects in Chicago which were considered to be moderately complex and two projects in Springfield, one of which was considered to be complex; but none were innovative. The majority of the investments in the assessment areas were made indirectly through equity funds or SBICs and were not complex.

Examples of community development projects follow:

Spring Meadow Associates
This project involved the construction of 84 affordable rental units in the Springfield assessment area. The bank invested in low income housing tax credits (LIHTC's) with the proceeds used to buy out a 50% equity partner and to cover a financing gap after the first mortgage. The development had been poorly managed by the initial general partner/manager and restructuring was needed to obtain a new general partner to keep the project viable. The project made use of LIHTC's and state funds, which in addition to the substantial work needed to restructure the failing project, make the investment complex.

Evans Langley Limited Partnership
This development is a Section 8 qualified apartment complex. The bank invested in LIHTC's with the proceeds used to provide funding for the rehabilitation of 45 units of affordable housing in the North Washington Park Neighborhood in Chicago. This project made use of LIHTC's, community development block grant funds, and other city funds for the construction and permanent loans. The use of tax credits, grants and city funds make this investment moderately complex.

Responsiveness of Qualified Investments to Credit and Community Development Needs

The bank's responsiveness to the most pressing needs in its assessment areas is excellent in Chicago and Springfield and poor in Champaign. The need for affordable housing was identified in each of the assessment areas along with financing for small businesses. In Chicago, 89% of the bank's investments were for creation, retention, and/or support of affordable housing. These investments resulted in the creation or retention of 3,630 units of affordable housing. Another 10% of the bank's investments supported economic development by providing financing for small businesses through an SBIC. In the Springfield assessment area, BOI displays an excellent responsiveness to the most pressing need of affordable housing with 96% of its investments in this category. A total of 166 affordable housing units were created or retained in this market. The investments in Champaign were in the form of grants, and due to the small dollar volume, reflected limited responsiveness to the community needs.

Conclusions for Areas Receiving Limited-Scope Reviews

BOI’s performance in the Peoria assessment area is inconsistent and stronger than the bank’s overall High Satisfactory performance under the Investment Test. The volume of investments is significant representing 29.9% of Tier 1 capital allocated to that assessment area. In the Bloomington, Davenport/Moline, and Rockford assessment areas, the bank’s performance is inconsistent and weaker than the bank’s overall High Satisfactory performance under the Investment Test. The volume of investments represents 0.2%, 2.5%, and 2.4% of Tier 1 capital for these assessment areas respectively.

SERVICE TEST

Conclusions for Assessment Areas Receiving Full-Scope Reviews

Service test performance in Chicago is adequate, and in Springfield and Champaign is good.

Retail Banking Services

Refer to Table 13 in Appendix C for the data used in this analysis.

Accessibility of Delivery Systems

The accessibility of the bank’s retail services is adequate in Chicago and good in Springfield and Champaign.

In the Chicago assessment area, the bank's branch presence is primarily suburban, as were the assessment areas the bank had designated. Our decision to expand the bank's assessment areas to include four full counties for this evaluation resulted from lending data that indicated that was a more appropriate assessment area. It is noted that the bank's deposits are primarily suburban in origin, with only 2.5% of the bank's deposits coming from the City of Chicago compared to 41% for the Chicago area overall. In the bank designated assessment areas, low- and moderate-income census tracts contained .3% and 6.5% of the area's population. Consideration was also given to the fact that since October of 1998, the bank has had an affiliate that operates within the entire Chicago area, including the City of Chicago, and the merger of the two banks has been planned since that time. The transfer of the BOI branches to that affiliate in September of 1999 was part of those plans.

We reviewed a map containing the location of bank branches to identify unreasonable geographic gaps in the branch network. Although, there are significant gaps in the branch distribution, access to the branches is reasonable when the above factors are considered.

In the Springfield assessment area the percentage of bank branches in moderate-income areas is significantly higher than the percentage of the population living in those areas. No unreasonable geographic gaps were noted in the branch network and, overall, access to the bank's branches is good.

In the Champaign assessment area, the percentage of branches in moderate-income areas is significantly higher than the percentage of the population living there. No unreasonable geographic gaps were noted in the branch network and overall, access to the bank's branches is good.
The bank promotes access to banking services through a variety of means, however, we could not discern that these services promote access by low- or moderate-income individuals. As a result, these services did not receive significant consideration in our analysis. BOI has an active toll-free loan-by-phone system. A consumer can apply for a loan (home equity loan, home equity lines of credit, installment loan, and credit cards) over the telephone twenty-four hours a day, seven days a week, in English or Spanish. The bank received 1,847; 114; and, 78 loan applications through this delivery channel in the Chicago, Springfield, and Champaign markets respectively. The Chicago applications are for all Bank One charters in that market.

Several of the bank's services are accessible through the Internet. Internet services include on-line applications for checking, savings, and certificates of deposit. Loan applications are also available for credit cards, home equity loans, home equity lines of credit, student loans, and mortgages. On-line applications are available for business installment, business credit cards, and business lines of credit for small businesses. Customers may also transfer between BOI accounts, pay bills, and get information on statements, investments, taxes and insurance. The bank received 160, 10, and 5 applications for loans from the Chicago, Springfield, and Champaign markets respectively.

Changes in Branch Locations

Branch activity during the evaluation period had little impact in the low- or moderate-income areas in Chicago, Springfield, or Champaign. In Chicago, three branches were closed during the evaluation period and all were in middle- or upper-income tracts. One branch was opened in an upper-income tract for a net reduction of two branches. One closed branch in Chicago did not have another location within three miles, and 40% of the population in surrounding tracts were low- or moderate-income. As noted earlier in this report, the bank's 22 branches were transferred to Bank One, NA in September of 1999.

Springfield had one branch office in a middle-income census tract close during the evaluation period. The closed branch was a limited service branch that only processed transactions and did not open new accounts.

Champaign had two branches closed during the evaluation period and both were in middle- or upper-income tracts.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

The reasonableness of business hours and services offered at branch locations is adequate in Chicago and excellent in Springfield and Champaign. Each branch office is a full-service banking center and the hours of operation are fairly consistent across the branches. All of the low- and moderate-income branches in Springfield (2) and Champaign (2) have Saturday hours. While middle- and upper-income branches have Saturday hours at 50% of the Springfield branches and 100% of the Champaign branches. The middle-income branch in Champaign is located near the University and has longer hours to support the student population.

There were no low- or moderate-income branches in the Chicago assessment area, but 68% of the branches in the area had Saturday hours. Five branches in Chicago have significantly reduced hours. All of these locations are located in nursing homes and offer services only to the occupants. The reduced hours do not adversely affect the reasonableness of the hours and services offered in the Chicago assessment area.

Community Development Services

The bank's performance under the service test was not impacted by community development services. There are many opportunities to participate in community development service activities in the Chicago assessment area, but the involvement by the bank was limited. An adequate level of community development services was noted in Springfield and Champaign.

Conclusions for Areas Receiving Limited Scope Reviews

Performance in the Bloomington, Davenport, Peoria, and combined non-metropolitan assessment areas is inconsistent and stronger than the overall Low Satisfactory performance in the Service Test. In these assessment areas, the percentage distribution of branches in low- and moderate-income areas approximates or exceeds the population living in such areas. Performance in the Rockford assessment area is not inconsistent with the overall Low Satisfactory performance in the Service Test.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan areas that received comprehensive examination review (designated by the term Full-Scope).

Time Period Reviewed	Lending Test: January ,1 1996, through December 31, 1999 Investment Test: January 1, 1995 through December 31, 1999 Service Test: January 1, 1995 through December 31, 1999	
Financial Institution		**Products Reviewed**
Bank One, Illinois, N.A. Springfield, IL		Home purchase and refinanced loans, home improvement loans, small business loans, small farm loans, Community development loans, investments, and services.
Affiliate(s)	**Affiliate Relationship**	**Products Reviewed**
Banc One Community Development Corporation	Holding company subsidiary	Community development loans and equity investments.
Banc One Capital Funding Corporation	Holding company subsidiary	Community development related loans and services.
Bank One Mortgage Company	Holding company subsidiary	Home purchase and refinance loans.
Bank One, Texas, N.A.	Holding company subsidiary	Community development loans.
First Chicago Leasing Corporation	Subsidiary of Bank One, N.A.	Community development related equity investments.
List of Assessment Areas and Type of Examination		
Assessment Area	**Type of Exam**	**Other Information**
Champaign MSA	Full-Scope	MSA #1400
Chicago MSA	Full-Scope	MSA #1600
Springfield MSA	Full-Scope	MSA #7880
Bloomington-Normal	Limited-Scope	MSA #1040
Davenport-Moline-Rock Island	Limited-Scope	MSA #1960
Peoria-Pekin	Limited-Scope	MSA #6120
Rockford	Limited-Scope	MSA #6880
Christian County	Limited-Scope	Non-metropolitan
Piatt County	Limited-Scope	Non-metropolitan

Appendix B: Market Profiles for Full-Scope Areas

Table of Contents

Market Profiles for Areas Receiving Full-Scope Reviews

Champaign MSA

Demographic Information for Full-Scope Area: Champaign MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts)	37	13.5	27.0	40.6	18.9	0.0
Population by Geography	173,025	15.5	15.4	47.4	21.7	0.0
Owner-Occupied Housing by Geography	34,857	1.4	7.6	60.2	30.8	0.0
Businesses by Geography	6,393	9.9	25.8	40.5	23.8	0.0
Farms by Geography	935	0.9	4.6	77.2	17.3	0.0
Family Distribution by Income Level	38,957	19.7	18.1	24.6	37.6	0.0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	14,743	10.1	19.9	57.2	12.8	0.0
Median Family Income HUD Adjusted Median Family Income for 1999 Households Below the Poverty Level	= $36,735 = $52,500 = 15.4%	Median Housing Value Unemployment Rate November 30, 1999				= $71,003 = 2.1%

Source: 1990 U.S. Census and 1999 HUD updated MFI.

The Champaign MSA consists of Champaign County. It is located in the west central part of Illinois. The bank's assessment area consists of the entire MSA and no changes were made to this assessment area during the evaluation period. In terms of deposit market share, BOI is the fourth largest bank in the MSA with a market share of 8.4% according to the June 30, 1999, FDIC Deposit Market Share Reports. The largest financial institution, Busey Bank, has a market share of 29.4%.

The University of Illinois is located in this MSA and has a significant impact on the economy and demographics of the community. The university is a major employer and, due to the student population, results in a number of census tracts being designated low- and moderate-income. The community's low- and moderate-income areas, other than those associated with the university, are concentrated North of University Avenue and South of Interstate 74. This area encompasses both the Cities of Champaign and Urbana, and extends from Cunningham Avenue on the East to Mattis Avenue on the West. There is also a moderate-income area surrounding downtown Urbana.

We contacted six community-based organizations in order to identify credit needs in the AA. We learned that affordable housing is a significant need and this includes financing for the purchase of affordable single family houses and financing for the

development of additional affordable rental housing, particularly large units with 3 or 4 bedrooms. A number of financial services education programs are operated in the community, but there is a continuing need for consumer education and assistance for individuals needing to repair damaged credit histories. There are a number of programs providing training for owners of small businesses, but helping new and prospective owners with business plan development is a continuing need. There is also a need for small loans to businesses just getting started. Small business and real estate lending for the economic development and revitalization of the North First Street area and other parts of downtown Champaign are needed.

A number of community organizations are active in community development in Champaign-Urbana and multiple opportunities for banks to participate in community development were noted.

Chicago MSA

Demographic Information for Full-Scope Area: Chicago MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts)	1,615	17.2	22.2	37.3	21.7	1.6
Population by Geography	6,561,517	10.7	20.8	41.9	26.5	0.1
Owner-Occupied Housing by Geography	1,415,735	3.2	13.6	48.7	34.5	0.0
Businesses by Geography	228,928	5.4	13.1	40.8	39.2	11.5
Farms by Geography	3,551	1.0	5.0	51.8	41.9	0.3
Family Distribution by Income Level	1,641,788	20.9	17.6	23.9	37.6	0.0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	631,844	19.2	29.6	39.5	11.7	0.0
Median Family Income HUD Adjusted Median Family Income for 1999 Households Below the Poverty Level	= $43,717 = $67,900 = 11.1%	Median Housing Value Unemployment Rate November 30, 1999				= $122,373 = 3.7%

Source: 1990 U.S. Census and 1999 HUD updated MFI.

The Chicago MSA consists of nine counties and is the largest MSA in the state of Illinois. BOI delineated seven separate assessment areas within the MSA and they are described as follows:

1. Cook/DuPage Counties - This assessment area encompasses the North-Northwest corner of Cook County and the Northwest corner of DuPage County.

2. Cook County - North Cook County including the northern city limits of Chicago.

3. Cook County - This is a small area Northwest (about 6.5 miles) of downtown Chicago, halfway between Lake Michigan and the Cook and DuPage County Line. The area lies South of I-90.

4. Cook/DuPage Counties - This is an area in West, Southwest Cook County and South, Southeast DuPage County.

5. DuPage/Will/Kane Counties - This area is in the Southwest corner of DuPage, Northwest corner of Will and the Southeast corner of Kane Counties.

6. Kane County - This area is located in Northeast Kane .

7. Cook County - This is a small area in downtown Chicago. It lies east of I-90 and extends to Lake Michigan. Using the intersection of Congress Parkway and I-90 as a reference point, the area runs 1 mile to the north and 1/2 mile to the south.

As noted earlier in the Scope of the Evaluation section of this document, we expanded the bank's assessment areas to include all of Cook, DuPage, Kane, and Will counties for purposes of our evaluation. The information in the demographic table above and the information below reflects the four county delineation. Community credit needs were identified through ongoing relationships with a variety of community-based organizations in the AA.

BOI is the sixteenth largest bank in the MSA with a deposit market share of 0.8% according to the June 30, 1999, FDIC Deposit Market Share Reports. The largest financial institution, Bank One, N.A., Illinois, (formerly known as The First National Bank of Chicago) has a market share of 13.7%.

The suburban portion of the bank's assessment area is predominantly middle- and upper-income communities. There are numerous financial institutions operating in these areas and competing for customers. The credit and community development needs that are present result from the high cost of living in general, the cost of housing, and the lack of land for development. The needs are not concentrated in any single part of the bank's assessment area. They are dispersed throughout it, as is the low- and moderate-income population of the area. The high cost of housing in these areas creates the need for affordable rental housing and makes it difficult to obtain home ownership. There is a need for technical assistance and financing for start-up businesses. Additionally, some of the older suburbs are attempting to revitalize their commercial districts.

There are a wide variety of community organizations addressing these needs and thus significant community development opportunities exists. For example, there are 13 Community Development Financial Institutions, 12 HUD-certified housing counseling agencies and 9 Small Business Development Centers located in these areas.

The City of Chicago is included in the bank's assessment area, and the city is an area of significant credit needs and numerous community development opportunities. Credit needs and development opportunities include:

- Small business loans - Community development organizations in every Chicago neighborhood help small businesses develop business plans, improve management systems, and obtain financing. Financial institutions can participate in these efforts with term loans of from $25,000 - $150,000 and with small lines of credit, especially for minority-owned construction companies.

- Commercial Real Estate - Commercial streets in Chicago neighborhoods have many mixed-use buildings on them. Community development organizations report that financing improvements to these properties can be difficult, but is very important to improving the appearances of and investment prospects in LMI communities.

- Residential Mortgages - Community organizations are particularly concerned with the need for conventional loans from prime lenders for home improvements, refinancing of purchase money mortgages, and home equity loans for consumer purchases. They also report significant, continuing demand for loans with flexible qualifying criteria for home purchases. The need for flexible, affordable financing is particularly important to communities that traditionally have been low-income but now are attempting, with development projects, to attract a wider mix of residents.

- Assistance to Community Development Financial Institutions (CDFI) - Chicago has a large number of CDFIs that serve the credit needs of individuals and organizations whose projects do not fit conventional bank criteria but may do so in the future. CDFIs active in Chicago include small business micro loan funds and community development loan funds. The needs of credit unions designated by the National Credit Union Administration as serving a low-income population especially came to our attention. All of these nonprofit organizations require cash donations to help support their operations. They also need in-kind donations of equipment and expertise, and they need deposits, loans, equity grants and near-equity investments.

- Assistance to Nonprofit Community Organizations - Many social service agencies also serve community development needs, and many of these organizations provide financial literacy education, which can help banks expand their markets into LMI neighborhoods. These organizations express a need for cash donations and for in-kind donations of expertise to design and deliver these financial literacy programs. They also are seeking participants for Individual Development Account programs.

Chicago also has many other resources available, such as well-endowed foundations and university-based institutes that provide assistance to community organizations. These resources can support the community development endeavors of banks and community organizations. The Federal Home Loan Bank, for example, has funds available that can help banks meet the credit needs described above while remaining within traditional bounds of safety and soundness.

Springfield MSA

Demographic Information for Full-Scope Area: Springfield MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts)	41	9.8	17.1	46.3	26.8	0.0
Population by Geography	178,386	5.0	15.6	49.2	30.2	0.0
Owner-Occupied Housing by Geography	47,994	3.3	12.1	51.7	32.9	0.0
Businesses by Geography	7,825	3.0	21.1	47.0	28.9	0.0
Farms by Geography	664	0.6	1.9	66.0	31.5	0.0
Family Distribution by Income Level	47,720	18.4	17.9	26.4	37.3	0.0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	17,351	9.6	22.1	52.8	15.5	0.0
Median Family Income HUD Adjusted Median Family Income for 1999 Households Below the Poverty Level	= $38,194 = $56,000 = 9.7%	Median Housing Value Unemployment Rate November 30, 1999				= $60,971 = 3.3%

Source: 1990 U.S. Census and 1999 HUD updated MFI.

The bank has delineated the entire Springfield MSA as its assessment area. The MSA consists of Sangamon County and includes the City of Springfield. No changes were made to this assessment area during the evaluation period. BOI is the largest bank in the MSA with a deposit market share of 18.7% according to the June 30, 1999, FDIC Deposit Market Share Reports. The second largest financial institution, Mercantile Bank, has a market share of 14.5%.

Springfield is the capital of Illinois and is located in the central part of the state. The area directly East of downtown Springfield is a concentration of eight low- and moderate-income census tracts. An Enterprise Zone has been designated here and this area is in need of economic development. There is also a significant need for rehabilitation of the aging housing stock within this area. Purchase/rehab loans are an unmet credit need and there are continuing needs for home improvement loans and activities to promote home ownership. The city has not provided incentives or subsidies for rehabbing properties. Additional activities to support small businesses are needed. There are two micro loan programs locally, but small businesses still have difficulties in qualifying for credit. Overall, there are adequate community development lending, investment, and service opportunities for banks. The information on credit and community development needs was ascertained through contacts with 5 community-based organizations.

Appendix C: Tables of Performance Data

Content of Standardized Tables

The tables cover the entire CRA evaluation period. References to the bank include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: purchased loans are treated as originations; market rank is based on the number of loans made by the bank as compared to all other lenders in the MSA/assessment area; and market share is the number of loans originated by the bank as a percentage of the aggregate number of reportable loans originated by all lenders in the MSA/assessment area. The following is a listing and brief description of the tables included in each set:

Table 1. **Lending Volume** - Presents the number and dollar amount of reportable loans originated by the bank over the evaluation period by MSA/assessment area.

Table 2. **Geographic Distribution of HMDA Home Purchase Loan Originations** - Compares the percentage distribution of the number of loans originated by the bank in low-, moderate-, middle- and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.

Table 3. **Geographic Distribution of HMDA Home Improvement Loan Originations** - See comments for Table 2.

Table 4. **Geographic Distribution of HMDA Refinance Loan Originations** - See comments for Table 2.

Table 5. **Geographic Distribution of Small Business Loan Originations** - The percentage distribution of the number of small loans (<$1 million) to businesses originated by the bank in low-, moderate-, middle- and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.

Table 6. **Geographic Distribution of Small Farm Loan Originations** - The percentage distribution of the number of small loans (<$500,000) to

farms originated by the bank in low-, moderate-, middle- and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.

Table 7. **Borrower Distribution of HMDA Home Purchase Loan Originations** - Compares the percentage distribution of the number of loans originated by the bank to low-, moderate-, middle- and upper-income borrowers to the percentage distribution of families by income level in each MSA/assessment area. The table also presents market rank and market share information based on the most recent aggregate market data available.

Table 8. **Borrower Distribution of HMDA Home Improvement Loan Originations** - See comments for Table 7.

Table 9. **Borrower Distribution of HMDA Refinance Loan Originations** - See comments for Table 7.

Table 10. **Borrower Distribution of Small Business Loan Originations** - Compares the percentage distribution of the number of small loans (< $1 million) originated by the bank to businesses with revenues of $1 million or less to the percentage distribution of businesses with revenues of $1 million or less. The table also presents the percentage distribution of the number of loans originated by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.

Table 11. **Borrower Distribution of Small Farm Loan Originations** - Compares the percentage distribution of the number of small loans (< $500 thousand) originated by the bank to farms with revenues of $1 million or less to the percentage distribution of farms with revenues of $1 million or less. The table also presents the percentage distribution of the number of loans originated by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

Table 12. **Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MSA/assessment area.

Table 13. **Distribution of Branch and ATM Delivery System** - Compares the percentage distribution of the number of the bank≈s retail branches and ATMs in low-, moderate-, middle- and upper-income geographies to the

percentage of the population within each geography.

Table 1. Lending Volume

LENDING VOLUME		STATE: ILLINOIS							EVALUATION PERIOD: JANUARY 1, 1996 TO DECEMBER 31, 1999			
MSA /Assessment Area	% of Total bank Deposits in Rated Area	Home Mortgage**		Small Business**		Small Farms**		Community Development***		Total Reported Loans		% of Rated Area Loans (#) in MSA/AA
		#	$ (000's)	#	$ (000's)	#	$ (000's)	#	$ (000's)	#	$ (000's)	
Full-Scope:												
Champaign	6.4	732	39,587	480	35,588	46	2,777	0	0	1,258	77,952	8.4
Chicago	41.4	2,011	52,899	1,057	108,160	4	429	2	1,266	3,074	162,754	20.7
Springfield	19.9	3,082	99,776	841	80,560	64	5,707	2	3,040	3,989	189,083	26.8
Limited-Scope:												
Bloomington	4.4	677	34,299	242	23,044	14	764	0	0	933	58,108	6.3
Davenport-Moline-Rock Island	4.1	728	33,222	182	28,453	1	400	0	0	911	62,075	6.1
Peoria-Pekin	7.1	1,659	69,277	402	42,232	11	677	0	0	2,072	112,186	13.9
Rockford	16.7	1,213	38,049	1,112	119,895	24	2,758	0	0	2,349	160,702	15.8
Non-Metro - Illinois	0.0	65	4,507	56	1,365	181	10,507	0	0	302	16,379	2.0

(*) Deposit data as of June 30, 1999.

(**) The evaluation period for Home Mortgage Loans, Small Loans to Businesses and Small Loans to Farms varies between January 1, 1996 to December 31, 1999.

(***) The evaluation period for Community Development Loans is January 1, 1995 to March 6, 2000.

Table 2. Geographic Distribution of Home Purchase Loan Originations

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE STATE: ILLINOIS EVALUATION PERIOD: JANUARY 1, 1996 TO DECEMBER 31, 1999

MSA /Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Purchase Loans	
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans		Overall	Low	Mod	Mid	Upper	#	% of Total**
Full-Scope:																
Champaign	1.3	1.0	7.6	14.7	60.2	48.0	30.9	36.3	21	1.1	0.0	1.5	0.8	1.4	102	17.1
Chicago	3.2	0.0	13.6	6.7	48.7	6.7	34.5	86.6	498	0.0	0.0	0.0	0.0	0.0	15	2.5
Springfield	3.3	8.1	12.1	15.1	51.7	40.9	32.9	35.9	29	0.8	1.9	0.8	0.9	0.6	198	33.1
Limited-Scope:																
Bloomington	0.8	0.0	20.3	28.0	56.4	52.9	22.5	19.1	31	0.4	0.0	0.7	0.4	0.4	68	11.4
Davenport-Moline-Rock Island	1.7	0.0	12.2	16.7	65.3	66.7	20.8	16.6	48	0.3	0.0	0.3	0.3	0.3	54	9.0
Peoria-Pekin	1.9	5.9	13.2	25.5	66.1	55.9	18.8	12.7	41	0.4	2.2	0.6	0.5	0.1	102	17.0
Rockford	2.2	2.3	16.5	23.3	55.1	27.9	26.2	46.5	62	0.2	0.0	0.2	0.1	0.3	43	7.2
Non-Metro - Illinois	0.0	0.0	6.3	12.5	66.2	56.3	27.5	31.2	12	3.2	0.0	6.5	2.7	3.1	16	2.7

(*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

Table 3. Geographic Distribution of Home Improvement Loan Originations

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT STATE: ILLINOIS EVALUATION PERIOD: JANUARY 1, 1996 TO DECEMBER 31, 1999

MSA /Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Improvement Loans	
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans		Overall	Low	Mod	Mid	Upper	#	% of Total**
Full-Scope:																
Champaign	1.3	0.0	7.6	2.9	60.2	71.0	30.9	26.1	6	2.0	0.0	1.9	2.7	0.9	69	3.3
Chicago	3.2	7.7	13.6	29.0	48.7	43.9	34.5	19.4	55	0.2	0.1	0.2	0.2	0.2	793	37.7
Springfield	3.3	4.2	12.1	12.4	51.7	54.2	32.9	29.2	4	7.7	15.6	12.7	7.0	6.0	579	27.6
Limited-Scope:																
Bloomington	0.8	2.1	20.3	23.1	56.4	47.4	22.5	27.4	4	6.5	0.0	7.8	5.4	8.2	95	4.5
Davenport-Moline-Rock Island	1.7	3.2	12.2	15.9	65.3	71.4	20.8	9.5	20	1.1	1.5	0.6	1.4	0.4	63	3.0
Peoria-Pekin	1.9	2.1	13.2	14.2	66.1	70.2	18.8	13.5	5	6.0	7.1	3.8	6.4	6.6	282	13.4
Rockford	2.2	1.4	16.5	24.0	55.1	56.5	26.2	18.1	7	3.8	2.3	5.8	3.9	2.4	221	10.5
Non-Metro - Illinois	0.0	0.0	6.3	0.0	66.2	0.0	27.5	0.0	0	0.0	0.0	0.0	0.0	0.0	0	0

(*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loan Originations

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE STATE: ILLINOIS EVALUATION PERIOD: JANUARY 1, 1996 TO DECEMBER 31, 1999

MSA /Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies			Market Share by Geography*					Total Home Mortgage Refinance Loans	
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	Overall Market Rank*	Overall	Low	Mod	Mid	Upper	#	% of Total**
Full-Scope:																
Champaign	1.3	2.5	7.6	11.7	60.2	59.5	30.9	26.3	7	4.2	10.6	7.7	4.7	2.9	558	7.5
Chicago	3.2	2.0	13.6	11.2	48.7	55.5	34.5	31.3	149	0.1	0.0	0.1	0.1	0.1	1,201	16.1
Springfield	3.3	3.7	12.1	13.2	51.7	48.7	32.9	34.4	7	4.0	15.9	12.3	4.1	2.8	2,305	30.9
Limited-Scope:																
Bloomington	0.8	1.0	20.3	29.4	56.4	49.9	22.5	19.7	12	2.8	4.1	3.6	2.6	2.5	513	6.9
Davenport-Moline-Rock Island	1.7	3.1	12.2	15.4	65.3	65.0	20.8	16.5	12	2.0	4.2	4.0	2.0	1.4	611	8.2
Peoria-Pekin	1.9	2.7	13.2	17.4	66.1	63.5	18.8	16.4	9	3.0	13.4	4.9	2.9	2.2	1,274	17.1
Rockford	2.2	1.4	16.5	13.9	55.1	53.3	26.2	31.4	16	1.7	2.2	2.3	1.7	1.4	946	12.7
Non-Metro - Illinois	0.0	0.0	6.3	0.0	66.2	18.4	27.5	81.6	4	5.5	0.0	0.0	1.5	11.3	49	0.6

(*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

Table 5. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL BUSINESS					STATE: ILLINOIS				EVALUATION PERIOD: JANUARY 1, 1996 TO DECEMBER 31, 1999							
MSA /Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Business Loans	
	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans		Overall	Low	Mod	Mid	Upper	#	% of Total **
Full-Scope:																
Champaign	9.9	5.4	25.8	21.9	40.5	40.8	23.8	31.9	5	8.2	6.7	8.1	8.6	8.0	480	11.0
Chicago	5.4	1.2	13.1	8.1	40.8	40.1	39.2	50.6	25	0.8	0.2	0.6	0.7	1.0	1,057	24.2
Springfield	2.9	4.4	21.1	17.2	47.0	44.4	29.0	34.0	5	9.4	9.5	8.3	8.7	11.0	841	19.2
Limited-Scope:																
Bloomington	11.4	10.7	17.7	24.4	45.3	36.8	25.6	28.1	9	4.5	6.5	6.6	3.7	3.8	242	5.5
Davenport-Moline-Rock Island	7.9	8.2	21.7	18.1	51.1	41.2	19.3	32.5	8	3.8	5.7	3.0	2.9	7.0	182	4.2
Peoria-Pekin	4.9	5.7	16.3	24.1	57.6	39.6	21.2	30.6	7	4.0	4.1	6.1	2.8	5.2	402	9.2
Rockford	9.0	9.5	15.1	15.3	54.0	46.8	21.8	28.4	2	11.8	17.2	12.5	11.8	11.5	1,112	25.4
Non-Metro - Illinois	0.0	0.0	7.7	0.0	61.8	3.6	30.5	96.4	4	5.7	0.0	0.0	0.3	42.5	56	1.3

(*) Based on 1998 Aggregate Small Business Data only. Market rank is for all income categories combined.
(**) Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

Table 6. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL FARM					STATE: ILLINOIS						EVALUATION PERIOD: JANUARY 1, 1996 TO DECEMBER 31, 1999					
MSA /Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Farm Loans	
	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans		Overall	Low	Mod	Mid	Upper	#	% of Total**
Full-Scope:																
Champaign	0.9	4.3	4.6	19.6	77.2	52.2	17.3	23.9	3	17.4	100.0	50.0	12.9	20.0	46	13.3
Chicago	1.0	0.0	5.0	0.0	51.8	0.0	41.9	100.0	17	0.7	0.0	0.0	0.0	2.7	4	1.1
Springfield	0.6	0.0	2.0	0.0	66.0	51.6	31.4	48.4	4	7.4	0.0	0.0	3.4	15.6	64	18.5
Limited-Scope:																
Bloomington	0.5	0.0	7.1	0.0	80.7	92.9	11.7	7.1	11	0.2	0.0	0.0	0.2	0.0	14	4.1
Davenport-Moline-Rock Island	0.4	0.0	4.2	0.0	73.2	0.0	22.2	100.0	0	0.0	0.0	0.0	0.0	0.0	1	0.3
Peoria-Pekin	0.1	0.0	3.6	18.2	86.2	63.6	10.2	18.2	11	0.2	0.0	0.0	0.0	5.3	11	3.2
Rockford	0.7	0.0	3.5	16.7	73.5	54.2	22.2	29.1	4	6.4	0.0	0.0	4.6	23.5	24	7.0
Non-Metro - Illinois	0.0	0.0	0.5	0.0	63.7	13.8	35.8	86.2	2	20.6	0.0	0.0	3.1	96.2	181	52.5

(*) Based on 1998 Aggregate Small Farm Data only. Market rank is for all income categories combined.

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

Table 7. Borrower Distribution of Home Purchase Loan Originations

BORROWER DISTRIBUTION: HOME PURCHASE	STATE: ILLINOIS							EVALUATION PERIOD: JANUARY 1, 1996 TO DECEMBER 31, 1999							
MSA /Assessment Area	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank**	Market Share by Borrower Income**					Total Home Purchase Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upper	#	% of Total***
Full-Scope:																
Champaign	19.7	6.9	18.2	20.6	24.5	27.5	37.6	32.4	21	1.1	0.0	1.4	0.9	1.3	102	17.1
Chicago	20.9	6.7	17.6	26.7	23.9	13.3	37.6	53.3	496	0.0	0.0	0.0	0.0	0.0	15	2.5
Springfield	18.4	14.1	17.9	28.3	26.4	23.7	37.3	22.2	29	0.8	0.9	0.9	0.9	0.6	198	33.1
Limited-Scope:																
Bloomington	16.5	8.8	18.5	22.1	26.8	32.4	38.2	29.4	31	0.4	0.3	0.1	0.8	0.7	68	11.4
Davenport-Moline-Rock Island	20.2	1.9	17.3	22.2	22.9	20.4	39.6	14.8	48	0.3	0.2	0.3	0.4	0.2	54	9.0
Peoria-Pekin	20.3	11.8	17.7	15.7	24.0	27.5	38.0	20.6	41	0.4	0.2	0.2	0.7	0.2	102	17.0
Rockford	18.4	14.0	17.7	9.3	26.0	16.3	37.9	58.1	62	0.2	0.0	0.1	0.1	0.5	43	7.2
Non-Metro - Illinois	13.5	6.3	16.4	18.8	24.2	56.2	45.9	18.7	12	3.2	0.0	1.5	8.2	3.1	16	2.7

(*) As a percentage of loans with borrower income information available.
(**) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.
(***) Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

Table 8. Borrower Distribution of Home Improvement Loan Originations

BORROWER DISTRIBUTION: HOME IMPROVEMENT			STATE: ILLINOIS						EVALUATION PERIOD: JANUARY 1, 1996 TO DECEMBER 31, 1999						
MSA /Assessment Area	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank**	Market Share by Borrower Income**					Total Home Improvement Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upper	#	% of Total***
Full-Scope:																
Champaign	19.7	13.0	18.2	26.1	24.5	27.5	37.6	33.3	6	2.0	4.5	3.9	1.1	0.9	69	3.3
Chicago	20.9	11.2	17.6	26.9	23.9	33.4	37.6	28.0	55	0.2	0.1	0.2	0.2	0.2	793	37.7
Springfield	18.4	12.3	17.9	23.3	26.4	28.0	37.3	34.2	4	7.7	5.2	8.7	8.1	8.1	579	27.6
Limited-Scope:																
Bloomington	16.5	10.5	18.5	24.2	26.8	36.8	38.2	28.4	4	6.5	7.1	8.6	6.7	5.3	95	4.5
Davenport-Moline-Rock Island	20.2	20.6	17.3	17.5	22.9	25.4	39.6	34.9	20	1.1	2.2	0.7	1.0	1.3	63	3.0
Peoria-Pekin	20.3	10.6	17.7	20.9	24.0	35.1	38.0	31.6	5	6.0	3.2	6.2	7.4	5.4	282	13.4
Rockford	18.4	8.1	17.7	24.4	26.0	33.0	37.9	32.6	7	3.8	3.9	3.9	5.0	2.8	221	10.5
Non-Metro - Illinois	13.5	0.0	16.4	0.0	24.2	0.0	45.9	0.0	0	0.0	0.0	0.0	0.0	0.0	0	0

(*) As a percentage of loans with borrower income information available.
(**) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.
(***) Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

Table 9. Borrower Distribution of Home Mortgage Refinance Loan Originations

BORROWER DISTRIBUTION: HOME MORTGAGE REFINANCE STATE: ILLINOIS EVALUATION PERIOD: JANUARY 1, 1996 TO DECEMBER 31, 1999

MSA /Assessment Area	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank**	Market Share by Borrower Income**					Total Home Mortgage Refinance Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upper	#	% of Total***
Full-Scope:																
Champaign	19.7	12.4	18.2	20.3	24.5	27.1	37.6	37.6	7	4.2	9.4	7.7	4.5	4.5	558	7.5
Chicago	20.9	4.8	17.6	19.1	23.9	37.0	1.7	37.9	148	0.1	0.1	0.1	0.2	0.2	1,202	16.1
Springfield	18.4	9.5	17.9	21.3	26.4	30.2	37.3	36.0	7	4.0	8.8	6.1	4.6	2.7	2,305	30.9
Limited-Scope:																
Bloomington	16.5	8.4	18.5	23.4	26.8	30.6	38.2	27.3	12	2.8	2.6	5.1	3.5	2.3	513	6.9
Davenport-Moline-Rock Island	20.2	7.7	17.3	16.9	22.9	26.2	39.6	27.3	12	2.0	3.0	2.6	2.5	2.0	611	8.2
Peoria-Pekin	20.3	8.0	17.7	18.0	24.0	28.8	38.0	31.5	9	3.0	3.3	3.4	3.2	2.5	1,276	17.1
Rockford	18.4	5.8	17.7	14.8	26.0	30.7	37.9	46.3	16	1.7	1.4	1.5	1.8	2.2	946	12.7
Non-Metro - Illinois	13.5	6.1	16.4	12.2	24.2	28.6	45.9	49.0	4	5.5	7.7	5.5	6.5	7.1	49	0.6

(*) As a percentage of loans with borrower income information available.
(**) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.
(***) Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

Table 10. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL BUSINESS				STATE: ILLINOIS				EVALUATION PERIOD: JANUARY 1, 1996 TO DECEMBER 31, 1999		
MSA /Assessment Area	Business with Revenues of $1 million or less			% Loans by Original Amount Regardless of Business Size			Market Share***		Total Small Business Loans	
	% of Businesses*	% BANK Loans**	% Market Loans***	$100,000 or Less	>$100,00 to $250,000	>$250,000 to $1,000,000	All	Rev $1 million or less	#	% of Total****
Full-Scope:										
Champaign	-	-	-	84.4	9.4	6.2	8.2	-	480	11.0
Chicago	-	-	-	77.7	11.5	10.8	0.8	-	1,057	24.2
Springfield	-	-	-	77.5	12.7	9.8	9.4	-	841	19.2
Limited-Scope:										
Bloomington	-	-	-	75.6	14.5	9.9	4.5	-	242	5.5
Davenport-Moline-Rock Island	-	-	-	63.7	14.8	21.5	3.8	-	182	4.2
Peoria-Pekin	-	-	-	75.9	12.4	11.7	4.0	-	402	9.2
Rockford	-	-	-	75.2	13.6	11.2	11.8	-	1,112	25.4
Non-Metro - Illinois	-	-	-	98.2	1.8	0.0	5.7	-	56	1.3

(*) Businesses with revenues of $1 million or less as a percentage of all businesses.
(**) Small loans to businesses with revenues of $1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 28.1% of small loans to businesses originated and purchased by the bank. Due to a lack of data and other errors, revenue data is not shown herein.
(***) Based on 1998 Aggregate Small Business Data only.
(****) Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

Table 11. Borrower Distribution of Small Loans to Farms

BORROWER DISTRIBUTION: SMALL FARM		STATE: ILLINOIS					EVALUATION PERIOD: JANUARY 1, 1996 TO DECEMBER 31, 1999		
MSA /Assessment Area	Farm with Revenues of $1 million or less		% Loans by Original Amount Regardless of Farm Size			Market Share***		Total Small Farm Loans	
	% of Farms*	% BANK Loans**	$100,000 or Less	> $100,00 to $250,000	> $250,000 to $1,000,000	All	Rev $1 million or less	#	% of Total****
Full Scope:									
Champaign	-	-	87.0	6.5	6.5	17.4	-	46	13.3
Chicago	-	-	50.0	50.0	0.0	0.7	-	4	1.1
Springfield	-	-	75.0	20.3	4.7	7.4	-	64	18.5
Limited Scope:									
Bloomington	-	-	85.7	14.3	0.0	0.2	-	14	4.1
Davenport-Moline-Rock Island	-	-	0.0	0.0	100.0	0.0	-	1	0.3
Peoria-Pekin	-	-	90.9	0.0	9.1	0.2	-	11	3.2
Rockford	-	-	45.8	50.0	4.2	6.4	-	24	7.0
Non-Metro - Illinois	-	-	81.8	16.0	2.2	20.6	-	181	52.5

(*) Farms with revenues of $1 million or less as a percentage of all farms.
(**) Small loans to farms with revenues of $1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 12.7% of small loans to farms originated and purchased by the bank. Due to a lack of data and other errors, revenue data is not shown herein.
(***) Based on 1998 Aggregate Small Farm Data only.
(****) Small loans to farms originated and purchased in the MSA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

Table 12. Qualified Investments

QUALIFIED INVESTMENTS			STATE: ILLINOIS			EVALUATION PERIOD: JANUARY 1, 1995 TO MARCH 6, 2000			
MSA/Assessment Area	Prior Period Investments*		Current Period Investments		Total Investment			Unfunded Commitments**	
	#	$ (000's)	#	$ (000's)	#	$ (000's)	% of Total $'s	#	$ (000's)
Full Scope:									
Champaign	0	0	15	82	15	82	0.3	0	0
Chicago	53	8,035	24	3,172	77	11,207	44.5	0	0
Springfield	2	149	33	2,979	35	3,128	12.4	0	0
Limited Scope:									
Bloomington	0	0	24	37	24	37	0.2	0	0
Davenport-Moline-Rock Island	1	393	13	30	14	423	1.7	0	0
Peoria-Pekin	10	8,642	8	20	18	8,662	34.4	0	0
Rockford	4	1,366	51	300	55	1,666	6.6	0	0
Non-Metro - Illinois	0	0	0	0	0	0	0.0	0	0

(*) ĄPrior Period Investments∆ means investments made in a previous evaluation period that remain outstanding as of the examination date.

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

Table13. Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH DELIVERY SYSTEM | STATE: ILLINOIS | EVALUATION PERIOD: JANUARY 1, 1995 TO DECEMBER 31, 1999

MSA/Assessment Area	Deposits	Branches						Branch Openings/Closings						Population			
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Branch Closings	# of Branch Openings	Net gain(+) / loss(-) of branches due to openings/closings				% of the Population with Each Geography*			
				Low (%)	Mod (%)	Mid (%)	Upp (%)			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Scope:																	
Champaign	6.4	3	5.3	0.0	66.7	33.3	0.0	2	0	0	0	-1	-1	15.5	15.4	47.4	21.7
Chicago	41.4	22	39.3	0.0	0.0	27.3	72.7	3	1	0	0	-2	0	10.7	20.8	41.9	26.6
Springfield	19.9	4	7.1	0.0	50.0	25.0	25.0	1	0	0	0	-1	0	5.0	15.6	49.2	30.2
Limited Scope:																	
Bloomington	4.4	3	5.4	33.3	33.3	0.0	33.4	1	0	0	0	0	-1	2.1	19.6	60.4	17.9
Davenport-Moline-Rock Island	4.1	3	5.4	66.7	0.0	33.3	0.0	0	0	0	0	0	0	3.4	15.5	62.6	18.5
Peoria MSA	7.1	9	16.1	0.0	22.2	55.6	22.2	2	3	0	1	1	-1	4.1	15.2	62.0	18.7
Rockford MSA	16.7	8	14.3	12.5	0.0	50.0	37.5	1	0	0	0	-1	0	5.2	19.8	52.8	22.2
Non-Metro Areas	0.0	4	7.1	0.0	25.0	0.0	75.0	0	0	0	0	0	0	0.00	8.1	64.4	27.5

(*) The percentage of the population in the MSA/AA that resides in these geographies.