



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

May 22, 2000

Community Reinvestment Act Performance Evaluation

**Harris Bank Winnetka, N.A.
Charter Number: 14365**

**520 Green Bay Road
Winnetka, Illinois 60093**

Office of the Comptroller of the Currency

**Chicago-West Field Office
85 West Algonquin Road, Suite 340
Arlington Heights, Illinois 60005**

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

General Information	1
Definitions and Common Abbreviations	2
Overall CRA Rating	4
Description of Institution	5
Scope of Evaluation	7
Fair Lending Review	9
Conclusions with Respect to Performance Tests	
Lending Test	10
Investment Test	14
Service Test	14
Appendix A: Scope of Evaluation	A-1
Appendix B: Market Profile for Area Receiving Full-Scope Review	B-1
Appendix C: Tables of Performance Data	C-1

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 **Harris Bank Winnetka, N.A.** prepared by the **Office of the Comptroller of the Currency (OCC)** the institution's supervisory agency, as of May 22, 2000. 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 refinancing 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.

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.

Overall CRA Rating

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

The following table indicates the performance level of **Harris Bank Winnetka, N.A. (HB Winnetka)** with respect to the Lending, Investment, and Service Tests:

Performance Levels	Harris Bank Winnetka, N.A. Performance Tests		
	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:

- y Lending levels that reflected a good responsiveness by HB Winnetka to the credit needs of its assessment area (AA).
- y Adequate distribution of HB Winnetka's loans among borrowers of different income levels throughout its AA.
- y Community development lending which had an overall neutral impact on the Lending Test conclusion.
- y Investments that reflected an adequate responsiveness by HB Winnetka to the needs of its AA.
- y Adequate accessibility of HB Winnetka's offices to individuals of different income levels and good responsiveness of HB Winnetka's services to the needs of its AA.
- y Good performance in providing community development services, which had a positive impact on the Service Test conclusion.

Description of Institution

HB Winnetka, N.A. (HB Winnetka) is an intrastate bank headquartered in Winnetka, Illinois. It is located in the Chicago MSA, approximately 16 miles north of downtown Chicago. HB Winnetka is a wholly owned subsidiary of Harris Bankcorp, Inc., located in Chicago, Illinois. Harris Bankcorp, Inc. is a subsidiary of the Bankmont Financial Corporation, which is wholly owned by the Bank of Montreal in Toronto, Canada. Bankmont Financial Corporation also owns Harris Bankmont, Inc. These two holding companies are generally referred to as Harris Bank. This organization includes the Harris Trust and Savings Bank (HTSB) in downtown Chicago and 25 separately chartered community banks in the Chicagoland area. There are approximately 140 branches in the Chicago area. It is one of the largest community bank networks in the Midwest. Harris Trust and Savings Bank (HTSB) alone is ranked the fourth largest bank in Chicago. According to the American Banker, a banking news publication, the Harris organization is the 35th largest banking organization in the United States. The assets of all community banks within the Harris Bank group amount to roughly \$26 billion as of September 1999. The Bank of Montreal had assets of approximately \$231 billion Canadian at October 31, 1999 and ranks as one of the ten largest banks in North America. Harris Bank's commitment to community banking is founded on the belief that local, independent banks, allowed to appoint their own management team and board of directors, have the insight to best serve their respective communities.

As of 12/31/99, HB Winnetka had \$375 million in total assets and \$315 million in deposits. This is the seventh largest bank in the Harris Bank group of banks, excluding Harris Trust and Savings Bank. HB Winnetka has two branch and 3 ATM locations in Winnetka and Hubbard Woods, Illinois.

HB Winnetka is a full-service bank, offering various loan and deposit products. In 1997 and 1998, Harris Bank consolidated the permanent financing mortgage business of all of its banks into one operation housed at HTSB. Mortgage applications taken at the bank are referred to and processed by one of HTSB's Regional Operations Centers (ROCs). Mortgage applications denied by the ROC can be overridden and reported on the bank's books. For the purpose of the CRA evaluation, affiliate mortgage loans from HTSB were considered. Mortgage loans were allocated by HTSB to the individual banks based on the referring bank and the location of the loan. Banks were assigned loans that were located in their AA.

HB Winnetka has been primarily a retail bank making primarily home mortgage loans. The residents within the bank's affluent AA are financially sophisticated and they use home equity loans instead of traditional installment loans, in order to take advantage of the tax deductibility and lower interest rates. As of December 31, 1999, net loans at \$280 million represented 75% of total assets, with real estate loans of \$217 million (77%), commercial loans of \$38 million (14%), and consumer loans of \$25 million (9%). Agricultural lending is not a primary business line of the bank. The bank's loan

to deposit ratio as of December 31, 1999 was 89%. Its market share of deposits in Cook County was 0.25%. It is the only bank headquartered in Winnetka, Illinois.

There were no legal, financial or other factors that impeded HB Winnetka's ability to help meet the credit needs of the communities it serves. As of December 31, 1999, HB Winnetka reported Tier 1 capital of \$28 million.

HB Winnetka was rated "Satisfactory" at its last CRA evaluation dated April 9, 1997.

Scope of the Evaluation

Evaluation Period/Products Evaluated

With the exception of community development (CD) loans, the evaluation period of the Lending Test is January 1, 1998 through December 31, 1999. For CD loans, the Investment Test and the Service Test, the evaluation period is April 9, 1997 through May 22, 2000.

For the Lending Test, HB Winnetka's origination, purchase and HTSB allocation of home mortgage loans, small loans to businesses, consumer loans and CD loans were evaluated. The bank did not make any small loans to farms during the evaluation period.

In the evaluation of HB Winnetka's performance, the home mortgage and investment activities of its HTSB affiliate were considered to the extent the loans and investments were allocated to the bank by HTSB, were located within the bank's AA and were not counted in any other affiliate's data.

Market share data for home mortgage loans and small loans to businesses were based on 1998 aggregate data, which were the most current data available at the time the bank's CRA performance was evaluated. Market share data were for the bank only and did not include the affiliate home mortgage loans allocated to the bank.

Data Integrity

As part of this CRA evaluation, we tested for accuracy a representative sample of HB Winnetka's publicly filed data on home mortgage loans and small loans to businesses. We also tested for accuracy a representative sample of HB Winnetka's optionally collected data on consumer loans and other secured loans for purposes of small business, as well as data on home mortgage loans allocated from the bank's affiliate, HTSB.

HB Winnetka had no significant errors in its data on home mortgage loans or small loans to businesses that would prevent an accurate evaluation of its CRA performance. The bank's publicly filed data were substantially correct and reliable.

HB Winnetka had no significant errors in its consumer loan data for the home equity, other secured or other unsecured categories, but had significant omissions in its data for the motor vehicle category. The bank was able to correct the motor vehicle consumer loan data; however, after further analysis, the bank elected not to have the motor vehicle category of consumer loans considered in this evaluation.

We verified information on bank-identified CD loans, qualified investments and CD services to ensure the activities met the regulatory definitions. HB Winnetka had

accurately identified substantially most of the activities it submitted. We excluded activities that did not meet the regulatory definitions from this evaluation.

Selection of Areas for Full-Scope Review

HB Winnetka has one assessment area (AA) consisting of 30 census tracts located in northeastern Cook County, which is within the Chicago MSA. This one AA received a full-scope review.

Ratings

The bank's rating was based on conclusions reached in the evaluation of HB Winnetka's performance in its one AA.

Other

During the evaluation, a total of 27 community contacts were made by the OCC, Federal Reserve Bank of Chicago, and Federal Deposit Insurance Corporation in the Chicagoland area. The community contacts mentioned several needs in the community that would provide opportunities to banks. Most of the contacts said that banks were doing a good job of meeting credit needs in their area.

One of the primary credit needs identified by the contacts was lending for affordable housing. The contacts stated that the following are opportunities for banks to help meet the affordable housing credit needs: providing below market rate loans to affordable housing developers; relaxing some underwriting standards; considering compensating factors when lesser experienced groups or developers apply for affordable housing development loans; conducting outreach to inform community groups and developers of various financing options available and the assistance the bank is willing to provide; conducting home buyers seminars and counseling; and providing flexible credit terms for borrowers who have good credit but inadequate cash flow. The contacts cited the following as obstacles to affordable housing: new home construction in the \$100,000 to \$300,000 range, little construction of affordable rental properties, high impact fees, high land costs, little vacant land available for housing developments, little property zoned for multi-family units, and few affordable housing developers.

The contacts also identified small business funding and operating lines of credit as a credit need, citing the Capital Access Program (CAP) as a vehicle to provide loans to businesses that do not qualify for conventional credit.

As neighborhoods change, and as older residents move out and young families move into older homes in established neighborhoods, there is an opportunity for banks to extend rehabilitation and home improvement loans.

Fair Lending Review

An analysis of 1998 HMDA and small business lending data, 1999 consumer complaint information, and public comments was performed according to the OCC's risk-based analysis approach. The analysis of the lending data revealed no significant differences for applicants by collected prohibited basis. In addition, an analysis of the consumer complaint data and public comments revealed no substantive fair lending issues that warranted more detailed review.

Conclusions with Respect to Performance Tests

LENDING TEST

The bank's performance under the Lending Test is rated Low Satisfactory. Based on this full-scope review, the bank's performance in its AA is adequate.

Lending Activity

Refer to Tables 1 and 14 in Appendix C for the facts and data used to evaluate the bank's lending activity.

Lending levels reflected a good responsiveness by HB Winnetka to the credit needs of its AA.

Approximately 51% of the total consumer loans, home mortgage loans and small loans to businesses originated/purchased in the bank's AA during the evaluation period were consumer loans. Home mortgage loans comprised 40% of the total and small business loans 9%. Agricultural lending was not a primary business line of HB Winnetka and no small loans to farms were made during the evaluation period.

Approximately 54% of the total consumer loans were home equity loans. Other unsecured loans comprised 28% and other secured loans comprised 18% of the consumer loans originated/purchased.

Among home mortgage loans originated/purchased, approximately 63% were for refinance, 35% for home purchase and 2% for home improvement.

HB Winnetka's lending activity in its AA was good. According to the FDIC's June 30, 1999 deposit market share report, HB Winnetka had a 0.25 percent deposit market share and ranked 55th of the 216 FDIC insured financial institutions with branches in Cook County. Based on 1998 aggregate HMDA market share data, HB Winnetka had a market share of 0.70% and ranked 38th of 301 lenders making home purchase loans and had a market share of 0.50% and ranked 46th of 374 lenders making refinance loans. The bank's market share increases to 1.58% for home purchase and 1.80% for refinance loans when the HTSB allocated mortgage loans are included. HB Winnetka had a market share of 1.30% and ranked 17th of 88 lenders making home improvement loans. Based on 1998 aggregate market data on small loans to businesses, HB Winnetka had a market share of 0.30% and ranked 57th of 262 lenders making small loans to businesses.

Distribution of Loans by Income Level of the Geography

There were no low-income census tracts and one moderate-income census tract in the bank's AA. The moderate-income census tract is a closed naval air station. Therefore, an analysis of the geographic distribution of loans would not be meaningful. Geographic distribution of loans was not taken into consideration in evaluating the bank's lending performance.

Lending Gap Analysis

Maps and reports detailing HB Winnetka's lending activity over the evaluation period for home mortgage loans, consumer loans and small loans to businesses were reviewed to identify gaps in the geographic distribution of those loans. No unexplained conspicuous gaps were identified.

Inside/Outside Ratio

A majority (52%) of the home mortgage loans, small loans to businesses and consumer loans originated/purchased by HB Winnetka over the evaluation period were outside its AA. Forty-five percent of the bank's home mortgage loans, 29% of the small loans to businesses and 57% of consumer loans were within the bank's AA. This information includes bank originations and purchases only and does not include extensions of credit by affiliates that are being considered under the other performance criteria. Most of the small loans to businesses are made to owners/managers who live inside the AA but whose business address is outside the MSA. Following an analysis of its lending patterns, the bank expanded its AA in March 2000 to include the census tracts where its loans were made and thereby increase the percentage of the bank's mortgage loans, small loans to businesses and consumer loans inside its AA. Because the percentage of loans inside the AA was so close to a majority and the bank had already taken steps to improve the inside/outside ratio, this performance was given neutral consideration in the overall analysis of the bank's lending performance.

Distribution of Loans by Income Level of the Borrower

The borrower distribution of HB Winnetka's home mortgage loans, small loans to businesses and consumer loans reflected an adequate dispersion among borrowers of different income levels throughout the bank's AA.

Home Mortgage Loans

Refer to Tables 7, 8 and 9 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases. Borrower income information was not available for 27% of the bank's home purchase loans and 25% of the refinance loans, which could have affected the respective percentages of loans to low- and moderate-income borrowers. The available data were

considered reasonably reliable to draw a conclusion on the bank's performance under this criterion.

The overall borrower distribution of home purchase loans was good. The portion of home purchase loans made to low- and moderate-income borrowers was below the percentage of low-income and moderate-income families living in the AA. However, Winnetka is a very affluent area of Chicago with a weighted average median housing cost in excess of \$300,000, which is three times the median housing value of the MSA. Considering that approximately 2% of the families living in the bank's AA were below the poverty level, the very high median home value in the bank's AA was a barrier to home ownership for low- and moderate-income borrowers. The bank's market share for low-income borrowers significantly exceeded HB Winnetka's overall market share in the AA for home purchase loans. The bank made no home purchase loans in 1998 to moderate-income borrowers.

Home improvement loan borrower distribution was good. The portion of home improvement loans made to low-income borrowers was below and to moderate-income borrowers was double the portion of low-income families and moderate-income families living in the AA. However, because of the very high cost of housing, only a small percentage of low- and moderate-income families own their own homes and would have the opportunity to improve them. The bank ranked 17th of 88 lenders in making home improvement loans in its AA. The bank made no home improvement loans to low-income borrowers in 1998. The market share to moderate-income borrowers more than doubled its overall market share for home improvement loans.

Refinance loan borrower distribution was adequate. No refinance loans were made to low-income borrowers and the portion of refinance loans made to moderate-income borrowers was below the percentage of moderate-income families living in the AA. However, because of the very high cost of housing, only a small percentage of low- and moderate-income families own their own homes and would have an opportunity to refinance them. The bank's market share to moderate-income borrowers was below its overall market share for refinance loans.

Small Loans to Businesses

Refer to Table 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The borrower distribution of small loans to businesses was adequate. The portion of HB Winnetka's loans to businesses with revenues of \$1 million or less was below the portion of businesses that are defined as such. The portion of loans of \$100,000 or less was somewhat below the portion of businesses that are defined as small. In addition, the market share of small loans made to small businesses was near HB Winnetka's overall market share for small loans to all businesses in its AA.

Small Loans to Farms

Refer to Table 11 in the Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

Agricultural lending was not a primary business line of HB Winnetka and no small loans to farms were made during the evaluation period.

Consumer Loans

Refer to Table 14 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Consumer loan borrower distribution was adequate. The portion of consumer loans to both low- and moderate-income borrowers was below the portion of low- and moderate- income households in HB Winnetka's AA. However, over half of the total consumer loans were home equity loans. Because of the very high cost of housing, only a small percentage of low- and moderate-income families own their own homes and would have the opportunity to obtain home equity loans.

Community Development Lending

Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's level of community development lending.

HB Winnetka extended an adequate amount of community development loans during the evaluation period. Therefore, the CD lending had a neutral impact on the Lending Test conclusions for the AA.

During the evaluation period, HB Winnetka purchased participations in three CD loans, totaling \$292,834. These loans were made to the Chicago Equity Fund (CEF) 1998 and 2000 Limited partnerships and Community Reinvestment Fund (CRF) 1997 Limited Partnership to provide equity for community development eligible projects. CEF and CRF determine the specific projects they will fund. CEF is a nonprofit real estate investment fund with the purpose of developing and operating affordable multifamily rental housing projects and related commercial facilities in Chicago-area neighborhoods. Most of the investments are to be made in socio-economically disadvantaged neighborhoods of Chicago and, to a lesser extent, suburban Chicago. The CRF is a nonprofit organization that acquires limited partnership interest in various project partnerships engaging in qualified community revitalization and economic development projects within communities in the Chicago area. These loans benefited the broader metropolitan area that includes the bank's AA.

INVESTMENT TEST

The bank's performance under the Investment Test is rated Low Satisfactory. Based on this full-scope review, the bank's performance in its AA is adequate.

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

In its investing activities, HB Winnetka exhibited adequate responsiveness to credit and community development needs. The bank's AA represented a small portion of a large metropolitan area where many investment opportunities were available to assist with needs within the various communities. However, within the bank's AA, qualifying CD investment opportunities were limited. The bank devoted its efforts in contributing to those investments that provide the most direct benefit to its AA.

The bank provided qualified investments within its AA through cash contributions and grants, and purchases of securities. Qualifying investments during this evaluation period totaled \$303,474.

HTSB, the bank's affiliate, invested in twenty-two mortgage-backed securities totaling more than \$49 million. The securities were backed by home mortgage loans originated to low- and moderate-income individuals throughout the Chicago MSA. HTSB allocated portions of the securities to its affiliate banks based on the benefit to each affiliate's AA according to the property location of the underlying mortgage loans. Positive consideration was given to portions of 2 securities with underlying mortgage loans totaling \$274,800 that were allocated to and directly benefited HB Winnetka's AA.

Additional donations and grants were provided to organizations with a community development focus. HB Winnetka contributed to 11 different community development organizations, totaling \$28,674 during the evaluation period.

SERVICE TEST

The bank's performance under the Service Test is rated High Satisfactory. This conclusion is based on the following:

- Delivery systems were reasonably accessible to geographies and individuals of different income levels in its AA.
- The bank had not opened or closed any branch offices during this evaluation period.
- Services did not vary in a way that inconveniences certain portions of the AA.

- The institution provided a good level of community development services.

Retail Banking Services

Refer to Table 13 for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Delivery systems were reasonably accessible to geographies and individuals in its AA. HB Winnetka has two branch office locations. While there are no low-income census tracts and only one moderate-income census tract in the AA, the bank's total lending activity during the evaluation period showed that it served all census tracts. The bank penetrated 97% of the census tracts with home mortgage loans and 93% with consumer loans. The bank's lending activity also showed that it reasonably served individuals of all income levels. As discussed in the Lending Test section of this evaluation, the bank had an adequate dispersion of home mortgage and consumer loans to borrowers of different income levels, including low- and moderate-income borrowers. The bank did not open or close any branch offices during the evaluation period.

The bank and the branch office lobby hours are Monday through Friday from 8:30 a.m. to 5:00 p.m., and Saturday from 8:30 a.m. to 1:00 p.m. The drive-up is open Monday through Friday from 7:30 a.m. to 5:30 p.m., and Saturday from 7:30 a.m. to 4:00 p.m. There were no differences in the services available at the different locations.

HB Winnetka has three ATMs, two at the main office and one at the branch location. Harris customers can also use any of the approximately 210 Harris ATMs in the Chicagoland area for no charge.

The bank provided alternative delivery systems, as detailed below. These systems were available to all customers. There were no data available specifically concerning the use of these systems by low- and moderate-income customers. Therefore, we did not place significant weight on these services in the Service Test conclusions.

- Harris Bank has a Client Contact Center. The Contact Center enables a customer to have easy access to banking services. The Center provides general deposit services such as stop payments, account closings, and transfers between accounts. The Center also provides loan services such as consumer loan applications, payoff requests, and rate information. The Center is staffed Monday through Friday from 7:00 a.m. to 10:00 p.m. and Saturday from 8:00 a.m. to 5:00 p.m. The Center has employees who are able to speak eight languages.
- The Client Contact Center's telephone system provides access to the Single Family Mortgage Call Center. The Call Center has approximately 12-14 mortgage originators responding to phone calls. Originators are available on a 24-hour basis, seven days a week. Additionally, the originators will meet potential applicants in locations convenient to the applicant, including their home.

- Customers can also bank online (Mbanx). Using Mbanx, a customer can apply for deposit accounts and loans, access account information, obtain product information, pay bills, transfer money between accounts, stop payments, order checks and make address changes. It also allows access to customer service representatives.
- Customers can also use Harris' bank-by-phone system that operates 24 hours, seven days a week.

Community Development Services

HB Winnetka's performance in providing services in its AA was good and had a positive impact on the Service Test conclusions. The bank provided a relatively high level of CD services that were responsive to the credit and community development needs of its AA.

The bank provided financial services that benefit low- and moderate- income individuals. In addition, bank personnel used their financial expertise to aid several organizations that provide services to low- and moderate-income individuals in the bank's AA. The following are representative of the types of CD services provided by the bank:

- Harris banks participated in the Illinois Link EBT cards introduced by the Department of Public Aid. This system allows recipients to access their benefits through Cash Station ATMs. ATM access allows multiple draws of the monthly benefits. Harris estimates that approximately 6,000 transactions each month occur at Harris Bank ATMs.
- Outreach efforts included a presentation to area real estate agents to provide information about Harris Bank's mortgage programs, including those developed especially for low- and moderate-income homebuyers.
- A bank officer served as an advisory board member of the North Shore Senior Center. This organization provides critical social services for seniors and their families. The Center approximates that at least one-half of their clientele are low- or moderate-income people. In addition to serving as a board member, the bank officer served as the assistant treasurer and chairperson of the capital fund drive.
- A bank officer served as a board member, treasurer and fundraiser for the Josselyn Center. The center is a non-for-profit Mental Health organization. The center states that 88% of its clientele is low- or moderate-income individuals.
- A bank officer served on the board of the Interfaith Housing Development Corporation. The corporation is a non-profit developer of low and moderate- income

housing. Its mission is to expand the housing stock available to low- and moderate-income individuals. The bank's officer helps the corporation in its effort to purchase low and moderate-income housing. Additionally, the bank co-sponsored two workshops with the Interfaith Housing. One workshop educated potential homebuyers on how to apply for a mortgage, repair credit and maintain a house. The other was designed to educate low- and moderate-income individuals on how to develop a budget, and save and spend wisely.

- A bank officer lent his financial expertise to the Forrest Powell Foundation. The foundation provided scholarships to youngsters for trade school and donated money to the Youth Job Center in Evanston to help low- and moderate-income youth find jobs. The bank officer helped complete a business loan application for the foundation. The purpose of the loan was to purchase a building for leasing to low- and moderate-income individuals.
- The president of the bank's affiliate, Harris Bank Wilmette, served on the board of WilPower, Inc. WilPower's mission is to enable adults disabled by chronic mental illnesses to live as independently as possible on their subsidized income. To do so, WilPower establishes community-based housing and support service programs. The bank president provided financial expertise in the organization's quest for future home purchases.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes CD Loans): 01/01/1998 to 12/31/1999 Investment and Service Tests and CD Loans: 4/9/1997 to 5/22/2000	
Financial Institution	Products Reviewed	
Harris Bank Winnetka, N.A. (HB Winnetka) Winnetka, Illinois	Home mortgage loans, small loans to businesses, consumer loans and community development loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Harris Trust and Savings Bank Chicago, Illinois	Bank Affiliate	Home mortgage loans and investments
List of AAs and Type of Examination		
AA	Type of Exam	Other Information
Portions of Cook County in Chicago MSA #1600	Full-Scope	

Appendix B: Market Profile for Full-Scope Area

HB Winnetka's AA in Portions of Chicago MSA

Demographic Information for Full-Scope Area:						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	30	0.00	3.33	0.0	96.67	0.00
Population by Geography	122,869	0.00	1.63	0.00	98.37	0.00
Owner-Occupied Housing by Geography	39,0-60	0.00	0.35	0.00	99.65	0.00
Businesses by Geography	7,873	0.00	1.31	0.00	98.69	0.00
Farms by Geography	121	0.00	4.13	0.00	95.87	0.00
Family Distribution by Income Level	36,060	4.42	7.28	12.41	75.89	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	4,218	0.00	7.92	0.00	92.08	0.00
Median Family Income	= \$42,758	Median Housing Value		= \$108,960		
HUD Adjusted Median Family Income for 1998	= \$63,800	Unemployment Rate		= 4.55%		
Households Below the Poverty Level	= 10.45%					

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 U.S. Census, and 1999 HUD updated MFI.

The bank's 1999 AA consists of a portion of the Chicago MSA. It includes 30 census tracts located in northeastern Cook County, one of the MSA's wealthiest areas. There are no low-income or middle-income census tracts. There is one moderate-income (3.33%) and 29 (96.67%) upper-income census tracts in the AA. The moderate-income census tract is the former Glenview Naval Air Station, which was closed in 1996. Plans are to redevelop the naval base into a residential area with projected housing values exceeding \$300,000. HB Winnetka's AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- or moderate-income areas.

The 1999 HUD adjusted median family income for the MSA is \$63,800, an increase of 49% from the 1990 median family income. Based on 1990 family income, four percent of the families in the bank's AA are low-income and seven percent are moderate-income.

The total population at the 1990 census was 122,869, with 2% of the population living in the moderate-income census tract and 98% in upper-income census tracts.

The bank's AA is in an affluent section of the Chicago MSA, which has a lower percentage of rental units and higher housing costs than the overall MSA. There are 122,869 total housing units in the AA. The large majority of housing is owner occupied (85%). Only 12% are occupied rental units. The weighted average median housing cost is \$301,053. Overall, the cost of housing in the area is high in relation to the entire Chicago MSA where the median housing value is \$108,960. There are limited opportunities for first time or entry level home-buyers in the local housing market.

The local economy is generally stable. Seventy-three percent of the businesses in the area have gross revenues of less than \$1 million. The AA contains a good mix of local employers and commuters to downtown Chicago. The primary industry is services (48%) followed by retail trade (15%). The 1999 unemployment rate in HB Winnetka's AA was 1.1%, less than the Chicago MSA which was 4.55%.

Competition in the AA is strong. There are 19 banks located in the AA. There are several mortgage companies and large banks, including branches of multi-billion dollar financial institutions located in the area, such as Bank One.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the Δ bank include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: purchased loans are treated as originations/purchases; market rank is based on the number of loans originated and purchased by the bank as compared to all other lenders in the MSA/AA; and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MSA/AA.

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

Table 1. Lending Volume Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MSA/AA.

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

Table 3. Geographic Distribution of Home Improvement Loans See Table 2.

Table 4. Geographic Distribution of Refinance Loans See Table 2.

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

Table 6. Geographic Distribution of Small Loans to Farms The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle- and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.

- Table 7. Borrower Distribution of Home Purchase Loans** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle- and upper-income borrowers to the percentage distribution of families by income level in each MSA/AA. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 8. Borrower Distribution of Home Improvement Loans** See Table 7.
- Table 9. Borrower Distribution of Refinance Loans** See Table 7.
- Table 10. Borrower Distribution of Small Loans to Businesses** Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 11. Borrower Distribution of Small Loans to Farms** Compares the percentage distribution of the number of small loans (less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Qualified Investments** Presents the number and dollar amount of qualified investments made by the bank in each MSA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.
- Table 13. Distribution of Branch Delivery System and Branch Openings/Closings** Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle- and upper-income geographies to the percentage of the population within each geography in each MSA/AA.

The table also presents data on branch openings and closings in each MSA/AA.

Table 14. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)
geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle- and upper-income geographies to the percentage distribution of the population within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle- and upper-income borrowers to the percentage of households by income level in each MSA/AA.

Table 1. Lending Volume

LENDING VOLUME												
State: Illinois												
Evaluation Period: 1/1/1998 to 12/31/1999												
MSA/AA:	% of Rated Area Deposits in MSA/AA*	Home Mortgage**		Small Loans to Businesses**		Small Loans to Farms**		Community Development***		Total Reported Loans	% of Rated Area Loans(%) in MSA/AA	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)			
Full-Scope:												
HB Winnetka AA in MSA 1600	100.00	388	105,405	88	9,598	0	0	3	293	479	115,296	100.00

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

(**) The evaluation period for Home Mortgage Loans, Small Loans to Businesses and Small Loans to Farms is 1/1/1998 to 12/31/1999.

(***) The evaluation period for Community Development Loans is 4/9/1997 to 5/22/2000

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE															
State: Illinois															
Evaluation Period: 1/1/1998 to 12/31/1999															
MSA/AA:	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		Upp	#
Full-Scope:															
HB Winnetka AA in MSA 1600	0.00	0.00	0.00	0.00	0.00	0.00	100.00	100.00	38	0.70	0.00	0.00	0.70	134	100.00

(*) 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 Loans

Geographic Distribution: HOME IMPROVEMENT State: Illinois Evaluation Period: 1/1/1998 to 12/31/1999																
MSA/AA:	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		Upp	#
Full-Scope:																
HB Winnetka AA in MSA 1600	0.00	0.00	0.00	0.00	0.00	0.00	100.00	100.00	17	1.30	0.00	0.00	0.00	1.40	7	100.00

(*) 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 Loans

Geographic Distribution: HOME MORTGAGE REFINANCE State: Illinois Evaluation Period: 1/1/19 98 to 12/31/1999																
MSA/AA:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	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	Low	Mod	Mid		Upp	#
Full-Scope:																
HB Winnetka AA in MSA 1600	0.00	0.00	0.00	0.00	0.00	0.00	100.00	100.00	46	0.50	0.00	0.00	0.00	0.50	245	100.00

(*) 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 LOANS TO BUSINESSES		State: Illinois		Evaluation Period: 1/1/1998 to 12/31/1999							
MSA/AA:	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	% of Businesses	% of Businesses	% of Businesses		Overall	Low	Mod		Upp	#
HB Winnetka AA in MSA 1600	0.00	1.00	0.00	99.00	57	0.30	0.00	0.00	0.40	88	100.00
Full-Scope:											

(*) 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 LOANS TO FARMS		State: Illinois		Evaluation Period: 1/1/19 98 to 12/31/1999							
MSA/AA:	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	% of Farms	% of Farms	% of Farms		Overall	Low	Mod		Upp	#
HB Winnetka AA in MSA 1600	0.00	4.00	0.00	96.00	0	0.00	0.00	0.00	0.00	0	0
Full-Scope:											

(*) 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 Loans

Borrower Distribution: HOME PURCHASE State: Illinois Evaluation Period: 1/1/1998 to 12/31/1999																
MSA/AA:	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	Upp	#
Full-Scope:	4.00	1.00	7.00	4.00	12.00	7.00	76.00	61.00	38	0.70	2.20	0.00	0.50	0.20	134	100.00
HB Winnetka AA in MSA 1600																

(*) As a percentage of loans with borrower income information available. No information was available for 27% of loans originated and purchased by the bank.

(**) 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 Loans

Borrower Distribution: HOME IMPROVEMENT State: Illinois Evaluation Period: 1/1/1998 to 12/31/1999																
MSA/AA:	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	Upp	#
Full-Scope:	4.00	0.00	7.00	14.00	12.00	14.00	76.00	71.00	17	1.30	0.00	2.90	1.50	1.30	7	100.00
HB Winnetka AA in MSA 1600																

(*) As a percentage of loans with borrower income information available. No information was available for 1% of loans originated and purchased by the bank.

(**) 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 Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		State: Illinois		Evaluation Period: 1/1/1998 to 12/31/1999									
MSA/AA:	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	% of Families	% of Families	% of Families	Overall Market Rank**	Overall	Low	Mod	Upp	#	% of Total****		
HB Winnetka AA in MSA 1600	4.00	7.00	12.00	6.00	65.00	46	0.50	0.00	0.30	0.00	0.10	245	100.00
Full-Scope:													

(*) As a percentage of loans with borrower income information available. No information was available for 25% of loans originated and purchased by the bank.
 (**) Based on 1999 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 LOANS TO BUSINESSES		State: Illinois		Evaluation Period: 1/1/1998 to 12/31/1999				
MSA/AA:	Businesses with Revenues of \$1 million or less	Loans by Original Amount Regardless of Business Size	Market Share***	Total Small Loans to Businesses				
	% of Businesses*	> \$100,000 to \$250,000	All	Rev \$1 million or less	#	% of Total****		
HB Winnetka AA in MSA 1600	73.85	65.91	26.14	7.95	0.25	0.20	88	100.00
Full-Scope:								

(*) 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 0% of small loans to businesses originated and purchased by the bank.
 (***) 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 LOANS TO FARMS		State: Illinois		Evaluation Period: 1/1/1998 to 12/31/1999			
MSA/AA:	Farms with Revenues of \$1 million or less	Loans by Original Amount Regardless of Farm Size		Market Share***		Total Small Farm Loans	
	% of Farms*	\$100,000 or Less	> \$100,000 to \$250,000	All	Rev \$1 million or less	#	
Full-Scope:							
HB Winnetka AA in MSA 1600	90.80	0.00	0.00	0.00	0.00	0	0.00

(*) 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.
 (***) 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: 4/9/1997 to 5/22/2000					
MSA/AA:	Full-Scope:	Prior Period Investments*		Current Period Investments		Total Investments		Unfunded Commitments**	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)		
HB Winnetka AA in MSA 1600		0	0	13	303	13	303	0	0

(*) A Prior Period InvestmentsΔ means investments made in a previous evaluation period that are outstanding as of the examination date.
 (***) Δ Unfunded CommitmentsΔ means legally binding investment commitments that are tacked and reported by the bank's financial reporting system.

Table 13. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS														
Evaluation Period: 1/1/1998 to 12/31/1999														
MSA/AA:	Deposits			Branches			Branch Openings/Closings			Population				
	% of Rated Area Deposits in MSA/AA	# of BANK Branches	% of Rated Area Branches in MSA/AA	Location of Branches by Income of Geographies			# of Branch Openings	Net Change in Location of Branches (+ or -)			% of the Population within Each Geography			
				Low	Mod	Upp		Low	Mod	Upp	Low	Mod	Upp	
Full-Scope:														
HB Wimetka AA in MSA 1600	100.00	2	100.00	0	0	100.00	0	0	0	0	0.00	1.63	0.00	98.37

Table 14. Geographic and Borrower Distribution of Consumer Loans (Optional)

Geographic and Borrower Distribution: CONSUMER LOANS														
Evaluation Period: 1/1/1998 to 12/31/1999														
MSA/AA:	Geographic Distribution						Borrower Distribution							
	Low-Income Geographies	Moderate-Income Geographies	Middle-Income Geographies	Upper-Income Geographies	Low-Income Borrowers	Moderate-Income Borrowers	Middle-Income Borrowers	Upper-Income Borrowers	Total Consumer Loans	% of Pop*	% of BANK Loans	% of Total**		
													% of Pop*	% of BANK Loans
Full-Scope:														
HB Wimetka AA in MSA 1600	0.00	0.00	0.00	98.37	4.42	2.70	7.28	4.80	12.41	7.10	75.89	75.80	488	100.00

(*) The percentage of the population in the MSA/AA that resides in these geographies.
 (**) Consumer loans originated and purchased in the MSA/AA as a percentage of all consumer loans originated and purchased in the rated area.
 (***) No income information was available for 9.6% of consumer loans.