



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

January 12, 2004

Community Reinvestment Act Performance Evaluation

**TCF National Bank
Charter Number: 23253**

**200 Lake Street East
Wayzata, MN 55391**

Office of the Comptroller of the Currency

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NOTE: This document is an evaluation of this 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. 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.

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Overall CRA Rating

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

The following table indicates the performance level of **TCF National Bank** (TCF) with respect to the Lending, Investment, and Service Tests:

Performance Levels	TCF National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory	X		X
Low Satisfactory			
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:

- TCF's overall Lending Test performance is good. For the bank as a whole, TCF demonstrates generally good lending activity, good geographic distributions, and excellent borrower income distributions. By rating area, overall Lending Test performance is excellent in the Multistate CMSA and State of Wisconsin and good in the States of Colorado, Michigan, and Minnesota.
- TCF's Investment Test performance is excellent across all rating areas. TCF has made a significant level of qualified investments in all areas. Investments focused on the primary identified credit and economic development needs in all assessment areas with the exception of Gary, Indiana. In every assessment area, one of these primary needs is affordable housing. TCF has had a very significant focus on that need, as over 90% of its dollars of qualified investments were housing-related.
- TCF's Service Test performance is good, primarily the result of good access to its products and services throughout its branch network. TCF offers greatly extended hours of operation and customer service in all assessment areas. Employees provide a good level of community development services, often serving in leadership capacities. By rating area, TCF had good performance in the Multistate CMSA and the States of Colorado, Michigan, and Minnesota. Service Test performance in the State of Wisconsin is excellent.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. 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 with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Block Numbering Area (BNA): A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development (CD): Affordable housing (including multifamily rental 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.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male household and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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 applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn).

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

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited 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, and branch distribution).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. 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): Any primary metropolitan statistical area (PMSA), metropolitan statistical area (MSA), or consolidated metropolitan statistical area (CMSA), as defined by the Office of Management and Budget, with a population of 250,000 or more, and any other area designated as such by the appropriate federal financial supervisory agency.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated Area: A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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

Upper-Income: Individual income that is more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.

Description of Institution

TCF National Bank (TCF) is an interstate bank headquartered in Wayzata, Minnesota. Its parent company is the \$11.4 billion TCF Financial Corporation (TCFFC), also of Wayzata, Minnesota.

TCF is a full-service commercial bank. It has a retail focus and emphasis on customer convenience. Most of its offices are open seven days a week and have expanded hours of operation. More than half of TCF's branches are located in supermarkets. The supermarket branches are largely concentrated in TCF's Minneapolis-St. Paul and Chicago areas, in Cub Foods and Jewel-Osco stores, respectively. TCF also has an extensive automated teller machine (ATM) network.

TCF has operating subsidiaries involved in residential mortgage lending, commercial leasing, mutual fund sales, and charitable contributions. TCF management asked that we consider the activities of three operating subsidiaries, TCF Mortgage Corporation (TCFMC), TCF Foundation, and TCF Leasing, Inc., in this evaluation. TCFMC is involved in residential mortgage lending. Its loan originations and purchases were a significant portion of the HMDA loan originations and purchases considered in this evaluation. TCF Foundation is the operating subsidiary through which the bank makes many of its charitable contributions, especially those in the states of Minnesota and Colorado. TCF Leasing, Inc. is a general equipment finance company that holds qualified investments in some of TCF's assessment areas. None of TCF's subsidiaries has an adverse impact on TCF's capacity to lend or invest in its communities.

TCF's 402 branch offices are located within six states. It operates 98 branch offices in Minnesota, most of which are in the Minneapolis-St. Paul area. It operates 191 branch offices in Illinois, all in the Chicago area. To the north of Chicago, TCF has 34 branch offices in southeastern Wisconsin, in the Milwaukee, Racine, and Kenosha area. To the east of Chicago, TCF has five branch offices in northwestern Indiana, in the Gary area. In Michigan, TCF has 56 branch offices, most of which are in the Ann Arbor and Detroit area. During the evaluation period, TCF merged with an affiliated bank, TCF National Bank Colorado. With the merger, TCF has 18 branch offices in Colorado, in the Denver and Colorado Springs areas.

In addition to branch offices, TCF and TCFMC operate loan production offices (LPOs) in those same six states. Of the 24 LPOs, nine are located within TCF's CRA assessment areas. TCF and/or TCFMC have five LPOs in Illinois, two in Minnesota, eight in Michigan, seven in Wisconsin, and one each in Colorado and Indiana.

TCF has \$11.4 billion assets, with net loans and leases representing 76% of those assets. The loan portfolio consists of one-to-four family residential real estate 58%, commercial and multifamily real estate 19%, commercial 8%, leases 9%, and all other 6%. TCF has Tier I Capital of \$755 million.

There are no known legal, financial, or other factors impeding TCF's ability to help meet credit needs in its assessment areas.

TCF's last CRA examination was as of January 2, 2001 and the CRA rating was "Satisfactory." That examination was prior to the July 2002 merger of TCF National Bank Colorado into TCF.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the Lending Test was generally October 1, 2000 through December 31, 2002. During the last CRA examination, community development loans had been evaluated through December 31, 2000. As a result, the evaluation period for Community Development loans during this examination was January 1, 2001 through December 31, 2002. In this evaluation, we considered home mortgage loan information reported by both TCF and TCFMC through HMDA reports. We evaluated TCF's business and community development lending based on data TCF had collected. TCF is not involved in agricultural lending, so farm loans and Tables 7 and 12 are not part of this performance evaluation.

Refinance loans were the most predominant loan product in each of TCF's assessment areas. As a result, performance for refinance loans received the most weight. There were instances in which very few loans of a certain loan type were originated or purchased in an assessment area. When there were ten or fewer loans of a certain loan type in an assessment area, an analysis of that loan type was not performed. Performance for that loan type would not have been a material consideration in the evaluation of the bank's overall performance for that assessment area.

The bank's performance relative to demographics generally carried the most weight in this evaluation. TCF's market share performance in 2002 had an influence on the conclusions when it was significantly different than demographic performance. Market share was not considered when the bank's overall market share for a loan type in an assessment area was less than .10%.

In our analysis of the geographic distribution of loans, we often gave greater weight to the bank's performance in moderate-income census tracts. This was because there were often more owner-occupied housing units in the moderate-income census tracts than there were in low-income census tracts, representing more opportunities to lend.

The geographic distribution conclusions are based on the combination of the geographic distribution of the bank's loans within its assessment areas, whether there were any unexplained gaps in lending in any geographic areas within the assessment areas, combined with the degree to which the bank's loans benefit the assessment areas versus the areas within each state that are not in the assessment areas.

In our analysis of borrower distribution, we considered the level of poverty in each assessment area and the impact it could have on the ability of lower-income families to obtain loans. Similarly, we considered housing costs relative to area incomes and the limiting affects those costs could have on the demand for loans by lower-income families. Refer to Appendix C: Market Profiles for poverty levels and housing costs for each full-scope assessment area.

The evaluation period for the Investment Test was January 1, 2001 through December 31, 2003. We considered grants and investments made by TCF, TCF Foundation, and TCF Leasing, Inc. We gave primary consideration to the volume of the grants and investments made during the current evaluation period. Additional consideration was given to the responsiveness of those grants and investments to identified community development needs. We also considered investments made during prior evaluation periods that remain outstanding, although they received a lesser consideration in this evaluation.

The evaluation period for the Service Test was January 1, 2001 through December 31, 2003. We gave primary consideration to TCF's delivery of retail products and services to its assessment areas. We evaluated the range of products and services offered by the branch offices, particularly any differences between branches in low- or moderate-income geographies relative to those in middle- or upper-income geographies. We also considered the community development services TCF provides in its assessment areas, although they received a lesser consideration in this evaluation.

Data Integrity

Before we began this evaluation, we reviewed the HMDA and small business loan data TCF had collected, as well as HMDA data TCFMC had collected. Based on a sample of this loan data, we determined the data was sufficiently accurate and could be relied on for this evaluation. During the evaluation, we also reviewed the loans, investments, and services management had represented had a primary purpose of community development. We confirmed that most did have such a primary purpose. We based this evaluation on only those loans, investments, and services that had such a primary purpose.

Selection of Areas for Full-Scope Review

The Multistate CMSA received a full-scope review. In addition, in each state where the bank has an office, we selected one assessment area for a full-scope review. That assessment area was the one with the highest volume of dollars of deposits and numbers of loans within that state. Refer to the "Scope" section under each State Rating for details regarding how the areas were selected.

Ratings

The bank's overall rating is a blend of the ratings for the one Multistate CMSA and the four states in which TCF has branch offices. Each of these five rated areas was not considered equally in arriving at the bank's overall rating. Instead, we placed greater weight on the bank's performance in the areas from which it derives greater volumes of deposits. As a result, the most weight was placed on TCF's performance in the State of Minnesota, from which TCF derives 44% of its deposits. The percentages of deposits TCF derives from the other rated areas are 32% for the Multistate CMSA, 17% for the State of Michigan, 6% for the State of Wisconsin, and 1% for the State of Colorado. Similarly, within each rated area, the greatest weight was based on the relative deposits derived from each assessment area. Refer to the "Scope" sections under each state for details regarding how the assessment areas were weighted in arriving at the overall rating for that rated area.

Fair Lending Review

We found no evidence of illegal discrimination or other illegal credit practices.

Multistate Metropolitan Statistical Area Rating

Chicago-Gary-Kenosha, IL-IN-WI Multistate Consolidated Metropolitan Statistical Area

CRA rating for the Chicago-Gary-Kenosha, IL-IN-WI Multistate Consolidated Metropolitan Statistical Area¹: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- TCF's overall excellent Lending Test performance is based on performance in the Chicago PMSA, TCF's primary market within the Multistate CMSA. In the Chicago PMSA, TCF demonstrated good lending activity, excellent overall geographic distributions, and excellent overall borrower income distributions. In the Gary PMSA, lending activity was adequate and both geographic and borrower distributions were good. In the Kenosha PMSA, lending activity was poor and both geographic and borrower distributions were excellent.
- TCF's overall excellent Investment Test performance is based on its excellent level of investments which are focused toward the primary identified credit and economic development needs in its Chicago and Kenosha PMSAs. Performance is good in the Gary PMSA with excellent investment levels negatively impacted by only adequate responsiveness to identified credit and economic development needs.
- TCF's good performance under the Service Test is demonstrated by reasonable access of branches to people and geographies of different income levels, enhanced by branch openings in moderate-income areas, excellent hours of operation, and a good level of community development services.

Description of Institution's Operations in Chicago-Gary-Kenosha, IL-IN-WI Multistate Consolidated Metropolitan Statistical Area

TCF has established an assessment area that consists of the entire Multistate CMSA. The assessment area also extends into a contiguous portion of the nonmetropolitan La Porte County, Indiana. In this evaluation, TCF's performance within the Multistate CMSA is presented separately by state.

¹ This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

TCF's Chicago, IL PMSA assessment area is TCF's only assessment area in Illinois. TCF derives approximately 30% of its deposits, \$2.5 billion, from the Chicago PMSA. Deposit market share reports show TCF ranks 14th of 305 FDIC-insured institutions in the PMSA. Of TCF's loan originations and purchases considered in this evaluation, 16% were from this PMSA. TCF operates 191 branches in the PMSA. Its branches are predominantly (72%) located in grocery stores. TCF operates 363 ATMs and three LPOs in the PMSA. The market is extremely competitive – in 2002 there were over 1,000 home mortgage lenders there.

TCF's Gary, IN PMSA assessment area is TCF's only assessment area in Indiana. TCF derives less than 1% of its deposits, \$10 million, from the Gary PMSA. Deposit market share reports show TCF ranks last of the 27 FDIC-insured institutions in the PMSA. Of TCF's loan originations and purchases considered in this evaluation, less than 1% were from this PMSA. All five of the branches TCF operates in the PMSA are located in grocery stores. TCF operates seven ATMs in the PMSA.

TCF's Kenosha, WI PMSA assessment area is one of TCF's three assessment areas within Wisconsin. TCF's performance within those other two Wisconsin assessment areas is discussed under the State of Wisconsin section of this evaluation. TCF derives approximately 2%, or \$137 million, of its deposits from the Kenosha PMSA. Deposit market share reports show TCF ranks fifth of the 14 FDIC-insured institutions in the PMSA. Of TCF's loan originations and purchases considered in this evaluation, just over 1% were from this PMSA. Of TCF's five Kenosha branches, four are traditional and one is located in a grocery store. TCF operates eleven ATMs in the PMSA.

Refer to the market profile for the Chicago-Gary-Kenosha, IL-IN-WI Multistate Consolidated Metropolitan Statistical Area in Appendix C for detailed demographics and other performance context information.

Scope of Evaluation in Chicago-Gary-Kenosha, IL-IN-WI Multistate Consolidated Metropolitan Statistical Area

The entire Multistate CMSA received a full-scope review because it is a multistate metropolitan area and as such must be assigned a rating. We first performed analyses on the individual PMSAs that comprise it – the Chicago, IL PMSA; the Gary, IN PMSA; and the Kenosha, WI PMSA. We then assigned one overall conclusion for each performance element and one consolidated rating for each of the three performance tests for the entire Multistate CMSA. While we separately evaluated TCF's performance in three PMSAs, we placed almost all of the weight on performance in the Chicago PMSA. This is because, of the three areas, TCF's business focus is clearly in this larger market. More information on the scope of the evaluation is included in Appendix A.

We considered information from community organizations and various members of the communities for this evaluation. Information obtained from these contacts is included in the Market Profile section in Appendix C.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in the Multistate CMSA is rated "Outstanding." Based on full-scope reviews, TCF's performance in the Chicago PMSA is excellent and in the Gary and Kenosha PMSAs is good.

Lending Activity

Refer to Table 1 Lending Volume in the "Multistate Metropolitan Statistical Area" section of Appendix D for the facts and data used to evaluate the bank's lending activity.

In the Chicago PMSA, lending levels reflect good responsiveness in relation to area credit needs and the bank's deposit market share. In this very competitive market, lenders tend to have lower levels of loans relative to deposits than those typical in other markets. For this market, TCF's lending activity compares well to that of other lenders. TCF has the 14th largest share of deposits of 305 FDIC-insured financial institutions with branch offices in the Chicago PMSA. TCF's deposits total \$2,461 million and represent 1.16% of aggregate market deposits.

During the evaluation period, TCF originated and purchased 8,984 HMDA loans totaling \$1,140 million in the Chicago PMSA. For all HMDA activity combined, TCF's market share is half of its deposit market share. By the volume of originations and purchases, TCF's most significant loan product was home mortgage refinance, followed distantly by home purchase. For home mortgage refinance, TCF ranked 30th of 901 lenders that reported HMDA data in the Chicago PMSA during 2002, with a .75% market share. For home purchase, TCF ranked 89th of 823 lenders with a .17% market share.

During the evaluation period, TCF originated and purchased 136 small loans to businesses totaling \$36 million in the Chicago PMSA. For small loans to businesses, TCF's market share is less than 5% of its deposit market share.

In the Gary PMSA, lending levels reflect adequate responsiveness in relation to area credit needs and the bank's deposit market share. In this market, lenders tend to have lower levels of loans relative to deposits than those typical in other markets. For this market, TCF's lending activity is reasonable compared to that of other lenders. TCF has the smallest share of deposits of 27 FDIC-insured financial institutions with branch offices in the Gary PMSA. TCF's deposits total \$10 million and represent .10% of aggregate market deposits.

During the evaluation period, TCF originated and purchased 39 HMDA loans totaling \$10 million in the Gary PMSA. For all HMDA activity combined, TCF's market share is 30% of its deposit market share. By numbers of loans, TCF's most significant loan product was home mortgage refinance. By dollars of loans, TCF's most significant loan product was multifamily. For home mortgage refinance, TCF ranked 177th of 390 lenders that reported HMDA data in the Gary PMSA during 2002, with a .04% market share. For multifamily, TCF ranked 13th of 21 lenders with a 2.22% market share.

During the evaluation period, TCF originated one small loan to a business totaling \$35 thousand in the Gary PMSA.

In the Kenosha PMSA, lending activity reflects poor responsiveness in relation to area credit needs and the bank's deposit market share. In this market, TCF's lending activity is below that of other lenders. TCF has the 5th largest share of deposits of 14 FDIC-insured financial institutions with branch offices in the Kenosha PMSA. TCF's deposits total \$137 million and represent 9.07% of aggregate market deposits.

During the evaluation period, TCF originated and purchased 725 HMDA loans totaling \$53 million in the Kenosha PMSA. For all HMDA activity combined, TCF's market share is approximately one-quarter of its deposit market share. TCF's most significant loan product was home mortgage refinance, followed distantly by home purchase and home improvement. For home mortgage refinance, TCF ranked twelfth of 266 lenders that reported HMDA data in the Kenosha PMSA during 2002, with a 2.50% market share. For home purchase, TCF ranked 33rd of 198 lenders with a .84% market share. For home improvement, TCF ranked second of 58 lenders with an 8.94% market share.

During the evaluation period, TCF originated and purchased five small loans to businesses totaling \$1 million in the Kenosha PMSA. For small loans to businesses, TCF's market share is less than 1% of its deposit market share.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the "Multistate Metropolitan Statistical Area" section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of TCF's home mortgage loans in both the Chicago and Kenosha PMSAs is excellent. The geographic distribution of home mortgage loans in the Gary PMSA is good.

Home Purchase Loans

TCF's geographic distribution of home purchase loans is excellent, based primarily on performance in the Chicago PMSA. In that market, the percentage of TCF's loans in low- and moderate-income geographies exceeded the percentage of owner-occupied housing units in those geographies. In low-income geographies, TCF exceeded the demographic to a significant degree. TCF's market share in low-income geographies significantly exceeded its overall market share and its market share in moderate-income geographies is near to its overall market share.

The volume of home purchase loans TCF originated in the Gary PMSA was low and would not result in a meaningful analysis.

TCF's geographic distribution of home purchase loans in the Kenosha PMSA is good. The percentage of TCF's loans in low-income geographies exceeded the percentage of owner-occupied housing units in those geographies. For moderate-income geographies, TCF's percentage of loans was near to the demographic. TCF's market shares in both low- and moderate-income geographies exceeded its overall market share.

Home Improvement Loans

TCF's geographic distribution of home improvement loans is excellent. In the Chicago PMSA, the percentage of TCF's loans in low- and moderate-income geographies significantly exceeded the percentage of owner-occupied housing units in those geographies. In addition, TCF's market shares in both low-and moderate-income geographies significantly exceeded its overall market share.

TCF did not originate or purchase any home improvement loans in the Gary PMSA.

TCF's geographic distribution of home improvement loans in the Kenosha PMSA is excellent. The percentage of TCF's loans in low-income geographies exceeded the percentage of owner-occupied housing in those geographies. In moderate-income geographies, performance significantly exceeded demographics. Market share performance was mixed. TCF's market share in moderate-income geographies significantly exceeded its overall market share, but TCF had no market share in low-income geographies.

Refinance Loans

TCF's geographic distribution of refinance loans is excellent in the Chicago PMSA, the Kenosha PMSA, and the Gary PMSA. With only one exception, the percentage TCF's loans in low- and moderate-income geographies exceeded the percentage of owner-occupied housing units in those PMSAs and TCF's market shares in the low- and moderate-income geographies exceeded its overall market shares in the PMSAs. The one exception was in the Gary PMSA, where TCF did not originate any loans in the low-income geographies. This lack of lending did not have a significant impact on the bank's performance since relatively few of the owner-occupied housing units in the PMSA are in those geographies.

Multifamily Loans

TCF's geographic distribution of multifamily loans is adequate, based primarily on performance in the Chicago PMSA. In that market, the percentage of TCF's loans in low-income geographies is significantly lower than the percentage of multifamily units in those geographies. Similarly, TCF's market share in low-income geographies is significantly lower than its overall market share. The percentage of TCF's loans in moderate-income geographies exceeds the demographic. TCF's market share in those moderate-income geographies is lower than its overall market share.

The geographic distribution of TCF's twelve multifamily loans in the Gary PMSA is very poor. While approximately 30% of the multifamily units in the assessment area are located in low-and moderate-income geographies, none of TCF's multifamily loans were in those geographies.

The volume of multifamily loans TCF originated in the Kenosha PMSA was low and would not result in a meaningful analysis.

Small Loans to Businesses

Refer to Table 6 in the "Multistate Metropolitan Statistical Area(s)" section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of TCF's small loans to businesses in the Chicago PMSA is excellent. In both the Gary and Kenosha PMSAs, a meaningful conclusion was not possible due to the limited number of small loans to businesses that TCF reported.

In the Chicago PMSA, the percentage of TCF's small loans to businesses in low-income geographies is near to the percentage of businesses located in those geographies. For moderate-income geographies, the bank exceeds the demographic. TCF's overall lending market share within this market is low and does not allow for a meaningful analysis.

Lending Gap Analysis

Our geographic distribution analysis included a review for lending gaps, particularly in low- and moderate-income areas. We did not identify any unexplained conspicuous gaps in the Multistate CMSA.

Inside/Outside Ratio

We calculated the inside/outside ratio at the state level. The two states that were analyzed for this rated area are Illinois and Indiana. Even though TCF's Kenosha offices are located in the Multistate CMSA, this analysis was performed at the state level and all lending within the State of Wisconsin, including lending by TCF's Kenosha offices, is considered in the inside/outside ratio for the State of Wisconsin. This analysis is based on loan originations and purchases by TCF National Bank and does not include loan originations and purchases by the bank's operating subsidiary, TCFMC.

In the State of Illinois, TCF made a substantial majority of its loans within its assessment area. TCF made 95% of its HMDA loans within the Chicago PMSA. In addition, TCF made all of its small loans to businesses within the PMSA. This concentration of local lending shows an excellent responsiveness to credit needs within the assessment area.

In the State of Indiana, TCF made a high percentage of its loans within its assessment area. Of the HMDA loans TCF made within the state, 87% were within the Gary PMSA. Of the two small loans to businesses TCF made within the state, one was in the assessment area. On a combined basis, TCF's level of local lending shows good responsiveness to credit needs within the assessment area.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the "Multistate Metropolitan Statistical Area(s)" section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Borrower distribution throughout the Multistate CMSA reflects overall excellent penetration among home mortgage loan customers of different income levels. This performance is especially noteworthy in light of the overall high cost of housing in the Chicago area.

Home Purchase Loans

TCF's distribution of home purchase loans to borrowers of different income levels is excellent, based primarily on performance in the Chicago PMSA. In that market, TCF's performance was strong in every respect. The percentage of TCF's loans to low-income borrowers is very near to the percentage of low-income families. TCF's market share of loans to low-income borrowers significantly exceeds its overall market share. For moderate-income borrowers, the percentage of TCF's loans significantly exceeds the demographic. TCF's market share for moderate-income borrowers is the same as its overall market share.

The volume of home purchase loans TCF originated in the Gary PMSA was low and would not result in a meaningful analysis.

TCF's distribution of home purchase loans to borrowers of different income levels in the Kenosha PMSA is excellent, based primarily on its performance for moderate-income borrowers. The percentage of TCF's loans to low-income borrowers is significantly lower than the percentage of low-income families. TCF's market share of loans to low-income borrowers is near to its overall market share. For moderate-income borrowers, TCF's percentage of loans significantly exceeded the demographic. TCF's market share of loans to moderate-income borrowers exceeded its overall market share.

Home Improvement Loans

TCF's distribution of home improvement loans to borrowers of different income levels is excellent, based primarily on performance in the Chicago PMSA. In that market, TCF's performance was strong in every respect. The percentage of TCF's loans to low-income borrowers exceeds the percentage of low-income families. TCF's market share of loans to low-income borrowers significantly exceeds its overall market share. For moderate-income borrowers, the percentage of TCF's loans significantly exceeds the demographic. TCF's market share for moderate-income borrowers exceeds its overall market share.

TCF did not originate or purchase any home improvement loans in the Gary PMSA.

The distribution of home improvement loans to borrowers of different income levels in the Kenosha PMSA is good. The percentage of TCF's loans to low-income borrowers is significantly lower than the percentage of low-income families. TCF's market share of loans to low-income borrowers is near to its overall market share. For moderate-income borrowers, TCF's percentage of loans exceeds the demographic. TCF's market share of loans to moderate-income borrowers is near to its overall market share.

Refinance Loans

TCF's distribution of refinance loans to borrowers of different income levels is excellent. In the Chicago PMSA, the percentage of TCF's loans to low-income borrowers is somewhat lower than the percentage of low-income families. TCF's market share of loans to low-income borrowers significantly exceeds its overall market share. For moderate-income borrowers, the percentage of TCF's loans significantly exceeds the demographic. TCF's market share for moderate-income borrowers exceeds its overall market share.

In the Gary PMSA, TCF's distribution of refinance loans to borrowers of different income levels is good. Performance for low-income borrowers is strong, as the percentage of TCF's loans to low-income borrowers is near to the percentage of low-income families. For moderate-income borrowers, the percentage of TCF's loans is somewhat lower than the demographic. TCF's lending market shares within this market are low and do not allow for a meaningful analysis.

TCF's distribution of refinance loans to borrowers of different income levels in the Kenosha PMSA is excellent. The percentage of TCF's loans to low-income borrowers is significantly lower than the percentage of low-income families. TCF's market share of loans to low-income borrowers significantly exceeds its overall market share. For moderate-income borrowers, TCF's percentage of loans exceeds the demographic. TCF's market share of loans to moderate-income borrowers exceeds its overall market share.

Small Loans to Businesses

Refer to Table 11 in the "Multistate Metropolitan Statistical Area(s)" section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The distribution of borrowers in the Chicago PMSA reflects adequate penetration among business customers of different sizes. In both the Gary and Kenosha PMSAs, a meaningful conclusion was not possible due to the limited number of small loans to businesses that TCF reported.

In the Chicago PMSA, the percentage of TCF's loans to small businesses (those with revenues of \$1 million or less) is below the percentage of businesses in the PMSA with those smaller revenues. TCF's overall lending market share within this market is low and does not allow for a meaningful analysis.

Community Development Lending

Refer to Table 1 Lending Volume in the “Multistate Metropolitan Statistical Area(s)” section of Appendix D for the facts and data used to evaluate the bank’s level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans, however.

Community development lending had a neutral impact on lending performance in the Multistate CMSA. During the evaluation period in the Chicago PMSA, TCF originated 65 community development loans totaling \$2.9 million. This is a moderate volume relative to the bank’s size and resources. A significant majority of the loans helped provide affordable housing for low- and moderate-income individuals and were made through TCF’s participation with lending intermediaries, namely the Community Investment Corporation and Neighborhood Housing Services of Chicago. TCF did not originate any community development loans in the Gary PMSA or Kenosha PMSA during the evaluation period.

Product Innovation and Flexibility

TCF’s offering of flexible loan products had a neutral impact on Lending Test performance in the Multistate CMSA. In the Chicago and Kenosha PMSAs, TCF and TCFMC offer loans under a range of conventional and government loan programs. During the evaluation period in Chicago, TCF and TCFMC originated loans under nine different flexible loan programs targeted to low- and moderate-income families. In Kenosha, loans were originated under seven different flexible programs. In Gary, TCF did not originate any loans with flexible features targeted at low- and moderate-income families.

INVESTMENT TEST

Refer to Table 14 in the “Multistate Metropolitan Statistical Area(s)” section of Appendix D for the facts and data used to evaluate the bank’s level of qualified investments.

Conclusions for Areas Receiving Full-Scope Reviews

The bank’s performance under the Investment Test in the Multistate CMSA is rated “Outstanding.” Based on full-scope reviews, the bank’s performance in the Chicago and Kenosha PMSAs is excellent and in the Gary PMSA is good.

In the Chicago PMSA, the volume of qualified investments originated by TCF is excellent. During the evaluation period TCF made 269 qualified investments totaling \$18.3 million. In addition, 13 prior period investments totaling \$2.6 million remain outstanding. Current and prior period investments represent 7.93% and 1.13% of allocated Tier I Capital, respectively. The vast majority (96%) of dollars invested during the evaluation period went toward the identified need of affordable housing that is discussed in the Market Profile for the Chicago PMSA.

In the Chicago PMSA, current period qualified investments consisted of both investments and grants. TCF made 13 investments totaling \$17.0 million, all of which were housing-related. The investments resulted in the creation of over 800 low-income housing units, mainly through the purchase of Fannie Mae mortgage-backed securities and Low-Income Housing Tax Credits. The remaining \$1.3 million of qualified investments were grants to local nonprofit organizations that focus on social services for low- and moderate-income persons (59%), low-income housing needs (36%), economic development through the financing of small businesses (3%), and revitalization and stabilization of the PMSA (2%). The investments were generally not complex or innovative, nor did they involve situations in which the bank has taken a leadership role. The volume of qualified investments had a significant bearing on the assigned rating, as did the responsiveness of the investments to identified needs in the community.

In the Gary PMSA, the volume of qualified investments originated by TCF is good. During the evaluation period TCF made seven grants totaling \$48 thousand. This represents 5.42% of allocated Tier I Capital in this PMSA. While this volume is favorable relative to the bank's scope of operations in the PMSA, the nature of many of the qualified investments was not responsive to the more pressing credit and economic development needs in the PMSA. As discussed in the Market Profile of this evaluation, community contacts and publicly available information mention the area's weak economic conditions and needs in areas such as housing and financial education. While TCF's grants helped low- and moderate-income persons, most of the funds (63%) went toward arts education. We did not identify any qualified investments that were particularly complex or innovative, nor did we identify any situations in which the bank has taken a leadership role. No prior period investments remain outstanding.

In the Kenosha PMSA, the volume of qualified investments originated by TCF is excellent. During the evaluation period TCF made 22 qualified investments totaling \$835 thousand. In addition, three prior period investments totaling \$45 thousand remain outstanding. These figures represent 6.53% and 0.35% of allocated Tier I Capital, respectively. The vast majority (98%) of the dollars invested during the evaluation period went toward the identified need of affordable housing.

In the Kenosha PMSA, current period qualified investments consisted of both investments and grants. TCF made four investments totaling \$779 thousand. All four investments were in Fannie Mae mortgage-backed securities and in aggregate allowed eight low- and moderate-income families to purchase homes within the PMSA. The remaining \$56 thousand of qualified investments were grants to local nonprofit organizations that focus on social services for low- and moderate-income persons (87%) and low-income housing needs (13%). We did not identify any investments that were particularly complex or innovative, nor did we identify any situations in which the bank has taken a leadership role. The volume of qualified investments had a significant bearing on the assigned rating, as did the responsiveness of the investments to identified needs in the community.

SERVICE TEST

Performance in the Multistate CMSA is rated “High Satisfactory.” The rating is based on performance in the Chicago PMSA which demonstrates good performance. Service Test performance in the adjacent Kenosha PMSA is also good while performance in the Gary PMSA is weaker than the performance in the Chicago PMSA. Because the Gary PMSA is significantly smaller, TCF’s adequate performance there did not impact our overall conclusion for the Service Test in this rating area.

Retail Banking Services

Refer to Table 15 in the “Multistate Metropolitan Statistical Area(s)” section of Appendix D for the facts and data used to evaluate the distribution of the bank’s branch delivery system and branch openings and closings.

Services and products are reasonably accessible to geographies and individuals of different income levels through TCF’s retail branch locations in the Multistate CMSA. Within the Chicago PMSA, TCF provides an adequate level of branches within both low- and moderate-income geographies when compared to area demographics. TCF has 191 branches in the PMSA. Within the Kenosha PMSA, TCF has a good level of branches when compared to area demographics. While TCF does not have any offices in low-income geographies, TCF does have one branch in a moderate-income tract. Because there is a somewhat sizable population in both the low- and moderate-income geographies, the absence of offices in the low-income areas diminishes what could be considered excellent performance in the moderate-income areas. None of TCF’s five branches in the Gary PMSA is located in low- or moderate-income geographies.

The opening and closing of offices in the Multistate CMSA have not adversely affected the accessibility of TCF's delivery systems. Within the Chicago PMSA, TCF opened 30 offices, three of which were in low- or moderate-income census tracts. One of these offices, which is located in a low-income tract, replaced an office that closed. There were two offices opened in moderate-income tracts. In addition to the office already discussed that closed in a low-income tract, there were two other branch closures. Both were in middle-income tracts. No offices opened or closed in the Kenosha PMSA. Four offices opened in the Gary PMSA, all were within middle- or upper-income census tracts. There were no offices closed in the Gary PMSA.

TCF provides excellent convenience to customers in terms of its banking hours throughout the Multistate CMSA. Within the Chicago PMSA, there are no differences in hours of operation based on the income level of the geography. While there is some variance in hours, the differences are slight and are based on the type of office – that is, whether it is a traditional branch or one located within a supermarket or other retail store. The supermarket branches typically offer greatly extended hours 364 days a year. The traditional branches also have extended weekday hours, all have Saturday hours, and most have Sunday hours. Only one Kenosha office does not offer Sunday hours and it is in a middle-income geography. Kenosha has one supermarket branch that offers extended hours 364 days a year. Offices in the Gary PMSA are in supermarkets with these same 8AM-8PM hours, 364 days a year.

Although there is a significant number of ATMs in the Chicago PMSA (363 ATMs), the presence of ATMs does not materially enhance access to financial or deposit services in the LMI geographies of the PMSA. The distribution of ATMs indicates only adequate performance in both low- and moderate-income census tracts. There are no ATMs in the low-income tracts in Kenosha, but the presence of ATMs in moderate-income tracts is excellent. TCF does not have ATMs in low- or moderate-income geographies in the Gary PMSA.

Most (138 or 72%) of TCF's branch offices in the Chicago PMSA do not have onsite lenders. Eight (4%) of the 191 branch offices have consumer, TCFMC, along with business lenders onsite. Sixteen (9%) have two of the three types of lending staff onsite. Twenty-nine (15%) have only one type of lender onsite – in most cases that is a consumer lender. There is no material difference in the availability of lending staff at branches in LMI geographies compared to in middle- and upper-income geographies. In the Kenosha PMSA, none of five branch offices have all three types of lenders onsite. Two (40%) have two of the three types of lenders. One (20%) has a consumer lender onsite and two (40%) have no lenders onsite. There are no onsite lenders in the Gary PMSA.

To alleviate concerns regarding TCF's ability to generate loans from these branches without lenders, we analyzed loan volumes by census tract and compared that to the location of each branch. We generally found that the demographics of the census tract in which a branch is located and the immediately surrounding census tracts had a direct correlation to smaller loan volumes. We also considered the length of time the branch had been opened. We found that nearly all of the branches located in census tracts with little or no loan activity had high poverty levels, lower income levels, and very limited owner-occupied housing. Several were newer offices (opened during the evaluation period). This was similar to the "gap" analyses completed under the Lending Test. We concluded that the absence of lenders in any particular branch does not, in itself, pose difficulties in generating loans and that alternate delivery methods are a mitigating factor.

Customers and credit applicants can use telephone banking and bank-by-mail as an alternative to traditional face-to-face services provided by bank staff and lenders. TCF did not, however, provide any information as to how low- and moderate-income people use these methods in the delivery of banking services or the loan process. As a result, we placed limited emphasis on this factor in our Service Test conclusions.

TCF offers bilingual services when necessary. We did not receive any information as to usage by low- and moderate-income people.

TCF offers a check cashing service for government and payroll checks for reduced fees compared to typical commercial check cashing businesses. A person using this service need not have a TCF deposit account but must provide identification information through an application process and obtain a check cashing card. In the Chicago area, TCF offered this service in 45 branches. The service was available in geographies of all income levels. Four of the five offices in Kenosha offered this service. The service was not offered in the Gary PMSA during the evaluation period.

Community Development Services

TCF provides a good level of community development services in the Multistate CMSA. Within the Chicago PMSA, TCF employees provide a good level of participation in area organizations that meet a community development definition. Within both the Kenosha and Gary PMSAs, TCF's performance is adequate.

Within Chicago, TCF has met with or provided service to 61 different organizations that address community development needs. The Chicago PMSA provides numerous opportunities for financial institutions to assist with community development. TCF's participation is good in light of those opportunities and the bank's size and overall presence within this competitive market. TCF has a significant involvement in Bank-at-School programs that primarily serve low- and moderate-income students. Numerous TCF employees participate in providing the associated financial education and training in 22 schools supported during the evaluation period. TCF has primarily addressed social service needs for low- and moderate-income people by working with 32 different social service groups. TCF provided support to 20 organizations that provide affordable housing. TCF is involved in a leadership capacity to less than half of the organizations. Only one program demonstrated innovation or complexity. This was a work-study program targeted to low- and moderate-income youth. The program is at an urban high school in a low-income neighborhood. TCF provides the opportunity for four students to job share one full-time clerical position at the local TCF branch. The money that TCF donates to the school is used to support the school as well as pay over 70% of each student's tuition. The students receive hands on training in a professional setting as well as a college preparatory education that otherwise would not be affordable.

In both of the Kenosha and Gary PMSAs, TCF has a much smaller presence and the level of community development service provided is adequate. In each location, TCF has only five branches and a limited staff size. In Kenosha, TCF has worked with one affordable housing organization. In the Gary PMSA, TCF has worked with three organizations that primarily address affordable housing and one organization that meets the social service needs of LMI people. TCF employees serve in a leadership role in only one of these groups.

State of Colorado Rating

CRA Rating for State: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- TCF's overall good Lending Test performance is the combination of adequate lending activity, good overall geographic distributions, and excellent overall borrower income distributions.
- TCF's overall excellent Investment Test performance is based on its excellent level of investments that are focused toward affordable housing, a primary identified credit and economic development need in the area.
- TCF's good performance under the Service Test is demonstrated by the accessibility of TCF's branches to people and geographies of different income levels, its record of opening branches, excellent hours of service, and an adequate level of community development services.

Description of Institution's Operations in the State of Colorado

TCF has two assessment areas in Colorado, the Denver PMSA and the Colorado Springs PMSA. Just over 1% (\$105 million) of TCF's deposits are from Colorado. Just over 1% of TCF's loans considered in this evaluation are from Colorado as well. In all markets, TCF's lending focus is on residential mortgage and retail customers; in Colorado during the evaluation period, that was the only kind of lending in which TCF was involved.

Of the two assessment areas, TCF has a greater presence in Denver. It has 13 branches (two of which are in supermarkets) in Denver and 15 ATMs. It has five branches (three of which are in supermarkets) in Colorado Springs and five ATMs. In Denver, deposit market share reports show TCF's \$61 million in deposits gives it a ranking of 61st among the 91 FDIC-insured institutions in the PMSA. In Colorado Springs, deposit market share reports show TCF's \$44 million in deposits gives it a ranking of 22nd among the 37 FDIC-insured institutions. During the evaluation period, TCF operated one LPO in Colorado, in the Denver PMSA.

Refer to the Market Profile for the State of Colorado in Appendix C for detailed demographics and other performance context information for the assessment area that received a full-scope review.

Scope of Evaluation in the State of Colorado

Of TCF's two Colorado assessment areas, we selected the Denver PMSA for a full-scope review. It is the area in which TCF has the larger portion of both deposits and loans. As a result, the Denver PMSA is the Colorado assessment area that carried more weight in assigning the ratings. We performed a limited-scope review for the Colorado Springs PMSA. More information on the scope of the evaluation is included in Appendix A.

Because TCF did not originate multifamily loans or small loans to businesses in the State of Colorado during the evaluation period, Tables 5, 6, and 11 are not included in the performance evaluation for this state.

We considered information from community organizations and various members of the Denver community for this evaluation. Information obtained from these contacts is included in the Market Profile section in Appendix C.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in the State of Colorado is rated "High Satisfactory." Based on a full-scope review, the bank's performance in the Denver PMSA is good.

Lending Activity

Refer to Table 1 Lending Volume in the State of Colorado section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Lending levels reflect adequate responsiveness in relation to area credit needs and the bank's deposit market share. For this market, TCF's lending activity is lower, but still reasonable, than that of other lenders. TCF has the 61st largest share of deposits of 91 FDIC-insured financial institutions with branch offices in the Denver PMSA. TCF's deposits total \$61 million and represent .18% of aggregate market deposits.

During the evaluation period, TCF originated and purchased 535 reportable home mortgage loans totaling \$69 million in the Denver PMSA. For all HMDA activity combined, TCF's market share is just under half of its deposit market share. By the volume of originations and purchases, TCF's most significant loan product was home mortgage refinance, followed distantly by home purchase. For home mortgage refinance, TCF ranked 106th of 627 lenders that reported HMDA data in the Denver PMSA during 2002, with a .12% market share. For home purchase, TCF ranked 236th of 532 lenders with a .01% market share.

TCF did not engage in Small Business lending in the Denver PMSA during the evaluation period.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to Tables 2, 3, and 4 in the State of Colorado section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

The geographic distribution of TCF's home mortgage loans in the Denver PMSA is good.

Home Purchase Loans

TCF's geographic distribution of home purchase loans is adequate. In the Denver PMSA, the percentage of TCF's loans in low-income geographies significantly exceeded the percentage of owner-occupied housing units in those geographies. In moderate-income geographies, TCF's percentage of loans was significantly lower than the demographic. TCF's lending market shares within this market are low and do not allow for a meaningful analysis.

Home Improvement Loans

TCF's geographic distribution of home improvement loans is excellent. The percentages of TCF's loans in both low-and moderate-income geographies significantly exceeded the percentage of owner-occupied housing units in those geographies. A market share analysis would not have been meaningful.

Refinance Loans

TCF's geographic distribution of refinance loans is good. The percentage of TCF's loans in low-income geographies approximated the percentage of owner-occupied housing units in those geographies. TCF's market share in those low-income geographies is somewhat lower than its overall market share. In moderate-income geographies, TCF's percentage of loans was near to the demographic and its market share exceeded its overall market share.

Lending Gap Analysis

Our geographic distribution analysis included a review for lending gaps, particularly in low- and moderate-income areas. We did not identify any unexplained conspicuous gaps in the Denver PMSA.

Inside/Outside Ratio

In the State of Colorado, TCF made a substantial majority of its loans within its assessment areas. TCF made 95% of its HMDA loans within its assessment areas. TCF's concentration of local lending shows an excellent responsiveness to area credit needs. This analysis is based on loan originations and purchases by TCF National Bank and does not include loan originations and purchases by the bank's operating subsidiary, TCFMC.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 8, 9 and 10 in the State of Colorado section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Borrower distribution in the Denver PMSA reflects excellent penetration among home mortgage loan customers of different income levels. This performance is especially noteworthy in light of the overall high cost of housing in the Denver area.

Home Purchase Loans

TCF's distribution of home purchase loans to borrowers of different income levels is adequate. TCF made 46 home purchase loans in the Denver PMSA and none was to a low-income borrower. For moderate-income borrowers, the percentage of TCF's loans exceeds the demographic. TCF's lending market shares within this market are low and do not allow for a meaningful analysis.

Home Improvement Loans

TCF's distribution of home improvement loans to borrowers of different income levels is excellent. In the Denver PMSA, the percentage of TCF's loans to low-income borrowers is near to the percentage of low-income families. For moderate-income borrowers, the percentage of TCF's loans exceeds the demographic. A market share analysis would not have been meaningful.

Refinance Loans

TCF's distribution of refinance loans to borrowers of different income levels is excellent. In the Denver PMSA, the percentage of TCF's loans to low-income borrowers is somewhat lower than the percentage of low-income families. TCF's market share of loans to low-income borrowers significantly exceeds its overall market share. For moderate-income borrowers, the percentage of TCF's loans exceeds the demographic. TCF's market share for moderate-income borrowers exceeds its overall market share.

Community Development Lending

Refer to Table 1 Lending Volume in the State of Colorado section of Appendix D for the facts and data used to evaluate the bank's level of community development lending.

Community development lending had a neutral impact on lending performance in the Denver PMSA. During the evaluation period, TCF originated two community development loans totaling \$94 thousand in the Denver PMSA. This is a moderate volume relative to the bank's size and resources. The loans represented TCF's pro-rata share of funding of a Community Development Financial Institution (CDFI). The CDFI focuses on affordable housing issues within various Colorado counties, including the Denver PMSA.

Product Innovation and Flexibility

TCF's offering of flexible loan products had a neutral impact on Lending Test performance. During the evaluation period, TCF originated loans under a home improvement program that offers a reduced interest rate and flexible underwriting criteria to residents of low- and moderate-income areas.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Lending Test in the Colorado Springs MSA is not inconsistent with the bank's overall "High Satisfactory" performance under the Lending Test in the State of Colorado. Refer to Tables 1 through 13 in the State of Colorado section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in the State of Colorado is rated "Outstanding." Based on a full-scope review, the bank's performance in the Denver PMSA is excellent.

Refer to Table 14 in the State of Colorado section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

TCF's volume of qualified investments in the Denver PMSA is excellent. During the evaluation period TCF made 24 qualified investments totaling \$587 thousand. This represents 10.37% of Tier I Capital allocated to the PMSA. The majority (91%) of these investments went toward meeting the identified need of affordable housing that is discussed in the Market Profile for the Denver PMSA. No prior period investments remain outstanding.

Current period qualified investments consisted of both investments and grants. TCF made three investments totaling \$492 thousand. All three investments were in Fannie Mae mortgage-backed securities and in aggregate allowed four low- and moderate-income families to purchase homes within the PMSA. The remaining \$95 thousand of qualified investments were grants to nonprofit organizations that focus on social services for low- and moderate-income persons (57%) and low-income housing needs (43%). We did not identify any investments that were particularly complex or innovative, nor did we identify any situations in which the bank has taken a leadership role. The volume of qualified investments had a significant bearing on the assigned rating, as did the responsiveness of the investments to identified needs in the community.

Conclusions for Area Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Investment Test in the Colorado Springs PMSA is not inconsistent with the bank's overall "Outstanding" performance under the Investment Test in Colorado.

Refer to Table 14 in the State of Colorado section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in the State of Colorado is rated "High Satisfactory." Based on a full-scope review, the bank's performance in the Denver PMSA is good.

Retail Banking Services

Refer to Table 15 in the State of Colorado section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Branches are accessible to people and geographies of different income levels within the Denver PMSA. TCF operates 13 offices within the Denver PMSA, none located in low-income geographies. Three offices are located in moderate-income tracts which demonstrates good performance when compared to area demographics.

TCF's record of opening and closing branches in the assessment area is good. TCF was forced to close or relocate several offices during the evaluation period when the supermarket chain that housed TCF offices sold to another company. As a result, TCF had to close six offices, two of which were in low- and moderate-income census tracts. TCF opened a total of eleven offices, three of which were in moderate-income geographies and one in a geography with an "NA" income designation. All of the opened branches were traditional offices which provide greater assurances that branches won't be closed due to circumstances beyond TCF's control.

TCF offers excellent convenience through extended hours of operation seven days a week. While the supermarket branches have slightly longer daily hours than the traditional branches, there are no material differences and low- and moderate-income people and geographies are not negatively impacted.

For this evaluation period, TCF had onsite consumer lenders at each of its 13 offices in the PMSA. None of the offices was staffed with TCFMC or business lenders.

TCF offers bank-by-mail and telephone banking. TCF did not, however, provide us with specific information as to how these alternative delivery systems help low- and moderate-income people obtain credit or other financial services. On the deposit side, the distribution of ATMs in geographies of all income levels was good in the Denver PMSA. TCF did not provide any information as to usage by low- and moderate-income people.

TCF offers bilingual services when necessary. We did not receive any information as to usage by low- and moderate-income people.

TCF offers a check cashing service for government and payroll checks for reduced fees compared to typical commercial check cashing businesses. A person using this service need not have a TCF deposit account but must provide identification information through an application process and obtain a check cashing card. In Colorado, TCF offered this service in all branches.

Community Development Services

TCF employees provided an adequate level of community development services in the Denver PMSA. While numerous opportunities exist, TCF has a very small presence in the PMSA including available staffing. TCF works with only four community development organizations but employees serve in leadership positions with all of them. Three of these organizations provide needed social services to low- and moderate-income people while the fourth provides necessary affordable housing. None of the services provided could be considered innovative or complex.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Service Test in the Colorado Springs MSA is not inconsistent with the bank's overall "High Satisfactory" performance under the Service Test in the State of Colorado. Refer to Table 15 in the State of Colorado section of Appendix D for the facts and data that support these conclusions.

State of Michigan Rating

CRA Rating for State: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rate: High Satisfactory

The major factors that support this rating include:

- TCF's overall good Lending Test performance is the combination of good lending activity, adequate overall geographic distributions, and excellent overall borrower income distributions.
- TCF's overall excellent Investment Test performance is based on its excellent level of investments that are focused toward affordable housing, a primary identified credit and economic development need in the area.
- TCF's good performance under the Service Test is demonstrated through the accessibility of branches to people and geographies of different income levels, excellent hours of operation, and a good level of services provided to community development organizations.

Description of Institution's Operations in the State of Michigan

TCF has four assessment areas in Michigan, the Ann Arbor PMSA, the Calhoun-Kalamazoo MSA, the Detroit PMSA, and the Saginaw-Bay City MSA. TCF derives 17% of its deposits (approximately \$1.4 billion) from Michigan. Approximately 14% of TCF's loans considered in this evaluation are from the state. Of the four assessment areas, Ann Arbor is generally the more predominant assessment area and the city in which TCF has a regional headquarters.

In Ann Arbor, TCF has 14 branches (one of which is in a supermarket) and 37 ATMs. 55% of TCF's Michigan deposits are from Ann Arbor. Deposit market share reports show the \$755 million in deposits gives TCF a ranking of second among 21 FDIC-insured institutions in the PMSA.

In Calhoun-Kalamazoo, TCF has three branches, four ATMs, and two LPOs. Seven percent of TCF's Michigan deposits are from Calhoun-Kalamazoo. Deposit market share reports show the \$95 million in deposits gives TCF a ranking of fourth among 14 FDIC-insured institutions in the MSA.

In Detroit, TCF has 31 branches (four of which are in retail stores), 37 ATMs, and one LPO. Twenty-eight percent of TCF's Michigan deposits are from Detroit. Deposit market share reports show the \$380 million in deposits gives TCF a ranking of 14th among 50 FDIC-insured institutions in the PMSA.

In Saginaw-Bay City, TCF has eight branches (one of which is in a supermarket) and twelve ATMs. Ten percent of TCF's Michigan deposits are from Saginaw-Bay City. Deposit market share reports show the \$145 million in deposits gives TCF a ranking of seventh among 15 FDIC-insured institutions in the MSA.

Refer to the Market Profiles for the State of Michigan in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in the State of Michigan

Of TCF's four Michigan assessment areas, we selected the Ann Arbor PMSA for a full-scope review. It is the area in which TCF has the largest portion of both deposits and loans. As a result, Ann Arbor is the area that carried the most weight in assigning the ratings. We performed limited-scope reviews for the other three assessment areas. More information on the scope of the evaluation is included in Appendix A.

We considered information from community organizations and various members of the Ann Arbor community for this evaluation. Information obtained from these contacts is included in the Market Profile section in Appendix C.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in the State of Michigan is rated "High Satisfactory." Based on a full-scope review, the bank's performance in the Ann Arbor PMSA is good.

Lending Activity

Refer to Table 1 Lending Volume in the State of Michigan section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Lending levels reflect good responsiveness in relation to area credit needs and the bank's deposit market share. In this very competitive market, lenders tend to have lower levels of loans relative to deposits than those typical in other markets. For this market, TCF's lending activity compares well to that of other lenders. TCF has the second largest share of deposits of 21 FDIC-insured financial institutions with branch offices in the Ann Arbor PMSA. TCF's deposits total \$755 million and represent 12.92% of aggregate market deposits.

During the evaluation period, TCF originated and purchased 2,964 HMDA loans totaling \$394 million and 111 small loans to businesses totaling \$37 million in the Ann Arbor PMSA. For all HMDA activity combined, TCF's market share is just under 20% of its deposit market share. TCF's most significant loan product by both numbers and dollars of loans was home mortgage refinance. The volumes of home purchase, multifamily, and small loans to businesses were of less significance. Also based on volume, home improvement loans were of least significance.

For home mortgage refinance, TCF ranked seventh of 414 lenders that reported HMDA data in the Ann Arbor PMSA with a 2.81% market share. For home purchase, TCF ranked 28th of 320 lenders with a .77% market share. For multifamily loans, TCF was the market leader with a 42% market share.

During the evaluation period, TCF originated and purchased 111 small loans to businesses totaling \$37 million in the Ann Arbor PMSA. For small loans to businesses, TCF ranked tenth of 77 lenders that reported CRA data in the Ann Arbor PMSA with a 3.51% market share. TCF's market share is just under 30% of its deposit market share.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the State of Michigan section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

The geographic distribution of TCF's home mortgage loans in the Ann Arbor PMSA is adequate.

Home Purchase Loans

TCF's geographic distribution of home purchase loans is excellent. In the Ann Arbor PMSA, the percentage of TCF's loans in low-income geographies significantly exceeded the percentage of owner-occupied housing units in those geographies. TCF's market share in those low-income geographies also significantly exceeded its overall market share. In moderate-income geographies, TCF's percentage of loans exceeded the demographic and its market share is somewhat lower than its overall market share.

Home Improvement Loans

TCF's geographic distribution of home improvement loans is excellent. In moderate-income geographies in the Ann Arbor PMSA, the percentage of TCF's loans exceeded the percentage of owner-occupied housing units in those geographies. In low-income geographies, the percentage of TCF's loans significantly exceeded the demographics. Market share performance was mixed. TCF's market share in moderate-income geographies significantly exceeded its overall market share, but TCF had no market share in low-income geographies.

Refinance Loans

TCF's geographic distribution of refinance loans in the Ann Arbor PMSA is adequate especially due to performance in the moderate-income geographies. The percentage of TCF's loans in low-income geographies exceeded the percentage of owner-occupied housing units in those geographies. For moderate-income geographies, TCF's percentage of loans was lower than the demographic. TCF's market shares in both low- and moderate-income geographies are near to its overall market share.

Multifamily Loans

TCF's geographic distribution of multifamily loans is excellent, especially due to performance in the low-income geographies. The percentage of TCF's loans in low-income geographies significantly exceeds the percentage of multifamily units in those geographies. TCF's market share in low-income geographies exceeds its overall market share. The percentage of TCF's loans in moderate-income geographies is lower than the demographic. TCF's market share in those moderate-income geographies is also lower than its overall market share.

Small Loans to Businesses

Refer to Table 6 in the State of Michigan section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of TCF's small loans to businesses in the Ann Arbor PMSA is adequate.

In the Ann Arbor PMSA, the percentage of TCF's small loans to businesses in low-income geographies exceeds the percentage of businesses located in those geographies. TCF's market share in low-income geographies significantly exceeded its overall market share. In moderate-income geographies, the bank achieved less than half of the demographic. Similarly, TCF's market share of small loans to businesses in moderate-income geographies was less than half of its overall market share of small loans to businesses.

Lending Gap Analysis

Our geographic distribution analysis included a review for lending gaps, particularly in low- and moderate-income areas. We did not identify any unexplained conspicuous gaps in the Ann Arbor PMSA.

Inside/Outside Ratio

In the State of Michigan, TCF made a high percentage of its loans within its assessment areas. During the evaluation period, TCF made 78% of its HMDA loans within its Michigan assessment areas. For this HMDA lending, TCF's inside/outside ratio ranged from a low of 46% for loans to finance multifamily dwellings to a high of 83% for home purchase loans. TCF made 90% of its small loans to businesses within its Michigan assessment areas. The volume of local lending within the State of Michigan shows good responsiveness to area credit needs. This analysis is based on loan originations and purchases by TCF National Bank and does not include loan originations and purchases by the bank's operating subsidiary, TCFMC.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 8, 9 and 10 in the State of Michigan section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Borrower distribution in the Ann Arbor PMSA reflects excellent penetration among home mortgage loan customers of different income levels. This performance is especially noteworthy in light of the overall high cost of housing in the Ann Arbor area.

Home Purchase Loans

TCF's distribution of home purchase loans to borrowers of different income levels is excellent. In the Ann Arbor PMSA, the percentage of TCF's loans to low-income borrowers is somewhat lower than the percentage of low-income families. For moderate-income borrowers, the percentage of TCF's loans exceeds the demographic. TCF's market shares of loans to both low- and moderate-income borrowers exceed its overall market share.

Home Improvement Loans

TCF's distribution of home improvement loans to borrowers of different income levels is excellent. In the Ann Arbor PMSA, the percentage of TCF's loans to low-income borrowers exceeds the percentage of low-income families. TCF's market share of loans to low-income borrowers significantly exceeds its overall market share. For moderate-income borrowers, the percentage of TCF's loans significantly exceeds the demographic and its market share exceeds its overall market share.

Refinance Loans

TCF's distribution of refinance loans to borrowers of different income levels is excellent. In the Ann Arbor PMSA, the percentage of TCF's loans to low-income borrowers is lower than the percentage of low-income families. TCF's market share of loans to low-income borrowers exceeds its overall market share. For moderate-income borrowers, the percentage of TCF's loans exceeds the demographic. TCF's market share for moderate-income borrowers exceeds its overall market share.

Small Loans to Businesses

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

The distribution of borrowers in the Ann Arbor PMSA reflects poor penetration among business customers of different sizes.

In the Ann Arbor PMSA, the percentage of TCF's loans to small businesses (those with revenues of \$1 million or less) is well below the percentage of businesses in the PMSA with those smaller revenues. Market share performance was a positive consideration, as TCF's market share of loans to small businesses exceeded its overall lending market share.

Community Development Lending

Refer to Table 1 Lending Volume in the State of Michigan section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

Community development lending had a neutral impact on lending performance in the Ann Arbor PMSA. TCF did not originate any community development loans in the Ann Arbor PMSA during the evaluation period.

Product Innovation and Flexibility

TCF's offering of flexible loan products had a neutral impact on Lending Test performance. TCF and TCFMC offer loans under a range of conventional and government loan programs. During the evaluation period, TCF and TCFMC originated loans under ten different flexible loan programs targeted to low- and moderate-income families.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Detroit PMSA is not inconsistent with the bank's overall "High Satisfactory" performance under the Lending Test in State of Michigan. In the Calhoun-Kalamazoo and Saginaw-Bay City MSAs, the bank's performance is weaker than the bank's overall performance in the state. This is the result of weaker performance in these areas for borrower distribution. Refer to Tables 1 through 13 in the State of Michigan section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in the State of Michigan is rated "Outstanding." Based on a full-scope review, the bank's performance in the Ann Arbor PMSA is excellent.

Refer to Table 14 in the State of Michigan section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

The volume of qualified investments originated by TCF in the Ann Arbor PMSA is excellent. TCF made 183 investments totaling \$5.8 million during the evaluation period. In addition, three investments totaling \$73 thousand remain outstanding from prior periods. These figures represent 8.29% and 0.10% of allocated Tier I Capital, respectively. Of the combined total, 95% by dollar and 12% by number went toward meeting the identified need of affordable housing that is discussed in the Market Profile for the Ann Arbor PMSA.

Current period qualified investments consisted of both investments and grants. TCF made three investments totaling \$5.5 million. All three investments were in Fannie Mae mortgage-backed securities and in aggregate provided 38 affordable housing units within the PMSA. The remaining \$356 thousand of qualified investments were grants to local nonprofit organizations that focus on social services for low- and moderate-income persons (63%), low-income housing (23%), and economic development through the financing of small businesses (14%). We did not identify any investments that were particularly complex or innovative, nor did we identify any situations in which the bank has taken a leadership role. The volume of qualified investments had a significant bearing on the assigned rating, as did the responsiveness of the investments to identified needs in the community.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Calhoun-Kalamazoo MSA, Detroit PMSA, and Saginaw-Bay City MSA is not inconsistent with the bank's overall "Outstanding" performance under the Investment Test in Michigan.

Refer to Table 14 in the State of Michigan section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in the State of Michigan is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Ann Arbor PMSA is good.

Retail Banking Services

Refer to Table 15 in the State of Michigan section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

TCF branches are accessible to people and geographies of all income levels. TCF has 14 offices in the Ann Arbor PMSA. The bank has an excellent presence in low-income geographies but only adequate penetration into moderate-income areas. The bank's record of opening or closing offices did not have an impact on our conclusions. TCF opened two offices and closed two offices. None was in a low- or moderate-income census tract.

Hours of operation are excellent due to convenient, extended hours and the use of seven days a week banking. Within Ann Arbor, two branches located in low-income census tracts do not have Sunday hours. One is located on the University campus and the other is TCF's main office. All other offices (including another branch located in a low-income tract as well as one located in a moderate-income tract) have extended hours seven days a week.

Not all branch offices in the PMSA have a full range of lenders onsite. Three (21%) of TCF's 14 branch offices have consumer, TCFMC, along with business lenders onsite. Two of these three offices with the full range of lending staff are located in low-income census tracts. Four (29%) have two of the three types of lending staff onsite. Three (21%) have only one type of lender onsite. Four branch offices (29%) have no lenders onsite and only one of these is located in a low- or moderate-income census tract. Consistent with TCF's locations in other states, lenders share responsibility for providing loan coverage to those offices without onsite lenders. TCF also offers bank-by-mail and telephone banking for the loan application process. Because we concluded overall lending activity was good and the distribution of loans was not negatively impacted by the absence of onsite lenders, we also concluded these alternative delivery systems were effective.

The distribution of ATMs in low- and moderate-income geographies is good and provides additional access to financial services. TCF did not, however, provide us with information as to the volume used by low- and moderate-income people.

TCF offers bilingual services when necessary. We did not receive any information as to usage by low- and moderate-income people.

TCF offers a check cashing service for government and payroll checks for reduced fees compared to typical commercial check cashing businesses. A person using this service need not have a TCF deposit account but must provide identification information through an application process and obtain a check cashing card. TCF offered this service in all of its Ann Arbor PMSA branches and all but two of the branches in limited-scope areas.

Community Development Services

TCF employees provide a good level of community development services within the Ann Arbor PMSA. This level of involvement is in line with existing opportunities. TCF employees support 19 organizations, generally split between affordable housing and social services that benefit low- and moderate-income families and individuals. Services do not demonstrate any complexity or innovation but TCF demonstrates excellent leadership by involvement on the boards or various subcommittees of twelve organizations.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Calhoun-Kalamazoo MSA, Detroit PMSA, Saginaw-Bay City MSA is not inconsistent with the bank's overall "High Satisfactory" performance under the Service Test in the State of Michigan. Refer to Table 15 in the State of Michigan section of Appendix D for the facts and data that support these conclusions.

State of Minnesota Rating

CRA Rating for State: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- TCF's overall good Lending Test performance is the combination of good lending activity, adequate overall geographic distributions, and excellent overall borrower income distributions. Community development lending and the development and use of flexible loan products also were positive elements of performance, although not to the extent that they impacted the overall Lending Test rating.
- TCF's overall excellent Investment Test performance is based on its excellent level of investments that are focused toward affordable housing, a primary identified credit and economic development need in the area. In addition, TCF has demonstrated leadership by working with organizations to develop programs targeted to them, thereby creating opportunities for investment by the bank.
- TCF's good performance under the Service Test is demonstrated through its accessibility of branches to people and geographies of different income levels, supplemented by its record of opening branches, excellent hours of service, ATM distribution, and the community development services its employees provide within the Minneapolis-St. Paul MSA.

Description of Institution's Operations in the State of Minnesota

TCF has four assessment areas in Minnesota, the Minneapolis-St. Paul MSA, the Duluth MSA, the Mankato-New Ulm Assessment Area, and the St. Cloud MSA. TCF derives 44% of its deposits (approximately \$3.5 billion) from Minnesota. Approximately 62% of TCF's loans considered in this evaluation are from the state.

Minneapolis-St. Paul is the metropolitan area in which TCF has its corporate headquarters. It is the most dominant market, not only within the State of Minnesota but also for the entire bank.

TCF has 88 branches in the Minneapolis-St. Paul area. Of these, 46 are in supermarkets and two are on the University of Minnesota campus. In addition, TCF has 511 ATMs and one LPO in the area. Ninety-six percent of TCF's Minnesota deposits are from the Minneapolis-St. Paul MSA. Deposit market share reports show the \$3.4 billion in deposits gives TCF a ranking of third among 136 FDIC-insured institutions in the MSA. TCF defines its assessment area as most of the counties in the Minneapolis-St. Paul MSA Assessment Area. The assessment area also extends slightly into the adjacent nonmetropolitan Rice County.

TCF has one branch and nine ATMs in Duluth. The branch is located on a university campus. Less than 1% of TCF's Minnesota deposits are from Duluth. Deposit market share reports show the \$7 million in deposits gives TCF a ranking of eleventh among the twelve FDIC-insured institutions in the MSA.

In the Mankato-New Ulm Assessment Area, TCF has four branches (two of which are in supermarkets) and eight ATMs. Two percent of TCF's Minnesota deposits are from the Mankato-New Ulm area. Deposit market share reports show the \$68 million in deposits gives TCF a ranking of twelfth among 28 FDIC-insured institutions in the assessment area.

In St. Cloud, TCF has five branches and 17 ATMs. Two of TCF's branches are located in supermarkets and one is located on a university campus. Two percent of TCF's Minnesota deposits are from St. Cloud. Deposit market share reports show the \$65 million in deposits gives TCF a ranking of twelfth among 33 FDIC-insured institutions in the MSA.

Refer to the Market Profiles for the State of Minnesota in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in the State of Minnesota

Of TCF's four Minnesota assessment areas, we selected the Minneapolis-St. Paul MSA for a full-scope review. It is the area in which TCF has the largest portion of both deposits and loans. Because of the significance of the Minneapolis-St. Paul market to TCF, it is the area that carried virtually all of the weight in assigning the ratings for Minnesota. We performed a limited-scope review for the other three assessment areas. More information on the scope of the evaluation is included in Appendix A.

We considered information from community organizations and various members of the Minneapolis-St. Paul community for this evaluation. Information obtained from these contacts is included in the Market Profile section in Appendix C.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in the State of Minnesota is rated "High Satisfactory." Based on a full-scope review, the bank's performance in the Minneapolis-St. Paul MSA is good.

Lending Activity

Refer to Table 1 Lending Volume in the State of Minnesota section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Lending levels reflect good responsiveness in relation to area credit needs and the bank's deposit market share. For this market, TCF's lending activity compares well to that of other lenders. TCF has the third largest share of deposits of 136 financial institutions with branch offices in the Minneapolis-St. Paul MSA. TCF's deposits total \$3,404 million and represent 6.78% of aggregate market deposits.

During the evaluation period, TCF originated and purchased 33,538 reportable HMDA loans totaling \$5,021 million in the Minneapolis-St. Paul MSA. For all HMDA activity combined, TCF's market share is approximately 70% of its deposit market share. By the volume of originations and purchases, TCF's most significant loan product was home mortgage refinance, followed by home purchase. For home mortgage refinance, TCF ranked sixth of 545 lenders that reported HMDA data in the Minneapolis-St. Paul MSA with a 4.66% market share. For home purchase, TCF ranked sixth of 505 lenders with a 4.64% market share.

During the evaluation period, TCF originated and purchased 475 small loans to businesses totaling \$83 million in the Minneapolis-St. Paul MSA. For small loans to businesses, TCF's market share is just under 5% of its deposit market share.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the State of Minnesota section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

The geographic distribution of TCF's home mortgage loans in the Minneapolis-St. Paul MSA is adequate.

Home Purchase Loans

TCF's geographic distribution of home purchase loans in the Minneapolis-St. Paul MSA is adequate. The percentage of TCF's loans in both low- and moderate-income geographies is lower than the percentage of owner-occupied housing units in those geographies. TCF's market share in low-income geographies is significantly lower, and in moderate-income geographies is somewhat lower, than its overall market share.

Home Improvement Loans

TCF's geographic distribution of home improvement loans is excellent. In both low- and moderate-income geographies in the Minneapolis-St. Paul MSA, the percentage of TCF's loans significantly exceeded the percentage of owner-occupied housing units in those geographies. In addition, TCF's market shares in both low- and moderate-income geographies significantly exceeded its overall market share.

Refinance Loans

TCF's geographic distribution of refinance loans in the Minneapolis-St. Paul MSA is adequate. The percentage of TCF's loans in both low- and moderate-income geographies is lower than the percentage of owner-occupied housing units in those geographies. TCF's market shares in both low- and moderate-income geographies are somewhat lower than its overall market share.

Multifamily Loans

TCF's geographic distribution of multifamily loans is excellent. The percentages of TCF's loans in both low- and moderate-income geographies exceed the percentage of multifamily units in those geographies. TCF's market share in low-income geographies is somewhat lower than its overall market share and in moderate-income geographies exceeds its overall market share.

Small Loans to Businesses

Refer to Table 6 in the State of Minnesota section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of TCF's small loans to businesses in the Minneapolis-St. Paul MSA is excellent.

In the Minneapolis-St. Paul MSA, the percentages of TCF's small loans to businesses in both low- and moderate-income geographies exceed the percentages of businesses located in those geographies. In addition, TCF's market shares in both low- and moderate-income geographies exceed its overall market share.

Lending Gap Analysis

Our geographic distribution analysis included a review for lending gaps, particularly in low- and moderate-income areas. We did not identify any unexplained conspicuous gaps in the Minneapolis-St. Paul MSA.

Inside/Outside Ratio

In the State of Minnesota, TCF made a substantial majority of its loans within its assessment areas. TCF made 92% of its HMDA loans within its Minnesota assessment areas. When TCF's HMDA reportable loans are broken out, the home improvement category has the lowest inside/outside ratio at 88% and the multifamily category has the highest ratio at 100%. TCF made 98% of its small loans to businesses within its Minnesota assessment areas. TCF's concentration of local lending within the State of Minnesota shows an excellent responsiveness to area credit needs. The analysis is based on loan originations and purchases by TCF National Bank and does not include loan originations and purchases by the bank's operating subsidiary, TCFMC.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 8, 9 and 10 in the State of Minnesota section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Borrower distribution in the Minneapolis-St. Paul MSA reflects excellent penetration among home mortgage loan customers of different income levels.

Home Purchase Loans

TCF's distribution of home purchase loans to borrowers of different income levels is excellent. In the Minneapolis-St. Paul MSA, the percentage of TCF's loans to low-income borrowers is near to the percentage of low-income families. For moderate-income borrowers, the percentage of TCF's loans significantly exceeds the demographic. TCF's market shares of loans to both low- and moderate-income borrowers exceed its overall market share.

Home Improvement Loans

TCF's distribution of home improvement loans to borrowers of different income levels is excellent. In the Minneapolis-St. Paul MSA, the percentage of TCF's loans to low-income borrowers significantly exceeds the percentage of low-income families. In addition, TCF's market share of loans to low-income borrowers significantly exceeds its overall market share. For moderate-income borrowers, the percentage of TCF's loans significantly exceeds the demographic and its market share exceeds its overall market share.

Refinance Loans

TCF's distribution of refinance loans to borrowers of different income levels is excellent. In the Minneapolis-St. Paul MSA, the percentage of TCF's loans to low-income borrowers is near to the percentage of low-income families. TCF's market share of loans to low-income borrowers exceeds its overall market share. For moderate-income borrowers, the percentage of TCF's loans exceeds the demographic and its market share exceeds its overall market share.

Small Loans to Businesses

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

The distribution of borrowers in the Minneapolis-St. Paul MSA reflects excellent penetration among business customers of different sizes.

In the Minneapolis-St. Paul MSA, the percentage of TCF's loans to small businesses (those with revenues of \$1 million or less) exceeds the percentage of businesses in the MSA with those smaller revenues. In addition, TCF's market share of loans to small businesses significantly exceeds its overall lending market share.

Community Development Lending

Refer to Table 1 Lending Volume in the State of Minnesota section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

Community development lending had a positive impact on lending performance in the Minneapolis-St. Paul MSA, although not such that it impacted the overall Lending Test rating. During the evaluation period, TCF originated 34 community development loans totaling \$28.3 million. This is a strong volume relative to the bank's size and resources. The significant majority of the loans helped finance multifamily rental housing primarily occupied by low- and moderate-income families. Based on their characteristics, most of these loans are also included in Table 5 and evaluated under HMDA lending, as explained above. The loans were responsive to the identified need for multifamily rental housing within the Minneapolis-St. Paul MSA. They were not complex or innovative.

Product Innovation and Flexibility

TCF's offering of flexible loan products had a positive impact on Lending Test performance. TCF and TCFMC offer loans under a wide range of conventional and government loan programs. In addition to the more common flexible loan programs, TCF has both created and participated in flexible loan programs that are targeted to its market. An example of this is TCF's partnerships with three different neighborhood groups in Minneapolis. As a result of these partnerships, several years ago TCF created home improvement loan programs with flexible terms that are specifically designed for area residents who have low or moderate incomes. In aggregate, TCF and TCFMC originated loans under 26 different flexible loan programs targeted to low- and moderate-income families during the evaluation period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Duluth MSA, Mankato-New Ulm Assessment Area, and St. Cloud MSA is not inconsistent with the bank's overall "High Satisfactory" performance under the Lending Test in the State of Minnesota. Refer to Tables 1 through 13 in the State of Minnesota section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in the State of Minnesota is rated "Outstanding." Based on a full-scope review, the bank's performance in the Minneapolis-St. Paul MSA is excellent.

Refer to Table 14 in the State of Minnesota section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

The volume of qualified investments originated by TCF in the Minneapolis-St. Paul MSA is excellent. During the evaluation period TCF originated 242 qualified investments totaling \$20.2 million. In addition, seven prior period investments totaling \$2.3 million remain outstanding. These figures represent 6.37% and 0.73% of allocated Tier I Capital, respectively. Of the combined total, 87% by dollar and 19% by number were oriented toward meeting the identified need of affordable housing that is discussed in the Market Profile for the Minneapolis-St. Paul MSA.

Current period qualified investments consisted of both investments and grants. TCF made ten investments totaling \$17.3 million. The ten investments were mainly Fannie Mae mortgage-backed securities and Low-Income Housing Tax Credits. In aggregate, they provided over 225 low-income housing units within the MSA. The remaining \$2.9 million consisted of grants to various local nonprofit organizations. The grants focused on social services for low- and moderate-income persons (77%), affordable housing needs (14%), revitalization or stabilization of the MSA (5%), and economic development through the financing of small businesses in the MSA (4%). The volume of qualified investments had a significant bearing on the assigned rating.

We noted leadership on the part of TCF within the MSA. For example, TCF has had a successful program of partnering with educational institutions that has resulted in improved attendance and student performance by providing financial and academic support to the institutions. Based on the success of its relationship with Patrick Henry High School, which dates back to 1988, TCF developed a similar partnership with Ascension School, through the establishment of a 501©3 nonprofit support organization called Friends of Ascension. Ascension school is a K-8 school located in a low-income census tract in North Minneapolis. Roughly 90% of the student body is from families with incomes below the poverty level. Through Friends of Ascension, TCF has created a one-on-one tutoring program and TCF employees have devoted thousands of hours to tutoring math and reading skills. In part through TCF's involvement, passing rates on the Minnesota Basic Skills test have increased dramatically over the past two years from 21% to 86%. During the evaluation period, TCF donated over \$694 thousand to Ascension School, through Friends of Ascension, and \$132 thousand to Patrick Henry High School.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the St. Cloud MSA is not inconsistent with the bank's overall "Outstanding" performance under the Investment Test in Minnesota. Performance in both the Duluth MSA and Mankato-New Ulm Assessment Area is weaker than the bank's overall performance in the state. This is because prior period investments were given lesser consideration in this evaluation and TCF had no current period investments in those areas.

Refer to Table 14 in the State of Minnesota section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in the State of Minnesota is rated "High Satisfactory." Based on a full-scope review, the bank's performance in the Minneapolis-St. Paul MSA is good.

Retail Banking Services

Refer to Table 15 in the State of Minnesota section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

TCF branches are accessible to people and geographies of different income levels. TCF has 88 branches in the assessment area. The excellent volume of branches located in moderate-income census tracts (21) is offset by having only one branch in a low-income census tract. Nonetheless, just under five percent of the population resides in low-income geographies. TCF's record of opening and closing offices has not adversely affected the accessibility of TCF's delivery systems. TCF did not close any offices in the MSA during the evaluation period. Two of the thirteen new offices were in moderate-income geographies and none was opened in a low-income tract.

Hours of service are excellent. Of the 88 branches, only four do not have weekend hours. Of these four, two are located in middle-income census tracts in downtown Minneapolis. Based on the reduced level of business activity/retail/shopping downtown on weekends, this is realistic. Another is located in downtown St. Paul in a moderate-income tract. Again, with the reduced activity in downtown during the weekend, this is realistic. The fourth is located in a moderate-income tract on the University of Minnesota campus in the Dinkeytown neighborhood. This is mitigated by the fact that there is another TCF office located nearby in the same census tract that does have full weekend hours.

Not all branch offices in the MSA have a full range of lenders onsite. Twenty (23%) of TCF's 88 branch offices have consumer, TCFMC, along with business lenders onsite. Twenty-four (27%) have two of the three types of lending staff onsite. Sixteen (18%) have one type of lender onsite – in most cases that is a consumer lender. Twenty-eight branch offices (32%) have no lenders onsite. Lenders from other offices provide support to the offices without the full range of lenders. TCF also offers bank-by-mail and telephone banking for the loan application process. Because of satisfactory lending activity and distribution of loans, we concluded these alternative delivery systems were effective.

TCF has a very large ATM system in the Minneapolis-St. Paul MSA and the distribution of those ATMs is excellent. TCF has 511 ATMs – 30 located in low-income tracts and 125 in moderate-income tracts. This extensive ATM system enhances the delivery of deposit services but TCF did not provide specific information as to usage by low- and moderate-income people. In addition, TCF provides another 22 ATMs that are used seasonally at the Minnesota State Fair, the annual Renaissance Festival held each fall, the annual fund raising weekend event held at the Basilica in Minneapolis, and at the area's summer amusement park.

TCF offers bilingual services when necessary. We did not receive any information as to usage by low- and moderate-income people.

TCF offers a check cashing service for government and payroll checks for reduced fees compared to typical commercial check cashing businesses. A person using this service need not have a TCF deposit account but must provide identification information through an application process and obtain a check cashing card. TCF offered this service in all Minnesota branches.

Community Development Services

TCF employees provide an excellent level of community development services within the Minneapolis-St. Paul MSA. Over 100 employees work with 55 different organizations to provide much needed affordable housing or social services to low- and moderate-income people. There are numerous opportunities for involvement within this MSA. TCF's performance is noteworthy considering its relative size in this highly competitive marketplace. In addition, TCF employees have demonstrated leadership through their involvement with these organizations. TCF employees are heavily involved on governing boards as chairpersons of subcommittees, and in loan review/administration efforts. TCF has also demonstrated a long-term relationship with many of these organizations.

While most of the services provided would not be considered particularly innovative or complex, two are noted here. One program benefited 50 victims of a property flipping scam in north Minneapolis. TCFMC employees devoted approximately 172 hours on this project by setting up a loan pool for the victims, providing necessary counseling and financial education, and other support. Many of these homes also got some of the rehab loans they needed in the form of a deferred second mortgage that is interest free and up to \$25,000. Most of the homes affected needed repair or maintenance work done. Rehab work was done by non-profits such as Habitat for Humanity.

The Investment Test comment above provides an example of the financial commitment made to the long-term service relationship that TCF has made with Patrick Henry High School. On the Service Test side, TCF provides significant amount of support to the school. Its focus has included improving attendance and academic achievement, encouraging continued education, and working with seniors on interviewing skills. This partnership has helped to stabilize the neighborhood and keep the school open. TCF employees contributed over 330 hours of support to the high school during evaluation period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Mankato-New Ulm Assessment Area and the St. Cloud MSA is not inconsistent with the bank's overall "High Satisfactory" performance under the Service Test in the State of Minnesota. In the Duluth MSA, the bank's performance is weaker than the bank's overall performance in the state because there are no offices located in low- or moderate-income geographies. Refer to Table 15 in the State of Minnesota section of Appendix D for the facts and data that support these conclusions.

State of Wisconsin

CRA Rating for State²: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- TCF's overall excellent Lending Test performance is the combination of excellent lending activity, excellent overall geographic distributions, and excellent overall borrower income distributions.
- TCF's overall excellent Investment Test performance is based on its excellent level of investments that are focused toward affordable housing, a primary identified credit and economic development need in the area.
- TCF's branches provide excellent access to people and geographies of different income levels. TCF has excellent hours of operation and a good level of community development services. Performance is further enhanced by excellent access to deposit services through its ATM distribution network.

Description of Institution's Operations in Wisconsin

TCF has two assessment areas in Wisconsin, the Milwaukee-Waukesha PMSA and the Racine PMSA. TCF derives 6% of its deposits (approximately \$450 million) from Wisconsin. Approximately 5% of TCF's loans considered in this evaluation are from the state. Of the two assessment areas, Milwaukee-Waukesha is the more predominant for TCF.

In the Milwaukee-Waukesha PMSA, TCF has 24 branches (13 of which are in supermarkets) and 57 ATMs. Eighty-two percent of TCF's Wisconsin deposits are from the Milwaukee-Waukesha area. Deposit market share reports show the \$375 million in deposits gives TCF a ranking of 15th among 58 FDIC-insured institutions in the PMSA.

In Racine, TCF has five branches (two of which are in supermarkets) and seven ATMs. Eighteen percent of TCF's Wisconsin deposits are from Racine. Deposit market share reports show the \$83 million in deposits gives TCF a ranking of tenth among 17 FDIC-insured institutions in the PMSA.

² For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Refer to the Market Profiles for the State of Wisconsin in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Wisconsin

Of TCF's two Wisconsin assessment areas, we selected the Milwaukee-Waukesha PMSA for a full-scope review. It is the area in which TCF has the larger portion of both deposits and loans. As a result, the Milwaukee-Waukesha PMSA is the Wisconsin assessment area that carried more weight in assigning the ratings. We performed a limited-scope review for the Racine PMSA. More information on the scope of the evaluation is included in Appendix A.

We considered information from community organizations and various members of the Milwaukee-Waukesha community for this evaluation. Information obtained from these contacts is included in the Market Profile section in Appendix C.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in the State of Wisconsin is rated "Outstanding." Based on a full-scope review, the bank's performance in the Milwaukee-Waukesha PMSA is excellent.

Lending Activity

Refer to Table 1 Lending Volume in the State of Wisconsin section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Lending levels reflect excellent responsiveness in relation to area credit needs and the bank's deposit market share. For this market, TCF's lending activity is strong compared to that of other lenders. TCF has the 15th largest share of deposits of 58 financial institutions with branch offices in the Milwaukee-Waukesha PMSA. TCF's deposits total \$375 million and represent .93% of aggregate market deposits.

During the evaluation period, TCF originated and purchased 2,146 HMDA loans totaling \$154 million in the Milwaukee-Waukesha PMSA. For all HMDA activity combined, TCF's market share is just under 80% of its deposit market share. TCF's most significant loan product by both numbers and dollars of loans was home mortgage refinance. The other significant loan products were home improvement and small loans to businesses.

For home mortgage refinance, TCF ranked 44th among the 403 lenders that reported HMDA data in the Milwaukee-Waukesha PMSA with a .63% market share. For home improvement, TCF ranked fourth of 119 lenders with a 6.15% market share.

During the evaluation period, TCF originated and purchased 237 small loans to businesses totaling \$69 million in the Milwaukee-Waukesha PMSA. For small loans to businesses, TCF ranked 32nd among the 124 lenders that reported CRA data in the Milwaukee-Waukesha PMSA with a .29% market share. TCF's market share is just over 30% of its deposit market share.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the State of Wisconsin section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

The geographic distribution of TCF's home mortgage loans in the Milwaukee-Waukesha PMSA is excellent.

Home Purchase Loans

TCF's geographic distribution of home purchase loans is excellent. In the Milwaukee-Waukesha PMSA, the percentages of TCF's loans in both low- and moderate-income geographies exceed the percentage of owner-occupied housing units in those geographies. TCF's market share in those low-income geographies is near to its overall market share. In moderate-income geographies, TCF's market share exceeds its overall market share.

Home Improvement Loans

TCF's geographic distribution of home improvement loans in the Milwaukee-Waukesha PMSA is excellent. The percentage of TCF's loans in low-income geographies is near to the percentage of owner-occupied housing in those geographies. The percentage of TCF's loans in moderate-income geographies exceeds the demographic. TCF's market shares in both low- and moderate-income geographies exceed its overall market share.

Refinance Loans

TCF's geographic distribution of refinance loans is excellent. In the Milwaukee-Waukesha PMSA, the percentage of TCF's loans in low-income geographies approximates the percentage of owner-occupied housing units in those geographies. The percentage of TCF's loans in moderate-income geographies exceeds the demographic. Market share performance is also strong. TCF's market share in both low- and moderate-income geographies significantly exceeds its overall market share.

Multifamily Loans

TCF's geographic distribution of multifamily loans in the Milwaukee-Waukesha PMSA is adequate. The percentage of TCF's loans in low-income geographies is significantly lower than the percentage of multifamily units in those geographies. The market share information we considered in this evaluation was for 2002. Because all of the multifamily loans TCF originated in this PMSA were from 2001 and none were from 2002, TCF had no market share in low-income geographies for 2002. For moderate-income geographies, the percentage of TCF's loans approximates the demographic. TCF's market share in moderate-income geographies is lower than its overall market share.

Small Loans to Businesses

Refer to Table 6 in the State of Wisconsin section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of TCF's small loans to businesses in the Milwaukee-Waukesha PMSA is excellent.

In the Milwaukee-Waukesha PMSA, the percentages of TCF's small loans to businesses in moderate-income geographies exceed and in low-income geographies significantly exceed the percentages of businesses located in those geographies. In addition, TCF's market shares in both low- and moderate-income geographies significantly exceed its overall market share.

Lending Gap Analysis

Our geographic distribution analysis included a review for lending gaps, particularly in low- and moderate-income areas. We did not identify any unexplained conspicuous gaps in the Milwaukee-Waukesha PMSA.

Inside/Outside Ratio

Even though TCF's Kenosha offices are located in the Chicago-Gary-Kenosha, IL-IN-WI Multistate MSA, this analysis was performed at the state level and all lending within the State of Wisconsin, including lending by TCF's Kenosha offices, is considered in the inside/outside ratio for the State of Wisconsin. The analysis is based on loan originations and purchases by TCF National Bank and does not include loan originations and purchases by the bank's operating subsidiary, TCFMC.

In the State of Wisconsin, TCF made an adequate percentage of its loans within its assessment areas. During the evaluation period, TCF made 49% of its HMDA loans and 95% of its small loans to businesses within its Wisconsin assessment areas. While the in/out ratios in this evaluation are based on numbers of loans, TCF's HMDA performance was slightly improved when considering the in/out ratios by dollars of loans. By dollars, TCF made 52% of its HMDA loans in its assessment areas. By numbers, home improvement loans had the lowest inside/outside ratio at 43%. This loan type represented the second largest category of HMDA loans for the bank by number (and the smallest by dollar). Of the HMDA categories, home purchase loans had the highest inside/outside ratio by numbers at 55%. The level of lending outside of the assessment areas is primarily the result of the LPOs TCF operates. While TCF has LPOs in every state in which it has branches, the highest number of TCF's LPOs is in Wisconsin. In addition, while some of TCF's LPOs in other states are located in the bank's assessment areas, in Wisconsin, each of TCF's seven LPOs is located outside of the assessment areas.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 8, 9 and 10 in the State of Wisconsin section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Borrower distribution in the Milwaukee-Waukesha PMSA reflects excellent penetration among home mortgage loan customers of different income levels.

Home Purchase Loans

TCF's distribution of home purchase loans to borrowers of different income levels is excellent. In the Milwaukee-Waukesha PMSA, the percentage of TCF's loans to low-income borrowers is somewhat lower than the percentage of low-income families. This performance is strong in light of the higher level of poverty that exists in this PMSA. TCF's market share of loans to low-income borrowers exceeds its overall market share. For moderate-income borrowers, the percentage of TCF's loans exceeds the demographic. TCF's market share of loans to moderate-income borrowers is lower than its overall market share.

Home Improvement Loans

TCF's distribution of home improvement loans to borrowers of different income levels is excellent. In the Milwaukee-Waukesha PMSA, the percentage of TCF's loans to low-income borrowers is somewhat lower than the percentage of low-income families. This performance is strong in light of the higher level of poverty that exists in this PMSA. TCF's market share of loans to low-income borrowers exceeds its overall market share. For moderate-income borrowers, the percentage of TCF's loans exceeds the demographic and its market share exceeds its overall market share.

Refinance Loans

TCF's distribution of refinance loans to borrowers of different income levels is excellent. In the Milwaukee-Waukesha PMSA, the percentage of TCF's loans to low-income borrowers is near to the percentage of low-income families. This performance is strong in light of the higher level of poverty that exists in this PMSA. TCF's market share of loans to low-income borrowers significantly exceeds its overall market share. For moderate-income borrowers, the percentage of TCF's loans significantly exceeds the demographic and its market share exceeds its overall market share.

Small Loans to Businesses

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

The distribution of borrowers in the Milwaukee-Waukesha PMSA reflects poor penetration among business customers of different sizes.

In the Milwaukee-Waukesha PMSA, the percentage of TCF's loans to small businesses (those with revenues of \$1 million or less) is well below the percentage of businesses in the PMSA with those smaller revenues. TCF's market share of loans to small businesses is below its overall lending market share.

Community Development Lending

Refer to Table 1 Lending Volume in the State of Wisconsin section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

Community development lending had a neutral impact on lending performance in the Milwaukee-Waukesha PMSA. During the two-year evaluation period, TCF originated 24 community development loans totaling \$45 thousand. Most of the loans represent TCF's pro-rata share of its participation in two lending consortia.

Product Innovation and Flexibility

TCF's offering of flexible loan products had a neutral impact on Lending Test performance. TCF and TCFMC offer loans under a range of conventional and government loan programs. During the evaluation period, TCF and TCFMC originated loans under nine different flexible loan programs targeted to low- and moderate-income families.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Lending Test in the Racine PMSA is not inconsistent with the bank's overall "Outstanding" performance under the Lending Test in the State of Wisconsin. Refer to Tables 1 through 13 in the State of Wisconsin section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in the State of Wisconsin is rated "Outstanding." Based on a full-scope review, the bank's performance in the Milwaukee-Waukesha PMSA is excellent.

Refer to Table 14 in the State of Wisconsin section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

TCF's volume of qualified investments in the Milwaukee-Waukesha PMSA is excellent. During the evaluation period TCF made 52 qualified investments totaling \$2.1 million. In addition, three investments totaling \$178 thousand that originated in prior periods remain outstanding. These figures represent 6.12% and 0.51% of allocated Tier I Capital, respectively. Of the combined total, 96% by dollar and 53% by number went toward the identified need of affordable housing that is discussed in the Market Profile for the Milwaukee-Waukesha PMSA.

Current period qualified investments consisted of both investments and grants. TCF made five investments totaling \$2.0 million. All five investments were in Fannie Mae mortgage-backed securities and in aggregate assisted 20 low- and moderate-income families in purchasing homes within the PMSA. The remaining \$159 thousand was made through 47 grants local nonprofit organizations. The grants addressed social services for low- and moderate-income persons (52%), low-income housing (41%), and economic development through the financing of small businesses (6%). We did not identify any investments that were particularly complex or innovative, nor did we identify any situations in which the bank has taken a leadership role. The volume of qualified investments had a significant bearing on the assigned rating, as did the responsiveness of the investments to identified needs in the community.

Conclusions for Area Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Investment Test in the Racine PMSA is not inconsistent with the bank's overall "Outstanding" performance under the Investment Test in Wisconsin.

Refer to Table 14 in the State of Wisconsin section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in the State of Wisconsin is rated "Outstanding." Based on a full-scope review, the bank's performance in the Milwaukee-Waukesha PMSA is excellent.

Retail Banking Services

Refer to Table 15 in the State of Wisconsin section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

TCF branches are readily accessible to people and geographies of different income levels. Of the 24 offices in the assessment area, two are in low-income tracts and five are in moderate-income tracts. This demonstrates good and excellent performance, respectively, when compared to the population in each type of geography. The bank's branch distributions were not materially changed by branch openings or closings. During the evaluation period, two offices closed (including one in a moderate-income tract) while three offices opened (including one in a low-income tract).

Hours of operation are excellent because of the extended, convenient hours. Hours vary but are based on the type of branch rather than where the branch is located. The 13 Jewel branches are open 84 hours a week including weekend hours. This includes four branches located in either low- or moderate-income tracts. The two Pick 'n Save offices are open 62 hours a week including somewhat shorter hours on weekends than during weekdays. The traditional offices are generally open more than 60 hours a week. Seven of the nine traditional offices do not have Sunday lobby hours but do have Sunday drive-up access. All seven are located in middle-income tracts.

Most (15 or 63%) of TCF's branch offices in the PMSA do not have any onsite lenders. One (4%) of the 24 branch offices has consumer, TCFMC, and business lenders onsite. That branch is located in a middle-income census tract. Three branch offices (12%) have two of the three types of lending staff onsite. Five (21%) have lenders onsite that originate only consumer loans. Of TCF's seven branches in low- and moderate-income census tracts, six do not have any onsite lenders. The seventh branch has only consumer lenders. Four of TCF's branches in the PMSA receive support from a TCFMC office in Burr Ridge Illinois. Because we concluded overall lending activity is strong in this PMSA and borrower and geographic distributions are favorable, we also concluded TCF's alternative delivery systems for loans, which include bank-by-mail and telephone banking, are effective.

On the deposit side, the distribution of ATMs is excellent. This PMSA has 57 ATMs – five of which are located in low-income tracts and thirteen in moderate-income tracts. This demonstrates good and excellent performance, respectively. While TCF did not provide us with specific information as to usage by low- and moderate-income people, ATMs provide valuable access to deposit services.

TCF offers bilingual services when necessary. We did not receive any information as to usage by low- and moderate-income people.

TCF offers a check cashing service for government and payroll checks for reduced fees compared to typical commercial check cashing businesses. A person using this service need not have a TCF deposit account but must provide identification information through an application process and obtain a check cashing card. TCF offered this service in all of its Milwaukee-Waukesha PMSA branches.

Community Development Services

TCF employees provide a good level of community development services within the Milwaukee-Waukesha PMSA. TCF employees have provided community development services to 21 different organizations during the evaluation period. The volume compares reasonably in relation to the numerous opportunities available that could be met. Thirteen of the organizations provide needed social services to low- and moderate-income people and seven assist affordable housing efforts in the PMSA. Only one offers any degree of complexity, others are more routine. This involves a nonprofit group that provides both lending to the developers of affordable housing and lending to the individual home purchaser through a joint relationship with Fannie Mae. This organization also has a program for grants that can be used as down payments. TCF employees are involved in the loan underwriting process for this organization.

TCF employees serve in a leadership capacity in 13 of 21 programs which is a positive level of involvement for that element. TCF employees serve on the boards of directors, various executive committees, loan committees, and other advisory councils for these groups.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Service Test in the Racine PMSA is weaker than the bank's overall "Outstanding" performance under the Service Test in the State of Wisconsin. The performance is weaker because branch distribution in the Racine PMSA is good. Refer to Table 15 in the State of Wisconsin section of Appendix D for the facts and data that support these conclusions.

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 non-metropolitan statistical areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD Loans): 10/1/2000 to 12/31/2002 CD Loans: 1/1/2001 to 12/31/2002 Investment and Service Tests: 1/1/2001 to 12/31/2003	
Financial Institution	Products Reviewed	
TCF National Bank (TCF) Wayzata, MN	Small business, home mortgage and CD loans.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
TCF Mortgage Corporation TCF Foundation TCF Leasing, Inc.	Operating subsidiary Operating subsidiary Operating subsidiary	Home mortgage loans. Charitable contributions. General equipment finance.
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Multistate CMSA Chicago PMSA #1600	Full-Scope	Entire Chicago, IL PMSA (Cook, DeKalb, DuPage, Grundy, Kane, Kendall, Lake McHenry and Will Counties)
Gary PMSA #2960	Full-Scope	Entire Gary, IN PMSA (Lake and Porter Counties) and portions of nonMSA La Porte County IN
Kenosha PMSA #3800	Full-Scope	Entire Kenosha, WI PMSA (Kenosha County)
State of Colorado Colorado Springs MSA #1720	Limited-Scope	Entire Colorado Springs, CO MSA (El Paso County)
Denver PMSA #2080	Full-Scope	Entire Denver, CO PMSA (Adams, Arapahoe, Denver, Douglas and Jefferson Counties)

<p>State of Michigan Ann Arbor PMSA #0440</p>	<p>Full-Scope</p>	<p>Partial Ann Arbor, MI PMSA (Washtenaw and Livingston Counties)</p>
<p>Calhoun-Kalamazoo MSA #3720</p>	<p>Limited-Scope</p>	<p>Partial Kalamazoo-Battle Creek, MI MSA (Calhoun and Kalamazoo Counties)</p>
<p>Detroit PMSA #2160</p>	<p>Limited-Scope</p>	<p>Partial Detroit, MI PMSA (entire Macomb, Oakland and St. Clair Counties and partial Wayne County)</p>
<p>Saginaw-Bay City MSA #6960</p>	<p>Limited-Scope</p>	<p>Partial Saginaw-Bay City-Midland, MI MSA (Bay and Saginaw Counties)</p>
<p>State of Minnesota Duluth MSA #2240</p>	<p>Limited-Scope</p>	<p>Partial Duluth-Superior, MN-WI MSA (partial St. Louis County MN)</p>
<p>Mankato-New Ulm Assessment Area</p>	<p>Limited-Scope</p>	<p>Entire nonMSA Blue Earth, Brown and Nicollet Counties</p>
<p>Minneapolis-St. Paul MSA #5120</p>	<p>Full-Scope</p>	<p>Partial Minneapolis-St. Paul, MN-WI MSA (entire Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, Sherburne, Washington and Wright Counties of the MSA and partial nonMSA Rice County, all in MN)</p>
<p>St. Cloud MSA #6980</p>	<p>Limited-Scope</p>	<p>Entire St. Cloud, MN MSA (Benton and Stearns Counties)</p>
<p>State of Wisconsin Milwaukee-Waukesha PMSA #5080</p>	<p>Full-Scope</p>	<p>Entire Milwaukee-Waukesha, WI PMSA (Milwaukee, Ozaukee, Washington and Waukesha Counties)</p>
<p>Racine PMSA #6600</p>	<p>Limited-Scope</p>	<p>Entire Racine, WI PMSA (Racine County)</p>

Appendix B: Summary of Multistate Metropolitan Statistical Area and State Ratings

RATINGS TCF National Bank				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
TCF National Bank	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Multistate Metropolitan Statistical Area or State:				
Chicago-Gary-Kenosha, IL-IN-WI CMSA	Outstanding	Outstanding	High Satisfactory	Outstanding
State of Colorado	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
State of Michigan	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
State of Minnesota	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
State of Wisconsin	Outstanding	Outstanding	Outstanding	Outstanding

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

Appendix C: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews

<i>Chicago-Gary-Kenosha, IL-IN-WI Multistate CMSA - Chicago, IL PMSA #1600</i>	C-2
<i>Chicago-Gary-Kenosha, IL-IN-WI Multistate CMSA - Gary, IN PMSA #2960</i>	C-4
<i>Chicago-Gary-Kenosha, IL-IN-WI Multistate CMSA - Kenosha, WI PMSA #3800</i>	C-6
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Chicago-Gary-Kenosha, IL-IN-WI Multistate CMSA

Demographic Information for Full-Scope Area: Chicago, IL PMSA #1600						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)						
1990	1,776	15.77	21.06	38.57	23.03	1.58
2000	1,875	13.01	24.59	35.63	25.87	0.91
Population by Geography						
1990	7,410,858	9.67	19.59	42.57	28.05	0.12
2000	8,272,768	7.64	23.48	39.45	29.42	0.01
Owner-Occupied Housing by Geography						
1990	1,628,992	2.85	12.48	48.78	35.88	0.00
2000	1,920,291	2.49	15.18	45.04	37.29	0.00
Businesses by Geography						
2002	369,480	4.15	10.67	40.27	43.63	1.28
Farms by Geography						
2002	6,885	0.78	4.43	58.17	36.47	0.15
Family Distribution by Income Level						
1990	1,864,224	19.85	17.39	24.00	38.76	0.00
2000	2,029,140	20.65	17.56	22.21	39.57	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies						
1990	694,259	17.81	28.42	41.19	12.59	0.00
2000	775,416	13.89	33.72	38.43	13.95	0.00
Median Family Income		Median Housing Value				
1990	\$42,758	1990				\$123,397
2000	\$61,182	2000				\$177,789
HUD Adjusted Median Family Income for 2002	\$75,400	2002				\$220,000
Households Below the Poverty Level		Unemployment Rate for 2003				6.3%
1990	10.45%					
2000	9.67%					

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 1990 U.S. Census, 2000 U.S. Census, and 2002 HUD updated MFI.
 December 2003 Bureau of Labor Statistics unemployment.

The assessment area consists of the entire Chicago PMSA #1600 which is one part of the greater Chicago-Gary-Kenosha, IL-IN-WI CMSA. The Chicago metropolitan area has the third largest population in the country. It is a major center for industry, commerce, finance, agriculture, transportation, entertainment, and culture. The city has significant importance to international trade through its various financial exchanges, shipping, and airport connections.

This is an extremely competitive banking environment. TCF has 191 branches and 363 ATMs in the PMSA. TCF's deposits of \$2.5 billion rank 14th with a market share of 1.16%. Market leaders are Bank One National Association and LaSalle Bank National Association with deposit market shares of 20% and 12%, respectively. There are 305 banks operating 2,249 offices in the PMSA. In addition, there are numerous mortgage companies, credit unions, currency exchanges, pay-day lenders, and sub-prime loan offices operating in the area.

Economic conditions are relatively stable because of the great economic diversity in the area. The recent downturn in the national economy did, however, result in some significant layoffs in the manufacturing and high tech industries. One source estimates that the area will need to create 100,000 jobs in other industries to replace lost manufacturing jobs. There has been some job growth in the leisure and hospitality fields as well as in financial services that support businesses.

The PMSA has some significant disparities in income levels and housing costs. Wealth is concentrated around suburbs north and west of the City of Chicago. The city has most of the area's low- and moderate-income census tracts. Taking it a step further, several of these areas have a very high percentage of people living below the poverty level. In these impoverished areas, there is little owner-occupied housing. A Chicago Housing and Development study shows wide variations in the median value of a single family home. This ranges from highs of \$1.3 million in the Near Northside neighborhood, \$932,500 in the Lincoln Park neighborhood, and \$690,000 in the Lakeview neighborhood to lows of \$50,000 in New City, \$36,000 in West Englewood, and \$30,000 in Riverdale. Across all neighborhoods, the average median value of a single-family residence is \$221,180.

Chicago has a large, sophisticated network of community development organizations. The neighborhood nonprofit groups join together with formal, city-wide organizations to promote community development activities. These include providing a forum for public housing policy, economic development, job creation and job training efforts, homelessness, and social service matters. Chicago also has a highly developed infrastructure of community development financial institutions, foundations, and university urban affairs and research programs. Several activist organizations are headquartered in Chicago. All of these factors combine to provide countless opportunities for public-private partnerships that foster community development. Because of the knowledge that the activist groups and community development organizations have with CRA, banks have an established market for involvement and playing leadership roles in establishing more community development activities.

Chicago also has Empowerment Zones and was designated as a "Renewal Community" in 2002. These provide wage credits, tax deductions, capital gains exclusions, and bond financing to help stimulate economic development and job growth. These areas are eligible to share in Low-Income Housing and New Market Tax Credits. These incentives encourage public and private investment in those designated neighborhoods.

Chicago-Gary-Kenosha, IL-IN-WI Multistate CMSA

Demographic Information for Full-Scope Area: Gary, IN PMSA #2960						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)						
1990	144	11.81	24.31	43.75	17.36	0.00
2000	159	9.43	26.42	40.88	23.27	0.00
Population by Geography						
1990	688,257	4.64	18.35	52.36	24.64	0.00
2000	712,748	4.29	22.21	44.38	29.12	0.00
Owner-Occupied Housing by Geography						
1990	170,856	2.60	14.62	54.16	28.62	0.00
2000	189,781	2.08	17.57	45.83	34.53	0.00
Businesses by Geography						
2002	21,344	7.07	21.88	47.62	23.46	0.00
Farms by Geography						
2002	641	1.40	6.55	64.59	27.46	0.00
Family Distribution by Income Level						
1990	182,665	20.15	16.93	24.13	38.78	0.00
2000	189,060	19.78	17.55	22.89	39.78	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies						
1990	67,733	9.09	26.72	50.33	13.87	0.00
2000	70,583	7.86	32.49	41.89	17.77	0.00
Median Family Income		Median Housing Value				
1990	\$35,943	1990				\$57,488
2000	\$51,756	2000				\$101,358
HUD Adjusted Median Family Income for 2002	\$55,762	Unemployment Rate for 2003				6.1%
Households Below the Poverty Level						
1990	11.95%					
2000	10.46%					

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 1990 U.S. Census, 2000 U.S. Census, and 2002 HUD updated MFI.
 December 2003 Bureau of Labor Statistics unemployment.

The assessment area consists of the Gary PMSA #2960 plus the adjacent La Porte County. Although La Porte County is a nonmetropolitan area, it is adjacent to the PMSA and does not extend substantially beyond its boundaries. The area has economic and demographic similarities to the PMSA and contains a branch of TCF. The Gary PMSA is a part of the greater Chicago-Gary-Kenosha, IL-IN-WI CMSA and is located immediately east of Chicago along the southern tip of Lake Michigan. Because of the easy access to three Interstate Highways, rush-hour commuter bus service into downtown Chicago, and less expensive housing, the area offers an alternative for Chicago workers willing to commute. This is especially true for residents of the more

suburban western portion of the PMSA. This area has typically newer, larger homes and people with higher incomes than what is found in the rest of the PMSA.

TCF has five branches in the assessment area and seven ATMs. This is a small market for TCF with only \$9.5 million in deposits in the area. TCF is ranked last of 27 banks in the area with a deposit market share of 0.10%. Market leaders are Bank One National Association and Centier Bank with market shares of 18% and 11%, respectively.

Economic conditions across the PMSA have been weak. Indiana has topped the nation in the number of manufacturing jobs lost. The Gary PMSA has one of the highest rates of personal bankruptcy filings in the US. Employment has been quite concentrated in the steel industry with a high dependence on manufacturing. With its historical connection to the steel industry, the PMSA has more vulnerability to downturns in the national economy. Large steel manufacturing firms in the area include USX, Inland Steel, LTV Steel, Bethlehem Steel, and Midwest/National Steel. Another large employer is Isplat Inland Inc, a large supplier of steel to the automobile industry. Without a significant turnaround in the national economy which would spur other industries to invest in new structures, building expansion, and new equipment purchases, the Gary economy could remain stressed due to excess production in the global steel market.

Riverboat gambling and growth in the service or retail industry have provided some needed new jobs. Local and state governments have become increasingly reliant on tax revenue from casino profits. However, recent legislative changes to the riverboat gaming industry could squeeze profits and lead to some downsizing. Legislation passed in 2002 that allowed permanent dockside operation led to an overall increase in business and revenues. But this same legislation capped the share of tax revenues that would be kept locally. Instead of a 75%-25% split between the state and casino communities, the local government payback was capped at \$95 million. Also complicating potential future gaming profits would be the opening of similar dockside casinos in suburban areas of Chicago.

Information from the Northwestern Indiana Regional Planning Commission shows that in 2001, the average sales price of a two-bedroom home in the PMSA was \$69,000; \$114,000 for a three-bedroom; and \$174,600 for a four-bedroom.

A community profile created by the Chicago Federal Reserve indicates that the area continues to need more units of affordable housing, financial counseling, jobs training, and day care facilities. This study also provided examples of over 40 community development organizations. Many of these organizations provide needed social services to low- and moderate-income people.

Community contacts have noted areas in which banks can become more involved. These include financial education, including education targeted to the area's growing Spanish-speaking population. Another need is financing for the purchase and rehabilitation of the area's aging housing stock.

Chicago-Gary-Kenosha, IL-IN-WI Multistate CMSA

Demographic Information for Full-Scope Area: Kenosha, WI PMSA #3800						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)						
1990	31	6.45	16.13	61.29	16.13	0.00
2000	30	3.33	26.67	56.67	13.33	0.00
Population by Geography						
1990	128,181	4.30	14.28	64.46	16.97	0.00
2000	149,577	2.56	19.01	63.08	15.35	0.00
Owner-Occupied Housing by Geography						
1990	32,368	1.33	10.26	68.34	20.08	0.00
2000	38,733	0.88	13.16	68.30	17.66	0.00
Businesses by Geography						
2002	5,214	8.59	11.35	60.36	19.70	0.00
Farms by Geography						
2002	238	0.42	4.62	86.13	8.82	0.00
Family Distribution by Income Level						
1990	34,184	17.03	19.84	25.24	37.89	0.00
2000	38,671	19.18	18.46	24.01	38.36	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies						
1990	12,603	6.32	21.99	60.56	11.12	0.00
2000	14,553	3.59	25.59	60.20	10.62	0.00
Median Family Income		Median Housing Value				
1990	\$35,657	1990				\$65,697
2000	\$56,525	2000				\$122,265
HUD Adjusted Median Family Income for 2002	\$59,700	Unemployment Rate for 2003				5.1%
Households Below the Poverty Level						
1990	9.31%					
2000	7.29%					

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 1990 U.S. Census, 2000 U.S. Census, and 2002 HUD updated MFI.
 December 2003 Bureau of Labor Statistics unemployment.

The assessment area consists of the Kenosha PMSA #3800 which is Kenosha County. It is a part of the greater Chicago-Gary-Kenosha, IL-IN-WI CMSA. Kenosha is located immediately north of the Illinois border along Lake Michigan. It is approximately 60 minutes from Chicago and 30 minutes from the Milwaukee area. The city is the county seat of Kenosha County. It is the home of a technical college, a private college, and the University of Wisconsin-Parkside. The city has been historically dependent upon the automotive industry but has been experiencing greater diversity through furniture, apparel, and metal manufacturing. With the recent population growth from former

Chicago residents willing to commute greater distances in return for more affordable housing, the city has had substantial growth in retail and service-related jobs.

TCF has five branches and eleven ATMs in the PMSA. Within this assessment area, TCF has generated \$137 million in deposits which resulted in a deposit market share of nine percent. TCF ranks fifth for deposits out of the 14 financial institutions located there. Banks with larger deposit market shares are Bank One, National Association (23%), M&I Marshall & Ilsley Bank (20%), Johnson Bank (14%), and Southport Bank (12%). This information was taken from June 30, 2003 FDIC Deposit Market Share Reports.

Nearly one-fifth of all jobs are related to manufacturing. Daimler-Chrysler dominates the job market with nearly 25% of all manufacturing jobs in the PMSA. Because of this concentration coupled with some volatility in the car industry, overall employment in the PMSA is more subject to swings in the national economy. According to industry analysts, Chrysler sales have been trending downward since 2000 despite generous sales incentives and low interest rates. Other large employers in the area include Snap-On Tools, Super Valu, Ladish TriClover, Jockey, Inc., the university system, and the health care industry.

The area has experienced significant population growth because of its proximity to the Chicago and Milwaukee metropolitan areas. Kenosha is an attractive alternative for city people looking for a less urban lifestyle. Information from the Kenosha Chamber of Commerce shows that an income level of \$100,000 in Kenosha would require an income level of \$186,588 in Chicago to maintain the same standard of living. Housing in Kenosha is more affordable with the median sales price at approximately \$121,000. The median apartment rental is \$589.

The city has a large Brownfield area downtown that is in process of redevelopment. This is a former manufacturing site for Simmons Mattress and GM auto manufacturing located near Lake Michigan. This site is called Harbor Park and its redevelopment will include residential housing, parks, trails, and a museum. Plans include the use of streetcars and will ultimately connect to the commuter rail system.

City and county web sites provide information on many different community development, economic development, housing, or social service organizations that provide assistance to low- and moderate-income people or to small businesses. The creation of more affordable housing units, preservation or renovation of existing older housing, the aforementioned lakeshore revitalization, and economic development through creation of more small business jobs are needs in the area. While this is not an all inclusive list of community development organizations or needs, these items do provide an indication of opportunities for financial institutions to provide services or to form partnerships for investment or lending purposes.

State of Colorado

Demographic Information for Full-Scope Area: Denver, CO PMSA #2080						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)						
1990	498	6.83	21.89	32.53	21.49	17.27
2000	514	4.09	27.43	38.91	28.79	0.78
Population by Geography						
1990	1,622,980	6.86	23.97	43.35	25.82	0.00
2000	2,109,282	4.72	28.04	39.46	27.67	0.12
Owner-Occupied Housing by Geography						
1990	399,963	3.67	19.89	45.25	31.19	0.00
2000	548,915	1.96	22.03	42.18	33.82	0.00
Businesses by Geography						
2002	171,064	7.79	20.66	37.35	33.92	0.27
Farms by Geography						
2002	2,604	3.57	18.43	44.82	32.95	0.23
Family Distribution by Income Level						
1990	424,057	18.79	18.71	24.56	37.94	0.00
2000	531,126	18.33	18.86	23.74	39.06	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies						
1990	159,032	12.16	35.54	40.02	12.28	0.00
2000	197,550	7.85	41.99	36.93	13.24	0.00
Median Family Income		Median Housing Value				
1990	\$40,222	1990				\$89,581
2000	\$61,185	2000				\$181,960
HUD Adjusted Median Family Income for 2002	\$69,900	2002				\$227,260
Households Below the Poverty Level		Unemployment Rate for 2003				5.9%
1990	9.52%					
2000	7.38%					

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 1990 U.S. Census, 2000 U.S. Census, and 2002 HUD updated MFI.
 December 2003 Bureau of Labor Statistics unemployment.

The assessment area consists of the Denver PMSA #2080 which is comprised of Adams, Arapahoe, Denver, Douglas, and Jefferson Counties. The City of Denver is the state’s capital and the center of its economic activity. As of June 30, 2003, TCF had \$61 million in deposits in this geographic area with a market share of 0.18%. Wells Fargo Bank West, NA and U.S. Bank, National Association have the two largest deposit market shares with 20% and 15%, respectively. Competition among the financial institutions is high. There are 91 banks operating 558 offices throughout the area.

Despite its diversification, Denver's economy has suffered in recent years. Unemployment has risen from a low point of 2.0% in December 2000 to 5.9% in 2002. The combination of the slowing national economy and the events of September 11, 2001 impacted Denver's economy in much the same way the national economy has been affected. Employment contracted in every industry including professional, information technology, and construction. Even state and local governments shed jobs to meet budgetary constraints. The largest employers include King Soopers, Qwest Communications, Columbia-HealthONE, United Airlines, and Lockheed Martin.

Commercial and residential rental property vacancy rates are rising, and home prices have shown signs of softening. The rapid price escalation for single-family residences during the 1990s and early 2000s has slowed. The Colorado Association of Realtors listed the median sales price of a residence in 2002 as just over \$227,000. The Metro Denver Chamber of Commerce calls the PMSA the 15th most expensive housing market in the country. Permits for building new homes declined and the supply of homes on the market has increased. Personal and business bankruptcies as well as foreclosures have continued to rise. Weak tourism and extreme drought conditions have also weighed down the economy. However, the area has a well-developed transportation hub including the interstate highway system, railroad connections, and the Denver International Airport (DIA). A positive sign for the economy is an 11% increase in passenger air traffic through DIA in 2003 as compared to 2002. This is important to an area dependent upon tourism. The access to transportation along with the area's skilled workforce and an expansive research base also support economic forecasts that Denver will remain attractive to new residents and capital investment.

HUD has designated a portion of Denver as an Enterprise Community. Denver and other counties in the PMSA have also designated Redevelopment Zones or Blighted Areas. These areas typically present greater opportunities for financial institutions for developing partnerships that encourage economic development. However, there appears to be little formal coordination of efforts among financial institutions, government entities, or nonprofit organizations. Denver has spent considerable resources on large municipal building projects in recent years. These projects include the new airport, professional sports stadiums and facilities, light rail, government offices, retail and leisure activities centers, and redevelopment of the Stapleton airport site. The projects were financed using combinations of tax incentives, grants, bonds, and private funding sources. There has been little direct bank involvement.

There are four CDFIs in the PMSA. There are also at least five active CD corporations that work primarily with financing and technical support for small businesses. There are numerous private and public organizations that assist with small business financing needs. Although the individual counties operate housing authorities, significant efforts have been concentrated toward economic development and municipal infrastructure.

Based on contacts with community organizations, we noted that there are numerous opportunities for bank involvement in CD activities and the creation of affordable housing. The greatest needs are for small business and affordable housing loans.

Affordable housing needs include loans for both construction of more housing units and financing at below market rates for low- and moderate-income families. Technical support is needed for small business owners; educational programs are needed for low- and moderate-income individuals seeking home ownership; and financial counseling is needed to improve or develop healthy credit histories for low- and moderate-income individuals.

State of Michigan

Demographic Information for Full-Scope Area: Ann Arbor, MI PMSA #0440						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)						
1990	103	8.74	16.50	45.63	27.18	1.94
2000	149	7.38	14.09	52.35	26.17	0.00
Population by Geography						
1990	398,582	8.46	15.34	48.44	27.37	0.39
2000	479,846	7.72	13.57	52.93	25.77	0.00
Owner-Occupied Housing by Geography						
1990	90,656	0.98	11.10	57.21	30.71	0.01
2000	123,626	1.26	9.62	57.94	31.18	0.00
Businesses by Geography						
2002	27,834	7.42	12.11	50.22	30.23	0.03
Farms by Geography						
2002	1,193	0.75	5.87	62.20	31.18	0.00
Family Distribution by Income Level						
1990	96,224	16.55	16.79	25.08	41.58	0.00
2000	117,849	16.31	17.08	23.61	43.01	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies						
1990	32,078	8.13	24.63	51.62	15.61	0.00
2000	39,342	6.97	22.93	54.25	15.86	0.00
Median Family Income		Median Housing Value				
1990	\$45,123	1990				\$104,479
2000	\$67,765	2000				\$175,892
HUD Adjusted Median Family Income for 2002	\$71,600	Unemployment Rate for 2003				3.8%
Households Below the Poverty Level						
1990	9.63%					
2000	8.53%					

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 1990 U.S. Census, 2000 U.S. Census, and 2002 HUD updated MFI.
 December 2003 Bureau of Labor Statistics unemployment.

The assessment area consists of Livingston and Washtenaw Counties of the Ann Arbor PMSA # 0440. It does not include Lenawee County. Lenawee County is not included in the delineation due to its poor proximity to bank offices. The assessment area is located in the southeastern corner of the state, approximately an hour's drive west of the Detroit area. Ann Arbor is the county seat of Washtenaw County, a major population center of the county, and the home to the large University of Michigan.

TCF provides a full range of financial products and services in this area via 14 branch offices and 37 ATMs. Bank competition is strong in this market with 21 banks operating

148 offices inside the assessment area. Financial service providers include large interstate banks, national mortgage companies, and local financial institutions. In the year 2002, there were 469 lenders that reported home mortgage loans in the area, and 77 that reported small business loans. As of June 30, 2003, TCF had the second-largest share of deposits of the financial institutions in the assessment area. TCF deposits total \$755 million and represent 13% of area deposits. National City Bank of Michigan is the market leader with nearly a 14% deposit market share.

The University of Michigan (based in the City of Ann Arbor) plays a significant role in the economy and growth of the area. It is a world-renowned facility that attracts students and professors from around the globe. The student population approximates 38,000 during the academic year. And the University is the area's largest employer with more than 24,000 employees. Its medical school (as well as other local hospitals) make Ann Arbor a regional medical center. The University's research and technology departments (in conjunction with other private businesses) provide leading research in the aeronautical, space, nuclear, chemical, and metallurgical fields.

Besides the University of Michigan, other major employers in the area include local hospitals, technology manufacturing for automotive corporations, a pharmaceutical company, Eastern Michigan University in Ypsilanti, city and county government, and computer related software and products. The presence of two major universities, as well as three colleges, in the area contributes to a highly educated and skilled workforce. Approximately 37% of the Ann Arbor population (aged 25 years and older) has a bachelor's degree, compared to 22% of the state's population and 24% of the nation's population.

The presence of the University places pressure on the cost and availability of housing in Ann Arbor. Housing costs are high. This includes land costs as well as owner- and renter-occupied housing. According to a January 2003 article in the Detroit Free Press, the average price of a 2,200 square foot home in Ann Arbor approximates \$315,800. Within the low- and moderate-income geographies, there are very high percentages of rental properties. This is somewhat typical in cities with a large student population. In the above table, note the very small percentage of owner-occupied housing in the low-income tracts. This has a very limiting influence in the ability of any particular financial institution to generate home loans in geographies with incomes at that level. The majority of low-income tracts are located either near the University of Michigan or Eastern Michigan University. Housing costs in these tracts are higher than corresponding prices in moderate-income tracts. This is because many single-family houses in the low-income tracts have been converted to lucrative rental housing for students thus driving up the value of remaining houses. This has also somewhat distorted home ownership data. It is not uncommon for parents to purchase a traditional single-family residence near the campus, own the house while the child(ren) attend the university, and to rent rooms to several other students.

There are many opportunities to participate in various community development activities. Identified needs include additional affordable housing units, home improvement loans, more multi-family housing units, and financial or credit counseling

for both individuals and small businesses. There are numerous organizations that are actively involved in these endeavors. There are also many organizations involved in small business development and financing micro-enterprises. The area also has several loan programs that benefit low- and moderate-income home buyers or small business owners. Financial institutions can work with these organizations to help meet the credit and community development needs of the communities they serve. Banks can support these organizations by providing flexible credit products, grant funding, in-kind donations of equipment and financial expertise, and with investments.

State of Minnesota

Demographic Information for Full-Scope Area: Minneapolis-St. Paul, MN MSA #5120						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)						
1990	627	8.29	15.63	54.86	19.62	1.59
2000	719	6.54	21.00	47.98	23.78	0.70
Population by Geography						
1990	2,399,376	5.55	12.18	60.50	21.65	0.13
2000	2,822,870	4.80	18.22	51.31	25.60	0.08
Owner-Occupied Housing by Geography						
1990	623,878	1.80	10.35	63.21	24.64	0.00
2000	780,005	1.58	14.45	55.19	28.78	0.00
Businesses by Geography						
2002	222,520	4.70	8.91	60.29	26.03	0.08
Farms by Geography						
2002	5,437	0.97	10.17	72.19	16.65	0.02
Family Distribution by Income Level						
1990	616,980	16.50	18.34	27.74	37.43	0.00
2000	709,301	16.73	18.53	26.14	38.61	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies						
1990	214,906	8.72	18.99	61.06	11.23	0.00
2000	250,078	7.49	26.37	52.49	13.65	0.00
Median Family Income		Median Housing Value				
1990	\$43,063	1990				\$92,977
2000	\$65,343	2000				\$145,816
HUD Adjusted Median Family Income for 2002	\$76,700	2002				\$221,329
Households Below the Poverty Level		Unemployment Rate for 2003				4.1%
1990	7.85%					
2000	6.35%					

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 1990 U.S. Census, 2000 U.S. Census, and 2002 HUD updated MFI.
 December 2003 Bureau of Labor Statistics unemployment.

The bank’s assessment area consists of portions of the Minneapolis-St. Paul Multistate MSA and is entirely in the State of Minnesota. The assessment area consists of Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, Sherburne, Washington, and Wright Counties as well as four adjacent census tracts of Rice County. This nonmetropolitan county is adjacent to Dakota County and contains a branch that TCF purchased in the City of Northfield. With 88 branches and 511 ATMs, TCF has the third largest deposit market share with \$3.4 billion or 6.78% of all deposits within the MSA. Market leaders are Wells Fargo Bank Minnesota, NA with a market share of 31.8% and U. S. Bank

National Association with 29.0%. There are 136 banks located within the assessment area operating 658 offices. This does not include credit unions and many mortgage companies that originate loans in the area. Competition for all types of loans, especially mortgage and commercial loans, is strong.

Minneapolis-St. Paul is the sixteenth largest metropolitan area in the United States. The area has a diversified economic base. It is a center for high-tech electronics, medical instruments, health care, finance, insurance, entertainment and the arts, printing and publishing, as well as processing and transporting agricultural products. The area is the home of sixteen FORTUNE 500 companies and several of the world's largest private companies. St. Paul serves as the state's capital. The University of Minnesota is the area's largest employer with over 34,000 employees. Other large employers include the Target Corporation, Wells Fargo, U.S. Bank, local and state governments, health care, and computer manufacturing.

The economy has softened with the national economic downturn following September 11, 2001. Commercial and office vacancy rates have increased. Unemployment was 4.1% at year-end 2003.

Portions of Minneapolis north and south of the downtown area have been designated as a HUD Empowerment Zone/Enterprise Community. St. Paul also has an Enterprise Community. These areas typically present greater opportunities for financial institutions for developing partnerships that encourage economic development.

The combination of continued population growth, the generally strong economy, and favorable interest rates has driven up home prices dramatically. The Minneapolis Board of Realtors indicated that the average sales price of a single-family residence was \$221,329 at year-end 2002 and \$246,700 by year-end 2003. Community contacts indicated a strong need for affordable housing and assistance for first-time homebuyers, credit counseling, and programs that require no or low down payments. The need includes lower cost single family, multifamily and other rental housing, and combination financing that could include rehabilitation funds in conjunction with first mortgages. Contacts stated there was a need for housing units for all income levels and that this would be an opportunity for banks to assist with development lending. Contacts said that home improvement loans are needed to improve the quality of the aging housing stock in many of the urban neighborhoods. Recently, some existing mobile home parks have been closed, razed and converted into commercial or retail development sites. This eliminated some affordable housing units and put additional pressure on the cost and availability of remaining affordable housing.

Several contacts said that banks should provide more financial/credit counseling programs or seminars that would educate individuals with little experience with banks about banking services. There is also a need for small business loans and loans that would promote job creation, particularly for the type of job that would provide higher wages that would support a family. These small businesses need technical assistance and mentoring. One contact said that more banks should be willing to invest in local Community Development Corporations and help fund revolving loan pools.

The Twin Cities has a wide variety of CD related organizations that play an active role in development and revitalization efforts. The non-profit sector is generally well organized, informed, and aware of CRA requirements for financial institutions. There are ample opportunities for financial institutions to form partnerships with these organizations.

The minority population in the Twin Cities has grown in recent years, primarily from immigration of Hmong into St. Paul, Somali in Minneapolis, and Hispanics into all areas. The influx of these recent immigrants has put a strain on the limited supply of subsidized housing. Estimates that in St. Paul alone, the waiting list for subsidized housing is over 5,000 families. St. Paul has the highest concentration of Hmong in the US. Approximately 70,000 Hmong (out of an estimated 90,000 in the US) live there. They are historically involved in farming and have a tightly woven family culture. As a group, they are highly dependent on public assistance and public housing. This is changing as the youth attain higher education levels and they become more acclimated to mainstream US life. There are no exact numbers of Somali immigrants available, but this is a rapidly growing segment of the minority population. Nearly all are from East Africa and are practicing Sunni Muslims. Their faith prohibits them from paying interest on loans. This requires some creative financing efforts on the part of local banks and businesses. According to a Fannie Mae source, the Twin Cities has the twelfth highest demand (in the US) for loan products that are compliant with Islamic law. One of TCF's competitors has partnered with the Somali community to provide basic banking seminars and to work with them on providing a credit type product. The Hispanic population is the largest immigrant population in the metro area with over 100,000 residents. Many are working in lower paying service jobs and establishing small businesses to serve their neighborhoods.

State of Wisconsin Full-Scope Area

Demographic Information for Full-Scope Area: Milwaukee-Waukesha, WI PMSA #5080						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)						
1990	392	19.13	17.35	43.11	19.64	0.77
2000	416	18.99	19.95	38.22	22.12	0.72
Population by Geography						
1990	1,432,149	12.73	13.58	46.59	27.05	0.06
2000	1,500,741	11.87	16.37	42.40	29.17	0.19
Owner-Occupied Housing by Geography						
1990	319,660	4.71	10.23	51.28	33.77	0.00
2000	359,082	4.46	12.07	46.80	36.67	0.00
Businesses by Geography						
2002	62,799	6.89	8.51	48.01	36.29	0.29
Farms by Geography						
2002	1,619	0.80	3.64	53.55	41.94	0.06
Family Distribution by Income Level						
1990	372,335	19.55	17.66	25.59	37.21	0.00
2000	383,799	19.72	17.80	23.53	38.96	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies						
1990	138,530	23.14	20.22	43.78	12.86	0.00
2000	143,984	20.63	24.40	40.12	14.85	0.00
Median Family Income		Median Housing Value				
1990	\$39,005	1990				\$73,428
2000	\$56,797	2000				\$125,318
HUD Adjusted Median Family Income for 2002	\$67,200	Unemployment Rate for 2003				5.1%
Households Below the Poverty Level						
1990	10.38%					
2000	9.56%					

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 1990 U.S. Census, 2000 U.S. Census, and 2002 HUD updated MFI.
 December 2003 Bureau of Labor Statistics unemployment.

The bank’s assessment area consists of the entire Milwaukee-Waukesha PMSA that includes Milwaukee, Ozaukee, Washington, and Waukesha Counties. Milwaukee is the largest city in the State of Wisconsin. The city has a significant number of low-income census tracts in the central part of the city and moderate-income tracts adjacent to these areas. In contrast, the suburban areas in Ozaukee and Waukesha Counties are affluent with high housing costs.

TCF generated \$375 million in deposits for a market share of 0.93% and market rank of 15th. There are 58 banks with 550 offices in the PMSA. The market leaders are U. S. Bank National Association with a deposit market share of 31%, M&I Marshall & Ilsley Bank with a deposit market share of 25%, and Bank One with a deposit market share of 6%. Banking competition is strong and increasing. There are numerous mortgage companies and credit unions in the area that increase the competition. Insurance companies also are actively seeking customers that would ordinarily use traditional banks for financial services. The deposit information was obtained from the June 30, 2003 FDIC Deposit Market Share Reports.

Economic conditions are good. Manufacturing and service related jobs form the bulk of the employment base. The service industries have seen the most significant growth in the last five years, however, this has typically been outside of the City of Milwaukee. Major employers in the PMSA include the health care industry, M&I Corp., Quad Graphics Incorporated, Rockwell Automation, Kohl's Corporation, Briggs & Stratton, and Roundy's, Inc. Milwaukee is also the home of Harley Davidson motorcycles and several professional sports teams. Tourism is an increasing source of revenue for the area.

The more suburban portions of the PMSA have had growth in both the service sector and in manufacturing jobs. Suburban cities have used tax incentives to encourage business relocations or expansions. A downside of this suburban business expansion is that lower paid or hourly wage employees have a difficult time finding affordable housing near the jobs.

The 2002 average sales price of homes in the City of Milwaukee was \$95,217. This information was obtained from the Wisconsin Realtors Association website. The website also shows that the average sales prices for homes in Wauwatosa and Waukesha were \$164,194 and \$169,748, respectively.

Feedback from community contacts indicates that few of the suburban cities offer affordable housing programs and strict zoning restrictions negatively impact affordable housing efforts. We did note that one census tract in Waukesha County is a target for new market tax credits. The Wisconsin Welfare to Work initiatives also present challenges to low- and moderate-income residents within Milwaukee. There is a need to get the people who need employment from the City of Milwaukee to the jobs that have relocated to the suburbs.

The City of Milwaukee has a HUD-designated Urban Renewal Community. The city's strategies under the Renewal Community designation include tax incentives for development projects and expanded services including workforce, education and affordable housing programs. One community contact from within this area said that there is a business incubator and several redevelopment organizations that promote small business development. Low-Income Housing Tax Credits are also readily available in this area, but there is a need for people with expertise in this type of financing and for pre-development grants or grant writing. Local Initiatives Support Corporation (LISC) has purchased the equity portions of some low-income housing projects due to insufficient interest by local financial institutions. Milwaukee also has

three low-income credit unions certified by the National Credit Union Administration. These groups provide financial institutions with investment opportunities as well as a means to participate in lending programs.

There are a variety of CD organizations that serve the greater Milwaukee area. These organizations serve small business development and financing needs, provide homeownership counseling and financial advice, develop low- and moderate-income housing, provide needed social services to low- and moderate-income families, and focus on job training efforts. There are significant opportunities to participate in CD activities in the PMSA.

Appendix D: Tables of Performance Data

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Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. 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/purchases 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 MA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

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 and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. Refer to Interagency Q&As ___ .12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of Assessment Area,” in the MSA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column.

Table 1. Other Products - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MSA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.

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 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 Home Mortgage Refinance Loans - See Table 2.

Table 5. Geographic Distribution of Multifamily Loans - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income

geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

Table 6. 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 share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

Table 7. **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 share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

Table 8. **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/assessment area. The table also presents market share information based on the most recent aggregate market data available.

Table 9. **Borrower Distribution of Home Improvement Loans** - See Table 8.

Table 10. **Borrower Distribution of Refinance Loans** - See Table 8.

Table 11. **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 12. **Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to

\$500,000) 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 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For 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 households 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/assessment area.

Table 14. 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.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MSA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column.

Table 15. 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 1. Lending Volume

LENDING VOLUME		Geography: MULTISTATE MSA						Evaluation Period: October 1, 2000 to December 31, 2002				
MSA/ Assessment Area:	% of Rated Area Loans (#) in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MSA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Chicago PMSA	92.27	8,984	1,140,435	136	35,503	0	0	65	2,882	9,185	1,178,820	94.40
Gary PMSA	0.40	39	10,353	1	35	0	0	0	0	40	10,388	0.36
Kenosha PMSA	7.33	725	52,857	5	1,151	0	0	0	0	730	54,008	5.24
Limited Review:												

* Loan Data as of December 31, 2002. Rated area refers to either the state or multistate CMSA rating area.
 ** The evaluation period for Community Development Loans is January 1, 2001 to December 31, 2002.
 *** Deposit Data as of June 30, 2003. Rated Area refers to the state, multistate CMSA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: MULTISTATE MSA				Evaluation Period: October 1, 2000 to December 31, 2002								
MSA/ Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% TCF Loans	% Owner Occ Units***	% TCF Loans	% Owner Occ Units***	% TCF Loans	% Owner Occ Units***	% TCF Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Chicago PMSA	812	92.48	2.85	7.02	12.48	12.81	48.78	52.96	35.88	27.09	0.18	0.31	0.16	0.22	0.12
Gary PMSA	5	0.57	2.60	0.00	14.62	20.00	54.16	60.00	28.62	20.00	0.02	0.00	0.00	0.04	0.00
Kenosha PMSA	63	7.18	1.33	1.59	10.26	9.52	68.34	58.73	20.08	30.16	0.74	1.03	0.83	0.54	1.25
Limited Review:															

* Based on 2002 Peer Mortgage Data.

** 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.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: MULTISTATE MSA								Evaluation Period: October 1, 2000 to December 31, 2002					
MSA/ Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total **	% Owner Occ Units***	% TCF Loans	% Owner Occ Units***	% TCF Loans	% Owner Occ Units***	% TCF Loans	% Owner Occ Units***	% TCF Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Chicago PMSA	179	56.11	2.85	11.73	12.48	27.37	48.78	45.81	35.88	15.08	0.46	1.38	0.80	0.42	0.24
Gary PMSA	0	0.00	2.60	0.00	14.62	0.00	54.16	0.00	28.62	0.00	0.00	0.00	0.00	0.00	0.00
Kenosha PMSA	140	43.89	1.33	1.43	10.26	20.71	68.34	57.14	20.08	20.71	8.94	0.00	14.75	7.47	10.26
Limited Review:															

* Based on 2002 Peer Mortgage Data.

** 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.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: MULTISTATE MSA				Evaluation Period: October 1, 2000 to December 31, 2002							
MSA/ Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% TCF Loans	% Owner Occ Units***	% TCF Loans	% Owner Occ Units***	% TCF Loans	% Owner Occ Units***	% TCF Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Chicago PMSA	7,841	93.66	2.85	4.02	12.48	13.05	48.78	51.19	35.88	31.68	0.75	0.99	0.98	0.94	0.52
Gary PMSA	22	0.26	2.60	0.00	14.62	27.27	54.16	40.91	28.62	31.82	0.04	0.00	0.05	0.03	0.05
Kenosha PMSA	520	6.21	1.33	1.73	10.26	13.85	68.34	64.62	20.08	19.81	2.50	2.56	4.88	2.41	1.97
Limited Review:															

* Based on 2002 Peer Mortgage Data.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: MULTISTATE MSA								Evaluation Period: October 1, 2000 to December 31, 2002				
MSA/ Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% TCF Loans	% MF Units***	% TCF Loans	% MF Units***	% TCF Loans	% MF Units***	% TCF Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Chicago PMSA	152	98.06	15.72	5.26	21.18	22.37	37.27	57.24	25.82	15.13	1.64	0.68	0.92	2.48	2.22
Gary PMSA	12	7.23	12.00	0.00	17.24	0.00	50.33	0.00	20.43	100.00	2.22	0.00	0.00	0.00	14.29
Kenosha PMSA	2	1.29	10.03	0.00	6.82	50.00	70.57	50.00	12.58	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															

* Based on 2002 Peer Mortgage Data.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: MULTISTATE MSA						Evaluation Period: October 1, 2000 to December 31, 2002						
MSA/ Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total **	% of Businesses ***	% TCF Loans	% of Businesses ***	% TCF Loans	% of Businesses ***	% TCF Loans	% of Businesses ***	% TCF Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Chicago PMSA	136	95.77	4.15	3.70	10.67	11.11	40.27	57.04	43.63	28.15	0.04	0.06	0.04	0.07	0.02
Gary PMSA	1	0.70	3.66	0.00	15.24	0.00	51.41	0.00	29.69	100.00	0.01	0.00	0.00	0.00	0.02
Kenosha PMSA	5	3.52	8.59	0.00	11.35	20.00	60.36	80.00	19.70	0.00	0.03	0.00	0.37	0.00	0.00
Limited Review:															

* Based on 2002 Peer Small Business Data.

** 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.

*** Source Data - Dun and Bradstreet 2003.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: MULTISTATE MSA				Evaluation Period: October 1, 2000 to December 31, 2002									
MSA/ Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total **	% Families ***	% TCF Loans ****	% Families ***	% TCF Loans****	% Families ***	% TCF Loans****	% Families ***	% TCF Loans****	Over all	Low	Mod	Mid	Upp	
Full Review:																
Chicago PMSA	812	92.48	19.85	19.40	17.39	32.21	24.00	26.78	38.76	21.60	0.20	0.36	0.20	0.22	0.13	
Gary PMSA	5	0.57	20.15	20.00	16.93	0.00	24.13	40.00	38.78	40.00	0.03	0.00	0.00	0.06	0.03	
Kenosha PMSA	63	7.18	17.03	6.35	19.84	33.33	25.24	34.92	37.89	25.40	0.85	0.80	1.38	0.99	0.32	
Limited Review:																

* Based on 2002 Peer Mortgage Data.
 ** As a percentage of loans with borrower income information available. No information was available for 4.43% of loans originated and purchased by TCF.
 *** Percentage of Families is based on the 1990 Census information.
 **** 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 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: MULTISTATE MSA				Evaluation Period: October 1, 2000 to December 31, 2002									
MSA/ Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% TCF Loans****	% Families***	% TCF Loans****	% Families***	% TCF Loans****	% Families***	% TCF Loans****	Over all	Low	Mod	Mid	Upp	
Full Review:																
Chicago PMSA	179	56.11	19.85	24.02	17.39	38.55	24.00	21.23	38.76	16.20	0.52	0.97	0.57	0.37	0.41	
Gary PMSA	0	0	20.15	0.00	16.93	0.00	24.13	0.00	38.78	0.00	0.00	0.00	0.00	0.00	0.00	
Kenosha PMSA	140	43.89	17.03	7.14	19.84	22.86	25.24	38.57	37.89	31.43	9.25	8.51	8.43	10.49	8.70	
Limited Review:																

* Based on 2002 Peer Mortgage Data.
 ** As a percentage of loans with borrower income information available. No information was available for 0.00% of loans originated and purchased by TCF.
 *** Percentage of Families is based on the 1990 Census information.
 **** 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 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: MULTISTATE MSA			Evaluation Period: October 1, 2000 to December 31, 2002	
MSA/ Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses ***	% TCF Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Chicago PMSA	136	95.77	75.24	47.06	43.38	25.74	30.88	0.04	0.09
Gary PMSA	1	0.70	73.59	0.00	100.00	0.00	0.00	0.01	0.00
Kenosha PMSA	5	3.52	79.08	80.00	40.00	20.00	40.00	0.03	0.09
Limited Review:									

* Based on 2002 Peer Small Business Data.
 ** 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.
 *** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B – 2003).
 **** 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 2.82% of small loans to businesses originated and purchased by TCF.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: MULTISTATE MSA				Evaluation Period: January 1, 2001 to December 31, 2003			
MSA/ Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Chicago PMSA	13	2,612	269	18,271	282	20,883	95.75	0	0
Gary PMSA	0	0	7	48	7	48	.22	0	0
Kenosha PMSA	3	45	22	835	25	880	4.03	0	0
Limited Review:									
Out of Assessment Area	0	0	1	41	1	41	-	0	0

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

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

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND OPENINGS/CLOSINGS																	
Geography: MULTISTATE MSA																	
Evaluation Period: January 1, 2001 to December 31, 2003																	
MSA/ Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
		% of Rated Area Deposits in AA	# of TCF Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography		
	Low				Mod	Mid	Upp	Low			Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Chicago PMSA	94.40	191	95.00	2.1	12.1	48.9	36.8	30	3	0	2	15	10	7.64	23.48	39.45	29.42
Gary PMSA	0.36	5	2.50	0.0	0.0	80.0	20.0	4	0	0	0	3	1	4.29	22.21	44.38	29.12
Kenosha PMSA	5.24	5	2.50	0.0	20.0	40.0	40.0	0	0	0	0	0	0	2.56	19.01	63.08	15.35
Limited Review:																	

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: STATE OF COLORADO						Evaluation Period: October 1, 2000 to December 31, 2002						
MSA/ Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total **	% Owner Occ Units***	% TCF Loans	% Owner Occ Units***	% TCF Loans	% Owner Occ Units***	% TCF Loans	% Owner Occ Units***	% TCF Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Denver PMSA	22	78.57	3.67	9.09	19.89	40.91	45.25	27.27	31.19	22.73	0.04	0.00	0.14	0.00	0.07
Limited Review:															
Colorado Springs MSA	6	21.43	1.30	0.00	18.80	16.67	45.72	66.67	34.18	16.67	0.04	0.00	0.00	0.08	0.00

* Based on 2002 Peer Mortgage Data.

** 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.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: STATE OF COLORADO				Evaluation Period: October 1, 2000 to December 31, 2002								
MSA/ Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total **	% Families ***	% TCF Loans ****	% Families ***	% TCF Loans****	% Families ***	% TCF Loans****	% Families ***	% TCF Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
Denver PMSA	46	73.02	18.79	0.00	18.71	21.74	24.56	21.74	37.94	56.52	0.02	0.00	0.03	0.02	0.01
Limited Review:															
Colorado Springs MSA	17	26.98	18.03	23.53	19.64	0.00	23.31	17.65	39.02	58.82	0.03	0.10	0.00	0.02	0.04

* Based on 2002 Peer Mortgage Data.
 ** As a percentage of loans with borrower income information available. No information was available for 0.00% of loans originated and purchased by TCF.
 *** Percentage of Families is based on the 1990 Census information.
 **** 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 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: STATE OF COLORADO				Evaluation Period: January 1, 2001 to December 31, 2003			
MSA/ Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Denver PMSA	0	0	24	587	24	587	59.11	0	0
Limited Review:									
Colorado Springs MSA	0	0	6	406	6	406	40.89	0	0

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

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

Table 1. Lending Volume

LENDING VOLUME		Geography: STATE OF MICHIGAN						Evaluation Period: October 1, 2000 to December 31, 2002				
MSA/ Assessment Area:	% of Rated Area Loans (#) in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MSA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Ann Arbor PMSA	37.19	2,964	393,828	111	36,998	0	0	0	0	3,075	430,826	54.91
Limited Review:												
Calhoun-Kalamazoo MSA	15.41	1,266	110,597	8	734	0	0	0	0	1,274	111,331	6.89
Detroit PMSA	31.65	2,217	265,909	398	124,699	0	0	2	266	2,617	390,874	27.66
Saginaw-Bay City MSA	15.75	1,236	93,254	21	6,417	0	0	45	217	1,302	99,888	10.54

* Loan Data as of December 31, 2002. Rated area refers to either the state or multistate CMSA rating area.
 ** The evaluation period for Community Development Loans is January 1, 2001 to December 31, 2002.
 *** Deposit Data as of June 30, 2003. Rated Area refers to either the state, multistate CMSA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: STATE OF MICHIGAN				Evaluation Period: October 1, 2000 to December 31, 2002					Market Share (%) by Geography*				
MSA/ Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% TCF Loans	% Owner Occ Units***	% TCF Loans	% Owner Occ Units***	% TCF Loans	% Owner Occ Units***	% TCF Loans						
Full Review:																
Ann Arbor PMSA	272	29.28	0.98	4.04	11.10	11.40	57.21	58.09	30.71	26.47	0.77	2.25	0.56	0.78	0.73	
Limited Review:																
Calhoun-Kalamazoo MSA	281	30.25	2.64	1.07	21.04	14.59	45.47	40.57	30.84	43.42	4.67	0.00	3.35	4.91	5.11	
Detroit PMSA	237	25.51	3.33	6.75	13.51	19.41	49.51	45.57	33.65	28.27	0.10	0.05	0.14	0.11	0.08	
Saginaw-Bay City MSA	139	14.96	4.85	2.88	15.95	17.99	63.68	59.71	15.52	19.42	1.06	0.79	0.68	1.09	1.30	

* Based on 2002 Peer Mortgage Data.

** 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.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: STATE OF MICHIGAN						Evaluation Period: October 1, 2000 to December 31, 2002						
MSA/ Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total **	% Owner Occ Units***	% TCF Loans	% Owner Occ Units***	% TCF Loans	% Owner Occ Units***	% TCF Loans	% Owner Occ Units***	% TCF Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Ann Arbor PMSA	84	31.82	0.98	2.38	11.10	14.29	57.21	51.19	30.71	32.14	2.09	0.00	4.26	2.03	1.40
Limited Review:															
Calhoun-Kalamazoo MSA	24	9.09	2.64	4.17	21.04	41.67	45.47	16.67	30.84	37.50	2.49	12.50	5.26	0.00	3.00
Detroit PMSA	109	41.29	3.33	5.50	13.51	22.94	49.51	50.46	33.65	21.10	0.32	0.73	0.42	0.34	0.21
Saginaw-Bay City MSA	47	17.80	4.85	6.38	15.95	19.15	63.68	57.45	15.52	17.02	1.10	3.03	0.56	0.89	2.41

* Based on 2002 Peer Mortgage Data.

** 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.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: STATE OF MICHIGAN				Evaluation Period: October 1, 2000 to December 31, 2002								
MSA/ Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% TCF Loans	% Owner Occ Units***	% TCF Loans	% Owner Occ Units***	% TCF Loans	% Owner Occ Units***	% TCF Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Ann Arbor PMSA	2,567	39.86	0.98	1.13	11.10	7.95	57.21	57.30	30.71	33.50	2.81	2.48	2.69	2.87	2.75
Limited Review:															
Calhoun-Kalamazoo MSA	961	14.92	2.64	0.10	21.04	15.09	45.47	39.65	30.84	45.16	6.82	1.14	5.82	6.54	7.68
Detroit PMSA	1,862	28.91	3.33	1.77	13.51	13.64	49.51	52.95	33.65	31.58	0.29	0.22	0.32	0.36	0.23
Saginaw-Bay City MSA	1,050	16.30	4.85	2.00	15.95	12.38	63.68	66.57	15.52	19.05	3.23	3.64	3.22	3.25	3.15

* Based on 2002 Peer Mortgage Data.
 ** 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.
 *** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: STATE OF MICHIGAN						Evaluation Period: October 1, 2000 to December 31, 2002						
MSA/ Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% TCF Loans	% MF Units***	% TCF Loans	% MF Units***	% TCF Loans	% MF Units***	% TCF Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Ann Arbor PMSA	41	82.00	15.89	36.59	34.01	21.95	29.27	21.95	20.83	19.51	41.67	52.63	25.00	36.36	40.00
Limited Review:															
Calhoun-Kalamazoo MSA	0	0.00	6.55	0.00	33.64	0.00	25.62	0.00	33.64	0.00	0.00	0.00	0.00	0.00	0.00
Detroit PMSA	9	18.00	4.22	0.00	14.74	33.33	54.20	55.56	26.84	0.00	3.91	0.00	7.69	4.11	0.00
Saginaw-Bay City MSA	0	0.00	15.19	0.00	14.64	0.00	39.42	0.00	30.75	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2002 Peer Mortgage Data.

** Multifamily loans originated and purchased in the MSA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: STATE OF MICHIGAN					Evaluation Period: October 1, 2000 to December 31, 2002				
MSA/ Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total **	% of Businesses ***	% TCF Loans	% of Businesses ***	% TCF Loans	% of Businesses ***	% TCF Loans	% of Businesses ***	% TCF Loans	Overall	Low	Mod	Mid	Upp						
Full Review:																					
Ann Arbor PMSA	111	20.63	7.42	9.91	12.11	5.41	50.22	43.24	30.23	41.44	0.46	1.06	0.18	0.44	0.58						
Limited Review:																					
Calhoun-Kalamazoo MSA	8	1.49	5.39	0.00	18.32	37.50	42.58	50.00	31.05	12.50	0.08	0.00	0.28	0.09	0.03						
Detroit PMSA	398	73.98	2.65	1.01	10.84	10.35	46.42	36.36	39.92	52.27	0.23	0.10	0.22	0.21	0.30						
Saginaw-Bay City MSA	21	3.90	9.79	38.10	14.29	9.52	58.48	52.38	17.44	0.00	0.17	0.85	0.12	0.15	0.00						

* Based on 2002 Peer Small Business Data.

** 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.

*** Source Data - Dun and Bradstreet (2003).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: STATE OF MICHIGAN						Evaluation Period: October 1, 2000 to December 31, 2002						
MSA/ Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total **	% Families ***	% TCF Loans ****	% Families ***	% TCF Loans ****	% Families ***	% TCF Loans ****	% Families ***	% TCF Loans ****	Over all	Low	Mod	Mid	Upp
Full Review:															
Ann Arbor PMSA	272	29.28	16.55	11.83	16.79	24.43	25.08	34.35	41.58	29.39	0.84	0.88	0.94	0.82	0.78
Limited Review:															
Calhoun-Kalamazoo MSA	281	30.25	22.11	13.72	18.08	28.88	22.57	29.60	37.25	27.80	5.81	6.71	5.56	6.11	5.41
Detroit PMSA	237	25.51	18.28	30.00	16.68	29.09	22.94	21.36	42.10	19.55	0.10	0.25	0.08	0.09	0.08
Saginaw-Bay City MSA	139	14.96	24.08	20.29	16.35	26.09	22.36	23.19	37.21	30.43	1.25	0.87	1.06	1.23	1.72

* Based on 2002 Peer Mortgage Data.
 ** As a percentage of loans with borrower income information available. No information was available for 3.44% of loans originated and purchased by TCF.
 *** Percentage of Families is based on the 1990 Census information.
 **** 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 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: STATE OF MICHIGAN		Evaluation Period: October 1, 2000 to December 31, 2002		
MSA/ Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses ***	% TCF Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Ann Arbor PMSA	111	20.63	76.74	36.94	28.83	27.03	44.14	0.46	0.56
Limited Review:									
Calhoun-Kalamazoo MSA	8	1.49	79.91	50.00	75.00	25.00	0.00	0.08	0.14
Detroit PMSA	398	73.98	73.62	33.17	29.90	27.39	42.71	0.23	0.34
Saginaw-Bay City MSA	21	3.90	80.53	19.05	28.57	33.33	38.10	0.17	0.16

* Based on 2002 Peer Small Business Data.

** 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.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2003).

**** 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 31.60% of small loans to businesses originated and purchased by TCF.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: STATE OF MICHIGAN				Evaluation Period: January 1, 2001 to December 31, 2003			
MSA/ Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Ann Arbor PMSA	3	73	183	5,828	186	5,901	58.54	0	0
Limited Review:									
Calhoun-Kalamazoo MSA	1	7	47	814	48	821	8.14	0	0
Detroit PMSA	5	310	139	2,276	144	2,586	25.65	0	0
Saginaw-Bay City MSA	3	18	46	755	49	773	7.67	0	0
Out of Assessment Area	0	0	3	7	3	7	-	0	0

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

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

Table 1. Lending Volume

LENDING VOLUME		Geography: STATE OF MINNESOTA						Evaluation Period: October 1, 2000 to December 31, 2002				
MSA/ Assessment Area:	% of Rated Area Loans (#) in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MSA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Minneapolis-St. Paul MSA	95.41	33,538	5,020,745	475	82,627	0	0	34	28,290	34,047	5,131,662	96.04
Limited Review:												
Duluth MSA	0.20	72	6,787	0	0	0	0	0	0	72	6,787	0.21
Mankato-New Ulm AA	0.79	277	23,550	6	2,990	0	0	0	0	283	26,540	1.92
St. Cloud MSA	3.60	1,279	141,275	4	694	0	0	0	0	1,283	141,969	1.83

* Loan Data as of December 31, 2002. Rated area refers to either the state or multistate CMSA rating area.
 ** The evaluation period for Community Development Loans is January 1, 2001 to December 31, 2002.
 *** Deposit Data as of June 30, 2003. Rated Area refers to either the state, multistate CMSA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: STATE OF MINNESOTA				Evaluation Period: October 1, 2000 to December 31, 2002					Market Share (%) by Geography*				
MSA/ Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% TCF Loans	% Owner Occ Units***	% TCF Loans	% Owner Occ Units***	% TCF Loans	% Owner Occ Units***	% TCF Loans	Over all	Low	Mod	Mid	Upp	
Full Review:																
Minneapolis-St. Paul MSA	10,785	94.59	1.80	1.08	10.35	7.60	63.21	67.98	24.64	23.33	4.64	2.14	3.75	5.10	4.06	
Limited Review:																
Duluth MSA	26	0.23	2.91	7.69	14.84	15.38	44.99	23.08	37.25	53.85	0.47	2.74	0.30	0.34	0.48	
Mankato-New Ulm AA	51	0.45	0.00	0.00	2.86	11.76	58.70	39.22	38.45	49.02	1.03	0.00	1.47	0.66	1.38	
St. Cloud MSA	540	4.74	0.03	0.37	3.07	0.19	83.57	78.52	13.33	20.93	6.71	0.00	0.00	6.65	7.33	

* Based on 2002 Peer Mortgage Data.

** 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.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: STATE OF MINNESOTA								Evaluation Period: October 1, 2000 to December 31, 2002					
MSA/ Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total **	% Owner Occ Units***	% TCF Loans	% Owner Occ Units***	% TCF Loans	% Owner Occ Units***	% TCF Loans	% Owner Occ Units***	% TCF Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Minneapolis-St. Paul MSA	1,571	95.21	1.80	5.41	10.35	18.14	63.21	61.49	24.64	14.89	7.72	19.49	14.42	7.00	5.46
Limited Review:															
Duluth MSA	3	0.18	2.91	0.00	14.84	0.00	44.99	66.67	37.25	33.33	0.35	0.00	0.00	0.73	0.00
Mankato-New Ulm AA	54	3.27	0.00	0.00	2.86	3.70	58.70	48.15	38.45	48.15	14.01	0.00	7.69	14.58	14.29
St. Cloud MSA	22	1.33	0.03	0.00	3.07	0.00	83.57	90.91	13.33	9.09	2.53	0.00	0.00	3.05	0.00

* Based on 2002 Peer Mortgage Data.

** 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.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: STATE OF MINNESOTA						Evaluation Period: October 1, 2000 to December 31, 2002						
MSA/ Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% TCF Loans	% MF Units***	% TCF Loans	% MF Units***	% TCF Loans	% MF Units***	% TCF Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Minneapolis-St. Paul MSA	104	99.05	13.72	20.19	14.60	21.15	56.99	46.15	14.69	12.50	7.14	5.00	10.07	6.67	6.00
Limited Review:															
Duluth MSA	0	0.00	37.34	0.00	24.90	0.00	23.52	0.00	14.24	0.00	0.00	0.00	0.00	0.00	0.00
Mankato-New Ulm AA	0	0.00	0.00	0.00	21.44	0.00	56.79	0.00	21.76	0.00	0.00	0.00	0.00	0.00	0.00
St. Cloud MSA	1	0.95	2.37	0.00	0.70	0.00	85.84	100.00	11.09	0.00	2.27	0.00	0.00	2.50	0.00

* Based on 2002 Peer Mortgage Data.

** Multifamily loans originated and purchased in the MSA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: STATE OF MINNESOTA				Evaluation Period: October 1, 2000 to December 31, 2002				
MSA/ Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*									
	#	% of Total **	% of Businesses ***	% TCF Loans	% of Businesses ***	% TCF Loans	% of Businesses ***	% TCF Loans	% of Businesses ***	% TCF Loans	Overall	Low	Mod	Mid	Upp					
Full Review:																				
Minneapolis-St. Paul MSA	475	97.94	4.70	6.53	8.91	10.32	60.29	58.74	26.03	24.42	0.33	0.52	0.38	0.31	0.36					
Limited Review:																				
Duluth MSA	0	0.00	32.68	0.00	11.64	0.00	33.82	0.00	21.86	0.00	0.00	0.00	0.00	0.00	0.00					
Mankato-New Ulm AA	6	1.24	0.00	0.00	10.52	0.00	58.69	100.00	30.79	0.00	0.06	0.00	0.00	0.13	0.00					
St. Cloud MSA	4	0.82	4.46	0.00	2.45	0.00	79.35	75.00	13.74	25.00	0.07	0.00	0.00	0.06	0.14					

* Based on 2002 Peer Small Business Data.

** 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.

*** Source Data - Dun and Bradstreet (2003).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: STATE OF MINNESOTA						Evaluation Period: October 1, 2000 to December 31, 2002								
MSA/ Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*						
	#	% of Total **	% Families ***	% TCF Loans ****	% Families ***	% TCF Loans ****	% Families ***	% TCF Loans ****	% Families ***	% TCF Loans ****	% Families ***	% TCF Loans ****	Over all	Low	Mod	Mid	Upp
Full Review:																	
Minneapolis-St. Paul MSA	10,785	94.59	16.50	14.13	18.34	32.21	27.74	31.72	37.43	21.94	5.24	6.02	5.55	5.35	4.29		
Limited Review:																	
Duluth MSA	26	0.23	18.32	11.54	17.49	19.23	22.34	34.62	41.84	34.62	0.57	1.72	0.23	0.62	0.47		
Mankato-New Ulm AA	51	0.45	13.78	7.84	15.28	21.57	23.91	41.18	47.03	29.41	1.13	0.74	0.81	1.63	0.96		
St. Cloud MSA	540	4.74	17.06	10.34	18.59	32.52	26.92	33.83	37.43	23.31	7.42	6.50	8.73	7.55	6.21		

* Based on 2002 Peer Mortgage Data.
 ** As a percentage of loans with borrower income information available. No information was available for 1.09% of loans originated and purchased by TCF.
 *** Percentage of Families is based on the 1990 Census information.
 **** 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 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: STATE OF MINNESOTA						Evaluation Period: October 1, 2000 to December 31, 2002								
MSA/ Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*						
	#	% of Total**	% Families***	% TCF Loans****	% Families***	% TCF Loans****	% Families***	% TCF Loans****	% Families***	% TCF Loans****	% Families***	% TCF Loans****	Overall	Low	Mod	Mid	Upp
Full Review:																	
Minneapolis-St. Paul MSA	1,571	95.21	16.50	37.52	18.34	34.46	27.74	18.89	37.43	9.13	7.97	20.43	9.16	4.29	2.63		
Limited Review:																	
Duluth MSA	3	0.18	18.32	0.00	17.49	0.00	22.34	100.00	41.84	0.00	0.36	0.00	0.00	1.08	0.00		
Mankato-New Ulm AA	54	3.27	13.78	16.67	15.28	38.89	23.91	29.63	47.03	14.81	14.43	40.0	41.18	9.52	3.37		
St. Cloud MSA	22	1.33	17.06	31.82	18.59	22.73	26.92	27.27	37.43	18.18	2.58	9.38	2.65	1.96	0.61		

* Based on 2002 Peer Mortgage Data.

** As a percentage of loans with borrower income information available. No information was available for 0.24% of loans originated and purchased by TCF.

*** Percentage of Families is based on the 1990 Census information.

**** 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 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: STATE OF MINNESOTA		Evaluation Period: October 1, 2000 to December 31, 2002		
MSA/ Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million Or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses ***	% TCF Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Minneapolis-St. Paul MSA	475	97.94	56.28	75.37	69.68	7.79	22.53	0.33	0.99
Limited Review:									
Duluth MSA	0	0.00	69.26	0.00	0.00	0.00	0.00	0.00	0.00
Mankato-New Ulm AA	6	1.24	72.96	16.67	16.67	16.67	66.67	0.06	0.00
St. Cloud MSA	4	0.82	66.93	100.00	75.00	0.00	25.00	0.07	0.20

* Based on 2002 Peer Small Business Data.

** 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.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2003).

**** 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 1.86% of small loans to businesses originated and purchased by TCF.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: STATE OF MINNESOTA				Evaluation Period: January 1, 2001 to December 31, 2003			
MSA/ Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Minneapolis-St. Paul MSA	7	2,324	242	20,179	249	22,503	95.54	0	0
Limited Review:									
Duluth MSA	2	71	0	0	2	71	.30	0	0
Mankato-New Ulm AA	3	645	0	0	3	645	2.74	0	0
St. Cloud MSA	4	49	3	285	7	334	1.42	0	0
Out of Assessment Area	0	0	1	100	1	100	-	0	0

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

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

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF WISCONSIN												
Evaluation Period: October 1, 2000 to December 31, 2002												
MSA/ Assessment Area:	% of Rated Area Loans (#) in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MSA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Milwaukee-Waukesha PMSA	82.38	2,146	154,385	237	69,233	0	0	24	45	2,407	223,663	81.93
Limited Review:												
Racine PMSA	17.62	509	37,983	6	534	0	0	0	0	515	38,517	18.07

* Loan Data as of December 31, 2002. Rated area refers to either the state or multistate CMSA rating area.
 ** The evaluation period for Community Development Loans is January 1, 2001 to December 31, 2002.
 *** Deposit Data as of June 30, 2003. Rated Area refers to either the state, multistate CMSA, or institution, as appropriate.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: STATE OF WISCONSIN						Evaluation Period: October 1, 2000 to December 31, 2002						
MSA/ Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total **	% Owner Occ Units***	% TCF Loans	% Owner Occ Units***	% TCF Loans	% Owner Occ Units***	% TCF Loans	% Owner Occ Units***	% TCF Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Milwaukee-Waukesha PMSA	802	90.11	4.71	4.49	10.23	13.84	51.28	51.25	33.77	30.42	6.15	7.17	9.33	6.19	5.01
Limited Review:															
Racine PMSA	88	9.89	4.09	9.09	4.26	5.68	81.76	71.59	9.89	13.64	5.34	3.57	11.11	4.31	13.95

* Based on 2002 Peer Mortgage Data.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE												Geography: STATE OF WISCONSIN					Evaluation Period: October 1, 2000 to December 31, 2002			
MSA/ Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*									
	#	% of Total**	% Owner Occ Units***	% TCF Loans	% Owner Occ Units***	% TCF Loans	% Owner Occ Units***	% TCF Loans	% Owner Occ Units***	% TCF Loans	Over all	Low	Mod	Mid	Upp					
Full Review:																				
Milwaukee-Waukesha PMSA	1,133	75.89	4.71	4.68	10.23	15.45	51.28	53.31	33.77	26.57	0.63	1.37	1.55	0.70	0.41					
Limited Review:																				
Racine PMSA	360	24.11	4.09	3.89	4.26	6.39	81.76	78.61	9.89	11.11	1.61	2.14	3.91	1.49	1.80					

* Based on 2002 Peer Mortgage Data.

** 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.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: STATE OF WISCONSIN						Evaluation Period: October 1, 2000 to December 31, 2002						
MSA/ Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% TCF Loans	% MF Units***	% TCF Loans	% MF Units***	% TCF Loans	% MF Units***	% TCF Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Milwaukee-Waukesha PMSA	57	91.94	13.81	5.26	16.02	15.79	50.60	49.12	19.57	29.82	1.44	0.00	0.84	1.20	4.04
Limited Review:															
Racine PMSA	5	8.06	7.16	0.00	6.80	0.00	69.20	100.00	16.16	0.00	2.94	0.00	0.00	4.08	0.00

* Based on 2002 Peer Mortgage Data.

** Multifamily loans originated and purchased in the MSA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: STATE OF WISCONSIN				Evaluation Period: October 1, 2000 to December 31, 2002			
MSA/ Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*								
	#	% of Total **	% of Businesses ***	% TCF Loans	% of Businesses ***	% TCF Loans	% of Businesses ***	% TCF Loans	% of Businesses ***	% TCF Loans	Overall	Low	Mod	Mid	Upp				
Full Review:																			
Milwaukee-Waukesha PMSA	237	97.53	6.89	11.39	8.51	12.24	48.01	53.59	36.29	22.78	0.29	0.56	0.62	0.30	0.20				
Limited Review:																			
Racine PMSA	6	2.47	10.80	0.00	4.74	0.00	77.29	100.00	7.04	0.00	0.05	0.00	0.00	0.06	0.00				

* Based on 2002 Peer Small Business Data.

** 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.

*** Source Data - Dun and Bradstreet (2003).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: STATE OF WISCONSIN						Evaluation Period: October 1, 2000 to December 31, 2002						
MSA/ Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total **	% Families ***	% TCF Loans ****	% Families ***	% TCF Loans ****	% Families ***	% TCF Loans ****	% Families ***	% TCF Loans ****	Over all	Low	Mod	Mid	Upp
Full Review:															
Milwaukee-Waukesha PMSA	154	73.33	19.55	14.58	17.66	25.69	25.59	29.86	37.21	29.86	0.24	0.34	0.13	0.29	0.26
Limited Review:															
Racine PMSA	56	26.67	18.61	17.86	17.50	26.79	27.26	28.57	36.63	26.79	0.67	1.05	0.89	0.47	0.46

* Based on 2002 Peer Mortgage Data.
 ** As a percentage of loans with borrower income information available. No information was available for 4.76% of loans originated and purchased by TCF.
 *** Percentage of Families is based on the 1990 Census information.
 **** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: STATE OF WISCONSIN						Evaluation Period: October 1, 2000 to December 31, 2002						
MSA/ Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% TCF Loans****	% Families***	% TCF Loans****	% Families***	% TCF Loans****	% Families***	% TCF Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
Milwaukee-Waukesha PMSA	802	90.11	19.55	13.59	17.66	25.56	25.59	34.66	37.21	26.18	6.41	8.10	7.22	7.38	4.02
Limited Review:															
Racine PMSA	88	9.89	18.61	12.50	17.50	21.59	27.26	45.45	36.63	20.45	5.45	5.13	5.84	7.25	2.40

* Based on 2002 Peer Mortgage Data.
 ** As a percentage of loans with borrower income information available. No information was available for 0.00% of loans originated and purchased by TCF.
 *** Percentage of Families is based on the 1990 Census information.
 **** 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 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: STATE OF WISCONSIN		Evaluation Period: October 1, 2000 to December 31, 2002		
MSA/ Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses ***	% TCF Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Milwaukee-Waukesha PMSA	237	97.53	77.53	22.78	34.60	24.05	41.35	0.29	0.23
Limited Review:									
Racine PMSA	6	2.47	79.01	83.33	66.67	33.33	0.00	0.05	0.15

* Based on 2002 Peer Small Business Data.

** 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.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2003).

**** 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 0.82% of small loans to businesses originated and purchased by TCF.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: STATE OF WISCONSIN				Evaluation Period: January 1, 2001 to December 31, 2003			
MSA/ Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Milwaukee-Waukesha PMSA	3	178	52	2,138	55	2,316	79.37	0	0
Limited Review:									
Racine PMSA	3	69	11	533	14	602	20.63	0	0
Out of Assessment Area	0	0	1	10	1	10	-	0	0

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

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

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: STATE OF WISCONSIN				Evaluation Period: January 1, 2001 to December 31, 2003									
MSA/ Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of TCF Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Milwaukee- Waukesha PMSA	81.93	24	82.76	8.3	20.8	45.8	25.0	3	2	1	-1	1	0	11.87	16.37	42.70	28.87
Limited Review:																	
Racine PMSA	18.07	5	17.24	0.0	20.0	80.0	0.0	1	0	0	0	1	0	7.23	9.47	69.17	14.13