



**LARGE BANK**

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

**Public Disclosure**

**July 1, 2006**

**Community Reinvestment Act**  
**Performance Evaluation**

**Harris NA**  
**Charter Number: 14583**

**111 West Monroe Street**  
**Chicago, Illinois 60603**

**Office of the Comptroller of the Currency**  
**Large Bank Supervision**  
**250 E Street, SW**  
**Washington D.C. 20219**

**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 Harris NA with respect to the Lending, Investment, and Service Tests:

Performance Levels	Harris NA Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	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:

- Adequate geographic distribution of home loans and loans to small businesses.
- Excellent distribution of home loans to borrowers of different income levels and good distribution of loans to small businesses based on revenue size.
- Positive impact of community development loans.
- Investment activity represents a good level of responsiveness to credit and community development needs.
- Adequate distribution of branches.
- Excellent provision of Community Development services, which had a positive impact on the service test rating.

## 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.

**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:** 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 householder 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 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). Beginning in 2004, the reports also include additional data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

**Home Mortgage Loans:** Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

**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 Area (MA):** Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget and any other area designated as such by the appropriate federal financial supervisory agency.

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an

employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county as measured through commuting.

**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 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 area, the institution will receive a rating for the multi-state metropolitan 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.

**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 One 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

Harris N.A. (HNA) is a \$37.6 billion (June 30, 2006) bank headquartered in Chicago, Illinois with tier one capital of \$3.1 billion. HNA's loan portfolio of \$25 billion (66 percent of total assets) is comprised of real estate loans (\$13.1 billion or 52 percent), commercial loans (\$5 billion or 20 percent), loans to individuals (\$4.6 billion or 18 percent), and other loans (\$2.3 billion or 9 percent).

HNA was formed in May 2005 through the consolidation of 27 separately chartered Harris banks. In that consolidation all Chicago area Harris banks were merged into Harris Bank Glencoe-Northbrook N.A. which was simultaneously renamed Harris N.A. and its headquarters relocated to downtown Chicago, Illinois. The last CRA examination of Harris Bank Glencoe-Northbrook N.A. occurred on May 20, 2002 at which time the bank was assigned a rating of Satisfactory by the Office of the Comptroller of the Currency.

HNA is wholly-owned by Harris Bankcorp, Inc. (HBI) which in turn is wholly-owned by Harris Financial Corporation (HFC). HFC is wholly-owned by BMO Financial Group (BMO) based in Toronto, Canada. BMO had total assets of \$311.6 billion Canadian on July 31, 2006.

HNA offers a full-range of real estate, commercial, consumer credit products and services, as well as trust services, and deposit products and services. Its activities, together with those products and services offered through its affiliates, provide a wide-range of lending, investing and financial management solutions to personal, business, corporate and institutional clients.

HBI has actively acquired other financial institutions since the prior CRA examination. In 2004, HBI acquired the Lakeland Community Bank in Round Lake, Illinois, the New Lenox State Bank in Plainfield, Illinois and the Mercantile National Bank of Indiana in Hammond, Indiana (Mercantile). In 2005, HBI acquired Villa Park Trust and Savings Bank in Villa Park, Illinois. All of these acquisitions were merged into HNA during the evaluation period except for Mercantile (merged into HNA on August 25, 2006).

HNA's subsidiary activities have no negative impact on the bank's ability to meet the credit needs in the community. In addition, there are no legal or financial factors impeding the bank's ability to help meet the credit needs within its communities.

Two affiliates of HNA, Mercantile National Bank of Indiana, Hammond, Indiana, and New Lenox State Bank, New Lenox, Illinois had their CRA activities considered in this evaluation, to the extent that they occurred within HNA's assessment area or a broader geographic area. However, these activities were only considered from the time of HBI's acquisition of them in 2004.

For purposes of this evaluation, HNA is an intrastate bank with two assessment areas (AAs) in Illinois. The Chicago AA includes all of Cook, DuPage, Kane and Kendall counties, and portions of Grundy, McHenry and Will counties. The Lake county AA includes all of Lake County Illinois.

HNA has 182 office locations and 327 ATMs within its AAs.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We reviewed HNA's origination and purchase of home mortgage loans and small loans to businesses for the time period of January 1, 2002 through December 31, 2005. Community development loans were reviewed from May 20, 2002 through July 1, 2006.

Appendix C includes tables (7 and 12) relating to farm loans. However, because the volume of farm lending was so low, meaningful conclusions could not be drawn. So, no analysis of this data was completed.

Our review of investments included an analysis of the investment portfolio and the donations and grants made between May 20, 2002 and July 1, 2006. We considered investments and donations or grants to organizations that have community development as their primary purpose.

Our evaluation of bank services included analyzing the bank's branch and ATM network for the availability and effectiveness of delivering retail banking services. We also considered the extent and innovativeness of the bank's community development services in meeting the credit needs within its assessment area. We reviewed bank services, including branch openings and closings, and community development services occurring between May 20, 2002 and July 1, 2006.

Recent changes made by the U.S. Census Bureau and Office of Management and Budget (OMB) had an affect on this CRA examination. The 2000 U.S. census resulted in a change to the boundaries and income levels of many existing geographies, deleted some geographies, and created some new geographies. These changes were effective January 1, 2003. Additionally, OMB revisions changed the boundaries of many existing MSAs and created some new types of statistical areas effective January 1, 2004. The evaluation period included loans made in 2002, 2003, 2004 and 2005; therefore three separate analyses were completed. The tables in the Appendix to this evaluation will reflect the bank's performance during the January 1, 2002 through December 31, 2002 period using 1990 Census Data and previous OMB MSA definitions, the January 1, 2003 through December 31, 2003 period using 2000 Census Data and previous OMB MSA definitions, and the January 1, 2004 through December 31, 2005 period using 2000 Census Data and revised OMB MSA definitions. The results of these analyses were combined to obtain an overall rating.

### Data Integrity

We verified the accuracy of the publicly filed home mortgage loans and small loans to businesses. HNA had no significant errors in its data that would preclude an accurate evaluation of its CRA performance.

We also verified information on community development loans, qualified investments, and community development services to ensure that these activities met the regulatory definitions. HNA accurately identified its activities submitted to us for consideration. We determined which community development loans, investments and services met the definition of community

development and included those under the Lending, Investment, or Services Test, respectively.

### **Selection of Areas for Full-Scope Review**

The Chicago and Lake County AAs account for 95.4 percent and 4.6 percent of HNA's deposits, respectively. Given the overwhelming dominance of the Chicago AA we performed full-scope examination procedures on that area. The Lake County AA area received a limited-scope review.

### **Ratings**

The bank's overall rating is based primarily on HNA's activities occurring in the Chicago AA.

### **Other**

We conducted sixteen community contacts within the AAs. The primary credit needs identified are for affordable housing, affordable small business loans (including start-up funding) and financial education. One contact commented on the need for all area banks to establish bank branches in the south and southwestern portions of Cook County.

## **Fair Lending or Other Illegal Credit Practices Review**

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

## **Conclusions with Respect to Performance Tests**

### **LENDING TEST**

#### **Conclusions for Areas Receiving Full-Scope Reviews**

HNA's performance under the Lending Test is rated high satisfactory. Based on the full-scope review, the bank's performance in the Chicago AA is good. HNA's performance in the 2004-2005 evaluation period was weighted more heavily than performance in 2002 and 2003 since it is more reflective of current practices.

#### **Lending Activity**

HNA's lending activity reflects good responsiveness to the credit needs of its AA. The lending activity in the Chicago AA is good. Refer to Table 1 Lending Volume in Appendix C for the facts and data used to evaluate the bank's lending activity.

To provide perspective regarding the relative levels of lending volume in each AA, we also compared the bank's deposit market rank and market share to its lending market rank and market share for each loan product. Because of the large number of lenders compared to banks in each AA (refer to Market Profiles in Appendix B), we based our analysis on the bank's percentile rankings in the deposit and loan markets rather than the actual values of market rank and market share.

HNA's market share percentile ranking for home purchase loans, home improvement loans, home refinance loans, and small loans to businesses substantially meets its percentile ranking for deposit market share. FDIC deposit market share data as of June 30, 2006 show that the bank ranks at the 99<sup>th</sup> percentile for deposit market share in the Chicago AA. HNA ranks at the 96<sup>th</sup> percentile for home purchase and home improvement loans, and the 97<sup>th</sup> percentile for home refinance loans, based on 2005 aggregate HMDA data for the Chicago AA. Mortgage companies and large interstate commercial and thrift financial institutions were significant lenders in the bank's AA, with the top ten companies capturing approximately 36 percent of the home purchase loan and home refinance loans markets, and over 42 percent of the home improvement loan market. According to 2005 aggregate small business loan data, the bank ranks at the 97<sup>th</sup> percentile for small loans to businesses in the Chicago AA. The top three lenders making small loans to businesses were non-bank credit card and financial service lenders that captured over 51 percent of the market.

## **Distribution of Loans by Income Level of the Geography**

HNA's distribution of loans is adequate among geographies of different income levels. The geographic distribution of loans in the Chicago AA is adequate.

### ***Home Mortgage Loans***

HNA's geographic distribution of home mortgage loans in the Chicago AA is adequate. Refer to Tables 2, 3, 4, and 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

HNA's geographic distribution is adequate for home purchase loans and home refinance loans, and good for home improvement loans and multi-family loans. More weight was given to the bank's performance in the more recent 2004-2005 evaluation period.

### **Home Purchase**

The geographic distribution of home purchase loans in the 2004-2005 evaluation period is adequate. The percentage of home purchase loans made in low- and moderate-income geographies is somewhat below the percentage of owner occupied units. The market share for home purchase loans made to low-income geographies is below the overall market share for home purchase loans. The market share for home purchase loans made in moderate-income geographies is somewhat below the overall market share for home purchase loans.

The geographic distribution of home purchase loans in the 2003 evaluation period is poor. The percentage of home purchase loans made in low- and moderate-income geographies is below the percentage of owner occupied units. The market share for home purchase loans made to

low- and moderate income geographies is also below the overall market share for home purchase loans.

The geographic distribution of home purchase loans in the 2002 evaluation period is adequate. The percentage of home purchase loans made in low- income geographies is near, and in moderate-income geographies is somewhat below, the percentage of owner occupied units. The market share for home purchase loans made to low- and moderate-income geographies is somewhat below the overall market share for home purchase loans.

### Home Improvement

The geographic distribution of home improvement loans in the 2004-2005 evaluation period is good. The percentage of home improvement loans made in low-income geographies is somewhat below the percentage of owner occupied units. The percentage of home improvement loans in moderate-income geographies substantially meets the percentage of owner occupied units. The market share for home improvement loans made in low-income geographies is below the overall market share for home improvement loans. The market share for home improvement loans made in moderate-income geographies is near the overall market share for home improvement loans.

The geographic distribution of home improvement loans in the 2003 evaluation period is excellent. The percentage of home improvement loans made in low-income geographies exceeds the percentage of owner occupied units. The percentage of home improvement loans in moderate-income geographies is near the percentage of owner occupied units. The market share for home improvement loans made in low- and moderate-income geographies is somewhat below the overall market share for home improvement loans.

The geographic distribution of home improvement loans in the 2002 evaluation period is good. The percentage of home improvement loans made in low-income geographies substantially meets the percentage of owner occupied units. The percentage of home improvement loans in moderate-income geographies is somewhat below the percentage of owner occupied units. The market share for home improvement loans made in low- and moderate-income geographies is somewhat below the overall market share for home improvement loans.

### Home Refinance

The geographic distribution of home refinance loans in the 2004-2005 evaluation period is adequate. The percentage of home refinance loans made in low-income geographies is below, and in moderate-income geographies is somewhat below, the percentage of owner occupied units. The market share for home refinance loans made in low- and moderate-income geographies is below the overall market share for home refinance loans.

The geographic distribution of home refinance loans in the 2003 and 2002 evaluation periods is poor. The percentage of home refinance loans made in low- and moderate-income geographies is below the percentage of owner occupied units. The market share for home refinance loans made in low-income geographies is below, and moderate-income geographies somewhat below, the overall market share for home refinance loans.

### Multi-Family

The geographic distribution of multi-family loans in the 2004-2005 evaluation period is excellent. The percentage of multi-family loans made in low- and moderate-income geographies exceeds the percentage of owner occupied units. The market share for multi-family loans made in low-income geographies is near, and moderate-income geographies exceeds, the overall market share for multi-family loans.

The geographic distribution of multi-family loans in both the 2003 and 2002 evaluation periods is good. The percentage of multi-family loans made in low-income geographies is somewhat below, and in moderate-income geographies exceeds, the percentage of owner occupied units. The market share for multi-family loans made in low- and moderate-income geographies is somewhat below the overall market share for multi-family loans.

### ***Small Loans to Businesses***

The bank's geographic distribution of small loans to businesses in the Chicago AA is adequate. As previously noted, additional weight was given to the bank's performance in the more recent 2004-2005 evaluation period.

The geographic distribution of small loans to businesses in the 2004-2005 and 2003 evaluation periods is adequate. The percentage of small loans to businesses made in low-income geographies is below, and in moderate-income geographies is somewhat below, the percentage of businesses within those geographies. The market share for small loans to businesses made in low- and moderate-income geographies is somewhat below the overall market share for small loans to businesses.

The geographic distribution of small loans to businesses in the 2002 evaluation period is poor. The percentage of small loans to businesses made in low- and moderate income geographies is below the percentage of businesses within those geographies. The market share for small loans to businesses made in low- and moderate-income geographies is below the overall market share for small loans to businesses.

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

### **Lending Gap Analysis**

Reports detailing HNA's lending activity over the evaluation period for home mortgage loans and small loans to businesses were reviewed to identify gaps in the geographic distribution of those loans. No unexplained conspicuous gaps were identified in the Chicago AA.

### ***Inside/Outside Ratio***

Ninety percent of HNA's loans are within its AAs. By number of loans, 86 percent of home mortgage loans, 97 percent of small loans to businesses, and 100 percent of community development loans are within the bank's AAs.

### **Distribution of Loans by Income Level of the Borrower**

The bank's distribution of loans is excellent among borrowers of different income levels. The distribution of loans among individuals of different income levels in the Chicago AA is excellent.

### ***Home Mortgage Loans***

HNA's distribution of home mortgage loans among individuals of different income levels in the Chicago AA is excellent. Refer to Tables 8, 9 and 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

HNA's borrower distribution is excellent for home purchase loans, home improvement and home refinance loans, taking into consideration the significant barriers that exist in the Chicago AA. The high poverty rate and high housing prices in relation to income are significant barriers to making home mortgage loans to low- and moderate-income individuals in the AA (see Market Profile in Appendix B).

### **Home Purchase**

The borrower distribution of home purchase loans in the 2004-2005 and 2003 evaluation periods is excellent. The percentage of home purchase loans made to low-income individuals is below, and to moderate-income individuals significantly exceeds, the percentage of families defined as such. The market share for home purchase loans made to low-income borrowers significantly exceeds, and to moderate-income borrowers is somewhat below, the overall market share for home purchase loans. It should be noted that almost ten percent of the households in the AA lived below the poverty level.

The borrower distribution of home purchase loans in the 2002 evaluation period is excellent. The percentage of home purchase loans made to low-income individuals is somewhat below, and to moderate-income individuals significantly exceeds, the percentage of families defined as such. The market share for home purchase loans made to low-income borrowers exceeds the overall market share for home purchase loans. The market share for home purchase loans made to moderate-income borrowers is near the overall market share for home purchase loans. It should be noted that almost eleven percent of the households in the AA lived below the poverty level.

### **Home Improvement**

The borrower distribution of home improvement loans in the 2004-2005 evaluation period is excellent. The percentage of home improvement loans made to low-income individuals is below, and to moderate-income individuals significantly exceeds the percentage of families defined as such. The market share for home improvement loans made to low-income borrowers exceeds the overall market share for home improvement loans, and to moderate-income borrowers substantially meets, the overall market share for home improvement loans. It should be noted that almost ten percent of the households in the AA lived below the poverty level.

The borrower distribution of home improvement loans in the 2003 evaluation period is excellent. The percentage of home improvement loans made to low-income individuals is

somewhat below, and to moderate-income individuals significantly exceeds, the percentage of families defined as such. The market share for home improvement loans made to low- and moderate-income borrowers exceeds the overall market share for home improvement loans. It should be noted that almost ten percent of the households in the AA lived below the poverty level.

The borrower distribution of home improvement loans in the 2002 evaluation period is excellent. The percentage of home improvement loans made to low-income individuals is somewhat below, and to moderate-income individuals significantly exceeds, the percentage of families defined as such. The market share for home improvement loans made to low- and moderate-income borrowers substantially meets the overall market share for home improvement loans. It should be noted that almost eleven percent of the households in the AA lived below the poverty level.

### Home Refinance

The borrower distribution of home refinance loans in the 2004-2005 and 2003 evaluation periods is excellent. The percentage of home refinance loans made to low-income individuals is below, and to moderate-income individuals exceeds, the percentage of families defined as such. The market share for home refinance loans made to low-income borrowers exceeds, and moderate-income borrowers is near, the overall market share for home purchase loans. It should be noted that almost ten percent of the households in the AA lived below the poverty level.

The borrower distribution of home refinance loans in the 2002 evaluation period is excellent. The percentage of home refinance loans made to low-income individuals is below, and to moderate-income individuals exceeds, the percentage of families defined as such. The market share for home refinance loans made to low-income borrowers exceeds the overall market share for home refinance loans. The market share for home refinance loans made to moderate-income borrowers is near the overall market share for home refinance loans. It should be noted that almost eleven percent of the households in the AA lived below the poverty level.

### ***Small Loans to Businesses***

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

HNA's distribution of small loans to businesses of different revenue sizes in the Chicago AA is good. As previously noted, additional weight was given to the bank's performance in the more recent 2004-2005 evaluation period.

The distribution of small loans to businesses of different revenue sizes in the 2004-2005 evaluation period is excellent. The percentage of small loans made to small businesses exceeds the percentage of businesses defined as such. The market share for small loans made to businesses with revenue of \$1 million or less significantly exceeds its overall small business market share.

The distribution of small loans to businesses of different revenue sizes in the 2003 evaluation period is good. The percentage of small loans made to small businesses is near the percentage of businesses defined as such. The market share for small loans made to businesses with revenue of \$1 million or less significantly exceeds its overall small business market share.

The distribution of small loans to businesses of different revenue sizes in the 2002 evaluation period is adequate. The percentage of small loans made to small businesses is somewhat below the percentage of businesses defined as such. The market share for small loans made to businesses with revenue of \$1 million or less significantly exceeds its overall small business market share.

## **Community Development Lending**

The community development lending has a positive impact on the conclusions for the Chicago AA. Refer to Table 1 Lending Volume in Appendix C for the facts and data used to evaluate the bank's level of community development lending.

To provide perspective regarding the relative level of community development lending, we allocated a portion of the bank's Tier 1 capital to each AA based on its pro rata share of deposits.

HNA has an excellent level of community development loans in the Chicago AA, given the community development needs and opportunities that exist in the AA. During the evaluation period for community development loans, the bank made 520 community development loans totaling \$398 million. The bank's community development lending represents 13.4 percent of Tier 1 capital allocated to the Chicago AA. HNA's community development lending addresses the needs for affordable housing. The following examples highlight HNA's community development lending in the Chicago AA:

- HNA made a \$9 million loan to refinance a commercial mortgage on a mixed use complex located in a moderate-income census tract in the Uptown community of Chicago. This project will provide needed affordable housing as well as revitalize this neighborhood. This complex includes 223 residential apartments - 43 efficiency units, 61 studio units and 119 one-bedroom units with rents ranging from \$550 to \$760 per month. These prices provide affordable housing for low- or moderate-income persons.
- HNA loaned approximately \$1.2 million to finance the construction and permanent financing of a 90-unit low-income senior housing apartment building located in the Chatham community of Chicago. The 5-story building is being built on vacant land and consists of 25 studio and 65 one-bedroom apartments. In addition to HNA's financing, funds are provided by City of Chicago HOME loan, ARC (Affordable Rents for Chicago) funds, and low-income housing tax credits.
- HNA funded almost \$584 thousand of a project to construct 36 three-bedroom residential units in 11 buildings scattered throughout the West Town and Humboldt Park neighborhoods of Chicago. The target population for the project's residents is single mother-headed families with incomes below \$21,000. The aim of the project is to provide decent, affordable housing, integrated with support services to residents in the West

Town and Humboldt Park communities. The project has been awarded Low Income Housing Tax Credits, as well as subordinate financing from IHDA, a Chicago DOH HOME Loan, and Federal Home Loan Bank's Affordable Housing Program. Financing is also being provided by the Illinois Affordable Housing Trust Fund and ARC (Affordable Rents for Chicago).

- HNA made a \$490 thousand loan to finance the construction of a 60-unit senior living, affordable housing complex with 31 parking spaces in the Austin community of Chicago. The target population for the project's residents is single senior citizens with incomes below 50 percent of the median household income for the Chicago area. The project has been awarded Low Income Housing Tax Credits, as well as subordinate financing from the City of Chicago Department of Housing Funds, ARC (Affordable Rents for Chicago) funds.
- HNA issued a \$3.5 million line of credit to provide affordable housing under the City of Joliet's Scattered Site Housing Program. The program is for first-time home buyers in low- and moderate-income census tracts and for low- and moderate-income families within the City of Joliet.
- HNA loaned approximately \$434 thousand to a non-profit organization for the purchase of a transitional housing complex for homeless families. The organization helps low- and moderate income families that have become homeless for various reasons, such as divorce, domestic violence, or loss of employment. The property consists of six 2-bedroom apartments in the Naperville, Illinois area.

## Other Lending Activities

During the evaluation period, HNA also made 39 loans for \$6.2 million which are guaranteed by the Small Business Administration (SBA). These loans were not reportable with HNA's CRA data. It should also be noted that HNA is a preferred SBA lender, meaning HNA has been delegated authority by the SBA to make credit decisions on SBA loan applications, which decreases the processing time involved in approving these loan requests.

## Product Innovation and Flexibility

Product innovation and flexibility had a neutral impact on the lending test conclusions for the Chicago AA. The following programs indicate the bank makes limited use of flexible lending practices in order to serve the affordable housing needs of the AA.

- Chicago Housing Choice Program: This program enables low-income Chicago renters to become homeowners by turning their Section 8 vouchers into monthly payment on affordable home mortgages. HNA made the initial loans under this innovative and flexible program, and until 2005, was the major lender of the program with 95 loans totaling almost \$12.3 million, out of the program's total of 156 loans closed.
- Illinois Housing Development Authority (IHDA): Over the exam period, HNA made 206 loans totaling almost \$27.9 million using IHDA programs. The most current program offered by IHDA is the Opportunity I-Loan program. This program is aimed at those individuals and families who do not have a traditional checking account or have not been

able to establish a credit history to qualify for low-interest mortgage loans and buy their first homes. HNA was involved in the development of this project.

- Federal Home Loan Bank (FHLB): *Affordable Housing Program (AHP)*: This FHLB grant program allows members to request funds for affordable housing homeownership or rental projects. To obtain these funds HNA files a joint loan application with the prospective home buyer with the FHLB. The funds may be used to assist in the financing for the purchase, construction or rehabilitation of owner-occupied housing to households with incomes at or below 80% of the area median income. In addition, these funds may also be used to finance the purchase, construction or rehabilitation of rental housing for affordable housing. During the evaluation period, HNA obtained 9 grants totaling \$3.1 million from the FHLB. Once approved, HNA advances the funds and files a subordinate mortgage because there is a 15 year compliance period (on rental property), and 5 years (on owner-occupied property) for which the bank retains liability.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the lending test in the Lake County AA is weaker than the bank's overall high satisfactory rating. Since only 4.58 percent of HNA's deposits are in the Lake County AA its performance is not weighted heavily in HNA's overall rating. Refer to the Tables 1 through 12 in Appendix C 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 is rated high satisfactory. Based on a full-scope review, the bank's performance in the Chicago AA is good.

Refer to Table 14 in Appendix C for the facts and data used to evaluate the bank's level of qualified investments. To provide perspective regarding the relative level of qualified investments, we allocated a portion of the bank's Tier 1 capital to each AA based on its pro rata share of deposits.

In its investing activities, HNA exhibited a good level of responsiveness to credit and community development needs. The opportunities to make qualified investments in the Chicago AA are many, especially in the areas of affordable housing, community services and activities that revitalize or stabilize low- or moderate-income geographies. HNA made qualified investments within its AA through purchases of securities, cash contributions, and grants. These investments totaled \$88.1 million. A significant factor taken into consideration in assessing the bank's volume of qualified investments is the fiercely competitive banking community that exists in the Chicagoland area. Within HNA's Chicago assessment area there are over 250 FDIC insured financial institutions competing for qualified CRA investments. (Refer to Market Profile in Appendix B).

The following is a discussion of some of HNA's specific qualified investments in the Chicago AA:

- HNA made just over \$1.5 million in investments to the Chicago Equity Fund during the evaluation period. In addition, \$3 million of prior period investments to this organization are still outstanding. The Chicago Equity Fund invests in affordable rental housing development projects and related activities that are part of community revitalization efforts.
- HNA made a \$1.5 million investment in the Illinois Facilities Fund during the evaluation period. In addition, \$500 thousand of prior period investments to this organization are still outstanding. The Illinois Facility Fund is a statewide community development financial institution. The bank's investment was used to fund a loan to a child care facility that will focus on publicly-subsidized child care programs directed toward low- and moderate-income families in Elgin, Illinois.
- HNA purchased \$15.6 million in affordable housing revenue bonds benefiting eight different multi-family housing projects within the Chicago AA. The majority of the residents in each project receive Section 8 subsidies or other government assistance.
- HNA purchased six mortgage-backed securities totaling \$15.5 million. The securities were backed by home mortgage loans originated to low- and moderate-income individuals throughout the Chicago AA.
- HNA purchased 38 bonds totaling \$14.9 million benefiting 16 different school districts within the bank's AA. These bond issuances were used for school improvements. More than 50 percent of the student population of the various school districts is low-income.
- Federal Home Loan Bank - *Down Payment Plus Program (DP)*: Downpayment Plus® offers Chicago FHLB members with downpayment and closing cost assistance programs for low- and moderate-income homebuyers. Chicago FHLB members may access subsidies of up to \$5,000 per household on behalf of eligible homebuyers to whom they are providing first mortgages. The subsidy may be used for downpayment and closing cost assistance, homebuyer counseling costs (up to \$600), or rehabilitation costs associated with the purchase of a home. The homebuyer must sign a 5 year retention agreement and agree to a lien on the property for the amount of the DP subsidy. The subsidy is forgiven over a 5 year time period. Over the evaluation period, HNA obtained 123 subsidies totaling \$434 thousand from the Chicago FHLB.
- Donations and grants were provided to organizations with a community development focus. During the evaluation period, HNA made 1,893 contributions to 515 different community development organizations totaling almost \$7.6 million.

HNA also made other qualifying investments in the current period totaling \$5.4 million. All of these investments helped to meet critical credit and community development needs within the Chicago AA.

HNA has several other prior period investments that are recognized during this evaluation period with an outstanding balance totaling approximately \$20.4 million. They include mortgage backed security pools, school bonds, affordable housing bonds and other community development investments; all of which continue to meet vital credit and community development needs.

Affiliates of HNA have made investments that benefit the Chicago AA. An affiliate purchased a \$100 thousand certificate of deposit in a Community Development Financial Institution. In addition, the affiliate had nine prior-period investments in the Chicago AA still outstanding. These nine investments consisted of one affordable housing bond with an outstanding balance of \$500 thousand and eight school district bonds with outstanding balances totaling nearly \$1.2 million.

The above described investments represent 3 percent of allocated tier one capital.

If a bank has adequately addressed the needs of its AA, the OCC will also consider community development activities that benefit areas outside of the bank's AA in the evaluation of its performance. HNA has adequately addressed the needs of its AA and, therefore, we considered community development investments made by an affiliate located outside of its AA. In the prior period, an affiliate purchased nine qualified zone academy bonds in the adjacent metropolitan area of Gary, Indiana (MA #23844). The outstanding balance on these bonds totals \$6 million.

In addition to the above described qualified investments HNA has unfunded commitments to several community development organizations totaling nearly \$4.3 million. All of these involve projects in the Chicago AA.

### **Conclusions for Area Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the investment test in the Lake County AA is not inconsistent with the bank's overall high satisfactory rating. Refer to Table 14 of Appendix C 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 is rated high satisfactory. Based on a full-scope review, the bank's performance in the Chicago AA is good.

### **Retail Banking Services**

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

HNA has an adequate distribution of delivery systems that are reasonably accessible to individuals and geographies of different income levels in the AA. The bank has 165 office locations throughout the Chicago MA. The percentage of branches in low- and moderate-income geographies is below the percentage of the population within these geographies; however, lending activity showed that HNA served individuals of all income levels.

There are only minor differences in the bank's services and business hours throughout the AA, none of which adversely affect low- or moderate income geographies or individuals. With a

few exceptions, most offices are full service facilities, offering traditional deposit and loan products. Most office lobbies are open at 9:00 a.m. or earlier Monday through Saturday, close at 5:00 p.m. or later Monday through Friday, and 12:00 p.m. or later on Saturday. Several locations also have Sunday hours.

Since the last CRA evaluation, HNA has closed 10 locations; one in a low-income geography, two in moderate-income geographies, two in middle-income geographies, and five in upper income geographies. During this same time, HNA opened 40 locations in the AA; two in low-income geographies, two in moderate-income geographies, 13 in middle-income geographies, and 23 in upper income geographies.

### **Alternative Delivery Systems**

HNA offers various types of alternative delivery systems, which include automated teller machines (ATMs), telephone banking, bank by mail, computer banking and courier services. The bank does not monitor the usage of these alternative delivery services by low- and moderate-income individuals; therefore, significant weight was not placed on these delivery systems when drawing our CRA performance conclusions.

HNA has 305 ATMs located within the Chicago AA, with 235 of them being located at HNA branches and the remaining 70 at stand-alone locations throughout the Chicago AA. Withdrawals can be made at all ATMs and deposits are accepted at 250. The overall distribution of ATMs in low- and moderate-income geographies is similar to the branch distribution.

### **Community Development Services**

HNA's performance in providing Community Development (CD) services in the Chicago AA is excellent. Bank management invests a substantial amount of time and effort in community development programs targeted to low- and moderate-income individuals and geographies within HNA's AA, positively impacting the service test rating. These services include providing credit counseling, first-time homebuyer seminars, financial planning, technical expertise to nonprofit or government organizations, and financial education and management skills. All of these are considered to address the credit needs identified in our community contacts for financial education.

Even with HNA's adequate level of retail banking services, it was able to achieve an excellent dispersion of home mortgage loans to borrowers of different income levels, including low- and moderate-income borrowers. HNA's excellent level of quality community development services provided to low- and moderate-income individuals and in low- and moderate-income geographies contributed to the excellent loan dispersion noted above. The percentage of these services offered in low- and moderate-income geographies exceeded the percentage of low- and moderate-income geographies in the bank's assessment area. The community development services offered demonstrate an exceptional responsiveness to the needs of the community.

The following paragraphs describe a sample of the CD services HNA officers and employees provided during this evaluation period:

- HNA conducted over 590 First Time Home Buyers seminars. A significant number of these seminars were held at locations in low- and moderate-income geographies. Most of these were held in conjunction with community groups, local universities, and government bodies. These seminars were designed to guide low- and moderate-income homebuyers through the home buying process. Information was provided to participants on how to apply for a loan, repair credit problems and maintain the home once purchased.
- HNA conducted over 170 financial education seminars. These seminars provided information on basic money management, including budgeting, expense management, importance of saving and investing and were targeted to low- and moderate-income individuals. A significant number of these seminars were held at locations in low- and moderate-income geographies.
- HNA conducted over 40 small business seminars throughout the bank's AA during the evaluation period. HNA partnered with local community groups to host these seminars which provided information on creating business plans, opening business banking accounts, financing options for small businesses, and accessing capital and other government resources. A significant number of these seminars were held at locations in low- and moderate-income geographies.
- HNA partnered with the Tax Payer Assistance Program where HNA employees assisted low-income families with the preparation of their state and federal income tax returns.
- Forty bank officers and employees actively use their financial expertise via fundraising, treasurerships, budgeting and various committee membership positions for 19 different United Way Chapters throughout the bank's AA. These activities focused on United Way programs targeted toward low- and moderate-income individuals. In addition, the bank's President and Chief Executive Officer served as the fundraising campaign chairman for the largest of the Chapters. The United Way supports agencies that provide emergency assistance, crisis intervention, and counseling. More than half of the money from the United Way chapters benefits low- and moderate-income individuals.
- Eight bank officers are board members of or hold committee membership positions at Metropolitan Family Services. This organization provides community services such as counseling for sexual abuse or domestic violence, school-based programs to support healthy child development, legal representation in adoption and custody proceedings, financial counseling, and other mentoring programs. All of these programs are targeted to low- and moderate-income families in the banks AA.
- Two bank officers are board members and serve on the loan committee of the Community Investment Corporation (CIC). The CIC is a pooled-risk mortgage lender specializing in rehabilitation of multifamily housing loans in lower-income neighborhoods within the bank's AA. The mission of CIC is to be the leading force in neighborhood revitalization through innovative financing programs.
- A bank officer is a member of the finance committee and the fundraising committee for Casa Central. Casa Central has a comprehensive network of bilingual/bicultural social service programs targeting low- and moderate income children, youth, families and the elderly within the bank's AA.

- A bank officer is on the Affordability Gap Lender's Committee of the Northwest Neighborhood Federation. The goal of the Committee is to develop a program to stabilize home ownership for low- and moderate-income families on the brink of home sale or foreclosure. The program will provide gap financing during a refinance so owners can pay what they can afford. In addition, homeowner counseling and financial literacy will enable borrowers to remain solvent and in their homes.
- A bank officer is on the board of directors of the Community Reinvestment Fund (CRF). CRF is a not-for-profit syndicator of equity investments in real estate projects that stabilize and strengthen the low- and moderate-income communities in which those developments are built. All of the projects that receive equity capital syndicated through CRF are located in or immediately adjacent to low- or moderate-income census tracts within the bank's AA.
- Two bank officers are on the Board of Advisors for the Local Initiative Support Corporation (LISC). LISC helps nonprofit community development organizations revitalize and stabilize distressed, low- and moderate-income neighborhoods within the bank's AA. LISC provides local community development organizations with loans, grants, and equity investments; local, statewide, and national policy support; as well as technical and management assistance.
- A bank officer is a founding board member of the Maywood Community Development Corporation (MCDC). MCDC is a new not-for-profit organization that was established to stimulate and support economic development within the Village of Maywood. The State of Illinois has designated the entire Village as an Enterprise Zone. The Village of Maywood Enterprise Zone Program offers numerous state incentives to encourage companies to locate to or expand in the Village of Maywood.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the service test in the Lake County AA is not inconsistent with the bank's overall high satisfactory rating. Since only 4.58 percent of HNA's deposits are in the Lake County AA, performance in this AA is not weighted heavily in the overall conclusion. Refer to Table 15 Appendix C 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 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”).

<b>Time Period Reviewed</b>	Lending Test - January 1, 2002 to December 31, 2005 Community Development Loans – May20, 2003 to July 1,2006 Investment Test - May 20, 2002 to July 1, 2006 Service Test - May 20, 2002 to July 1, 2006	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
Harris NA Chicago, Illinois	HMDA and small business loans Community Development investments, services and loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Mercantile National Bank of Indiana, Hammond, Indiana	Affiliate	Community Development Investments
New Lenox State Bank	Affiliate	Community Development Investments
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information (Reflects counties in MAs where whole MAs not selected)</b>
Chicago-Naperville-Joliet, IL, MA #16974	Full-scope	Cook, DuPage, Grundy, Kane, Kendall, McHenry, and Will
Lake, IL MA #29404	Limited-scope	Lake

## Appendix B: Market Profiles for Full-Scope Areas

### Chicago-Naperville-Joliet, IL MA

Demographic Information for Full-Scope Area: Chicago-Naperville-Joliet, IL MA #16974						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1,694	13.75	25.21	34.77	25.27	1.00
Population by Geography	7,494,897	7.99	23.73	38.66	29.60	0.01
Owner-Occupied Housing by Geography	1,721,116	2.63	15.30	44.34	37.74	0.00
Businesses by Geography	390,218	3.34	13.91	37.87	44.59	0.29
Farms by Geography	5,929	1.00	7.69	46.87	44.43	0.02
Family Distribution by Income Level	1,831,695	20.92	17.56	21.98	39.54	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	704,829	14.53	33.93	37.32	14.22	0.00
Median Family Income = \$60,166			Median Housing Value = \$175,204			
HUD Adjusted Median Family Income for 2005 = \$68,550			Unemployment Rate = 3.80%			
Households Below the Poverty Level = 10%						

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 U.S. Census, and 2005 HUD updated MFI.

HNA is headquartered in downtown Chicago, Illinois within its Chicago AA. The Chicago AA is contained completely within the Chicago-Naperville-Joliet, Illinois MA and includes all of Cook, DuPage, Kane and Kendall counties and portions of Grundy, McHenry and Will counties.

For borrower distribution, HNA's 2002 through 2005 HMDA reported lending data and small business data was evaluated against the U.S. Department of Housing and Urban Development estimated median family income figures, and Dun and Bradstreet data, respectively. All of these figures are updated annually.

HNA's AA meets the requirements of the CRA regulation and does not exclude any low- or moderate-income geography.

Competition within this market is strong. As of June 30, 2006, HNA ranks third in this market in terms of deposit market share with 9.53 percent. Ahead of HNA is JP Morgan Chase NA and LaSalle Bank National Association with 15.3 percent and 14.11 percent deposit market share, respectively. In total, HNA has \$24.9 billion in deposits within this AA, or 95 percent of all its deposits. In terms of lending competition (for those lenders reporting their HMDA loans), it was observed that in 2005 HNA was competing with 988 lenders for home purchase loans, 931 lenders for home refinancing loans, and 449 lenders for home improvement loans.

The employment base and primary industries in this AA are service oriented (41.2 percent) followed by retail trade (15.03 percent). The vast majority of businesses in the area are considered to be small businesses with less than 50 employees (79.5 percent). In addition, the vast majority of these small businesses report gross revenue of \$1 million or less.

The seasonally adjusted unemployment rate for the Chicago MA is relatively low at 3.8 percent (October, 2006) compared to the national average of 4.4 percent (October, 2006).

We meet with 16 different community organizations, including community development financial institutions, during the evaluation period. These organizations represented affordable housing, economic development, community development services, and small business interests. These organizations identified a desperate need for affordable housing loans to low- and moderate-income individuals, affordable small business loans (including availability of start-up funds) to small enterprises, and financial education to low- and moderate-income individuals. One organization also commented on the need for all area financial institutions to establish branches in the south and southwestern portions of the Chicago AA.

## Appendix C: Tables of Performance Data

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### Content of Standardized 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: (1) 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; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this PE. [Note: Do not renumber the tables.]

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by 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 in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column with the appropriate caption, such as: “Statewide/Regional,” “Statewide/Regional with potential benefit to one or more AAs” or “Out of Assessment Area.” “Out of Assessment Area” is used ONLY if the bank has otherwise adequately met the CD lending needs of its assessment area.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/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. For HNA this is not applicable, and therefore not included.
- 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 MA/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 MA/assessment area. **Note: this information was not supplied and therefore the table is not included.**

**Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/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 in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column with the appropriate caption, such as: "Statewide/Regional," "Statewide/Regional with potential benefit to one or more AAs" or "Out of Assessment Area." "Out of the Assessment Area" is used ONLY if the bank has otherwise adequately met the qualified investment needs of its assessment area.

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

Table 1. Lending Volume

LENDING VOLUME												Geography: ILLINOIS		Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2005	
MA/Assessment Area (2005):	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***			
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)				
<b>Full Review:</b>															
Chicago AA 2004-2005	89.00	14,792	2,722,865	12,930	1,107,903	85	9,844	235	229,090	28,042	4,069,702	95.42			
Chicago AA 2003	89.48	12,920	2,301,520	5,107	714,294	82	9,400	179	118,482	18,288	3,143,696	0.00			
Chicago AA 2002	88.71	9,544	1,783,047	4,308	565,331	113	10,595	106	50,413	14,071	2,409,386	0.00			
<b>Limited Review:</b>															
Lake County AA 2004-2005	11.00	1,879	516,909	1,566	145,254	3	693	17	15,537	3,465	678,393	4.58			
Lake County AA 2003	10.52	1,605	407,928	534	86,266	0	0	12	4,612	2,151	498,806	0.00			
Lake County AA 2002	11.29	1,269	360,694	516	84,402	1	3	5	5,061	1,791	450,160	0.00			

\* Loan Data as of December 31, 2005. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2004 to July 1, 2006.

\*\*\* Deposit Data as of June 30, 2006. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2005					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa ll	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Chicago AA 2004-2005	5,051	86.09	2.63	2.04	15.30	8.45	44.34	36.27	37.74	53.24	1.51	0.63	0.78	1.28	2.17	
Chicago AA 2003	3,080	88.79	2.69	1.33	16.15	7.18	45.36	37.82	35.79	53.67	1.70	0.60	0.77	1.47	2.45	
Chicago AA 2002	2,932	88.61	3.12	2.76	13.01	6.58	49.35	39.77	34.52	50.89	1.71	0.98	0.89	1.47	2.38	
<b>Limited Review:</b>																
Lake County AA 2004-2005	816	13.91	1.19	0.12	16.35	15.07	36.62	38.24	45.84	46.57	2.23	0.66	1.60	2.09	2.83	
Lake County AA	389	11.21	0.87	0.26	7.95	4.88	32.59	23.65	58.59	71.21	2.20	0.98	1.22	1.38	2.96	
Lake County AA 2002	377	11.39	0.31	0.00	7.79	2.92	34.37	25.73	57.53	71.35	2.25	0.00	0.83	1.34	3.21	

\* Based on 2005 Peer Mortgage Data (Western)

\*\* 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.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT 2005			Geography: ILLINOIS						Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31,						
MA/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***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Chicago AA 2004-2005	1,532	93.76	2.63	2.02	15.30	14.95	44.34	47.06	37.74	35.97	3.42	1.72	2.92	3.49	3.94
Chicago AA 2003	605	94.24	2.69	3.14	16.15	14.71	45.36	49.92	35.79	32.23	3.87	2.81	3.04	4.18	4.08
Chicago AA 2002	624	94.69	3.12	3.04	13.01	10.58	49.35	53.21	34.52	33.17	3.99	2.40	3.07	4.40	4.04
<b>Limited Review:</b>															
Lake County AA 2004-2005	102	6.24	1.19	0.00	16.35	12.75	36.62	30.39	45.84	56.86	2.49	0.00	1.12	1.57	4.58
Lake County AA 2003	37	5.76	0.87	0.00	7.95	8.11	32.59	10.81	58.59	81.08	2.79	0.00	3.66	0.75	3.99
Lake County AA 2002	35	5.31	0.31	0.00	7.79	5.71	34.37	20.00	57.53	74.29	2.27	0.00	2.27	1.16	3.13

\* Based on 2005 Peer Mortgage Data (Western)

\*\* 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 units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE 31, 2005			Geography: ILLINOIS						Evaluation Period: JANUARY 1, 2002 TO DECEMBER						
MA/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***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Chicago AA 2004-2005	8,004	89.36	2.63	1.24	15.30	8.80	44.34	41.67	37.74	48.30	1.50	0.40	0.80	1.47	1.96
Chicago AA 2003	9,028	88.50	2.69	0.71	16.15	7.07	45.36	39.53	35.79	52.69	1.58	0.56	0.88	1.52	1.85
Chicago AA 2002	5,801	87.26	3.12	1.03	13.01	5.00	49.35	37.80	34.52	56.16	1.44	0.54	0.74	1.28	1.79
<b>Limited Review:</b>															
Lake County AA 2004-2005	953	10.64	1.19	0.52	16.35	14.59	36.62	32.11	45.84	52.78	1.83	1.47	1.51	1.36	2.34
Lake County AA 2003	1,173	11.50	0.87	0.09	7.95	2.73	32.59	19.27	58.59	77.92	1.62	0.28	0.78	1.07	1.92
Lake County AA 2002	847	12.74	0.31	0.12	7.79	2.13	34.37	16.53	57.53	81.23	1.72	1.01	0.85	0.94	2.10

\* Based on 2005 Peer Mortgage Data (Western)

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2005					Market Share (%) by Geography				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa ll	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
<b>Full Review:</b>																
Chicago AA 2004-2005	200	96.15	11.64	16.50	24.27	36.50	35.57	36.50	28.52	10.50	2.80	2.65	3.10	3.03	1.54	
Chicago AA 2003	205	97.16	11.71	8.29	25.00	28.29	35.80	31.71	27.49	31.71	4.17	2.51	3.04	3.99	9.31	
Chicago AA 2002	184	94.85	15.95	13.04	21.20	22.28	37.45	35.33	25.41	29.35	4.66	3.50	3.24	4.34	11.36	
<b>Limited Review:</b>																
Lake County AA 2004-2005	8	3.85	6.09	12.50	34.70	12.50	36.12	37.50	23.10	37.50	7.45	20.00	2.63	9.09	11.11	
Lake County AA 2003	6	2.84	5.95	0.00	21.35	33.33	41.56	16.67	31.14	50.00	5.19	0.00	3.33	5.71	8.82	
Lake County AA 2002	10	5.15	2.67	0.00	20.44	10.00	34.45	10.00	42.44	80.00	9.71	0.00	4.76	2.63	18.60	

\* Based on 2005 Peer Mortgage Data (Western)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: ILLINOIS								Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2005				
MA/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 Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Chicago AA 2004-2005	12,908	89.18	3.34	1.29	13.91	7.23	37.87	33.94	44.59	57.54	3.62	2.01	2.28	3.17	4.55
Chicago AA 2003	5,096	90.52	3.45	1.33	14.18	8.50	39.10	38.21	42.97	51.96	2.82	1.65	1.95	2.68	3.43
Chicago AA 2002	4,252	89.18	4.59	1.76	11.10	4.61	40.87	40.69	42.00	52.94	2.59	1.25	1.13	2.46	3.41
<b>Limited Review:</b>															
Lake County AA 2004-2005	1,566	10.82	1.04	0.45	14.93	8.37	30.93	23.63	53.10	67.56	4.35	2.41	3.52	3.61	5.17
Lake County AA 2003	534	9.48	1.00	0.00	7.51	3.56	27.12	17.23	64.37	79.21	2.59	0.00	1.77	1.58	3.22
Lake County AA 2002	516	10.82	0.28	0.19	5.87	1.36	27.32	15.50	66.54	82.95	2.74	2.63	1.03	1.92	3.26

\* Based on 2005 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2005).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS DECEMBER 31, 2005			Geography: ILLINOIS						Evaluation Period: JANUARY 1, 2002 TO						
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Farms*	% BANK Loans	% of Farms*	% BANK Loans	% of Farms*	% BANK Loans	% of Farms*	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Chicago AA 2004-2005	85	96.59	1.00	1.18	7.69	9.41	46.87	58.82	44.43	30.59	2.89	0.00	8.33	2.80	2.43
Chicago AA 2003	82	100.00	0.89	0.00	7.68	6.10	49.73	69.51	41.63	24.39	6.22	0.00	7.07	6.73	5.56
Chicago AA 2002	113	99.12	0.99	0.88	4.91	0.00	54.99	82.30	38.90	16.81	13.08	100.00	0.00	14.23	9.27
<b>Limited Review:</b>															
Lake County AA 2004-2005	3	3.41	1.46	0.00	16.04	0.00	40.73	0.00	41.77	100.00	1.15	0.00	0.00	0.00	3.33
Lake County AA 2003	0	0.00	1.03	0.00	5.02	0.00	35.39	0.00	58.56	0.00	0.00	0.00	0.00	0.00	0.00
Lake County AA 2002	1	0.88	0.12	0.00	4.97	0.00	31.43	100.00	63.48	0.00	3.57	0.00	0.00	10.00	0.00

\* Based on 2005 Peer Small Business Data -- US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2005).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: ILLINOIS						Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2005							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Chicago AA 2004-2005	4,755	85.99	20.92	10.30	17.56	20.38	21.98	24.27	39.54	45.05	1.24	2.50	1.03	0.96	1.44
Chicago AA 2003	2,919	88.59	21.39	9.63	17.83	21.24	22.26	23.91	38.52	45.22	1.54	1.90	1.31	1.19	1.93
Chicago AA 2002	2,869	88.55	20.54	11.57	17.53	23.49	24.04	24.92	37.89	40.01	1.69	1.75	1.32	1.48	2.25
<b>Limited Review:</b>															
Lake County AA 2004-2005	775	14.01	17.00	14.45	17.25	21.68	22.01	18.71	43.75	45.16	1.98	3.06	1.60	1.46	2.39
Lake County AA 2003	376	11.41	13.06	7.45	14.03	13.83	20.45	16.49	52.46	62.23	2.00	2.22	1.30	1.19	2.83
Lake County AA 2002	371	11.45	11.44	6.20	14.82	12.13	22.29	19.14	51.45	62.53	2.13	1.56	0.99	1.47	3.54

\* Based on 2005 Peer Mortgage Data (Western)

\*\* As a percentage of loans with borrower income information available for 2005. No information was available for 7.5% of loans originated and purchased by bank.

\*\*\* Percentage of Families is based on the 2000 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 2005		Geography: ILLINOIS								Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31,					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>*</sup>				
	#	% of Total <sup>**</sup>	% Famili es <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Chicago AA 2004- 2005	1,481	93.73	20.92	8.85	17.56	21.81	21.98	27.95	39.54	41.39	3.72	3.92	3.69	3.15	4.21
Chicago AA 2003	595	94.15	21.39	12.10	17.83	21.68	22.26	31.43	38.52	34.79	4.22	4.35	4.22	4.11	4.29
Chicago AA 2002	616	94.77	20.54	12.50	17.53	26.30	24.04	33.77	37.89	27.44	4.42	4.21	4.31	5.12	3.95
<b>Limited Review:</b>															
Lake County AA 2004-2005	99	6.27	17.00	8.08	17.25	15.15	22.01	23.23	43.75	53.54	2.62	1.52	1.31	2.10	4.26
Lake County AA 2003	37	5.85	13.06	2.70	14.03	8.11	20.45	10.81	52.46	78.38	3.09	1.27	1.81	1.11	4.81
Lake County AA 2002	34	5.23	11.44	0.00	14.82	11.76	22.29	20.59	51.45	67.65	2.50	0.00	1.35	2.15	3.56

\* Based on 2005 Peer Mortgage Data (Western)

\*\* As a percentage of loans with borrower income information available for 2005. No information was available for 4.4% of loans originated and purchased by bank.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* 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.

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE 2005			Geography: ILLINOIS						Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31,						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans**	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Chicago AA 2004-2005	7,647	89.32	20.92	9.64	17.56	20.15	21.98	26.73	39.54	43.48	1.46	2.01	1.34	1.23	1.60
Chicago AA 2003	8,622	88.46	21.39	7.64	17.83	19.20	22.26	27.63	38.52	45.53	1.56	1.86	1.53	1.47	1.59
Chicago AA 2002	5,676	87.34	20.54	9.57	17.53	20.86	24.04	26.00	37.89	43.57	1.51	1.69	1.31	1.36	1.70
<b>Limited Review:</b>															
Lake County AA 2004-2005	914	10.68	17.00	13.89	17.25	19.69	22.01	19.58	43.75	46.83	1.79	2.42	1.38	1.25	2.24
Lake County AA 2003	1,125	11.54	13.06	4.44	14.03	11.64	20.45	18.76	52.46	65.16	1.67	1.98	1.42	1.30	1.86
Lake County AA 2002	823	12.66	11.44	4.25	14.82	12.64	22.29	15.55	51.45	67.56	1.69	1.48	1.31	1.06	2.12

\* Based on 2005 Peer Mortgage Data (Western)

\*\* As a percentage of loans with borrower income information available for 2005. No information was available for 5.2% of loans originated and purchased by bank.

\*\*\* Percentage of Families is based on the 2000 Census information.

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

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

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: ILLINOIS			Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2005				
MA/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***	% BANK****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Chicago AA 2004-2005	12,930	89.20	63.87	67.15	79.33	10.69	9.98	3.62	5.99
Chicago AA 2003	5,107	90.53	63.09	55.96	67.93	14.94	17.13	2.82	4.86
Chicago AA 2002	4,308	89.30	75.21	54.29	69.66	15.18	15.16	2.59	4.99
<b>Limited Review:</b>									
Lake County AA 2004-2005	1,566	10.80	66.26	71.39	79.05	9.58	11.37	4.35	7.55
Lake County AA 2003	534	9.47	65.68	55.81	63.30	16.48	20.22	2.59	4.35
Lake County AA 2002	516	10.70	74.69	57.36	65.50	14.34	20.16	2.74	5.51

\* Based on 2005 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/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 - 2005).

\*\*\*\* 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 6.64% of small loans to businesses originated and purchased by the bank.

**Table 12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS 2005			Geography: ILLINOIS		Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31,				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total	% of Farms	% BANK Loans	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Chicago AA 2004-2005	85	96.59	84.74	87.06	62.35	29.41	8.24	2.89	3.20
Chicago AA 2003	82	100.00	86.12	87.80	58.54	31.71	9.76	6.22	6.12
Chicago AA 2002	113	99.12	90.17	65.49	70.80	19.47	9.73	13.08	10.17
<b>Limited Review:</b>									
Lake County AA 2004-2005	3	3.41	83.33	66.67	0.00	33.33	66.67	1.15	0.00
Lake County AA 2003	0	0.00	81.28	0.00	0.00	0.00	0.00	0.00	0.00
Lake County AA 2002	1	0.88	85.84	100.00	100.00	0.00	0.00	3.57	4.76

\* Based on 2005 Peer Small Business Data -- US and PR

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

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2005).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 10.23% of small loans to farms originated and purchased by the bank.

Institution ID: Harris NA

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: ILLINOIS				Evaluation Period: MAY 20, 2002 TO JULY 1, 2006			
MA/Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Chicago AA	29	25,534	2,185	62,551	2,214	88,085	87.14	4	4,279
<b>Limited Review:</b>									
Lake County AA	4	572	168	6,426	172	6,998	6.92	0	0
Statewide/Regional Investment	9	6,000	0	0	9	6,000	5.94	0	0

\* 'Prior Period Investments' means investments made in a previous 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.

Institution ID: Harris NA

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS TO JULY 1, 2006								Geography: ILLINOIS				Evaluation Period: MAY 20, 2002					
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK 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
<b>Full Review:</b>																	
Chicago AA	95.42	165	90.61	3.05	8.54	40.85	47.56	40	10	+1	0	+11	+18	7.99	23.73	38.66	29.60
<b>Limited Review:</b>																	
Lake County AA	4.58	17	9.39	0.00	5.88	29.41	64.71	5	2	0	0	+1	+2	2.76	24.34	33.68	39.23