



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

January 2, 2001

Community Reinvestment Act Performance Evaluation

TCF National Bank

Charter Number: 23253

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NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

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

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

Performance Levels	TCF National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory	X		X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- TCF has demonstrated good responsiveness to the credit needs of its various assessment areas. The strength of TCF's lending performance was especially seen in its distribution of home mortgage loans to low- and moderate-income borrowers. TCF uses many programs that provide greater flexibility in underwriting standards for low- and moderate-income borrowers. This has had a positive impact on the bank's ability to reach borrowers that would not qualify for credit under traditional underwriting guidelines. The geographic distribution of home mortgage loans in low- and moderate-income geographies was also noted as excellent within the State of Wisconsin and in the Chicago-Gary-Kenosha, IL-IN-WI CMSA (Consolidated Metropolitan Statistical Area). In general, however, TCF has much higher deposit market shares and a higher deposit rank out of all financial institutions located within its respective communities than it has for its lending market shares. This is partially attributed to TCF's marketing practices that emphasize the deposit function. It can also be attributed to the highly competitive lending markets that TCF faces.
- TCF has made substantial investments within most of its full-scope assessment areas, especially in the form of mortgage-backed securities. These investments have had a significant impact on those areas and often addressed critical affordable housing concerns. Performance was especially strong in the Minneapolis-St. Paul, Milwaukee-Waukesha, and the Metro East (Detroit) Assessment Areas as well as in the Chicago-Gary-Kenosha, IL-IN-WI CMSA. These areas, which represent 79 percent of TCF's total deposit base, had generally excellent levels of mortgage-

backed securities supplemented by a significant volume of charitable grants. Performance in these areas far outweighs the weaker performance found in the Southeast Assessment Area.

- TCF's offices and delivery systems provide access to financial products and services for geographies and individuals of different income levels. TCF's expanded service hours emphasize convenience. TCF operates an expansive ATM network that also provides customer convenience. TCF's employees provide a relatively high level of services that cover a wide range of community development related services within most of its assessment areas.

Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

LMI - Used as an adjective within the body of this document to describe either low- and moderate-income geographies or low- and moderate-income individuals.

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

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

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

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

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

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

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

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

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

Description of Institution

TCF is the lead bank of the TCF Financial Corporation holding company. TCF's headquarters are in Minneapolis, Minnesota. It is an interstate bank with offices located in Illinois, Indiana, Michigan, Minnesota, and Wisconsin. As of December 31, 2000, TCF had \$11 billion in total assets and \$683 million in Tier I Capital.

This bank is the result of the April 2000 merger of the former TCF National Bank Minnesota with its main office in Minneapolis, TCF National Bank Illinois with its main office in the Chicago suburb of Burr Ridge, TCF National Bank Wisconsin with its main office in Milwaukee, and TCF National Bank (formerly known as Great Lakes National Bank Michigan) with its main office in Ann Arbor. Following the consolidation, the name of the combined bank became TCF National Bank.

- TCF is a subsidiary of the TCF Financial Corporation, an \$11 billion holding company also located in Minneapolis, Minnesota. In addition to TCF National Bank, the holding company owns TCF Colorado Corp., a holding company for TCF National Bank Colorado. Other significant subsidiaries include mortgage banking, commercial leasing, insurance and annuity/mutual fund sales companies. The holding company also maintains a charitable foundation.
- TCF's most significant subsidiary is TCF Mortgage Corporation. At the bank's request, we included mortgage loans from this subsidiary in our evaluation. During the evaluation period, another mortgage company affiliate, Standard Federal Mortgage Corporation, was merged into the TCF Mortgage Corporation. Loans from this entity are also included in our review. The other significant subsidiaries of the bank are Winthrop Resources Corporation and TCF Leasing, Inc., both of which do commercial leasing. The activities of the leasing subsidiaries do not impact the bank's capacity for community reinvestment.
- TCF offers a wide variety of financial services. Its primary marketing focus is offering low- to middle-income consumers retail banking services. Customer convenience is a mainstay of its strategy. More than half of its offices are located in supermarkets.
- Until April 1997, TCF had been a thrift savings institution. As such, its primary mission had focused on residential real estate loans and consumer loans. Although its balance sheet continues to be heavily dominated by residential real estate, a corporate strategy includes growth in its commercial and consumer portfolio. TCF has modified its consumer lending focus since the last CRA examination by discontinuing its indirect automobile lending activities and emphasizing consumer loan growth through its home equity loan product. Also since the last CRA examination, TCF acquired additional branches in the Chicago area which significantly strengthened the bank's presence in this highly competitive market. The bank has also opened new offices in several of its other assessment areas. TCF exited several of its smaller markets since the last CRA examination. These activities are more fully described within the narrative sections for each state and in

the Scope of the Evaluation section.

- Total loans represented 78 percent of the bank's total assets on December 31, 2000. The loan portfolio was broken down as follows: 1-4 family residential real estate 70 percent, other real estate and construction 15 percent, 7 percent leases, 5 percent commercial, and 3 percent consumer.
- There are no known legal, financial or other factors impeding the bank's ability to help meet the credit needs in its assessment areas.
- The last CRA examination of TCF was dated January 12, 1998. We assigned a "Satisfactory" rating to the bank's performance. Note that this previous evaluation was completed on the former TCF National Bank Minnesota prior to the consolidation of its Midwestern banks in 2000.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The bank's evaluation period generally covers October 1, 1997 through December 31, 2000. The evaluation period varies slightly depending on the product and state for all three tests included in our analysis. The starting date for each state or product is based on the cut-off date used in the prior CRA examination. The products and starting dates are broken down by state as follows:

HMDA and CRA Loan Data

Illinois, Michigan, Minnesota, and Wisconsin -
 October 1, 1997 through September 30, 2000
 Indiana -
 January 31, 1998 through September 30, 2000

Community Development Lending

Minnesota, Illinois, and Michigan -
 October 1, 1997 through December 31, 2000
 Indiana -
 January 31, 1998 through December 31, 2000
 Wisconsin -
 January 1, 1998 through December 31, 2000

Qualified Investments

Minnesota -
 October 22, 1997 through December 31, 2000
 Illinois -
 October 1, 1997 through December 31, 2000
 Wisconsin and Michigan -
 January 1, 1998 through December 31, 2000
 Indiana -
 January 31, 1998 through December 31, 2000

Community Development Services

Minnesota, Illinois, and Michigan -
 October 1, 1997 through December 31, 2000
 Indiana -
 January 31, 1998 through December 31, 2000
 Wisconsin -
 January 1, 1998 through December 31, 2000

In this evaluation, we included an analysis of TCF's mortgage lending efforts, including home purchase, home improvement, and refinance loans, small business loans, and community development loans. We also evaluated the level of services offered by the bank to its community and the level of qualifying investments made.

In general, we gave equal weight to the bank's mortgage lending products when

assigning the rating to the Lending Test. The Lending Activity section of each rated area more fully describes how the various products were weighted. In addition, we also gave consideration to the bank's community development lending efforts. These efforts, where applicable, typically had a positive impact on the bank's lending performance. TCF is not a small farm lender and, as a result, we did not analyze or draw conclusions on this loan category.

We based our conclusions for the Investment Test on the level of qualifying investments made by the bank during the evaluation period and on investments made before this evaluation period that have outstanding balances. We assigned the Service Test ratings based on a review of the bank's accessibility to its communities and the level of community development services offered by the bank.

The bank provided us with a breakdown of the percentage of loans originated inside and outside the assessment areas based on statewide information. This information is provided in the narrative section for each state. TCF provided us with a consolidated bank-wide inside/outside ratio for the products included in this evaluation. A significant portion of all loans were made within the assessment areas. Eighty-four percent of all HMDA reportable loans are made within the assessment areas. By product, the lowest ratio is for home improvement loans with 76 percent of all loans made within the assessment area; the highest ratio is for the home purchase product with 93 percent of the loans made inside the assessment areas. Ninety percent of all small business loans were made inside the assessment areas.

Data Integrity

To assess the accuracy of the bank's CRA and HMDA data, we reviewed a sample of home mortgage loan data the bank had reported on its HMDA Loan Application Registers and small business loan data the bank had reported on its CRA Disclosure Statements. We identified some reporting errors in both sets of data. Because of these errors, the bank's publicly reported data is not entirely accurate. The bank subsequently revised the data. We used the revised and accurate data in this evaluation.

To assess the accuracy of the bank's qualified investments, we sampled current period investments, charitable grants, and donations. Current period investments total \$35.9 million. We considered all but two investments (totaling \$394,000) to be qualified investments. Charitable grants and donations for the evaluation period total \$4.7 million. While we disqualified some of the grants and donations the bank had considered to be qualified, the disqualifications were not material. In each assessment area, the errors represented zero percent (by dollar) of the allocated Tier 1 Capital. Examiners determined prior period investments (\$5.8 million) were qualified investments during the previous CRA evaluation.

Examiners reviewed all community development loans. We did not identify any material errors.

Examiners also reviewed all community development services that the bank offered for

our consideration. We disqualified some service activities and adjusted the bank's information accordingly. These adjustments did not negatively impact our conclusions regarding the bank's community development service activities.

Selection of Areas for Full-Scope Review

The Chicago-Gary-Kenosha, IL-IN-WI multistate CMSA received a full-scope review. In addition, in each state where the bank has an office, examiners selected specific assessment areas within that state for full-scope reviews. We determined which assessment areas should have full-scope reviews based on the volume of deposits generated within the assessment area. We compared the volume of deposits in each particular assessment area to the volume of deposits for the state as a whole. The areas selected for a full-scope review represented the highest percentage(s) of deposits within each state. Refer to the "Scope" section under each State Rating for details regarding which areas were selected.

Ratings

The bank's overall rating is a blend of the state and multistate metropolitan area ratings and a roll-up of the overall conclusion for each of the three performance tests. In arriving at the overall rating, the greatest weighting was given to the conclusions reached for the State of Minnesota followed by the greater Chicago CMSA. These two areas have the greatest proportion of all deposits for the corporation with 39 percent and 33 percent, respectively. Thus, the bank's overall rating was most significantly influenced by performance within the State of Minnesota. The state rating for Minnesota was, in turn, based on performance in the Minneapolis-St. Paul Assessment Area which had 94 percent of TCF deposits within the State of Minnesota. The Chicago CMSA includes all of Chicago, IL PMSA #1600 (the only assessment area in Illinois), Kenosha, WI PMSA #3800, and a small portion of Gary, IN PMSA #2960 (the only assessment area in Indiana). PMSA refers to primary metropolitan statistical area.

The basis for rolling up the Lending, Investment, and Service Test component ratings to the bank level is based on the percent of deposits originating in each rating area. In other words, we placed the greatest emphasis on those areas containing the largest segment of the bank's deposits. Once we rolled these component ratings up to the bank level, we assigned the overall bank rating based on the respective point values that apply to the component ratings contained in the regulation. As a result of doing this, we have assigned component ratings of "High Satisfactory" to the Lending Test, "Outstanding" to the Investment Test, and "High Satisfactory" to the Service Test. This results in the overall "Satisfactory" rating.

State ratings are based primarily on those areas that received full-scope reviews. Refer to the "Scope" section under each State Rating for details regarding how the areas were weighted in arriving at the overall state rating.

Fair Lending Review

An analysis of three years of public comments and consumer complaint information as well as HMDA, small business and small farm lending data was performed according to the OCC's risk based fair lending approach. Based on its analysis of the information, the OCC decided that a comprehensive fair lending examination would not need to be conducted in connection with the CRA evaluation this year. The latest comprehensive fair lending exam was performed in 1998.

Multistate Metropolitan Area Rating

CRA Rating for Chicago-Gary-Kenosha, IL-IN-WI CMSA: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- TCF has demonstrated excellent responsiveness to the credit needs of the assessment area through its home mortgage lending. The bank's ability to generate mortgage loans within low- and moderate-income geographies was excellent.
- TCF has an excellent level of investments, primarily in the form of mortgage- backed securities supplemented with a large volume of charitable grants. The investments helped address much needed affordable housing issues within the CMSA.
- TCF has a good branch distribution network and offers excellent customer convenience through its extended hours and vast ATM system. TCF has greatly expanded the number of its branches through the acquisition or opening of 135 offices since the last CRA examination. TCF employees have also provided a good level of community development services focused on affordable housing issues.

Description of Institution's Operations in the Chicago-Gary-Kenosha, IL-IN-WI CMSA

TCF has established an assessment area that covers most of the greater Chicago-Gary-Kenosha, IL-IN-WI CMSA. In Illinois, this consists of all portions of the Chicago PMSA #1600. This is TCF's only assessment area in the State of Illinois. In Indiana, this area consists of eight census tracts in Highland, a suburban section of the Gary PMSA #2960. The Highland Assessment Area is immediately adjacent to Chicago. It is also TCF's only assessment area in Indiana. In Wisconsin, the area consists of Kenosha County which is the Kenosha PMSA #3800. TCF also has other assessment areas in the State of Wisconsin which are discussed in another portion of this Performance Evaluation.

TCF previously had offices in Illinois located in the Rockford MSA #6880. TCF sold these branches in 1998 and eliminated the assessment area. We did not include this area for analysis because it was sold relatively early in the evaluation period.

TCF has 167 offices and 407 ATMs in the Illinois portion of the assessment area; one branch and three ATMs in the Indiana portion, and five branches and fourteen ATMs in the Kenosha portion.

Refer to the Market Profiles for the Multistate Metropolitan Area in Appendix C for

detailed demographics and other performance context information for this assessment area that received a full-scope review.

Scope of Evaluation in Chicago-Gary-Kenosha, IL-IN-WI CMSA

The Chicago-Gary-Kenosha, IL-IN-WI CMSA received a full-scope review because it is a multistate metropolitan area. We performed analyses on the individual PMSAs and assigned one overall conclusion for each performance element and one consolidated rating for each of the three performance tests. From this point on, we will refer to this area as the greater Chicago CMSA. Refer to the Scope of the Examination table in Appendix A for the names of the counties in the assessment area.

TCF acquired the Indiana branch on January 31, 1998. Information and data for this office is included after that date. The dates included for the facts and data of the Illinois and Wisconsin portions of the assessment area are described on page 9.

The Chicago PMSA carried the greatest weight in arriving at the ratings for this CMSA. This is because the Chicago area had deposits equal to 32 percent of TCF's total deposit base. The Kenosha PMSA had 1 percent of TCF's total deposits. The Highland Assessment Area had less than \$600,000 in deposits which is less than one percent of TCF's total deposits. While discussion is provided on the performance in the Highland Assessment Area, this area carried little weight. The volume of loans generated was too small to result in meaningful conclusions.

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

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in the greater Chicago CMSA is rated "Outstanding." Based on full-scope review, the bank's performance is excellent in both the Chicago PMSA and Kenosha PMSA. The very small volume of loans generated or purchased in the Highland Assessment Area did not impact our conclusions.

Lending Activity

Refer to Table 1 in the Multistate CMSA section of Appendix D for the facts and data used to evaluate the bank's lending activity.

TCF's lending record in the Chicago PMSA represents an excellent responsiveness to the credit needs, primarily through the excellent distribution of its mortgage loans into

low- and moderate-income geographies. Specifically, TCF's market share for its two largest mortgage loan products (refinance loans and home purchase loans with market shares of 1.89 percent and 1.59 percent, respectively) exceed the bank's deposit market share.

In 1999, among similarly situated commercial banks in the assessment area, TCF's reported lending volumes tended to reflect the strong competition within the PMSA. Although TCF ranked relatively high in terms of deposit market share, its overall lending volumes were low in comparison. In the Chicago PMSA, TCF's Illinois deposits ranked the bank 15th in size with a market share of 1.27 percent. When considering all residential lending products combined (refinance, home purchase and home improvement), the bank's lending ranking in the PMSA is 54th with an overall market share of 0.48 percent. In this PMSA, the bank is ranked 126th as a lender for small business purposes with a market share of 0.03 percent.

Lending competition in TCF's assessment area is intense, with 352 CRA reporters in the Chicago PMSA. This does not include smaller financial institutions (those banks with total assets under \$250 million that are not affiliates of a holding company with assets over \$1 billion) that made small business loans within the assessment area that are not subject to CRA reporting requirements. In addition, we identified 908 local and national HMDA reporters in the assessment area.

TCF's home purchase loans accounted for 38 percent of the number of home mortgage loans it originated in Illinois. TCF's home improvement loans accounted for 2 percent and home mortgage loans for refinance purposes accounted for 60 percent of the home mortgage loans it originated in Illinois.

In the Highland Assessment Area, TCF made very few loans. The bank's sole office in the state is located in a grocery store and the office has very limited space. The small space did not allow for an onsite lender within the store. From the time this office opened in 1998 until the merger of the TCF charters in April 2000, state law prohibited the Illinois lenders, who were in closest proximity to this Indiana office, from making loans in Indiana. Accordingly, during the time period before the merger, lenders from the Michigan offices or from the Indiana loan production offices were used whenever a loan applicant needed assistance. This did not foster customer convenience and the result was substantially smaller loan volumes than in other TCF assessment areas.

In the Highland Assessment Area, the bank ranks last of 19 financial institutions physically located in the assessment area with a deposit market share of 0.03 percent. Based on 1999 HMDA aggregate data, TCF did not make mortgage loans. An affiliated mortgage company made six loans in 1999 which were subsequently attributed to this office by TCF. There were 208 lenders that reported HMDA loans within the assessment area during 1999. Based on 1999 CRA aggregate data, TCF ranks 44th in small loans to businesses with a market share of 0.07 percent. There were 80 lenders that reported small business loans within the assessment area during 1999.

Total originations/purchases of home mortgage loans in the Highland Assessment Area

were very limited with only eight home purchase loans and five refinance loans. There were no home improvement loans reported. There were only two loans made to small businesses, therefore, analysis would not result in relevant conclusions. CD lending had a neutral impact on the overall Lending Test rating because there were no community development loans made here during the evaluation period.

In the Kenosha PMSA, TCF's lending record reflects excellent responsiveness because of its home mortgage lending, particularly for home improvement and refinance loans. TCF was successful in originating these types of loans in low- and moderate-income geographies. TCF's market share for the home improvement product (at 9.8 percent) also greatly exceeded its deposit market share. For the refinance loan product, TCF's market shares in low- and moderate-income geographies well exceeded its overall market share for this product. TCF's deposit market share is 7 percent and is ranked fifth of 23 financial institutions located in the area. TCF has an overall home mortgage market share of 3 percent and is ranked sixth out of 319 local and national lenders that reported mortgage loans in the area. TCF's small business lending is nominal with only five small loans to businesses reported. TCF is ranked 44th of 65 lenders with a market share of 0.07 percent.

In analyzing TCF's Lending Test performance in the greater Chicago CMSA, most weight was given to home mortgage lending because of the significant volume of loans generated and because it is a strategic focus for the bank. In terms of both number of loans and dollar volume, home mortgage lending was over 99 percent of all reportable loans. Specifically, most weighting was given to the refinance category because it represented 59 percent of all home mortgage loans made. We also gave secondary consideration to the home purchase category because this was the second largest volume of loans generated by the bank in the area. TCF reported only 77 small business loans which was not meaningful for analysis.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

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

The overall geographic distribution of TCF's home mortgage lending is excellent in the Chicago PMSA. There are no low- or moderate-income geographies in the Highland Assessment Area so an analysis of this component was not completed. The geographic distribution of mortgage loans in the Kenosha PMSA is excellent.

Home Purchase Loans

TCF's distribution of home purchase loans is excellent. Within the highly competitive Chicago market, TCF generated over 8,000 home purchase loans and achieved an

overall market rank of 14th. In the Kenosha PMSA, TCF's performance is good although relatively few loans were originated or purchased.

TCF's distribution of lending in the low-income areas of the Chicago PMSA significantly exceeded the owner-occupied demographics of the area. Market share in the low-income geographies also greatly exceeded the bank's overall market share for the home purchase product. In the Kenosha PMSA, the bank did not report any loans in the low-income geographies. There are few owner-occupied housing units in these geographies.

TCF's distribution of lending in the moderate-income areas of the Chicago PMSA significantly exceeded the owner-occupied demographics of the areas. Market share within the moderate-income areas also exceeded the bank's overall market share. In the Kenosha PMSA, TCF's distribution of loans in moderate-income areas exceeded the owner-occupied demographics. We did not draw conclusions on the nominal market share data.

Home Improvement Loans

Overall, TCF's geographic distribution of home improvement loans is excellent in both the Chicago and the Kenosha PMSAs.

TCF generated only 2 percent of its Illinois HMDA loans in this category. Accordingly, this category did not carry as much weight in the home mortgage lending conclusions. An analysis of the bank's nominal market share in the Chicago PMSA is not meaningful to this evaluation.

TCF's distribution of lending in the low-income areas of the Chicago PMSA significantly exceeded the owner-occupied demographics of the areas. The bank's portion of loans in the low-income areas of the Kenosha PMSA was well above the demographics. TCF's market share in the Kenosha PMSA was, however, significantly below the bank's overall market share.

TCF's distribution of lending in the moderate-income areas of the Chicago PMSA substantially exceeded the owner-occupied demographics of the areas. The portion of loans in moderate-income areas of the Kenosha PMSA also substantially exceeded the demographics. TCF's market share in this PMSA is close to its overall market share.

Refinance Loans

Overall, TCF's distribution of home refinance loans is likewise excellent in both the Chicago and the Kenosha PMSAs. TCF generated over 12,000 loans of this type in the competitive Chicago PMSA. In the Kenosha PMSA, TCF generated 365 loans and attained the fourth highest volume of loans originated or purchased of all 245 lenders reporting in the market.

TCF's distribution of lending in the low-income areas of the Chicago PMSA slightly

exceeded the owner-occupied demographics of the areas. Market share within the low-income areas nearly matched the bank's overall market share for loans of this type. TCF's distribution of loans in the Kenosha PMSA also slightly exceeded the owner-occupied demographics of the area. TCF's market share in the low-income areas exceeded its overall market share for loans of this type.

TCF's distribution of lending in the moderate-income areas of the Chicago PMSA essentially matched the owner-occupied demographics of the areas. Market share within the moderate-income tracts slightly exceeded its overall market share. In the Kenosha PMSA, TCF's distribution of loans of this type exceeded demographics. Market share also exceeded its overall market share in the Kenosha PMSA.

Small Loans to Businesses

Refer to Table 5 in the Multistate CMSA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

During the evaluation period, the bank's lending activity with small loans to businesses consisted of 77 loans, not a significant level. Accordingly, while analysis and commentary follows regarding the bank's distribution with small loans to businesses, minimal emphasis was placed on this product in the Lending Test rating for this CMSA. The bank's nominal market shares did not render meaningful analysis.

TCF's distribution of lending in the low-income areas of the Chicago PMSA slightly exceeded the business demographics of the areas which indicates excellent performance. TCF's distribution of lending in the moderate-income areas of the Chicago PMSA slightly exceeded the business demographics of the areas.

There are no low- or moderate-income areas within the Highland Assessment Area. TCF made only five small loans to businesses in the Kenosha PMSA. Therefore, we did not complete analyses on this component for these locations.

Small Loans to Farms

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

As previously stated, TCF does not lend to small farms.

Lending Gap Analysis

An analysis of TCF's home mortgage and small business lending patterns utilizing a variety of techniques including mapping, did not reveal any significant or unexplained gaps in the geographic distribution in any of the bank's assessment areas. Although there were several geographies where TCF made very few or no loans, the gaps were

mostly a result of limited market presence, few owner-occupied homes, or a very high concentration of families living below the poverty level.

Inside/Outside Ratio

We calculated the inside/outside ratio on the state level. The Chicago PMSA and the Highland Assessment Area are the only assessment areas defined in the respective states of Illinois and Indiana. A discussion of TCF's inside/outside ratio for these two states is given below. For the Kenosha PMSA, this discussion is included in the conclusions for the State of Wisconsin. The analysis included originations and purchased loans directly attributed to TCF.

The analysis shows an excellent response to the credit needs of the bank's Illinois assessment area. Ninety-eight percent of the HMDA loan products were made within the assessment area. By product, home improvement loans had the lowest percentage made inside the assessment area with 97 percent. Ninety-seven percent of all loans to small businesses were made inside the assessment area.

In Indiana, the bank originated a substantial majority of its loans outside the Highland Assessment Area. This office, however, generated very few loans. During the evaluation period, TCF reported a total of 112 HMDA reportable loans and 4 loans to small businesses. During the evaluation period, only 6 percent (a total of only seven loans) of the bank's home mortgage lending originated within its assessment area (note that we did not include the six other loans included in the Lending Test analysis in the analysis of loans made inside/outside the assessment area because they were originated by affiliates). Of the HMDA products reported, TCF made 18 percent of its home purchase loans and four percent of its refinance loans inside the assessment area. For small loans to businesses, TCF made two of four loans inside the Indiana assessment area. Bank personnel said the low penetration of lending within the assessment area is attributable to the size of the branch office, which is too small to allow for an onsite lender.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 7, 8, and 9 in the Multistate CMSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The overall borrower distribution of TCF's home mortgage lending is excellent in the Chicago PMSA and in the Kenosha PMSA. There were only 13 mortgage loans in the Highland Assessment Area. These are too few loans on which to draw meaningful conclusions. Although information is included in the narrative below, this is for informational purposes only.

Home Purchase Loans

TCF's distribution of home purchase loans to borrowers of different income levels is adequate. TCF's performance in the Kenosha PMSA is considered good.

TCF's distribution of lending to low-income borrowers in the Chicago PMSA was substantially below the family income demographics of the area even when considering the level of families in the area that live below the poverty level. However, the bank's market share among low-income borrowers nearly matched the bank's overall market share. In the Kenosha PMSA, the bank's distribution of loans to low-income borrowers was significantly below demographics. If the poverty levels were considered, TCF's distribution of such loans would greatly exceed demographics. The market share is nominal and was not a factor in our conclusions. In the Highland Assessment Area, TCF did not make any loans to low-income borrowers.

TCF's distribution of lending to moderate-income borrowers in the Chicago PMSA significantly exceeded the family income demographics of the area. TCF's market share among moderate-income borrowers essentially matched its overall market share for this product. In the Kenosha PMSA, the bank's distribution of loans to moderate-income borrowers substantially exceeded the demographics. Market share information was not relevant to our conclusions. In the Highland Assessment Area, the percentage of loans made to moderate-income borrowers and shown on Table 7 appears to be excellent performance. However, it must be noted that this actually represents only three loans of the eight home purchase loans made by this office. The number of loans involved is too small to impact our conclusions.

Home Improvement Loans

Overall, TCF's distribution of home improvement loans to borrowers of different income levels is excellent. An analysis of the bank's nominal market share in the Chicago PMSA is not meaningful to this evaluation. TCF did not make any home improvement loans in the Highland Assessment Area. Also note that TCF did not obtain income information on 24 percent of the home improvement loans it originated. We based the conclusions given below on only those loans made with borrower income information available.

TCF's distribution of lending to low-income borrowers in the Chicago PMSA significantly exceeded the family income demographics of the area. TCF's distribution of home improvement loans in the Kenosha PMSA was significantly below demographics even when considering the percentage of families living below the poverty level. TCF's market share for loans of this type was also below the overall market share.

TCF's distribution of lending to moderate-income borrowers in the Chicago PMSA also substantially exceeded the family income demographics of the area. In Kenosha, the distribution of loans to borrowers with income at this level was significantly above demographics. The bank's market share to borrowers at this income level also exceeded its overall market share.

Refinance Loans

Overall, TCF's distribution of home refinance loans to borrowers of different income levels in the assessment area is excellent. TCF generated a very large number of loans in the Chicago PMSA and achieved an 11th place rank in the market. TCF generated the fourth largest volume of loans of this type in the Kenosha PMSA. TCF only reported five loans of this type in the Highland Assessment Area. One loan was made to a middle-income borrower; two loans were made to upper-income borrowers; and TCF did not have income information on two loans. We can not draw relevant conclusions on these few loans. Note that TCF did not obtain income information on 26 percent of the loans made for refinance. The conclusions below are based on those loans with income information available.

TCF's distribution of lending to low-income borrowers in the Chicago PMSA was significantly below the family income demographics of the area. When considering the level of families in the area that live below the poverty level, however, the bank's distribution would be close to the demographic comparator. In addition, TCF's market share among low-income borrowers exceeded its overall market share. In the Kenosha PMSA, the distribution of loans to low-income borrowers was also significantly below demographics. But if the volume of families living below poverty was considered, the bank's distribution would exceed the demographics. TCF's market share to low-income borrowers exceeded its overall market share.

TCF's distribution of lending to moderate-income borrowers in the Chicago PMSA significantly exceeded the area's family income demographics. TCF's market share to moderate-income borrowers also exceeded its overall market share. TCF's distribution of loans of this type in the Kenosha PMSA also significantly exceeded demographics. Likewise, the bank's market share to moderate-income borrowers in the Kenosha PMSA exceeded its overall market share.

Small Loans to Businesses

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

TCF made few loans to small businesses during this evaluation. Accordingly, these few loans carry little weight in our Lending Test conclusions. Based on the distributions shown on Table 10 for the Chicago and Kenosha PMSAs, TCF's distribution of small loans to businesses indicates poor responsiveness to the credit needs of smaller businesses in the assessment area. Although Table 10 shows 100 percent of TCF's loans in the Highland Assessment Area were to businesses with revenues of \$1 million or less, note that this is based on only two loans and is therefore not meaningful for our analysis.

TCF's loan distribution to small business borrowers in both the Chicago and the

Kenosha PMSAs was substantially below the small business demographics of the respective areas. The bank's market share of lending to businesses with annual revenues of \$1 million or less was very low and not a meaningful part of our conclusions. Less than half of TCF's small business loans in both PMSAs were for less than \$100,000.

Small Loans to Farms

Refer to Table 11 in the Multistate CMSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to farms.

As previously stated, TCF is not a small farm lender.

Community Development Lending

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

The bank's community development lending efforts had a neutral impact on the Lending Test rating for the multistate CMSA. TCF originated an adequate volume of community development loans in the Chicago PMSA, especially when compared to the ample opportunities present in this market. The dollar volume represents 1.4 percent of the assessment area's allocated Tier 1 Capital. Most loans address the need for affordable housing and neighborhood revitalization. There are no particularly notable complex or innovative characteristics to these loans.

TCF did not make any community development loans in either the Highland Assessment Area or the Kenosha PMSA.

Product Innovation and Flexibility

Product innovation and flexibility had a positive impact on the Lending Test rating in the multistate CMSA. This conclusion is supported primarily because of the success of some of these programs in the Chicago and the Kenosha PMSAs. TCF did not provide any information on specific programs or products used in the State of Indiana that could be considered flexible.

Within the Chicago PMSA portion of this multistate CMSA, TCF has used ten different programs or processes that have assisted LMI borrowers obtain 720 home mortgage loans totaling over \$108 million. These programs offer such things as below market rates, minimum down payments, the ability to use gifts as down payments, or the ability to obtain a loan without a credit history. One internal process is a second review of applicants that would be denied using secondary market underwriting criteria. Through this process, bank personnel look for ways to approve applicants using more liberal

terms that still fall within guidelines established by TCF. Once approved, these loans are kept in-house. Two other programs are done in conjunction with the City of Chicago and enable LMI applicants to purchase either public housing units or other houses within economically distressed neighborhoods. These programs help to revitalize and stabilize targeted areas in the city. Providing affordable housing and revitalizing distressed areas are identified needs within the PMSA.

In the Kenosha PMSA, TCF has used four different programs or processes that assisted LMI borrowers with housing related loans. These programs generated 28 loans totaling \$1,008,790. One is the same internal process described above that is a second review of applicants denied credit under secondary market underwriting guidelines. The other programs are state-sponsored programs that have allowed LMI borrowers to obtain home purchase or home improvement loans with more flexible terms. In addition, TCF has made six other loans totaling over \$640,000 that have more flexible terms but do not typically include income limits on the applicant.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in the greater Chicago CMSA is rated "Outstanding." Based on full-scope reviews, the bank's performance in both its Chicago PMSA and the Kenosha PMSA is excellent. Performance in the Highland Assessment Area is, however, very poor.

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

Chicago PMSA

Bank performance in this assessment area is excellent in relation to its size and presence in the Chicago PMSA. Investment opportunities are plentiful (refer to the Market Profile in Appendix C). Qualified investments in the Chicago PMSA total \$15.6 million. This volume of investments represents 7.12 percent of the bank's allocated Tier 1 Capital. These investments do not have any notable complex or innovative characteristics.

During the evaluation period, TCF invested in seven mortgage-backed securities (MBS) totaling \$12.9 million. Three of the MBS financed 48 home loans to low- and moderate-income borrowers in the Chicago PMSA. Detailed information was not available for the other MBS. By contract, however, at least 90 percent of the underlying loans in each MBS must be in the Chicago PMSA. No less than 90 percent of the underlying loans must be to low- and moderate-income borrowers. These investments have positively impacted the availability of home loans for low- and moderate-income families in the Chicago PMSA.

The balance of current period investments consists of \$1.3 million in charitable grants and donations. TCF's grants and donations benefited at least 75 different community development organizations in the Chicago PMSA. These donations have positively impacted the provision of affordable housing and social services to low- and moderate-income people in the Chicago PMSA.

TCF also has five prior period investments totaling \$1.4 million. The bank's investment test performance is strong even without consideration of prior period investments. These investments continue to have a positive impact in the Chicago PMSA because they address affordable housing concerns that remain a significant credit need within the area.

Kenosha PMSA

Performance in this assessment area is also excellent. There are at least moderate investment opportunities available in the assessment area (see the Market Profile section of Appendix C for details). Qualified investments total just over \$1.1 million and represent 11.88 percent of the Tier 1 Capital allocated to this assessment area. There are no notable complex or innovative characteristics associated with these investments.

TCF invested in six mortgage-backed securities that make up nearly all of the investment dollars. These mortgage-backed securities helped to address affordable housing needs in the area. The structure of the securities and the underlying mortgages are similar to what is described above. In addition, TCF made 11 charitable donations totaling approximately \$7,000 to organizations that meet a community development purpose.

Highland Assessment Area

Bank performance in this assessment area is very poor in relation to its size and available investment opportunities (refer to the Market Profile in Appendix C). The county in which the Highland Assessment Area is located has a significant number of organizations that serve the needs of LMI people. These organizations and the programs that they offer provide opportunities for area financial institutions to participate in the form of investments or grants.

TCF made no investments in the Highland Assessment Area.

Despite the very poor performance in this assessment area, it did not have a negative impact on our conclusions for the multistate CMSA because the area is so small. The Highland Assessment Area has less than one percent of the bank's total deposits. Performance in the Chicago PMSA carried the most weight in arriving at the Investment Test rating and was also supported by similar performance found in the Kenosha PMSA.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in the greater Chicago CMSA is rated "High Satisfactory." Based on full-scope reviews, the bank's performance is good in the Chicago PMSA; good in the Kenosha PMSA; and adequate in the Highland Assessment Area.

Retail Banking Services

Refer to Table 13 in the Multistate CMSA section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Chicago PMSA

TCF's delivery systems are accessible to geographies and individuals of different income levels. The bank has 167 offices located within the PMSA. The bank's location of branches in both low- and moderate-income geographies is below the distribution of the population living in such geographies. The sheer number of TCF branches helps mitigate concerns over this distribution as does the bank's recent improvement in this area through acquisitions and new branch openings as discussed below. As of June 30, 1999, TCF's number of branches places it second in the Chicago Assessment Area in total branches. TCF ranks second of all banks in the PMSA in terms of offices located in low-income tracts. TCF has the highest number of offices (at 18) located in moderate-income tracts out of all banks located in the PMSA.

TCF's hours and services offered in the Chicago Assessment Area are excellent. General hours at the bank's 136 supermarket branches are 8:00 AM to 8:00 PM. These branches are open 364 days a year, closed only for Christmas Day. Banking hours for all branches are comparable among all locations regardless of the income level of the geography. All traditional branches have Saturday hours and generally have extended hours on Thursdays and Fridays.

TCF's loan and deposit products are offered at all locations. TCF's products include low minimum, no fee checking accounts, savings accounts, certificates of deposit, and various loan products.

TCF's record of opening and closing branches has improved the accessibility of its delivery systems. TCF was very active in acquiring and opening additional branches during our evaluation period. The bank opened a total of 52 branches and closed only three branches. Also, TCF acquired an additional 80 branches from another financial institution. The net effect between the opened and acquired branches on low-income tracts was positive with five additional branches. The net effect on moderate-income tracts was also positive with 11 additional branches.

TCF's ATM network of 407 machines in the Chicago Assessment Area offers an

effective alternative system for delivering teller based services to low- and moderate-income geographies and to low- and moderate-income individuals. The distribution of ATMs in both low- and moderate-income geographies is slightly below the distribution of the population living in such geographies.

We did not give significant weight to other alternative delivery systems, such as telephone and Internet banking, because the bank did not provide data on how low- and moderate-income individuals and geographies are impacted by these services.

TCF has also made a concerted effort to market its products and services to the significant Hispanic population in the PMSA. TCF uses Spanish language brochures as well as radio and print advertisements. TCF did not provide specific information on how this marketing effort met the needs of the Hispanic population who also fall into a low- or moderate-income category. It does, however, provide an indication that TCF takes additional steps to deliver its products and services to a broader audience.

Kenosha PMSA

TCF's delivery systems are accessible to geographies and individuals of different income levels. The bank has five offices located within the PMSA. One office is located in a low-income tract. This office is located in downtown Kenosha and is more centrally located to all of the adjacent low- and moderate-income areas of the city. TCF does not have any offices in the moderate-income areas.

Since the last examination, TCF has added two offices within this MSA. Although both were located in upper-income geographies, these offices brought added convenience and access to a wider variety of financial services and products to a broader market. One of these new offices was in a grocery store which provided longer service hours during the week as well as Sunday hours.

Hours do not vary in a way that impact LMI geographies or individuals. All offices offer at least two nights with extended hours, all have Saturday hours, and Sunday hours are available at the grocery store office.

TCF's loan and deposit products are offered at all locations. TCF's products include low minimum, no fee checking accounts, savings accounts, certificates of deposit, and various loan products. However, not all offices have onsite lenders. The offices share consumer lenders and a residential mortgage lender. Bank personnel contact TCF lenders from Milwaukee to accommodate commercial credit needs of the bank's Kenosha customers. The offices that do not have onsite lenders are in middle- or upper-income geographies, which does not negatively impact the accessibility of loan services to LMI geographies or individuals.

TCF has 14 ATMs in the Kenosha PMSA. One is located in the downtown (low-income) area. This ATM also provides a Spanish language option. We did not give significant weight to other alternative delivery systems, such as telephone and Internet banking because the bank did not provide data on how low- and moderate-income individuals and geographies are impacted by these services.

Highland Assessment Area

TCF's delivery systems are reasonably accessible to geographies and individuals of different income levels throughout the assessment area. The bank has only one branch in the Highland Assessment Area. This branch is located in an upper-income tract. Within the bank's assessment area there are no low- and moderate-income tracts.

TCF's hours and services are good. The branch is open, with expanded hours, Monday through Friday and is also open on Saturday. Because there are no other branches and there are no low- or moderate-income geographies in this assessment area, an analysis of office hours and services by income level of the geography is not meaningful.

TCF's record of opening and closing branches has not adversely affected its delivery systems. The bank opened the Highland branch during the evaluation period. It was the only branch opening or closing.

We did not perform an analysis of alternative delivery system meeting the needs of low- and moderate-income individuals because the bank did not provide data on how low- and moderate-income individuals and geographies were impacted by these services.

Community Development Services

TCF's performance in providing community development services is good. This is based particularly upon the relatively high level of services provided in the Chicago PMSA. Community development opportunities in this assessment area are formally structured and abundant, however, the environment for such opportunities is extremely competitive because of the city's stature as a national hub for commerce and the presence of numerous financial institutions. Despite this competitive atmosphere, several bank employees were involved in a good number of organizations that served a community development need.

Over the evaluation period, the bank's community development service activities have focused on affordable housing and home ownership for low- and moderate-income people. This focus addresses identified community development needs.

In the Kenosha PMSA, TCF provided an adequate level of community development services. Lenders have worked with applicants for the Wisconsin Housing and Economic Development Authority (WHEDA) which provides an affordable housing program. TCF employees provided technical assistance, training, and loan file processing to the WHEDA organization as well as credit counseling to WHEDA's applicants.

TCF's provision of community development services is poor in the Highland Assessment Area. Community development service opportunities are available in this area. TCF was not involved in any CD service activities over the evaluation period. However, because of the very limited number of employees, participation in community development activities would be difficult.

State Ratings

CRA Rating for Michigan:	<u>Satisfactory</u>
The Lending Test is rated:	<u>High Satisfactory</u>
The Investment Test is rated:	<u>Low Satisfactory</u>
The Service Test is rated:	<u>High Satisfactory</u>

The major factors that support this rating include:

- TCF has demonstrated overall good responsiveness to credit needs within the full-scope areas. Performance was generally stronger in the Metro East Assessment Area where the bank achieved excellent penetration of home improvement and refinance loans to all borrowers and within geographies of all income levels. The bank also had an excellent level of community development loans in this area. In the Southeast Assessment Area, TCF had good penetration of its home mortgage loans to borrowers and geographies of different income levels.
- TCF's overall performance within the state reflects two distinct levels of performance from the two areas that received full-scope reviews. Within the Metro East Assessment Area, TCF has demonstrated excellent performance through a significant volume of investments, primarily in the form of mortgage-backed securities. These securities, which were supplemented by charitable grants that benefited a large number of nonprofit organizations, addressed affordable housing needs and provided necessary social services to low- and moderate-income people in the assessment area. However, performance in the Southeast Assessment Area is poor. The very small dollars invested in the Southeast Assessment Area provided only minimal impact on the area's needs and in relation to the available opportunities.
- TCF's offices and delivery systems provide good access to financial services and products in geographies of different income levels and to individuals of all incomes. Accessibility is considered excellent in the Southeast Assessment Area and adequate in the Metro East Assessment Area. Hours and services are comparable regardless of the income level of the location. TCF employees also provide an adequate level of community development services in both assessment areas.

Description of Institution's Operations in Michigan

TCF has six assessment areas within the State of Michigan. They are the Calhoun-Kalamazoo Assessment Area (portion of the Kalamazoo-Battle Creek, MI MSA #3720), the Jackson Assessment Area (Jackson, MI MSA #3520), Metro East Assessment Area (portion of Detroit PMSA #2160), Saginaw-Bay Assessment Area (portion of Saginaw-Bay City-Midland, MI MSA #6960), Southeast Assessment Area (portion of Ann Arbor, MI PMSA #0440), and the Tuscola Assessment Area (a nonmetropolitan area). Note that the two PMSAs TCF refers to as its Metro East and the Southeast Assessment

Areas are parts of the greater Detroit-Ann Arbor-Flint, MI CMSA. TCF maintains a loan production office in the city of Flint which is not included in an assessment area. In addition, TCF sold its branches in the Jackson County Assessment Area but still maintains a consumer loan production office there. The bank also has a mortgage loan production office there.

TCF has 56 offices and 112 ATMs within the State of Michigan.

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

Scope of Evaluation in Michigan

We selected the Metro East and the Southeast Assessment Areas for full-scope reviews. These two assessment areas had the bulk of TCF's \$1.4 billion deposits within Michigan with 20 percent and 52 percent, respectively. All other assessment areas received limited-scope reviews. TCF sold its three branches in Jackson County during 2000 thus eliminating it as an assessment area. We included it for a limited-scope review, however, because it was a part of the bank for the majority of the evaluation period. Refer to the Scope of the Examination table in Appendix A for more information on the names of the counties included in each assessment area.

Because the Southeast Assessment Area had the larger percentage of deposits for the two full-scope areas, the performance in this assessment area received greater weighting in determining the overall rating for the state. The Lending Activity section below describes how the weighting was applied to the various loan products for the Lending Test rating for the state.

During the examination, we considered information from community organizations and representatives for the communities that were subject to full-scope reviews. Information obtained from these contacts was included in the Market Profile section of Appendix C.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Michigan is rated "High Satisfactory." Based on full-scope reviews, the bank's performance is excellent in the Metro East Assessment Area and good in the Southeast Assessment Area.

Lending Activity

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

TCF's lending record in Michigan represents a good responsiveness to the credit needs of its two full-scope assessment areas.

In the Metro East Assessment Area, the bank's 3,047 loans originated/purchased during the evaluation period were comprised of approximately 89 percent home mortgage loans and 11 percent small loans to businesses.

The composition of home mortgage loan originations was 16 percent (423 loans) home purchase, 7 percent (187 loans) home improvement, and 77 percent (2,084 loans) home refinance. For weighting purposes, the focus in the following home mortgage distribution analyses will be on the refinance lending category. Small business had limited impact on the Lending Test conclusions because of the limited volume of loans generated.

The bank ranks 16th out of 187 banks in the area in deposit market share (0.55 percent). TCF ranks 21st (0.29 percent) in small loans to businesses based on 1999 CRA aggregate data. Based on 1999 HMDA aggregate data, TCF ranks 42nd with a market share of 0.46 percent. TCF's lending performance is most heavily weighted toward its mortgage lending and this product's market share is relatively near to the bank's deposit market share.

In the Southeast Assessment Area, the bank's approximately 3,500 loans originated during the evaluation period were comprised of 97 percent home mortgage loans and 3 percent small loans to businesses.

The composition of home mortgage loan originations was 20 percent (661 loans) home purchase, 4 percent (132 loans) home improvement, and 76 percent (2,535 loans) home refinance. Given the nominal level of small business lending, for weighting purposes, the focus and greatest weighting in the analyses was on home mortgage lending, especially in the refinance category.

The bank ranks first in deposit market share (14 percent). TCF ranks 17th (0.58 percent) in small loans to businesses based on 1999 CRA aggregate data. Based on

1999 HMDA aggregate data, TCF is ranked second in originations/purchases of loans for home mortgage loans with a market share of 4 percent.

In analyzing TCF's Lending Test performance in Michigan, greater weight was given to the home mortgage lending category based on the large volume of loans generated. As noted above, small business lending did not have a significant impact on the Lending Test conclusions. Significant volumes of community development lending positively impacted the Metro East Assessment Area. The impact of community development lending in the Southeast Assessment Area was neutral.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

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

The overall geographic distribution of home mortgage loans is good for the Southeast Assessment Area and excellent for the Metro East Assessment Area.

In both the Metro East and the Southeast Assessment Areas, this conclusion is based primarily on the bank's lending in the refinance category which is where the volume of data allows for more meaningful analysis.

Home Purchase Loans

The geographic distribution of home purchase loans is good. The geographic distribution is adequate in the Metro East Assessment Area and is good in the Southeast Assessment Area.

In the Metro East Assessment Area, the portion of home purchase loans made in low-income geographies was slightly below the portion of owner-occupied housing units there. An analysis of TCF's nominal market share is not meaningful to this evaluation. In the Southeast Assessment Area, the distribution of these loans made in low-income geographies exceeded the portion of owner-occupied units there. In addition, the respective market share of such loans matched the bank's overall market share.

In the Metro East Assessment Area, the portion of home purchase loans made in moderate-income geographies was below the portion of owner-occupied housing units there. The nominal market share for loans in moderate-income geographies makes analysis not meaningful. In the Southeast Assessment Area, the distribution of these loans made in moderate-income geographies was slightly below the portion of owner-occupied units there. The respective market share of such loans exceeded the bank's overall market share.

Home Improvement Loans

The geographic distribution of home improvement loans is good. In the Metro East Assessment Area, the geographic distribution of home improvement loans is excellent and it is good in the Southeast Assessment Area.

In the Metro East Assessment Area, the portion of home improvement loans made in low-income geographies was near to the portion of owner-occupied housing units there. The market share for loans in low-income geographies was too small to result in meaningful conclusions. In the Southeast Assessment Area, the distribution of these loans made in low-income geographies was slightly below the portion of owner-occupied units there. However, the market share of such loans was well below the bank's overall market share.

In the Metro East Assessment Area, the portion of home improvement loans made in moderate-income geographies substantially exceeded the portion of owner-occupied housing units there. The nominal market share for loans in moderate-income geographies was not analyzed. In the Southeast Assessment Area, the distribution of these loans made in moderate-income geographies was slightly below the portion of owner-occupied units there. The market share of such loans slightly exceeded the bank's overall market share.

Refinance Loans

The geographic distribution of home mortgage refinance loans is good. In the Metro East Assessment Area, the distribution of such loans was excellent and the geographic distribution in the Southeast Assessment was adequate.

In the Metro East Assessment Area, the portion of loans made in low-income geographies was slightly below the portion of owner-occupied housing units there. The market share for loans in low-income geographies was very low and was not meaningful to our analysis. In the Southeast Assessment Area, the portion of home refinance loans made in low-income geographies was near to the portion of owner-occupied housing units there. The market share for loans in low-income geographies was well below the bank's overall market share.

In the Metro East Assessment Area, the portion of loans made in moderate-income geographies significantly exceeded the portion of owner-occupied housing units there. The nominal market share for loans in moderate-income geographies was not relevant to our analysis. In the Southeast Assessment Area, the portion of home refinance loans made in moderate-income geographies was below the portion of owner-occupied housing units there. The market share for loans in moderate-income geographies, however, exceeded the bank's overall market share.

Small Loans to Businesses

Refer to Table 5 in the State of Michigan section of Appendix D for the facts and data

used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses is adequate. In the Metro East Assessment Area, TCF exhibited good geographic distribution. But in the Southeast Assessment Area, TCF had poor geographic distribution of loans in this category.

In the Metro East Assessment Area, the portion of small loans to businesses made in low-income geographies was below the portion of businesses in those geographies. The market share for such loans was very low and analysis of this component would not render meaningful conclusions. In the Southeast Assessment Area, the portion of small loans to businesses made in low-income areas was well below the portion of businesses in those geographies. Market shares were also very low in this assessment area as well but the bank's market share in low-income tracts exceeded its nominal overall market share.

In the Metro East Assessment Area, the portion of small loans to businesses made in moderate-income geographies significantly exceeded the portion of businesses in those geographies. The market share for such loans also exceeded the bank's overall market share. In the Southeast Assessment Area, the portion of small loans to businesses made in moderate-income areas was significantly below the portion of businesses in those areas. The bank's market share in these geographies was too low to render meaningful conclusions.

Small Loans to Farms

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

TCF is not a small farm lender and no analysis was completed on this component.

Lending Gap Analysis

An analysis of TCF's home mortgage and small business lending patterns utilizing a variety of techniques including mapping, did not reveal any significant or unexplained gaps in the geographic distribution in any of the bank's assessment areas. Although there were several geographies where TCF made very few or no loans, the gaps were mostly a result of limited market presence, few owner-occupied homes or a very high concentration of families living below the poverty level.

Inside/Outside Ratio

The bank originated a significant majority of its loans within its assessment areas in the State of Michigan. The analysis included originated and purchased loans directly attributed to TCF. During the evaluation period, 87 percent of the bank's HMDA lending (home purchase, home improvement, refinance, and multi-family) was made inside the

assessment areas. Loans to finance multi-family dwellings had the lowest inside/outside ratio at 77 percent while loans made for refinance had the highest at 87 percent. TCF originated 87 percent of its small loans to businesses within its assessment areas.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 7, 8, and 9 in the State of Michigan section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The overall borrower distribution of home mortgage loans is good. In the Metro East Assessment Area, the distribution of home mortgage loans to borrowers of different income levels is excellent. In the Southeast Assessment Area, the distribution of such loans is good.

In both assessment areas, this conclusion is based primarily on the bank's lending in the home refinance category which is where the data is more meaningful.

Home Purchase Loans

TCF's distribution of home purchase loans to borrowers of different income levels is good. The bank exhibited good distribution in the Southeast Assessment Area and excellent in the Metro East Assessment Area. TCF's home purchase lending market share was nominal in the Metro East Assessment Area and was not meaningful to this analysis.

TCF's distribution of lending to low-income borrowers in the Metro East Assessment Area was well below the family income demographics of the area. However, when the portion of those living below the poverty level is considered, TCF's performance would exceed the revised demographics. The bank's distribution of lending to low-income borrowers in the Southeast Assessment Area was well below the family income demographics of the area. When considering the area's level of families that live below the poverty level, TCF's performance would be close to that revised demographic. TCF's market share in the low-income geographies in the Southeast Assessment Area was significantly above the bank's overall market share.

TCF's distribution of lending to moderate-income borrowers in the Metro East Assessment Area substantially exceeded the family income demographics of the area. The bank's distribution of lending to moderate-income borrowers in the Southeast Assessment Area also exceeded the family income demographics of the area. The market share was slightly below the bank's overall market share.

Home Improvement Loans

TCF's distribution of home improvement loans to borrowers of different income levels is excellent in both assessment areas.

In the Metro East Assessment Area, the portion of home improvement loans made to low-income borrowers exceeded the portion of families defined as such. The home improvement lending market share was nominal in this full-scope area and was not meaningful to this analysis. In the Southeast Assessment Area, the portion of home improvement loans made to low-income borrowers significantly exceeded the portion of families defined as such. The market share for such loans also significantly exceeded the bank's overall market share.

The bank's portion of loans made to moderate-income borrowers in the Metro East Assessment Area significantly exceeded the portion of families defined as such. The respective market share of such loans was not meaningful. The bank's portion of loans made to moderate-income borrowers in the Southeast Assessment Area also substantially exceeded the portion of families defined as such. The bank's respective market share of such loans was near to the bank's overall market share.

Refinance Loans

Overall, TCF's distribution of home refinance loans to borrowers of different income levels is excellent. The distribution is excellent in the Metro East Assessment Area and is good in the Southeast Assessment Area. In the Southeast Assessment Area, TCF had the third highest market rank for this loan type. TCF's refinance lending market share was nominal in the Metro East Assessment Area and was not meaningful to this analysis.

In the Metro East Assessment Area, the portion of home refinance loans made to low-income borrowers was well below the portion of families defined as such. However, when the level of families living below the poverty level is considered, the bank's portion of loans to low-income borrowers would exceed demographics. In the Southeast Assessment Area, the portion of home refinance loans made to low-income borrowers was significantly below the portion of families defined as such. But the bank's performance would be close to demographics when considering the poverty level. The market share for such loans exceeded the bank's overall market share.

In the Metro East Assessment Area, the bank's portion of loans made to moderate-income borrowers significantly exceeded the portion of families defined as such. The bank's portion of loans made to moderate-income borrowers in the Southeast Assessment Area exceeded the portion of families defined as such. The bank's respective market share of such loans also exceeded the bank's overall market share.

Small Loans to Businesses

Refer to Table 10 in the State of Michigan section of Appendix D for the facts and data

used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The borrower distribution of small loans to businesses is poor in each full-scope assessment area.

In both the Metro East and Southeast Assessment Areas, the bank's portion of loans made to small businesses (businesses with annual revenues of \$1 million or less) was well below the portion of businesses defined as such. The bank's market share of such loans in both assessment areas was slightly above the bank's overall market share, however, the market share information was very low and not relevant to our analysis.

Small Loans to Farms

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

TCF is not a farm lender and analysis was not completed on this component.

Community Development Lending

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

The bank's volume of community development lending had a neutral impact on the Southeast Assessment Area where the volume of community development loans is adequate. The volume of community development lending had a positive impact on the Metro East Assessment Area where the volume of loans was excellent. Overall, the bank's community development lending efforts had a positive impact on the Lending Test rating for the State of Michigan.

TCF originated one community development loan in the Southeast Assessment Area. While the dollar volume of the loan represented just 0.4 percent of the assessment area's Tier 1 Capital, it addressed a community need for affordable housing and was of notable complexity. In general, the assessment area has a good level of community development opportunities available.

- TCF originated a \$267,000 loan to finance the acquisition and improvement of Parkhurst Apartments. This was a low-income tax credit project to develop a 48-unit affordable housing complex in Ann Arbor, Michigan. TCF was the lead bank. Complex characteristics included the size of the project, the number of parties involved and the fact that TCF administered the construction loan.

TCF originated three community development loans in the Metro East Assessment Area. The dollar volume represents 16.1 percent of the assessment area's allocated

Tier 1 Capital. The loans addressed affordable housing needs and Detroit revitalization efforts. This assessment area can be characterized as having numerous community development opportunities. See the Market Profile section of Appendix C for additional details. One loan also had notable complexity.

- TCF provided \$726,000 construction financing (and \$2.3 million permanent financing) for the Arbors at St. Clair project. This was a low-income tax credit project to construct a 108-unit affordable housing apartment complex in Port Huron, Michigan. Complex characteristics included the size of the project, the number of parties involved and the fact that TCF administered the construction loan.

Product Innovation and Flexibility

Product innovation and flexibility had a positive impact on the Lending Test conclusions. TCF offers several flexible mortgage-related lending programs serving LMI borrowers.

TCF has an internal process through which it reviews applications from LMI applicants or geographies that would not meet secondary market underwriting criteria. The applications are considered using more lenient terms that still fall within TCF guidelines. If approved, these loans are kept in-house. In the Metro East Assessment Area, TCF made 29 loans totaling just under \$1.2 million through this process. In the Southeast Assessment Area, TCF made 18 loans totaling \$1.5 million under these more flexible guidelines.

TCF has also made extensive use of home purchase and home improvement products offered through the Michigan State Housing Development Agency (MSHDA) in both of the full-scope areas. These programs provide subsidized interest rates, some with down payment assistance, specifically to borrowers with incomes less than 80 percent of the median family income. TCF had the state's highest volume of loans generated under the MSHDA home improvement program. Within these two assessment areas, TCF made nine home purchase loans totaling \$560,000 and 64 home improvement loans totaling \$710,000.

TCF also uses three other flexible home mortgage programs for borrowers whose income levels are below 80 percent of the median family income. In the Metro East Assessment Area, TCF originated 18 loans totaling \$1.4 million using these programs. In the Southeast Assessment Area, TCF originated 11 loans totaling nearly \$700,000. In addition, TCF originated 56 loans totaling \$4.9 million in other programs that allow flexible loan terms but do not restrict borrowers' income levels.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Jackson and Saginaw-Bay Assessment Areas is not inconsistent with the bank's overall "High Satisfactory" performance under the Lending Test in Michigan. Performance in the Calhoun-Kalamazoo Assessment Area is weaker than the overall performance

because of weaker distribution of HMDA loans into LMI geographies. Performance in the Tuscola Assessment Area is weaker than the overall Lending Test rating in the state because of weaker distribution of HMDA loans to LMI borrowers. These areas did not impact the overall Lending Test rating because these areas accounted for only 12 percent of TCF's deposits within the state. Refer to Tables 1 through 11 in the State of Michigan section of Appendix D for facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's Investment Test performance in the State of Michigan is rated "Low Satisfactory." Based on full-scope reviews, performance is poor in the Southeast Assessment Area and excellent in the Metro East Assessment Area.

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

Southeast Assessment Area

Bank performance in this assessment area is poor in relation to its size and the numerous investment opportunities available (refer to the Market Profile in Appendix C). Qualified investments in the Southeast Assessment Area totaled \$723,000. This volume of investments represented only 0.96 percent of the bank's allocated Tier 1 Capital. These investments did not have any notable complex or innovative characteristics.

During the evaluation period, TCF invested in three mortgage-backed securities (MBS) totaling \$352,000. The underlying loans financed four home loans to low- and moderate-income borrowers in the Southeast Assessment Area. The relatively small dollar size of the investment as well as the fact that it represented only four homes in the MSA resulted in limited impact on the overall availability of home loans for low- and moderate-income families in the assessment area.

The balance of current period investments consisted of \$211,000 in charitable grants and donations. TCF grants and donations benefited approximately 65 different community development organizations in the Southeast Assessment Area. These donations provided a positive benefit to these organizations and their ability to provide necessary social services to low- and moderate-income people in the assessment area.

TCF also had two prior period investments with a balance of \$160,000. Although these investments continue to positively impact the Southeast Assessment Area, they do not substantially improve the bank's investment test performance due to the relatively small dollars involved.

Metro East Assessment Area

Bank performance in this assessment area is excellent in relation to its size and reflects the numerous investment opportunities available (refer to the Market Profile in Appendix C). Qualified investments in the Metro East Assessment Area totaled \$7.8 million. This volume of investments represented 26.44 percent of the bank's allocated Tier 1 Capital. These investments did not have any notable complex or innovative characteristics.

During the evaluation period, TCF invested in five mortgage-backed securities totaling \$6 million. In total, 99 percent of the 73 underlying loans financed home loans to low- and moderate-income borrowers in the Metro East Assessment Area. These

investments have positively impacted the availability of home loans for low- and moderate-income families in the assessment area.

The balance of current period investments consisted of \$176,000 in charitable grants and donations. TCF grants and donations benefited at least 40 different community development organizations in the Metro East Assessment Area. These donations have positively impacted the provision of social services to low- and moderate-income people in the assessment area.

TCF also had four prior period investments with a balance totaling \$1.7 million. The bank's investment test performance in the Metro East Assessment Area was strong without consideration to prior period investments, although these investments continue to have a positive impact.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, Investment Test performance in the Jackson Assessment Area is stronger than the bank's overall "Low Satisfactory" rating for the State of Michigan. This conclusion is based solely on the dollar volume of the investments made and that this volume represents 4.5 percent of the Tier 1 Capital allocated to this assessment area. Performance in the Calhoun-Kalamazoo, Saginaw-Bay, and Tuscola Assessment Areas is weaker. In each of these assessment areas, the investment levels are less than 1 percent of the Tier 1 Capital allocated to the respective areas. These four limited-scope assessment areas account for only 28 percent of the bank's Michigan deposits in total. Consequently, performance differences did not materially impact Michigan's Investment Test rating.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in Michigan is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Metro East Assessment Area is adequate and is good in the Southeast Assessment Area.

Retail Banking Services

Refer to Table 13 in the State of Michigan section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

TCF's delivery systems are accessible to geographies and individuals of different income levels throughout the assessment areas. Accessibility is adequate in the Metro East Assessment Area and excellent in the Southeast Assessment Area.

TCF has 28 branches within the Metro East Assessment Area. The distribution of offices in both low- and moderate-income geographies is below the distribution of the population living in such geographies. The LMI tracts of the bank's assessment area are generally on the outskirts of the assessment area. The bank has four branches adjacent to these tracts and another four branches in close proximity. These branches help provide reasonable access for residents of the LMI tracts.

TCF has 14 branches within the Southeast Assessment Area. The distribution of offices in low-income geographies greatly exceeds the distribution of the population living in such geographies. The distribution of offices in moderate-income geographies is slightly below the distribution of the population living in such geographies.

TCF's record of opening and closing branches has not adversely affected the accessibility of its delivery systems. The Metro East Assessment Area had eight branch openings and two branch closings. The net effect on LMI census tracts was one additional branch in a moderate-income tract. The Southeast Assessment Area had four branch openings and four branch closings. The net effect on LMI census tracts was one additional branch in a low-income tract and one less branch in a moderate-income tract.

TCF's hours and services offered in the Metro East and Southeast Assessment Areas are good. Twelve branches in the Metro East Assessment Area and two branches in the Southeast Assessment Area are located in a grocery or retail store. These branches offer extended hours and are open seven days a week. Office hours and services are comparable among all locations regardless of the income level of the geography or whether the office is a traditional or supermarket office. TCF's products include low minimum, no fee checking accounts, savings accounts, certificates of deposit, and various loan products.

TCF's ATM network offers an effective alternative delivery system for delivering teller based services to low- and moderate-income geographies and to low- and moderate-income individuals.

The Metro East Assessment Area has 58 ATMs. The distribution of ATMs in low-income geographies is less than the distribution of the population living in such geographies. The distribution in moderate-income geographies meets the distribution of the population living in such geographies. The proximity and number of ATMs near to the low-income geographies provides additional service access to these geographies.

The Southeast Assessment Area has 31 ATMs. The distribution of ATMs in low-income geographies exceeds the distribution of the population living in such geographies. The distribution of Southeast Assessment Area's ATMs in moderate-income geographies is less than the distribution of the population living in such geographies.

We did not give significant weight to other alternative delivery systems, such as telephone and Internet banking, because the bank did not provide data on how low- and moderate-income individuals and geographies are impacted by these services.

Community Development Services

TCF's provision of community development services is adequate in both the Metro East and Southeast Assessment Areas. Community development service opportunities are readily available in both assessment areas. Bank employees in both locations provide an adequate number of services to some of the organizations that provide community development related services.

Over the evaluation period, the bank's community development service activities within the two assessment areas have focused on affordable housing and home ownership for low- and moderate-income people. In the Southeast Assessment Area, service activities have also involved organizations that provide social services to low- and moderate-income people. These service activities address identified community development needs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Calhoun-Kalamazoo, Saginaw-Bay, and Tuscola Assessment Areas is not inconsistent with the bank's overall "High Satisfactory" performance under the Service Test in Michigan. Conclusions for the Jackson Assessment Area are not relevant because TCF has exited this market and no longer has branches there. Refer to Table 13 in the state of Michigan section of Appendix D for the facts and data that support these conclusions.

CRA Rating for Minnesota:	<u>Satisfactory</u>
The Lending Test is rated:	<u>High Satisfactory</u>
The Investment Test is rated:	<u>Outstanding</u>
The Service Test is rated:	<u>High Satisfactory</u>

The major factors that support this rating include:

- TCF has demonstrated good responsiveness to the credit needs of its assessment area primarily through its ability to generate loans to low- and moderate-income borrowers. TCF also had good levels of community development loans in the area.
- TCF has demonstrated excellent responsiveness through a very large volume of investments, primarily in the form of mortgage-backed securities. A large volume of charitable grants to a very large number of community development organizations supplements these investments. These investments and grants addressed affordable housing needs and provided needed social services to low- and moderate-income people.
- TCF's delivery systems are accessible to geographies and individuals of different income levels. TCF improved accessibility since the last CRA examination through the opening of 12 new offices, three of which were in moderate-income areas. Expanded hours provide good convenience as does TCF's vast ATM network. TCF employees also provide a good level of community development services.

Description of Institution's Operations in Minnesota

TCF has six assessment areas in the State of Minnesota. These six include both MSA and nonmetropolitan areas. They are Duluth (portion of the Duluth-Superior, MN-WI MSA #2240), Mankato-New Ulm (nonmetropolitan), Minneapolis-St. Paul (portion of the Minneapolis-St. Paul, MN-WI MSA #5120), St. Cloud (all of St. Cloud MSA #6980), U of M Crookston (one tract of Grand Forks, ND-MN MSA #2985), and U of M Morris (one tract of a nonmetropolitan area). The assessment areas with a U of M designation are part of a business arrangement with the University of Minnesota to provide deposit-taking ATMs at specific locations on the University of Minnesota campuses in these cities. TCF does not maintain a banking office at either of these two sites.

During October 1999, TCF sold its office(s) in the Rochester MSA #6820. Although TCF no longer includes this MSA as an assessment area, we included it for a limited-scope review because it was a part of the bank's operations for the majority of the evaluation period. In first and second quarter 1998, TCF also sold its offices in Pipestone, Marshall, and Austin, eliminating these assessment areas. We did not include information on these locations in our evaluation because the sale occurred so early in the evaluation period.

Within the six existing Minnesota assessment areas, TCF has 84 offices and 663 ATMs.

The offices are made up of 47 traditional branches and 37 branches located in supermarkets. TCF operates the largest supermarket-banking network in the state.

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

Scope of Evaluation in Minnesota

We selected the Minneapolis-St. Paul Assessment Area as a full-scope review area because this area had the largest percentage of TCF deposits within the state. This assessment area had 94 percent of TCF's \$2.6 billion in deposits within the State of Minnesota. All other assessment areas received a limited-scope review. Refer to the Scope of Examination table in Appendix A for more information on the names of the counties included in each assessment area.

We based the overall performance of the bank in Minnesota on its performance in the Minneapolis-St. Paul Assessment Area. The Lending Activity section below describes how the various loan products were weighted in determining the Lending Test rating for the state.

During this examination, we considered information from community organizations and various members of the communities that were subject to a full-scope review. Information obtained from these contacts is included in the Market Profile section of Appendix C.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

Lending Activity

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

TCF's lending record in Minnesota represents a good responsiveness to the credit needs of its assessment areas, primarily through its home mortgage lending. In particular, the lending market shares for the two primary mortgage loan products (home

purchase and refinance loans) is near to TCF's deposit market share which indicates good performance.

In the Minneapolis-St. Paul Assessment Area, TCF generated just over 94 percent of its Minnesota deposits. This ranked the bank's deposits third in size, with a market share of 5 percent. TCF is, however, significantly smaller than the two market leaders, US Bank, NA and Wells Fargo Bank Minnesota, NA. Within TCF's assessment area, these two banks have 29 percent and 27 percent of the deposit market share, respectively. In this MSA, TCF was ranked 23rd for small business loan originations, with a market share of 0.30 percent. The bank's residential lending is tenth. TCF has a market share for residential loans of 2.13 percent. It should be noted that the affiliated TCF Mortgage Corporation had a market share of 1.32 percent and was ranked 16th. If the residential loans generated by the two entities were combined, the two would have a market share of 3.45 percent and would rank fifth.

TCF's home purchase loans accounted for 44 percent of the number of home mortgage loans it originated in the Minneapolis-St. Paul Assessment Area. TCF's home improvement loans accounted for 5 percent and home mortgage loans for refinance purposes accounted for 51 percent of the home mortgage loans it originated in this full-scope assessment area.

Lending competition in TCF's assessment areas is intense, with 649 financial institutions that reported HMDA loans in the Minneapolis-St. Paul MSA. In addition, 152 financial institutions reported small business loans in the assessment area.

In analyzing TCF's Lending Test performance in the assessment area, we gave equal weight to home purchase and refinance lending because of the significance of the lending in terms of volume, because the volumes generated were nearly equal, and because of identified credit needs. Because loans to small businesses only comprised one percent of the reportable loans, this type of lending did not have a significant impact on the Lending Test conclusions for the state.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

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

The overall geographic distribution of TCF's home mortgage lending is adequate in the Minneapolis-St. Paul Assessment Area.

Home Purchase Loans

Overall, TCF's distribution of home purchase loans is adequate.

TCF's distribution of lending in the low-income areas of the assessment area was less than the owner-occupied demographics of the areas. In addition, TCF's market share in these low-income areas was below its overall market share. TCF's overall market rank in this very competitive assessment area was good at number four.

TCF's distribution of lending in the moderate-income areas of the assessment area was well below the owner-occupied demographics of the areas. In addition, TCF's market share in these moderate-income areas was below its overall market share.

Home Improvement Loans

Overall, TCF's geographic distribution of home improvement loans is excellent.

TCF's distribution of lending in the low-income areas of the Minneapolis-St. Paul Assessment Area exceeded the owner-occupied demographics of the areas. TCF's market share in these low-income areas also exceeded its overall market share.

TCF's distribution of lending in the moderate-income areas of the Minneapolis-St. Paul Assessment Area significantly exceeded the owner-occupied demographics of the areas. TCF's market share in these moderate-income areas also significantly exceeded its overall market share.

Refinance Loans

Overall, TCF's distribution of home refinance loans is adequate.

TCF's distribution of lending in the low-income areas of the Minneapolis-St. Paul Assessment Area was below the owner-occupied demographics of the areas. Further, the bank's market share of loans made in the low-income areas of this assessment area was below its overall market share. TCF achieved an overall market rank of fourth in the assessment area, which is good in this competitive market.

TCF's distribution of lending in the moderate-income areas of the Minneapolis-St. Paul Assessment Area was well below the area's demographics. In addition, the bank's market share in the MSA's moderate-income areas was near to its overall market share.

Small Loans to Businesses

Refer to Table 5 in the State of Minnesota section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

TCF's geographic distribution of small loans to businesses reflects an excellent dispersion throughout its assessment area. Business lending is not a significant product line for TCF which is reflected in the bank's nominal market share. The percentages are too low to result in meaningful conclusions.

TCF's distribution of lending in the low-income areas of the Minneapolis-St. Paul Assessment Area significantly exceeded the business demographics of the areas.

TCF's distribution of lending in the moderate-income areas of the Minneapolis-St. Paul Assessment Area also significantly exceeded the business demographics of the areas.

Small Loans to Farms

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

As previously stated, TCF does not lend to small farms.

Lending Gap Analysis

An analysis of TCF's home mortgage and small business lending patterns utilizing a variety of techniques including mapping, did not reveal any significant or unexplained gaps in the geographic distribution in any of the bank's full-scope assessment areas. Although there were several geographies where TCF made very few or no loans, the gaps were mostly a result of limited market presence, few owner-occupied homes or a very high concentration of families living below the poverty level.

Inside/Outside Ratio

We performed the inside/outside ratio analysis at the state level. The analysis included originations and purchased loans directly attributed to TCF. During the review period TCF originated or purchased 93 percent of its HMDA reportable loans and 93 percent of its loans to small businesses in its Minnesota assessment areas. This shows an excellent response to the credit needs of the bank's Minnesota assessment areas.

When the HMDA reportable loans are broken out, the home improvement product has the lowest inside/outside ratio at 90 percent while the home purchase category has the highest ratio at 96 percent.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 7, 8 and 9 in the State of Minnesota section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The overall borrower distribution of TCF's home mortgage lending is excellent in the Minneapolis-St. Paul Assessment Area.

Home Purchase Loans

TCF's distribution of home purchase loans to borrowers of different income levels is good.

TCF's distribution of lending to low-income borrowers in the Minneapolis-St. Paul Assessment Area was below the family income demographics of the area. However, if the portion of families living below the poverty level was considered, the bank's portion of loans to low-income families would exceed the demographics. The bank's market share of loans to low-income borrowers was slightly below its overall market share. As previously stated, TCF achieved an overall market rank of fourth in this highly competitive market.

TCF's distribution of lending to moderate-income borrowers in the Minneapolis-St. Paul Assessment Area significantly exceeded the family income demographics of the area. The bank's market share of lending to moderate-income borrowers in the assessment area was below its overall market share.

Home Improvement Loans

Overall, TCF's distribution of home improvement loans to borrowers of different income levels is excellent.

TCF's distribution of lending to low-income borrowers in the Minneapolis-St. Paul Assessment Area substantially exceeded the family income demographics of the areas. In addition, TCF's market share of low-income borrowers in the assessment area substantially exceeded its overall market share.

TCF's distribution of lending to moderate-income borrowers in the assessment area also substantially exceeded the family income demographics of the areas. TCF's market share of moderate-income borrowers in the Minneapolis-St. Paul Assessment Area exceeded its overall market share.

Refinance Loans

Overall, TCF's distribution of home refinance loans to borrowers of different income levels in its full-scope assessment area is excellent.

TCF's distribution of lending to low-income borrowers in the Minneapolis-St. Paul Assessment Area was below the family income demographics of the respective areas. When the portion of families living below the poverty level are considered, the bank's performance would be well above the adjusted demographics. The bank's market share of low-income borrowers significantly exceeded the bank's overall market share in the assessment area.

TCF's distribution of lending to moderate-income borrowers in the Assessment Area significantly exceeded the area's family income demographics. The bank's market share of moderate-income borrowers exceeded the bank's overall market share in the assessment area.

Small Loans to Businesses

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

TCF's distribution of small business loans reflects a poor response to the credit needs of smaller businesses in this assessment area. The bank's portion of loans to businesses with revenues of \$1 million or less was well below the percentage of businesses with revenues at that level. TCF is not a significant small business lender, which explains its very small market share. TCF's market share of loans to these borrowers was not a meaningful part of our analysis. A favorable aspect of its small business lending is that over 49 percent of the bank's business loans were originally for amounts less than \$100,000.

Small Loans to Farms

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

As previously stated, TCF does not lend to small farms.

Community Development Lending

Refer to Table 1 in the State of Minnesota section of Appendix D for the facts and data used to evaluate the banks level of community development lending.

The bank's community development lending efforts during the evaluation period had a positive influence on our overall Lending Test rating for the state. TCF originated a good volume of community development loans in the Minneapolis-St. Paul Assessment Area over the evaluation period. The dollar volume represents 4.6 percent of the assessment area's allocated Tier 1 Capital. In comparison, the two largest financial institutions in the market had community development lending at 6 percent and 1.5 **percent** of their respective Tier 1 Capital levels. It should also be noted that these banks are considerably larger and have significantly more resources than TCF. Most TCF community development loans address the need for affordable housing. There are ample community development opportunities available in this assessment area. One loan is of notable complexity.

- TCF originated a \$2.1 million loan to finance the Central Towers Project. This was a low-income tax credit project to renovate 198 units of affordable housing for low-income senior citizens in downtown St. Paul. TCF was the lead bank with a 50 percent participation in the project. Complex characteristics included the size of the project, the number of parties involved and the fact that TCF administered the construction loan.

Product Innovation and Flexibility

Product innovation and flexibility had a positive impact on the Lending Test conclusions. TCF uses nine flexible home mortgage loan programs which helps to partially explain the favorable volume of loan originations to low- and moderate-income borrowers. As previously discussed, these programs provide flexible underwriting for low- or moderate-income borrowers. Several of these programs provide home improvement loans at rates well below market rates and often include more leniency in debt-to-income ratios or higher loan-to-value ratios than traditionally allowed. Some programs have payment deferral or forgiveness features if the borrower stays in the home for a certain number of years. Some are geared toward first-time homebuyers. All are restricted to borrowers whose incomes are less than 80 percent of the median family income. These programs are very responsive to identified needs in the assessment area.

The areas of Minneapolis and St. Paul with less expensive housing are typically neighborhoods with older homes that need renovation or updating. Several of these programs address those concerns. Affordable housing is also typically mentioned in contacts made with community organizations. These programs assist LMI individuals in obtaining more affordable financing options. In the Minneapolis-St. Paul Assessment Area, the bank used these programs to originate 1,201 home mortgage loans totaling nearly \$52 million. TCF also made 128 loans totaling \$10.6 million using an internal process through which it reviews applications from LMI applicants and geographies that would be denied using secondary market underwriting criteria. Through the process, the bank considers the applicants using more flexible underwriting criteria which still fall within TCF guidelines. If approved, these loans are kept in-house.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Duluth, Rochester, and St. Cloud Assessment Areas is not inconsistent with the bank's overall "High Satisfactory" performance under the Lending Test in Minnesota. We did not consider any small business loans in this analysis because the number of loans in any of the limited-scope areas was too small to result in meaningful conclusions.

TCF's performance in the Mankato-New Ulm Assessment Area is stronger than the overall Lending Test rating in the state because this assessment area had better geographic distribution of its HMDA loans. The bank also had a large dollar volume of community development loans in the assessment area. This area only accounts for 2.5 percent of TCF's deposits within the state and therefore did not have a material impact on the overall Lending Test rating for the state.

A conclusion on TCF's performance in the U of M Crookston and U of M Morris Assessment Areas is not meaningful. These assessment areas did not generate any loans. These two assessment areas are part of an accommodation arrangement with the University of Minnesota system to place deposit-taking ATMs on campus. There are no branches or employees in these assessment areas.

Refer to the Tables 1 through 11 in the State of Minnesota section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in Minnesota is rated "Outstanding." Based on full-scope reviews, the bank's performance in the Minneapolis-St. Paul Assessment Area is excellent.

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

Bank performance in this assessment area is excellent in relation to its size and the competitive nature of this market. The volume of investments is high even in light of the ample investment opportunities available (refer to the Market Profile in Appendix C). Qualified investments in the Minneapolis-St. Paul Assessment Area totaled \$15.3 million. This volume of investments represented 6.04 percent of the bank's allocated Tier 1 Capital. These investments did not have any notable complex or innovative characteristics.

During the evaluation period, TCF invested in four mortgage-backed securities (MBS) totaling \$10.7 million. In total, 99 percent of the 115 underlying loans in these MBS financed home loans to low- and moderate-income borrowers in the Minneapolis-St. Paul Assessment Area. These investments have positively impacted the availability of home loans for low- and moderate-income families in the assessment area.

The balance of current period investments consisted of \$2.5 million in charitable grants and donations. TCF grants and donations benefited at least 113 different community development organizations. These donations have positively impacted the provision of affordable housing and social services to low- and moderate-income people in the assessment area.

TCF also had four prior period investments with a balance of \$2.1 million. The bank's investment performance is strong even without consideration to prior period investments. These prior period investments continue to have a positive impact in the Minneapolis-St. Paul Assessment Area because the investments met an identified credit need for affordable housing.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, Investment Test performance in the bank's other assessment areas with branch offices (Mankato-New Ulm, St. Cloud, Duluth and Rochester) is not inconsistent with the bank's overall "Outstanding" rating for the State of Minnesota.

In assessment areas with deposit-taking automated teller machines as the sole delivery channel (U of M Crookston and U of M Morris), TCF has no qualified investments. This performance had no impact on Minnesota's Investment Test rating. There are no

deposits attributed to these assessment areas. And the assessment areas result solely from a bank service arrangement with the University of Minnesota.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

Retail Banking Services

Refer to Table 13 in the State of Minnesota section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

TCF's delivery systems are accessible to geographies and individuals of different income levels. TCF has 75 branches and 600 ATMs to help serve the needs of the assessment area. The distribution of offices in the low-income geographies is slightly below the distribution of the population living in such geographies. The difference of 4 percent of the bank's branches in low-income geographies versus 5.5 percent of the population residing in low-income geographies is a minimal difference and does not change the overall conclusion. The distribution of offices in the moderate-income geographies meets the distribution of the population living in such geographies.

TCF's record of opening and closing branches has improved the accessibility of its delivery systems. TCF opened 12 new branch locations during our evaluation period. The net effect on LMI census tracts was three additional branches in moderate-income tracts.

The hours and services that TCF offers throughout the full-scope assessment area are excellent. Saturday hours are offered at all locations except for the two downtown Minneapolis skyway branches which are in middle-income geographies. TCF has 33 supermarket branches which have expanded hours during the week and are also open on both Saturday and Sunday. Office hours and services are comparable among all locations regardless of the income level of the geography or whether or not the office is a traditional or supermarket office. Beginning in January 2001, four traditional branches will also be open on Sunday.

TCF's standard loan and deposit products are offered at all locations. TCF's products include low-minimum, no fee checking, various savings products, certificates of deposit, and various loan products. TCF has several home purchase programs designed to help both low- and moderate-income individuals to qualify and purchase a home.

TCF's ATM network offers an effective alternative delivery system for delivering teller-

based services to low- and moderate-income geographies and to low- and moderate-income individuals. The distribution of ATMs in low-income geographies exceeds the distribution of the population living in such geographies in the Minneapolis-St. Paul Assessment Area. The distribution of ATMs in moderate-income geographies is below the distribution of the population living in such geographies in the Minneapolis-St. Paul Assessment Area. The difference is minimal and does not alter our conclusion.

We did not give significant weight to other alternative delivery systems, such as telephone and Internet banking because the bank did not provide data on how low- and moderate-income individuals and geographies are impacted by these services.

Community Development Services

TCF's provision of community development services is good in the Minneapolis-St. Paul Assessment Area. Ample community development service opportunities are available. In response to these opportunities, TCF employees provide community development related service to a relatively high number of organizations.

Over the evaluation period, the bank's community development service activities have focused on affordable housing, home ownership and social services for low- and moderate-income people. These service activities address identified community development needs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Mankato-New Ulm Assessment Area is stronger than the bank's overall "High Satisfactory" performance under the Service Test in Minnesota. This is because TCF has offices in moderate-income geographies that exceed the demographic comparator. Performance is weaker than the state rating in the Duluth and St. Cloud Assessment Areas because there are no offices in either assessment area located in low- or moderate-income geographies. Together, these areas have only 2 percent of TCF's deposits in the state and therefore did not have an impact on our conclusions.

Conclusions for the Rochester Assessment Area are not relevant because TCF has exited from this market and no longer has offices there. We also did not render conclusions on Service Test performance for the U of M Crookston or the U of M Morris Assessment Areas because TCF only places a deposit-taking ATM at sites on campus through a business arrangement with the University of Minnesota and does not have physical branches in these areas. Refer to Table 13 in the State of Minnesota section of Appendix D for the facts and data that support these conclusions.

CRA Rating for Wisconsin:	<u>Outstanding</u>
The Lending Test is rated:	<u>Outstanding</u>
The Investment Test is rated:	<u>Outstanding</u>
The Service Test is rated:	<u>High Satisfactory</u>

The major factors that support this rating include:

- TCF has demonstrated excellent responsiveness to credit needs in its assessment areas through excellent dispersion of its home mortgage products to borrowers of different income levels and within low- and moderate-income geographies. TCF also has excellent penetration of its small business loans within low- and moderate-income geographies.
- TCF has an excellent level of investments, primarily in the form of mortgage- backed securities. These are supplemented by charitable grants that benefited many local community development nonprofit organizations.
- TCF's branch distribution system provides good accessibility to geographies and individuals of different income levels. Expanded hours and a large ATM network provide good convenience to customers. TCF employees also provide an adequate level of community development services that primarily focused on affordable housing issues.

Description of Institution's Operations in Wisconsin

TCF has two assessment areas within the State of Wisconsin. The assessment areas are the Milwaukee-Waukesha PMSA #5080, and the Racine, WI PMSA #6600. Note that the Milwaukee-Waukesha and the Racine PMSAs are the Milwaukee-Racine, WI CMSA. Also note that TCF has an assessment area in the Kenosha PMSA which was previously evaluated in this report under the multistate consolidated metropolitan statistical area for Chicago-Gary-Kenosha, IL-IN-WI.

During the evaluation period, TCF sold offices located in three assessment areas. These are Appleton-Oshkosh-Neenah, WI MSA #0460, Madison MSA #4720, and Walworth (nonmetropolitan). We included the former assessment areas in Appleton and Walworth for limited-scope reviews because they were a part of the bank's operations for more than half of the evaluation period. We did not include a review of the bank's performance in the Madison MSA because the offices were sold relatively early in the evaluation period. TCF operates loan production offices in Wausau, Stevens Point, Sheboygan, Madison, Janesville, Green Bay, and Fond Du Lac. There are no deposit-taking facilities or ATMs in these locations and they are not included in any assessment areas.

TCF has 27 offices and 97 ATMs within the 2 remaining assessment areas.

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

Scope of Evaluation in Wisconsin

We selected the Milwaukee-Waukesha PMSA for a full-scope review because this area had the largest share of all TCF deposits within the State of Wisconsin. This PMSA has 68 percent of the deposits within the state. TCF has a somewhat limited presence in the state with \$386 million in deposits. The Racine PMSA, as well as the Appleton MSA and the Walworth Assessment Area that are no longer a part of the bank, received limited-scope reviews. Refer to the Scope of Examination table in Appendix A for more information on the names of the counties included in each assessment area.

We weighted the overall performance of the bank in Wisconsin by the percent of deposits generated in each assessment area. Therefore, the bank's performance in the Milwaukee-Waukesha PMSA was selected for full-scope analysis and received the greatest weighting toward the bank's state rating. This PMSA generated over half of the state's deposits. The Lending Activity section below describes the weighting applied to the various loan products in the Lending Test rating for the state.

During the examination, we considered information from community organizations and various members of communities that were subject to a full-scope review. Information obtained from these contacts was included in the Market Profile section of Appendix C.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

Lending Activity

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

TCF's lending record in Wisconsin represents an excellent responsiveness to the credit needs of its assessment areas, primarily through its home mortgage lending.

In the Milwaukee-Waukesha PMSA, TCF generated 68 percent of its Wisconsin deposits, ranking the bank 23rd in size out of 125 financial institutions. TCF had a deposit market share of 0.96 percent. In this assessment area, home mortgage loans represented 65 percent of all home mortgage loans that TCF generated within the state.

This market also represents 94 percent of the small business loans that TCF generated within the state. In this PMSA, the bank is ranked the 24th lender for small business purposes with a market share of 0.68 percent. The bank's home mortgage lending ranked 20th in the PMSA with a market share of 1.60 percent.

In the Milwaukee-Waukesha PMSA, TCF's home purchase loans accounted for 9 percent of the number of home mortgage loans it originated. TCF's home improvement loans accounted for 41 percent and home mortgage loans for refinance purposes accounted for 50 percent of the home mortgage loans it originated.

Lending competition in TCF's assessment area is intense, with 407 HMDA reporters in the Milwaukee-Waukesha PMSA. In addition, 127 local and national CRA reporters (small business loans) were identified in the assessment area.

In analyzing TCF's Lending Test performance in Wisconsin, we gave equal weight to its home improvement and refinance lending because of the significance of both products in terms of the number and dollar volume of loans generated. Little weight was given to small business lending because this was a minor component of total lending.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

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

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

Home Purchase Loans

TCF's distribution of home purchase loans is excellent. The bank's nominal market share for this product was not a meaningful part of our conclusion.

TCF's distribution of lending in the low-income areas of the Milwaukee-Waukesha PMSA exceeded the owner-occupied demographics of the area.

TCF's distribution of lending in the moderate-income areas of the Milwaukee-Waukesha PMSA significantly exceeded the owner-occupied demographics of the area.

Home Improvement Loans

Overall, TCF's geographic distribution of home improvement loans is excellent.

TCF's distribution of lending in the low-income areas of the Milwaukee-Waukesha

PMSA exceeded the owner-occupied demographics of the area. The bank's market share in low-income geographies met the bank's overall market share for loans of this type. TCF achieved the fourth highest overall market rank in this market.

TCF's distribution of lending in the moderate-income areas of the Milwaukee-Waukesha PMSA significantly exceeded the owner-occupied demographics of the area. The bank's market share of home improvement loans in moderate-income geographies exceeded its overall market share.

Refinance Loans

Overall, TCF's distribution of home refinance loans is excellent.

TCF's distribution of lending in the low-income areas of the Milwaukee-Waukesha PMSA was near to the owner-occupied demographics of the area. The bank's market share matched the bank's overall market share for loans of this type.

TCF's distribution of lending in the moderate-income areas of the Milwaukee-Waukesha PMSA significantly exceeded the area's demographics. The bank's market share in moderate-income tracts exceeded the bank's overall market share for loans of this type.

Small Loans to Businesses

Refer to Table 5 in the State of Wisconsin section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/ purchase of small loans to businesses.

TCF's geographic distribution of small loans to businesses reflects an excellent dispersion in the Milwaukee-Waukesha PMSA.

TCF's distribution of lending in the low-income areas of the Milwaukee-Waukesha PMSA exceeded the business demographics of the area. In addition, TCF's market share in these low-income areas exceeded its overall market share.

TCF's distribution of lending in the moderate-income areas of the Milwaukee-Waukesha PMSA significantly exceeded the business demographics of the area. Further, the bank's market share in the PMSA's moderate-income areas also exceeded its overall market share.

Small Loans to Farms

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

As previously stated, TCF is not a small farm lender.

Lending Gap Analysis

An analysis of TCF's home mortgage and small business lending patterns utilizing a variety of techniques including mapping, did not reveal any significant or unexplained gaps in the geographic distribution in any of the assessment areas. Although there were several geographies where TCF made very few or no loans, the gaps were mostly a result of limited market presence, few owner-occupied homes or a very high concentration of families living below the poverty level.

Inside/Outside Ratio

The inside/outside ratio was performed at the state level. The analysis included originated and purchased loans directly attributed to TCF. TCF originated or purchased 66 percent of its HMDA reportable loans and 100 percent of its loans to small businesses within its Wisconsin assessment areas. This shows a good response to the credit needs of the bank's Wisconsin assessment areas. Broken out by HMDA product, the refinance category had the lowest inside/outside ratio at 62 percent while the home purchase category had the highest inside/outside ratio at 93 percent.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 7, 8, and 9 in the State of Wisconsin section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The overall borrower distribution of TCF's home mortgage lending is excellent in the Milwaukee-Waukesha PMSA.

Home Purchase Loans

TCF's distribution of home purchase loans to borrowers of different income levels is excellent. The analysis of the bank's nominal market share was not a relevant consideration in our conclusion.

TCF's distribution of lending to low-income borrowers in the Milwaukee-Waukesha PMSA was below the family income demographics of the area. When considering the area's level of families that live below the poverty level, the bank's portion of loans would greatly exceed demographics.

TCF's distribution of lending to moderate-income borrowers in the PMSA substantially exceeded the family income demographics of the area.

Home Improvement Loans

Overall, TCF's distribution of home improvement loans to borrowers of different income levels is excellent.

TCF's distribution of lending to low-income borrowers in the Milwaukee-Waukesha PMSA was well below the family income demographics of the area. When considering the area's level of families that live below the poverty level, the bank's performance would greatly exceed the demographic comparator. The bank's market share was moderately below its overall market share for loans of this type. TCF achieved a good overall market rank with the fourth highest ranking.

TCF's distribution of lending to moderate-income borrowers in the PMSA significantly exceeded income demographics of the area. The bank's market share exceeded its overall market share.

Refinance Loans

Overall, TCF's distribution of home refinance loans to borrowers of different income levels in the full-scope assessment area is excellent.

TCF's distribution of lending to low-income borrowers in the Milwaukee-Waukesha PMSA was significantly below the family income demographics of the area. When considering the area's level of families that live below the poverty level, TCF's portion of loans in low-income areas would slightly exceed the demographics. The analysis of the bank's market share exceeded the overall market share.

TCF's distribution of lending to moderate-income borrowers in the PMSA significantly exceeded the area's family income demographics. The analysis of the bank's market share was above its overall market share.

Small Loans to Businesses

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

TCF's distribution of small business loans reflects a poor responsiveness to the credit needs of smaller businesses in the full-scope assessment area. The bank's loan distribution to small business borrowers was substantially below the small business demographics of the area. TCF's market share of lending to businesses with annual revenues of \$1 million or less was low and not a relevant part of our analysis. Almost 48 percent of the bank's small business loans were for less than \$100,000 which is a favorable indicator that TCF makes smaller dollar loans to businesses.

Small Loans to Farms

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

As previously stated, TCF does not lend to small farms.

Community Development Lending

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

The bank's community development lending efforts during the evaluation period had a positive influence on our overall rating. TCF originated an excellent volume of community development loans in the Milwaukee-Waukesha PMSA over the evaluation period. The dollar volume represented 19.5 percent of the assessment area's allocated Tier 1 Capital. Most loans addressed the need for affordable housing and many involve more complex construction loans. There are numerous opportunities for community development lending in the assessment area. Some specific examples that demonstrate complexity include the following loans:

- TCF provided a \$900,000 construction loan for the Hartford project. This project involved the purchase of two, and the construction of seven, single-family affordable homes for low- and moderate-income borrowers in Hartford, Wisconsin. TCF was the sole lender on this project. Complex characteristics included the size of the project, the number of parties involved and the fact that TCF administered the construction loan.
- TCF provided a \$684,000 loan (the bank's portion of a \$2 million line of credit) for the Freedomia project. This project involved the construction of 39 affordable housing units (single family and duplexes) for sale to low- and moderate-income borrowers in Freedomia, which is in Ozaukee County, Wisconsin. Ozaukee County has the highest median resale value of a home in the state. The demand for affordable housing in this county is substantially unmet, which makes this project particularly responsive to community needs. TCF was instrumental in establishing a seven-bank loan consortium to fund this, and other, projects. TCF was the lead agent. Complex characteristics included the size of the project, the number of parties involved and the fact that TCF administered the construction loan.
- TCF provided a \$684,000 loan (the bank's portion of a \$2 million construction line of credit) for the Phoenix Heights project. Phoenix Heights was a 10-acre "Brownfield" development project in the City of Waukesha, Wisconsin. The project (to be completed over several phases) will yield many affordable housing units - 67 single family homes, 8 duplex homes, and 24 condominium units. A majority of the homes in the development will be sold to low- and moderate-income families. Complex

characteristics included the size of the project, the number of parties involved and the fact that TCF administered the construction loan.

Product Innovation and Flexibility

Product flexibility had a positive impact on the Lending Test conclusions for the State of Wisconsin. TCF has four flexible home mortgage loan programs or processes. These programs provide flexible underwriting for low- or moderate-income borrowers. Two programs are home improvement programs with more lenient underwriting in debt-to-income or interest rate. One program is through Wisconsin Housing and Economic Development Association which provides below market rate loans to LMI people or targeted properties in LMI or distressed areas. The last is an internal process through which TCF reviews all mortgage loans that would be denied using secondary market underwriting criteria and considers them for alternative underwriting. Loans made under this process are kept in-house. All loans are to LMI people or located in LMI geographies. In the Milwaukee-Waukesha PMSA, the bank used these flexible programs to originate 247 home purchase loans totaling \$8.1 million. TCF also uses HUD, FHA, and Federal Veterans' Affairs loans that generally have lower down payment requirements but don't necessarily restrict income levels to below 80 percent of median family income.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Lending Test in the Appleton and Racine Assessment Areas is not inconsistent with the bank's overall "Outstanding" performance under the Lending Test in Wisconsin. Performance in the Walworth Assessment Area is, however, slightly weaker than the overall performance within the state. Performance is weaker in this area primarily because the distribution of HMDA loans to low-income borrowers was substantially below demographics. This attribute does not materially impact the bank's overall state performance because of the bank's nominal presence in this assessment area.

Refer to the Tables 1 through 11 in the State of Wisconsin section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

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

Bank performance in this assessment area is excellent in relation to its size and available investment opportunities (refer to the Market Profile in Appendix C). Qualified investments in the Milwaukee-Waukesha PMSA totaled \$1.6 million. This volume of investments represented 6.16 percent of the bank's allocated Tier 1 Capital. These investments did not have any notable complex or innovative characteristics.

During the evaluation period, TCF invested in four mortgage-backed securities (MBS) totaling \$1.4 million. All 16 of the underlying loans in these MBS financed home loans to low- and moderate-income borrowers in the Milwaukee-Waukesha PMSA. These investments have positively impacted the availability of home loans for low- and moderate-income families in the Milwaukee-Waukesha PMSA.

The balance of current period investments consisted of \$172,000 in charitable grants and donations. TCF grants and donations benefited at least 39 different community development organizations. These donations have positively impacted the provision of affordable housing and social services to low- and moderate-income people in the Milwaukee-Waukesha PMSA.

TCF also had one prior period investment with a balance of \$70,000. The bank's investment performance is strong even without consideration of prior period investments. This investment continues to have a positive impact in the Milwaukee-Waukesha PMSA because it addressed affordable housing concerns that remain identified credit needs within the assessment area.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, Investment Test performance in the Appleton-Oshkosh-Neenah Assessment Area is weaker than the bank's overall "Outstanding" rating for the State of Wisconsin. In September 1999, TCF sold the branches in this assessment area. Prior to the sale, however, this assessment area accounted for only 11 percent of the bank's Wisconsin deposits. Consequently, this performance difference did not impact Wisconsin's Investment Test rating.

Performance in the Racine and Walworth Assessment Areas is not inconsistent with TCF's overall "Outstanding" rating for the State of Wisconsin.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in Wisconsin is rated "High Satisfactory." Based on a full-scope review, the bank's performance in the Milwaukee-Waukesha PMSA is good.

Retail Banking Services

Refer to Table 13 in the State of Wisconsin section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

TCF's delivery systems are accessible to geographies and individuals of different income levels. The bank has 23 branches located in the Milwaukee-Waukesha PMSA. The bank's location of branches in low-income geographies is well below the distribution of the population living in such geographies. The location of branches in moderate-income geographies essentially meets the distribution of the population living in such geographies.

TCF's record of opening and closing branches has not adversely affected the accessibility of its delivery systems. TCF opened ten branches and closed one branch in the Milwaukee-Waukesha PMSA. The net effect on LMI census tracts was one additional branch in a moderate-income tract.

TCF's hours and services offered in the PMSA are excellent. Office hours and services are comparable among all locations (including both traditional and supermarket locations) regardless of the income level of the geography. Traditional branches have extended hours on Thursday and Friday until 7:00 PM, and are generally open Saturdays until 3:00 PM. Fourteen of the branches are located within grocery or retail stores and are open seven days a week with expanded hours.

TCF's standard loan and deposit products are offered at all locations. TCF's products include low-minimum, no fee checking, various savings products, certificates of deposit, and various loan products, including the Target Area Home Improvement Program (TAHIL) which is designed to meet the credit needs of individuals living in low- and moderate-income geographies.

TCF's ATM network offers an effective alternative delivery system for delivering teller based services to low- and moderate-income geographies and to low- and moderate-income individuals. TCF has 86 ATMs within the assessment area. The distribution of ATMs in low-income geographies is slightly below the distribution of the population living in low-income geographies. The distribution of ATMs in moderate-income geographies exceeds the distribution of the population living in moderate-income geographies.

We did not give significant weight to other alternative delivery systems, such as telephone and Internet banking, because the bank did not provide data on how low- and moderate-income individuals and geographies are impacted by these services.

Community Development Services

TCF's provision of community development services is adequate in the Milwaukee-Waukesha PMSA. This is based on the moderate volume of activities conducted by TCF employees. Ample opportunities are available.

Over the evaluation period, the bank's community development service activities have focused on affordable housing and home ownership for low- and moderate-income people. These service activities address identified community development needs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Racine Assessment Area is weaker than the state rating because all of the offices in this assessment area are located in middle-income tracts. Conclusions on the performance in the Appleton-Oshkosh-Neenah and the Walworth Assessment Areas are not meaningful because TCF exited these markets and no longer has branches there. Refer to Table 13 in the State of Wisconsin section of Appendix D for the facts and data that support these conclusions.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes CD loans): 10/01/97 to 9/30/00 Investment and Service Tests: 10/01/97 to 12/31/00 Community Development Loans: 10/01/97 to 12/31/00 (note: see individual states for specific dates.)	
Financial Institution	Products Reviewed	
TCF National Bank (TCF) Minneapolis, MN	Small business loans, residential real estate loans, community development loans.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
TCF Mortgage Corporation	Operating subsidiary	Residential real estate loans.
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Multistate Metropolitan Area Chicago PMSA #1600	Full-scope	Cook, De Kalb, Du Page, Grundy, Kane, Kendall, Lake, McHenry, and Will Counties
Highland PMSA #2960	Full-scope	Tracts 0403.00, 0404.00, 0405.00, 0406.00, 0408.00, 0409.00, 0427.00, and 0428.00 of Lake County
Kenosha PMSA #3800	Full-scope	Kenosha County
State of Michigan Calhoun-Kalamazoo MSA #3720	Limited-scope	Calhoun and Kalamazoo Counties
Jackson MSA #3520	Limited-scope	Jackson County
Metro East PMSA #2160	Full-scope	Macomb and Oakland Counties and portions of St. Clair and Wayne Counties
Saginaw-Bay MSA #6960	Limited-scope	Bay and Saginaw Counties
Southeast PMSA #0440	Full-scope	Livingston and Washtenaw Counties
Tuscola	Limited-scope	Tuscola County
State of Minnesota Duluth MSA #2240	Limited-scope	Portions of St. Louis County
Mankato-New Ulm	Limited-scope	Blue Earth, Brown, and Nicollet Counties Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, Sherburne, Washington

<p>Minneapolis-St. Paul MSA #5820</p> <p>Rochester MSA #6820 St. Cloud MSA #6980 U of M Crookston MSA #2985 U of M Morris</p> <p>State of Wisconsin Appleton-Oshkosh-Neenah MSA #0460 Milwaukee-Waukesha PMSA #5080</p> <p>Racine PMSA #6600 Walworth</p>	<p>Full-scope</p> <p>Limited-scope Limited-scope</p> <p>Limited-scope Limited-scope</p> <p>Limited-scope</p> <p>Full-scope</p> <p>Limited-scope Limited-scope</p>	<p>and Wright Counties Olmstead County Benton and Stearns Counties</p> <p>Tract 0206.00 of Polk County Tract 9802.00 of Stevens County</p> <p>Portions of Calumet, Outagamie, and Winnebago Counties Milwaukee, Ozaukee, Washington, and Waukesha Counties Racine County Walworth County</p>
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Appendix B: Summary of Multistate Metropolitan Area and State Ratings

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

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

Appendix C: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews

Multistate Metropolitan Area	C-2
Chicago PMSA #1600.....	C-2
Highland Assessment Area	C-5
Kenosha PMSA #3800	C-8
State of Michigan.....	C-11
State of Minnesota.....	C-16
State of Wisconsin	C-19

Multistate Metropolitan Full-Scope Areas

Chicago, IL PMSA #1600

Demographic Information for Full-Scope Area: Chicago PMSA #1600						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1,776	15.77%	21.06%	38.57%	23.03%	1.58%
Population by Geography	7,410,858	9.67%	19.59%	42.57%	28.05%	0.12%
Owner-Occupied Housing by Geography	1,628,992	2.85%	12.48%	48.78%	35.88%	0.00%
Businesses by Geography	264,305	4.58%	11.89%	41.16%	41.03%	1.34%
Farms by Geography	5,858	0.67%	3.76%	60.52%	34.86%	0.20%
Family Distribution by Income Level	1,864,224	19.85%	17.39%	23.99%	38.77%	NA
Distribution of Low- and Moderate-Income Families throughout AA Geographies	694,255	17.81%	28.42%	41.19%	12.59%	NA
Median Family Income		Median Housing Value		= \$123,397		
HUD Adjusted Median Family Income for 2000	= \$42,758	Unemployment Rate		= 3.50%		
Households Below the Poverty Level	= 10.45%					

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 U.S. Census and 2000 HUD updated MFI.

The assessment area consists of all counties within the nine county Chicago PMSA #1600. Chicago is the focal point of the third largest metropolitan area in the United States. The city is considered a transportation hub and is a major economic, business, entertainment, and cultural center for the upper Midwest. Major employers in the area include finance, manufacturing, information technology, health care, retail, and the arts. Wealth is concentrated in suburban areas north and west of the City of Chicago. The city itself has large pockets of poverty and has a significant percentage of low- and moderate-income census tracts. This assessment area meets the definition of the regulation and does not arbitrarily exclude LMI geographies.

TCF has 167 offices and 407 ATMs located within the assessment area. Within the assessment area, TCF has generated \$2.2 billion in deposits which resulted in a deposit market share of 1.27 percent. TCF ranks 15th out of 642 financial institutions. Banks in this assessment area with the highest deposit market shares are First National Bank of Chicago (13 percent deposit market share), LaSalle Bank NA (9 percent), Harris Trust & Savings Bank (6 percent), LaSalle Bank FSB (5 percent), and Northern Trust Company (5 percent). This information was obtained from the June 30, 1999 FDIC Deposit Market Share Reports.

Chicago is considered a financial center for the Midwest. The assessment area is highly banked. There are 642 banks operating nearly 2,200 offices. This does not include credit unions or finance companies. Banking competition is intense and somewhat fragmented. Five major commercial exchanges also play a prominent role in the city's financial prominence. They are the Chicago Board of Trade, the Chicago Mercantile Exchange, the Chicago Board Options Exchange, the Mid-America Commodity Exchange, and the Midwest Stock Exchange. These are some of the world's largest and most influential exchanges.

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

Three non-contiguous areas make up Chicago's Empowerment Zone (EZ) established by HUD in 1994. They are the near West Side, Pilsen/Little Village, and the near South Side. In addition, the City of Chicago and the State of Illinois have recognized portions of the city as participants in non-designated Enterprise Communities (EC). These include the communities of Englewood, Calumet, and the remainder of the West Side. Although not recognized by federal authorities as an Enterprise Community, the city and state's designation will allow these communities to share in many of the same types of benefits available to EZ and EC areas.

We reviewed information provided by fourteen community contacts made in the City of Chicago during the last three years. These were contacts made by the OCC and other regulatory agencies. These contacts provided background information on the economy, the condition of housing, the types of housing and small business loans available, the availability of financial services, and the responsiveness of banks within the assessment area.

The most commonly cited need involved a request for financial counseling and special programs for first-time homebuyers. Several commented on a need for below market interest rates and lower down payment requirements. Both of these options would help an LMI borrower qualify and afford home loan. Several commented on the vast need for home improvement loans or home equity loans that could be used for the rehabilitation and restoration of the older housing stock found in Chicago. Over one-third of Chicago households are experiencing some type of housing problem including such factors as excessive cost burden, physical defects in the structure, and overcrowding. Some contacts said that existing obstacles toward affordable housing include the high cost of new construction, especially because of the high cost of vacant

land. There is little available vacant land and very little of what is available is zoned for multi-family structures that would be conducive to affordable rental housing units.

Another identified need involved job creation and small business loan programs that would also include technical assistance for small business owners. There were several comments about the need for start-up financing for new businesses. Another said that financial institutions could help nonprofit organizations with counseling programs so that small business owners could learn about existing programs to finance small business needs. One contact said that there has been an increase in unscrupulous lending activities that take advantage of lower income people. These are typically outside of the established banking community and cause additional financial pressure on a segment of the population that is already strapped.

Highland Assessment Area

Demographic Information for Full-Scope Area: Highland Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	8	NA	NA	16.03%	83.97%	NA
Population by Geography	67,174	NA	NA	16.04%	83.96%	NA
Owner-Occupied Housing by Geography	19,310	NA	NA	16.44%	83.56%	NA
Businesses by Geography	2,689	NA	NA	16.73%	83.27%	NA
Farms by Geography	45	NA	NA	17.78%	82.22%	NA
Family Distribution by Income Level	18,888	7.77%	12.44%	23.41%	56.38%	NA
Distribution of Low- and Moderate-Income Families throughout AA Geographies	3,817	NA	NA	21.40%	78.60%	NA
Median Family Income		Median Housing Value		= \$91,032		
HUD Adjusted Median Family Income for 2000	= \$36,921	Unemployment Rate		= 1.71%		
Households Below the Poverty Level	= \$53,800					
	= 3.05%					

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 U.S. Census and 2000 HUD updated MFI.

The assessment area consists of eight census tracts within the Gary, IN PMSA #2960 which is a part of the greater Chicago-Gary-Kenosha, IL-IN-WI CMSA. The area is located in the northwest corner of Indiana, immediately east of the greater Chicago area. It includes the City of Highland as well as portions of other suburban cities immediately adjacent to Highland. Because TCF has only one office located in this portion of the PMSA, the bank selected the assessment area to reflect the area immediately surrounding the office. The assessment area does not have any low- or moderate-income census tracts. The assessment area meets the technical requirements of the regulation and does not arbitrarily exclude low- or moderate-income tracts.

In addition to the single office location, TCF has three ATMs in this assessment area. TCF has a very limited presence in the area with only a 0.03 percent deposit market share. The bank ranks the lowest in terms of deposit share of the financial institutions serving the assessment area.

The area has several larger regional banks and smaller financial institutions. Major competitors include Lake Security Federal Savings and Loan, Bank of Calumet, Citizen's State Bank, Bank One, National City Bank, and Fifth Third. These banks are considerably larger than TCF within this assessment area. In a three-mile radius surrounding TCF's office, there are 16 financial institutions operating 40 offices.

The City of Highland is a smaller suburb southwest of Gary, Indiana. It has higher income levels and higher housing costs than much of the surrounding area within Lake County. An Internet web site from the city shows a population under 25,000 and

average housing costs at \$106,900. The area has experienced significant growth in middle- and upper-income residential development in recent years. There has also been considerable growth in the retail and service industries.

The top twenty employers in Lake County center around three types of companies - those involved in steel manufacturing, healthcare, or the gaming industry. None of the major employers in Lake County are located in Highland. Rather, the businesses are located in other suburban cities immediately surrounding Highland. Commuters have easy access to three Interstate Highways as well as rush-hour commuter bus service into downtown Chicago.

Lake County has a Community Economic Development Department that provides services to local businesses through a variety of programs. One program that it uses is a revolving loan fund. Funding sources for this as well as other assistance programs come from Community Development Block Grants, SBA loans, Indiana Department of Commerce, Tax Increment Financing, Industrial Development Revenue Bonds and local commercial banks.

To better understand local housing needs and economic development issues, we reviewed the executive summaries of the Consolidated Plan (submitted to HUD) for Lake County. The Plan highlights some housing needs and some available programs that would assist LMI people to obtain or to rehabilitate existing housing. The Plan discusses a need for affordable housing stock for first-time homebuyers. The Plan discusses a need for economic development that would provide jobs for LMI people. The Plan says that the county regularly works with local private banks and the Indiana Department of Commerce to foster economic development. The Plan lists the names of several entities that also have provided funds or expertise for various programs to address housing and economic development needs (such as a Lakeshore Employment program, Northwest Indiana Forum, Federal Home Loan Bank Affordable Housing Program, and the Lilly Endowment).

The entities referred to in the preceding paragraphs provide an indication that financial institutions in the area have opportunities to work with many different types of organizations or programs to meet community development needs. In addition to the entities listed above, there are nonprofit organizations that serve LMI populations for housing, social services, and job creation efforts that need funding or technical expertise and advice or both.

We reviewed information provided by three community contacts made during the last three years in Lake County which surrounds the Highland Assessment Area. These were contacts made by another regulatory agency. These contacts provided background information on the economy, the condition of housing, the types of housing and small business loans available, the availability of financial services, and the responsiveness of banks within the assessment area.

The most commonly cited need involved providing potential applicants with more options in obtaining a real estate loan. For the most part, one contact said that real estate mortgage brokers are providing more mortgage loans than local banks. There is

a need for home improvement and rehabilitation loans. There is also a need for more first-time homebuyers programs that would use more flexible underwriting guidelines than traditionally used. In addition, one contact said that there should be more full-service banking facilities where customers or potential customers could get all their financial service needs met.

Kenosha PMSA #3800

Demographic Information for Full-Scope Area: Kenosha PMSA #3800						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	31	6.45%	16.13%	61.29%	16.13%	NA
Population by Geography	128,181	4.30%	14.28%	64.46%	16.97%	NA
Owner-Occupied Housing by Geography	32,368	1.33%	10.26%	68.34%	20.08%	NA
Businesses by Geography	3,892	9.97%	13.16%	57.58%	19.30%	NA
Farms by Geography	221					NA
Family Distribution by Income Level	34,184	17.03%	19.84%	25.24%	37.89%	NA
Distribution of Low- and Moderate-Income Families throughout AA Geographies	12,603	6.32%	21.99%	60.56%	11.13%	NA
Median Family Income		Median Housing Value		= \$65,697		
HUD Adjusted Median Family Income for 2000	= \$35,657	Unemployment Rate		= 3.41%		
Households Below the Poverty Level	= 9.31%					

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 U.S. Census and 2000 HUD updated MFI.

The assessment area consists of the Kenosha PMSA #3800 which is Kenosha County. It is a part of the greater Chicago-Gary-Kenosha, IL-IN-WI CMSA. Kenosha is located immediately north of the Illinois border along Lake Michigan and south of the Milwaukee-Racine area. The city is the county seat of Kenosha County. It is the home of a technical college, a private college, and the University of Wisconsin - Parkside. The city was historically dependent upon the automotive industry but has been experiencing greater diversification through furniture, apparel and metal manufacturing. With recent population growth from former Chicago residents willing to commute greater distances in return for more affordable suburban living, the city has had growth in the retail and service industries. This assessment area meets the requirements of the regulation and does not arbitrarily exclude any LMI geographies.

TCF has 5 branches and 14 ATMs in the PMSA. Within this assessment area, TCF has generated \$92 million in deposits which resulted in a deposit market share of 7 percent. With this volume of deposits, TCF ranks fifth out of 23 financial institutions located there. Per June 30, 1999 FDIC Deposit Market Share Reports banks in this assessment area with higher deposit market shares are: Bank One WI (22 percent), M&I Marshall & Ilsley Bank (19 percent), Johnson Bank (11 percent), and Firststar Bank Milwaukee, NA (10 percent).

Information from the Southeast Wisconsin Regional Economic Partnership indicates that the southeastern part of the state has over 40 percent of the state's manufacturing facilities. This portion of the state has the third highest percentage of all manufacturing jobs in the United States. Some of the largest employers in the area include the

Chrysler Engine Plant, Snap-On Tools, Jockey, Inc., Ladish TriClover, the university system, and the health care industry.

Updated 2000 census information from the U.S. Census Bureau shows a nearly 17 percent population increase since 1990. Updated population figures show 149,577 people in the county. Because of Kenosha's close proximity to the Chicago and Milwaukee metropolitan areas, Kenosha is an attractive alternative for city people looking for a less urban lifestyle. Information from the Chamber of Commerce shows that the median home sales price is just over \$127,000 which is considerably less than the typical suburban home in the Chicago area or Milwaukee suburbs. Parts of Kenosha County have farmland and scenic landscapes. A newsletter written by the Kenosha County Extension Services discusses some of the challenges facing the county as a result of recent growth. This newsletter indicates that the county needs to manage the growth and development while preserving the agricultural land and quality of life. It continues to say that in addition to balancing rural land use and urban growth, the area needs to strike a balance between new development and revitalization of the older parts of certain neighborhoods.

The Kenosha County Extension Service gives examples of different development projects currently in process and other areas that need attention. There are large Brownsfield areas with abandoned manufacturing sites that need to be renovated. There is a need for capital for revitalization of older neighborhoods in the City of Kenosha, both for affordable housing and for infrastructure. The downtown area has some abandoned buildings and signs of deterioration. A large site along Lake Michigan is currently under redevelopment.

The Executive Summary of the Consolidated Plan developed by the City of Kenosha for HUD describes housing conditions and community development needs. The city has no public housing. It says that the Kenosha Housing Authority (KHA) uses Section 8 Assistance Programs and programs from the Wisconsin Housing and Economic Development Authority (WHEDA) to assist low-income people obtain housing. There have been instances of lengthy waiting periods for assistance. The city identified a need to families that receive rental subsidies to become economically self-sufficient. KHA established a program to provide this assistance.

The city has also identified other community development needs through this Consolidated Plan. These are neighborhood revitalization, economic development and job creation, public services, removal of slums and blighted areas, historic preservation, and lakefront revitalization. Housing priorities are to increase homeownership, rehabilitate some low-income housing for both homeowners and renters, create a greater supply of larger affordable housing units, and to assist low-income renters.

The local Kenosha Community Action Agency operates 13 different programs that would assist LMI people with housing, employment, or other needed social services. Another Wisconsin state housing organization that operates in the area is committed to providing safe, affordable housing. This organization lists six programs that help LMI people with housing needs. Neighborhood Housing Services has an office in Kenosha that uses public and private investments for affordable housing issues within the city.

There are at least five local Economic Development organizations operating within the county. An Internet web site maintained by the Kenosha Chamber of Commerce lists fifteen organizations or committees that have a small business or economic development focus. While these examples do not include all of the various community development organizations serving the assessment area, these do provide an indication that there are many opportunities for financial institutions to provide community development services or to form partnerships for investment or lending purposes.

We did not rely on information obtained from contacts that regulatory agencies made with community groups to develop this community profile. Rather we relied on publicly available information from several community development related organizations such as the Chamber of Commerce, Southeast Wisconsin Regional Economic Partnership, Wisconsin state housing programs, Neighborhood Housing Services of Kenosha, University of Wisconsin-Parkside, and the Kenosha County Extension Service.

State of Michigan Full-Scope Areas

Metro East Assessment Area

Demographic Information for Full-Scope Area: Metro East Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	872	6.65%	16.97%	45.99%	29.47%	0.92%
Population by Geography	3,324,170	5.98%	16.67%	45.75%	31.50%	0.10%
Owner-Occupied Housing by Geography	897,683	3.43%	13.75%	48.33%	34.48%	0.00%
Businesses by Geography	119,047	3.15%	11.48%	46.56%	38.62%	0.18%
Farms by Geography	2,392	0.92%	8.19%	51.34%	39.55%	0.00%
Family Distribution by Income Level	893,824	18.25%	16.56%	22.89%	42.30%	0.00%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	311,136	11.66%	26.54%	46.64%	15.17%	0.00%
Median Family Income		Median Housing Value		= \$66,680		
HUD Adjusted Median Family Income for 2000	= \$40,727	Unemployment Rate		= 5.70%		
Households Below the Poverty Level	= \$63,200					
	= 12.84%					

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 1990 U.S. Census and 2000 HUD updated MFI.

The assessment area consists of portions of the Detroit PMSA #2160 which is a part of the greater Detroit-Ann Arbor-Flint CMSA. This assessment area consists of Oakland and Macomb Counties as well as portions of western Wayne County and the City of Port Huron in St. Clair County. Significant cities within the assessment area include Livonia, Dearborn, Farmington Hills, Pontiac, Troy, and Port Huron. Very little of Detroit proper is included within the assessment area but the city has an overriding influence on the economy of the entire area. The only portion of Detroit inside the assessment area is the very far Northwest corner of the city where TCF has an office inside a K-Mart store. The assessment area was selected to reflect those areas in which TCF has an office. The assessment area meets the technical requirements of the regulation and does not arbitrarily exclude LMI geographies.

TCF has 28 offices and 58 ATMs within the Metro East Assessment Area. Within the area, TCF has a deposit market share of 0.55 percent. This ranks the bank 16th out of 187 financial institutions in the area.

Banking competition is strong with many large national and regionally based financial institutions. Some of the larger banks in the area include Comerica Bank, Bank One Michigan, Standard Federal Bank, Michigan National Bank, and National City Bank Michigan-Illinois.

The local economy is directly tied to the health of the automotive industry. As a result,

the local economy is generally more sensitive to swings in the national economy. The area also has strong ties to machinery production, steel manufacturing, chemical production, and an increasing dependence on the service industry. General Motors, Ford, Daimler-Chrysler, along with automotive suppliers are major employers in the greater PMSA. The area's other significant employers include the service industry, retail trade, medical, education, and utilities.

As part of our efforts to understand the local economy, housing, and other economic development or community development needs within the assessment area, we reviewed the executive summaries for 10 various communities that had submitted Consolidated Plans to HUD. Several of these cities are described as "aging communities" with a strong need for housing preservation or rehabilitation. Most cities operate some form of public or subsidized housing but indicate that the supply is far short of demand. Several cities indicate that there are high levels of substandard housing. These Consolidated Plans clearly describe numerous agencies or city departments that would provide ample opportunities for the assistance of local lenders or private enterprise. The Plans discuss additional opportunities that are present through local non-profit organizations.

The Consolidated Plans for Oakland County and for Macomb County describe these areas as generally very wealthy and with very high housing costs. But despite the apparent affluence, there are pockets of serious poverty and concern for adequate LMI housing. The affluence of the area has further impacted the ability of lower-income residents to obtain affordable, adequate housing.

The Consolidated Plans frequently mention an increasingly "frail and elderly" population. Most Plans specify a need to help keep these susceptible elderly in their homes. The Plans also often mentioned a need for more social services to assist LMI elderly. The Plans indicate that addressing these issues will help to preserve and stabilize neighborhoods.

Research on small business matters conducted in 1998 by the Michigan Small Business Development Center (SBDC) at Wayne State University identified common needs within the state. The SBDC has thirteen regional centers and 45 satellite offices in Michigan. Among weaknesses and threats cited by these small businesses were a need for marketing assistance, finding and retaining qualified employees, controlling costs and managing cash flow, and additional working capital. The research also showed that most businesses do not use publicly-supported or nonprofit organizations for business development assistance. The research said that if businesses sought technical assistance or business advice, banks would be the third choice behind an accountant or another business associate. The SBDC has many partnerships with private organizations, state agencies, and nonprofit groups that address needs of small businesses through various programs and services.

The information from the SBDC shows many different programs and organizations that provide financing options for small businesses. Many of these also work in conjunction with other lenders, venture capitalists, private underwriters, investment bankers, investors, or Real Estate Investment Trusts. Within the Metro East Assessment Area,

there are several small business incubators. There are also numerous organizations that provide technical assistance to small businesses. These various entities provide ample opportunities for financial institutions in the area to form partnerships in the form of investments or loans as well as service by providing technical assistance.

The Consolidated Plans mentioned above said that for suburbs around Detroit, the lack of a coordinated, metropolitan-wide mass transit system is a hindrance to job creation and further economic development.

We reviewed information provided by four community contacts made in the assessment area during the last three years. These were contacts made by other regulatory agencies. These contacts provided background information on the economy, the condition of housing, the types of housing and small business loans available, the availability of financial services, and the responsiveness of banks within the assessment area. The most commonly cited need involved the need to obtain funds for revitalization and housing rehabilitation. Many older sections of several communities are described as needing extensive revitalization. There is a need in some areas for smaller, decent quality rental housing that is affordable for LMI people. There is a need for mortgage loans with lower down payment requirements. One contact said that there is a need for small business loans and for training for business owners. The contacts described the opportunities for financial institutions to participate in various community development efforts as “numerous” or “plentiful.”

Southeast Assessment Area

Demographic Information for Full-Scope Area: Southeast Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	103	8.74%	16.50%	45.63%	27.18%	1.94%
Population by Geography	398,582	8.46%	15.34%	48.44%	27.37%	0.39%
Owner-Occupied Housing by Geography	90,656	0.98%	11.10%	57.21%	30.71%	0.01%
Businesses by Geography	18,214	8.76%	12.69%	49.31%	29.19%	0.04%
Farms by Geography	898	0.89%	6.35%	61.58%	31.18%	0.00%
Family Distribution by Income Level	96,224	16.55%	16.79%	25.08%	41.58%	NA
Distribution of Low- and Moderate-Income Families throughout AA Geographies	32,077	8.13%	24.63%	51.62%	15.61%	0.00%
Median Family Income		Median Housing Value		= \$104,479		
HUD Adjusted Median Family Income for 2000	= \$45,123	Unemployment Rate		= 2.53%		
Households Below the Poverty Level	= 9.63%					

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 U.S. Census and 2000 HUD updated MFI.

The assessment area consists of a portion of Ann Arbor, MI PMSA #0440 which is part of the greater Detroit-Ann Arbor-Flint, MI CMSA. This assessment area is made up of Washtenaw and Livingston Counties. The assessment area meets the requirements of the regulation and does not arbitrarily exclude any LMI geographies. The City of Ann Arbor is the principal population center in the assessment area. Ann Arbor is the home of the University of Michigan which has played a significant role in the growth and economy of the area. The University is a major employer and student activities dominate the city. Hospitals in the city and the University's medical school make Ann Arbor a leading medical center in the Midwest. In addition, the University's research and technology departments in conjunction with local private industries make the area a leader in aeronautical, space, nuclear, chemical, and metallurgical research.

TCF has 14 offices and 31 ATMs within the assessment area. TCF has the highest deposit market share in the assessment area with 14 percent of all deposits. The next largest competitor is National City Bank Michigan-Illinois with a deposit market share of 12 percent followed by Bank One Michigan with a deposit market share of 10 percent.

Besides the University of Michigan with over 24,000 employees, other major employers in the area include local hospitals, technology manufacturing for the automotive corporations, a pharmaceutical company, Eastern Michigan University in Ypsilanti, city and county government, and computer related software and products.

The presence of the University of Michigan with its 35,000 students has a strong influence on the housing market. Housing costs are high. This includes land costs as well as owner- and renter-occupied housing. Within the low- and moderate-income

geographies, there are very high percentages of rental properties. This is somewhat typical in cities with a large student population. In the above table, note the very small percentage of owner-occupied housing in the low-income tracts. This has a very limiting influence in the ability of any particular financial institution to generate home loans in geographies with incomes at that level.

To better understand the local housing and community development needs of the area, we reviewed the executive summary of the city's Consolidated Plan that was submitted to HUD. The Plan discussed identified needs related to housing, public facilities, public services and community development. The city has public and assisted housing units for the very low-income residents. The Plan says that although there has been considerable money spent on the rehabilitation of these units, there is a constant need for additional repair. There have typically been inadequate budgets to pay for complete maintenance and to address the need for improved security. The Plan also says that overuse of the units contributes to deterioration.

The Consolidated Plan lists many organizations that are involved in affordable housing issues. It also refers to as many as 18 different non-profit groups that provide or administer programs for the homeless. The Plan says that the city and Washtenaw County work together with local non-profit agencies to address LMI housing and social service issue. The city and county coordinate efforts with the Michigan Housing Trust Fund, a Local Initiatives Support Corporation (LISC), and private lenders. These references provide an indication that there are numerous opportunities for financial institutions to address community development related needs.

We did not rely on information from community organizations to develop this profile of the assessment area or to develop an understanding of the credit needs within the area. Rather, we used information provided through the City of Ann Arbor, the University of Michigan, and from the above mentioned Consolidated Plan. We also referred to information provided from the research conducted by Wayne State University through the Small Business Development Center. That information covered the State of Michigan, including this assessment area. The information is summarized in the Metro East Profile.

State of Minnesota Full-Scope Areas

Minneapolis-St. Paul Assessment Area

Demographic Information for Full-Scope Area: Minneapolis-St. Paul Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	627	8.29%	15.63%	54.86%	19.62%	1.59%
Population by Geography	2,399,376	5.55%	12.18%	60.50%	21.65%	0.13%
Owner-Occupied Housing by Geography	623,878	1.80%	10.35%	63.21%	24.64%	0.00%
Businesses by Geography	105,186	5.17%	9.96%	61.23%	23.53%	0.11%
Farms by Geography	4,277	0.84%	11.25%	73.81%	14.05%	0.05%
Family Distribution by Income Level	616,980	16.50%	18.34%	27.75%	37.42%	0.00%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	214,903	8.72%	18.99%	61.06%	11.23%	0.00%
Median Family Income		Median Housing Value		= \$92,977		
HUD Adjusted Median Family Income for 2000	= \$43,063	Unemployment Rate		= 2.61%		
Households Below the Poverty Level	= \$68,600					
	= 7.85%					

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

The assessment area consists of portions of the Minnesota section of the Minneapolis-St. Paul, MN-WI Multi-state MSA. The assessment area consists of Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, Sherburne, Washington, and Wright Counties. The assessment area meets the requirements of the regulation and does not arbitrarily exclude any LMI geographies.

TCF has 75 offices and 600 ATMs located throughout the assessment area. TCF has the third highest deposit market share within the assessment area with \$2.5 billion in deposits and a 5 percent market share. This is based on June 30, 1999 FDIC Deposit Market Share Reports. Wells Fargo Bank Minnesota, NA is the closest competitor with \$12.5 billion in deposits and a 27 percent market share. US Bank, NA is the market leader with \$13 billion in deposits and a 29 percent market share. Broken out by individual counties, however, Wells Fargo has the highest volume of deposits in Anoka, Dakota, Hennepin, and Washington Counties. US Bank has the highest deposit volume in only Ramsey County.

TCF's market is extremely competitive, particularly among the larger commercial financial institutions. There are 234 financial institutions located within the assessment area operating 655 offices. This does not include finance companies and many mortgage companies that compete for and originate loans in the area. The banks range in size from \$5 million to \$70 billion. Competition for all types of loans, especially mortgage and commercial loans, is strong. In 1999, 649 lenders originated 175,326

mortgage loans in this assessment area and 152 lenders reported over 29,000 small business loans. (Note: In general, only banks that meet the size requirement of total assets greater than \$250 million report the number and dollar of loans to small businesses. Within the assessment area there are also many small banks that do not report this data that also compete for commercial loans.)

Minneapolis-St. Paul is the 15th largest metropolitan area in the United States. The area has a thriving, diversified economic base. It is a center for high-tech electronics, medical instruments, health care, finance, insurance, entertainment and the arts, printing and publishing, as well as processing and transporting agricultural products. The area is the home of seventeen FORTUNE 500 companies and several of the world's largest private companies. The University of Minnesota as well as several other smaller public and private colleges and universities are located here. St. Paul serves as the state's capital.

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

According to current information from the Minneapolis Area Association of Realtors, the February 2001 average sales price of a home in the greater metropolitan area hit \$189,000, which is an 11 percent increase from one year ago. The combination of the strong economy and generally favorable interest rates has driven up home prices dramatically. Even within areas that have high poverty levels and high concentrations of rental housing, sales prices have increased dramatically. An example is the Phillips neighborhood which is immediately south of downtown Minneapolis. The median sales price of a home in this area for 2000 was \$83,073 that represents a 51 percent increase over 1999. The core-city areas of St. Paul have also had significant increases in home sales prices as well. In three core-city St. Paul neighborhoods, the median sales price of homes ranged from a low of \$90,000 to \$114,000. These increases have, however, greatly impacted the ability of LMI families to afford a home. Information from the Minneapolis Area Association of Realtors shows that income needed to afford a home in St. Paul's most affordable neighborhood rose from \$24,700 to \$30,800 over the last year (this assumes a 3 percent down-payment and a 7.03 percent interest rate).

Average rent in the Twin Cities area on a one-bedroom apartment has hit \$700 per month. Community contacts indicated a strong need for affordable housing and assistance for first time homebuyers. This included lower cost housing, multi-family and other rental housing, and combination financing that could include rehabilitation or fix-up funds in conjunction with first mortgages. Contacts stated there was a need for housing at all income levels and that this would be an opportunity for banks to assist with development lending. Contacts said that home improvement loans are needed to improve the quality of the aging housing stock in many of the urban neighborhoods. Many contacts said that there needs to be more first-time homebuyer programs, credit and financial counseling, and programs that require low or no down payments.

The Twin Cities has a wide variety of community development related organizations that

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

Updated information from Minnesota Department of Economic Security reported that the unemployment rate at year-end 2000 was a low 2.6 percent. The average for the state of Minnesota was 3.3 percent. Labor shortages have especially hit the manufacturing and high-technology sectors hard. An executive summary from Standard and Poor's states that labor shortage problems have driven up construction and transportation costs within the area.

Contacts with community groups said that there is a need for small business loans and loans that would result in job creation, particularly for the type of job that would provide higher wages that would support a family. Contacts said that there is a need for technical assistance and managerial counseling for small business owners. Some contacts said that there is a need for additional affordable housing units, rehabilitation loans for older homes in the inner-city, and more loans geared toward LMI or first time homebuyers. Several contacts said that banks should provide more financial/credit counseling programs or seminars that would inform people with little experience with banks about banking services. One contact said that more banks should be willing to invest in local Community Development Corporations and help fund revolving loan pools.

We reviewed 24 contacts made during the last three years. These contacts were made by the OCC and the Federal Reserve. Most of the contacts focused on general economic development/job creation or on providing affordable housing. Other contacts were involved in local government, were members of business associations serving small businesses, or provided needed social services for LMI families and individuals.

State of Wisconsin Full-Scope Areas

Milwaukee-Waukesha, WI PMSA #5080

Demographic Information for Full-Scope Area: Milwaukee-Waukesha PMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	392	19.13%	17.35%	43.11%	19.64%	0.77%
Population by Geography	1,432,149	12.73%	13.58%	46.59%	27.05%	0.06%
Owner-Occupied Housing by Geography	319,660	4.71%	10.23%	51.28%	33.77%	0.00%
Businesses by Geography	47,881	7.16%	9.26%	48.60%	34.65%	0.33%
Farms by Geography	1,402	1.07%	3.14%	55.14%	40.58%	0.07%
Family Distribution by Income Level	372,335	19.55%	17.66%	25.59%	37.21%	0.00%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	138,529	23.14%	20.22%	43.78%	12.86%	0.00%
Median Family Income		Median Housing Value		= \$73,428		
HUD Adjusted Median Family Income for 2000	= \$39,005	Unemployment Rate		= 2.81%		
Households Below the Poverty Level	= 10.38%					

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

The assessment area consists of the entire Milwaukee-Waukesha, WI PMSA #5080 which is all of Milwaukee, Ozaukee, Washington, and Waukesha Counties. The area is located on the southeastern edge of the state on Lake Michigan. Milwaukee is the largest city in the state. The Milwaukee-Racine CMSA has a population of nearly 1.7 million people and is the 27th largest metropolitan area in the United States (based on updated 2000 Census data). Milwaukee has a significant number of low-income census tracts located in the central part of the city. Large portions of the moderate-income tracts are adjacent to these areas. The assessment area meets the requirements of the regulation and does not arbitrarily exclude LMI geographies.

TCF has 23 offices and 86 ATMs in the assessment area. TCF generated \$263 million in deposits for a market share of 0.96 percent. This ranks TCF 23rd of all banks in the PMSA. The market leaders are M&I Marshall & Ilsley Bank with a deposit market share of 18 percent, Firststar Bank Milwaukee, NA with a deposit market share of 17 percent, Bank One Wisconsin with a deposit market share of 10 percent, and Associated Bank Milwaukee with a deposit market share of 6 percent. Banking competition is strong and increasing. There are 125 banks operating 547 offices in the assessment area. There are numerous mortgage companies and credit unions in the area. Insurance companies are actively seeking customers that

would ordinarily use traditional banks for financial services. We obtained the deposit information from the June 30, 1999 FDIC Deposit Market Share Reports.

Economic conditions are good. Manufacturing and service related jobs form the bulk of the employment base. The service industries have seen the most significant growth in the last five years, however, this has been typically outside of the City of Milwaukee. Major employers in the MSA include Quad Graphics Incorporated, Rockwell/Allen Bradley, Miller Brewing Company, Kohl's Corporation, GE Medical Systems, Briggs & Stratton, West Bend Company, and Regal Ware. Milwaukee is the home of Harley Davidson motorcycles and several professional sports teams. Tourism is an increasing source of revenue for the area.

The more suburban portions of the PMSA have had growth in both the service sector and in manufacturing jobs. Suburban cities have used tax incentives to encourage business relocations or expansions. There is also generally adequate access to these new jobs by the interstate highway system. However, a downside of this suburban business expansion is that lower paid or hourly wage employees have a difficult time finding affordable housing near the jobs. Housing in the suburban areas is substantially higher than within the City of Milwaukee. A large segment of Milwaukee residents commute outside the city to the suburbs for employment.

The 1999 average tax-assessed value of single family residences in the City of Milwaukee was \$70,694. This information was obtained from the Milwaukee Department of City Development data sheet. Conversely, information from the Wisconsin Realtors Association reports that during 1999, the median sales prices for homes in Washington and Waukesha Counties were \$141,900 and \$166,100, respectively.

A statewide development organization (Wisconsin Housing and Economic Development) and Milwaukee's Department of City Development currently have programs to develop affordable housing projects in the central portion of Milwaukee. This is an area that is largely LMI and the projects should provide over 150 affordable housing units. Several former nonprofit organizations that sought to provide affordable housing have failed or have discontinued operations because they have lost reliable funding sources. The city has changed its allocation method for distributing Community Development Block Grants which was a major funding source for several of these nonprofit groups.

The City of Milwaukee has received HUD's designation as an Enterprise Community. There are two areas specified in the plan. The plan emphasizes jobs and business development as critical elements.

There are a wide variety of community development organizations that serve the greater Milwaukee area. These organizations serve small business development and financing needs, provide homeownership counseling and financial advice, develop LMI housing, provide needed social services to LMI families, and focus on job training efforts. There are also three low-income credit unions certified by the National Credit Union Administration. These groups provide financial institutions with investment opportunities

as well as involvement through lending programs.

We reviewed information provided through contacts with four community groups that were made over the last three years. These were contacts made by another regulatory agency. These contacts provided background information on the economy, the condition of housing, the types of housing and small business loans available, the availability of financial services, and the responsiveness of banks within the assessment area. The most commonly cited need involved the need for more housing units that would be considered affordable to LMI people. All made reference to the rapid growth of the suburban areas and the very expensive housing found there. Two problems specifically mentioned that impede the construction of affordable housing are the high cost of vacant land and zoning rules that require larger lot sizes. One community group said that there were a number of community development projects underway that would allow participation from local financial institutions. Another contact said that there should be more start-up companies for the area or a relocation of existing businesses into the area.

Appendix D: Tables of Performance Data

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Chicago-Gary-Kenosha, IL-IN-WI Multistate CMSA	D-5
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Content of Standardized Tables

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

The following is a listing and brief description of the tables included in each set:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MSA/assessment area.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle- and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle- and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle- and upper-income geographies compared to the

percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.

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

commitments. In order to be included, an unfunded commitment must have been reported on schedule RC-L of the Call Reports as an off-balance sheet item.

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

- Compares the percentage distribution of the number of bank branches in low-, moderate-, middle- and upper-income geographies to the percentage of the population within each geography in each MSA/AA. The table also presents data on branch openings and closings in each MSA/AA.

Table 14. Geographic and Borrower Distribution of Consumer Loans -

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 the population within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle- and upper-income borrowers to the percentage of households by income level in each MSA/assessment area.

Table 1. Lending Volume

LENDING VOLUME		State: Multistate CMSA				Evaluation Period: October 1, 1997 to September 30, 2000						
MSA/Assessment Area:	% of Rated Area Loans (#) in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MSA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full-Review:												
Chicago PMSA #1600	97.06	21,353	3,284,794	70	17,955	0	0	13	3,110	21,436	3,305,859	95.86
Highland Assessment Area	0.07	13	1,624	2	250	0	0	0	0	15	1,874	0.03
Kenosha PMSA #3800	2.87	628	30,817	5	1,484	0	0	0	0	633	32,301	4.11

(*) Rated area refers to either the state or multistate MSA rating area.

(**) The evaluation period for Community Development Loans is October 1, 1997 to December 31, 2000.

(***) Deposit data as of June 30, 1999. Rated area refers to either the state or multistate MSA rating area.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		State: Multistate CMSA					Evaluation Period: October 1, 1997 to September 30, 2000					Market Share (%) by Geography ***				
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans						
Full-Review:																
Chicago PMSA #1600	8,137	99.18	2.85	7.08	12.48	17.09	48.78	32.14	35.88	43.37	1.59	4.21	2.74	1.14	1.57	
Highland Assessment Area	8	0.10	0.00	0.00	0.00	0.00	16.44	12.50	83.56	87.50	0.22	0.00	0.00	0.00	0.24	
Kenosha PMSA #3800	59	0.72	1.33	0.00	10.26	11.86	68.34	64.41	20.08	23.73	0.49	0.00	0.29	0.44	0.75	

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

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

(***) Based on 1999 Aggregate HMDA Data only.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		State: Multistate CMSA		Evaluation Period: October 1, 1997 to September 30, 2000											
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***				
	#	% of Total*	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans	Overall	Low	Mod	Mid	Upp
Full-Review:															
Chicago PMSA #1600	422	67.41	2.85	7.35	12.48	27.25	48.78	49.53	35.88	15.88	0.36	0.59	0.69	0.32	0.12
Highland Assessment Area	0	0.00	0.00	0.00	0.00	0.00	16.44	0.00	83.56	0.00	0.00	0.00	0.00	0.00	0.00
Kenosha PMSA #3800	204	32.59	1.33	4.41	10.26	20.10	68.34	56.86	20.08	18.63	9.80	0.00	7.23	9.43	13.48

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

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

(***) Based on 1999 Aggregate HMDA Data only.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE				State: Multistate CMSA				Evaluation Period: October 1, 1997 to September 30, 2000							
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***				
	#	% of Total*	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans	Overall	Low	Mod	Mid	Upp
Full-Review:															
Chicago PMSA #1600	12,683	97.16	2.85	3.79	12.48	12.65	48.78	43.71	35.88	39.75	1.89	1.76	2.03	1.99	1.75
Highland Assessment Area	5	0.04	0.00	0.00	0.00	0.00	16.44	0.00	83.56	100.00	0.13	0.00	0.00	0.00	0.16
Kenosha PMSA #3800	365	2.80	1.33	1.92	10.26	14.79	68.34	64.93	20.08	18.36	3.92	4.94	5.54	3.76	3.52

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

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

(***) Based on 1999 Aggregate HMDA Data only.

Table 5. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		State: Multistate CMSA					Evaluation Period: October 1, 1997 to September 30, 2000									
MSA/Assessment Area:	Total Small Loans To Businesses		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***					
	#	% of Total*	% of Businesses**	% TCF Loans	% of Businesses**	% TCF Loans	% of Businesses**	% TCF Loans	% of Businesses**	% TCF Loans	Overall	Low	Mod	Mid	Upp	
Full-Review:																
Chicago PMSA #1600	70	90.91	4.58	5.71	11.89	12.86	41.16	41.43	41.03	40.00	0.03	0.08	0.08	0.03	0.03	
Highland Assessment Area	2	2.60	0.00	0.00	0.00	0.00	16.73	0.00	83.27	100.00	0.07	0.00	0.19	0.00	0.12	
Kenosha PMSA #3800	5	6.49	9.97	0.00	13.16	20.00	57.58	40.00	19.30	40.00	0.07	0.00	0.00	0.11	0.00	

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

(**) Source of Data-Dunn and Bradstreet.

(***) Based on 1999 Aggregate Small Business Data only.

Table 6. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		State: Multistate CMSA		Evaluation Period: October 1, 1997 to September 30, 2000											
MSA/Assessment Area:	Total Small Loans To Farms		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***				
	#	% of Total*	% of Farms**	% TCF Loans	% of Farms**	% TCF Loans	% of Farms**	% TCF Loans	% of Farms**	% TCF Loans	Overall	Low	Mod	Mid	Upp
Full-Review:															
Chicago PMSA #1600	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Highland Assessment Area	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Kenosha PMSA #3800	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

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

(**) Source of Data-Dunn and Bradstreet.

(***) Based on 1999 Aggregate Small Farm Data only.

Table 7. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		State: Multistate CMSA					Evaluation Period: October 1, 1997 to September 30, 2000									
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****					
	#	% of Total*	% of Families*	% TCF Loans***	% of Families*	% TCF Loans***	% of Families*	% TCF Loans***	% of Families*	% TCF Loans***	Overall	Low	Mod	Mid	Upp	
Full-Review:																
Chicago PMSA #1600	8,137	99.18	19.85	6.06	17.39	21.85	24.00	24.71	38.76	47.38	1.59	1.54	1.60	1.62	2.68	
Highland Assessment Area	8	0.10	7.77	0.00	12.44	42.86	23.41	0.00	56.38	57.14	0.22	0.00	0.00	0.00	0.51	
Kenosha PMSA #3800	59	0.72	17.03	12.28	19.84	29.82	25.24	29.82	37.89	28.07	0.49	1.27	0.91	0.20	0.54	

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

(**) Percentage of Families is based on 1990 Census information.

(***) As a percentage of loans with borrower income information available. No information was available for 18.72% of loans originated and purchased by the bank.

(****) Based on 1999 Aggregate HMDA Data only.

Table 8. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		State: Multistate CMSA				Evaluation Period: October 1, 1997 to September 30, 2000					Market Share (%) by Borrower Income****				
MSA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp
	#	% of Total*	% of Families*	% TCF Loans***	% of Families*	% TCF Loans***	% of Families*	% TCF Loans***	% of Families*	% TCF Loans***					
Full-Review:															
Chicago	422	67.41	19.85	25.09	17.39	29.15	24.00	30.63	38.76	15.13	0.36	0.65	0.44	0.24	0.14
Highland Assessment Area	0	0.00	7.77	0.00	12.44	0.00	23.41	0.00	56.38	0.00	0.00	0.00	0.00	0.00	0.00
Kenosha PMSA #3800	204	32.59	17.03	4.93	19.84	26.60	25.24	25.62	37.89	42.86	9.80	6.06	14.39	7.93	10.30

(*) Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
 (**) Percentage of Families is based on 1990 Census information.
 (***) As a percentage of loans with borrower income information available. No information was available for 24.28% of loans originated and purchased by the bank.
 (****) Based on 1999 Aggregate HMDA Data only.

Table 9. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		State: Multistate CMSA					Evaluation Period: October 1, 1997 to September 30, 2000									
MSA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****					
	#	% of Total*	% of Families*	% TCF Loans***	% of Families*	% TCF Loans***	% of Families*	% TCF Loans***	% of Families*	% TCF Loans***	Overall	Low	Mod	Mid	Upp	
Full-Review:																
Chicago PMSA #1600	12,683	97.16	19.85	9.36	17.39	22.15	24.00	27.86	38.76	40.63	1.89	2.29	2.39	2.32	2.17	
Highland Assessment Area	5	0.04	7.77	0.00	12.44	0.00	23.41	33.33	56.38	66.67	0.13	0.00	0.00	0.00	0.31	
Kenosha PMSA #3800	365	2.80	17.03	9.32	19.84	23.16	25.24	33.90	37.89	33.62	3.92	5.34	6.16	5.03	4.05	

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

(**) Percentage of Families is based on 1990 Census information.

(***) As a percentage of loans with borrower income information available. No information was available for 25.60% of loans originated and purchased by the bank.

(****) Based on 1999 Aggregate HMDA Data only.

Table 10. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		State: Multistate CMSA 2000			Evaluation Period: October 1, 1997 to September 30,				
MSA/Assessment Area	Total Small Loans to Businesses		Businesses with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share****	
	#	% of Total*	% of Businesses**	% TCF Loans***	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less
Full-Review:									
Chicago PMSA #1600	70	90.91	83.54	37.14	47.14	18.57	34.29	0.03	0.03
Highland Assessment Area	2	2.60	86.65	100.00	50.00	50.00	0.00	0.07	0.07
Kenosha PMSA #3800	5	6.49	88.21	40.00	40.00	20.00	40.00	0.07	0.00

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

(**) Businesses with revenues of \$1 million or less as a percentage of all businesses.

(***) Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 1.30% of small loans to businesses originated and purchased by the bank.

(****) Based on 1999 Aggregate Small Business Data only.

Table 11. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		State: Multistate CMSA		Evaluation Period: October 1, 1997 to September 30, 2000					
MSA/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**	% TCF Loans***	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less
Full-Review:									
Chicago PMSA #1600	NA	NA	NA	NA	NA	NA	NA	NA	NA
Highland Assessment Area	NA	NA	NA	NA	NA	NA	NA	NA	NA
Kenosha PMSA #3800	NA	NA	NA	NA	NA	NA	NA	NA	NA

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

(**) Farms with revenues of \$1 million or less as a percentage of all farms.

(***) Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

(****) Based on 1999 Aggregate Small Farm Data only.

Table 12. Qualified Investments

QUALIFIED INVESTMENTS									
		State: Multistate CMSA			Evaluation Period: October 1, 1997 to December 31, 2000				
MSA/Assessment Areas:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$'s	#	\$ (000's)
Full-Review:									
Chicago PMSA #1600	5	1,449	195	14,155	200	15,604	93.31	0	0
Highland Assessment Area	0	0	0	0	0	0	0.00	0	0
Kenosha PMSA #3800	0	0	17	1,118	17	1,118	6.69	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				State: Multistate CMSA				Evaluation Period: October 1, 1997 to December 31, 2000									
MSA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in MSA/AA	# of TCF Branches	% of Rated Area Branches in MSA/AA	Location of Branches by Income of Geographies				# of Branch Closings	# of Branch Openings	Net Change in Location of Branches (+ or -)				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Review:																	
Chicago PMSA #1600	95.86	167	99.64	3.61	10.84	47.59	37.95	3	52	3	3	25	18	9.67	19.59	42.57	28.05
Highland Assessment Area	0.03	1	0.06	0.00	0.00	0.00	100.00	0	1	0	0	0	1	0.00	0.00	16.04	83.96
Kenosha PMSA #3800	4.11	5	0.30	20.00	0.00	60.00	20.00	0	2	0	0	0	2	4.30	14.28	64.46	16.97

Table 1. Lending Volume

LENDING VOLUME		State: Michigan				Evaluation Period: October 1, 1997 to September 30, 2000						
MSA/Assessment Area:	% of Rated Area Loans (#) in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MSA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full-Review:												
Metro East	28.38	2,705	244,728	337	102,235	0	0	3	4,786	3,045	350,008	20.28
Southeast	321.28	3,351	407,454	111	29,747	0	0	1	267	3,463	437,468	51.62
Limited-Review:												
Calhoun-Kalamazoo	15.67	1,668	120,673	8	903	0	0	4	3,790	1,680	125,367	10.06
Jackson	5.49	582	41,989	5	1,218	0	0	2	3,900	589	47,107	2.25
Saginaw-Bay	16.45	1,724	100,579	37	15,255	0	0	4	474	1,765	116,308	13.70
Tuscola	1.73	185	10,029	1	330	0	0	0	0	186	10,359	2.10

(*) Rated area refers to either the state or multistate MSA rating area.

(**) The evaluation period for Community Development Loans is October 1, 1997 to December 31, 2000.

(***) Deposit data as of June 30, 1999. Rated area refers to either the state or multistate MSA rating area.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE				State: Michigan		Evaluation Period: October 1, 1997 to September 30, 2000									
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***				
	#	% of Total*	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans	Overall	Low	Mod	Mid	Upp
Full-Review:															
Metro East	423	19.48	3.43	2.60	13.75	11.82	48.33	48.23	34.48	37.35	0.16	0.27	0.16	0.13	0.18
Southeast	661	30.43	0.98	1.51	11.10	10.14	57.21	51.89	30.71	36.46	1.61	1.64	1.93	1.44	1.79
Limited-Review:															
Calhoun-Kalamazoo	586	26.98	2.64	2.39	21.04	16.89	45.47	38.57	30.84	41.98	8.66	11.11	6.57	8.85	9.49
Jackson	138	6.35	2.20	2.90	9.96	18.84	79.58	70.29	8.26	7.97	1.47	1.10	1.93	1.48	1.11
Saginaw-Bay	348	16.02	4.85	4.89	15.95	20.40	63.68	56.90	15.52	17.82	2.51	6.49	3.17	2.24	2.32
Tuscola	16	0.74	0.00	0.00	0.00	0.00	67.42	75.00	32.58	25.00	0.66	0.00	0.00	0.73	0.48

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

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

(***) Based on 1999 Aggregate HMDA Data only.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT				State: Michigan		Evaluation Period: October 1, 1997 to September 30, 2000									
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***				
	#	% of Total*	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans	Overall	Low	Mod	Mid	Upp
Full-Review:															
Metro East	187	33.51	3.43	3.21	13.75	23.53	48.33	48.66	34.48	24.06	0.26	0.45	0.30	0.26	0.20
Southeast	132	23.65	0.98	0.76	11.10	10.61	57.21	61.36	30.71	27.27	1.67	0.00	1.89	1.53	1.94
Limited-Review:															
Calhoun-Kalamazoo	54	9.68	2.64	0.00	21.04	37.04	45.47	25.93	30.84	37.04	2.08	0.00	2.84	1.52	2.43
Jackson	40	7.17	2.20	10.00	9.96	5.00	79.58	82.50	8.26	2.50	1.75	11.76	1.94	1.46	1.96
Saginaw-Bay	128	22.94	4.85	10.94	15.95	23.44	63.68	55.47	15.52	10.16	1.30	3.06	2.08	0.96	1.30
Tuscola	17	3.05	0.00	0.00	0.00	0.00	67.42	82.35	32.58	17.65	1.59	0.00	0.00	2.44	0.00

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

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

(***) Based on 1999 Aggregate HMDA Data only.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															State: Michigan					Evaluation Period: October 1, 1997 to September 1, 2000				
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***													
	#	% of Total*	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans	Overall	Low	Mod	Mid	Upp									
Full-Review:																								
Metro East	2,084	27.98	3.43	2.74	13.75	17.47	48.33	48.08	34.48	31.67	0.52	0.45	0.74	0.58	0.37									
Southeast	2,535	34.03	0.98	0.75	11.10	8.60	57.21	57.32	30.71	33.29	4.76	2.62	5.63	4.58	4.91									
Limited-Review:																								
Calhoun-Kalamazoo	1,027	13.79	2.64	1.85	21.04	17.43	45.47	38.36	30.84	42.36	8.92	1.85	7.81	8.93	10.32									
Jackson	403	5.41	2.20	1.49	9.96	7.20	79.58	82.63	8.26	8.68	3.68	1.75	2.63	3.92	3.58									
Saginaw-Bay	1,248	16.75	4.85	3.69	15.95	13.70	63.68	65.06	15.52	17.55	4.90	5.21	4.95	4.86	4.93									
Tuscola	152	2.04	0.00	0.00	0.00	0.00	67.42	74.34	32.58	25.66	3.24	0.00	0.00	3.68	2.44									

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

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

(***) Based on 1999 Aggregate HMDA Data only.

Table 5. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															State: Michigan		Evaluation Period: October 1, 1997 to September 30, 2000				
MSA/Assessment Area:	Total Small Loans To Businesses		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***										
	#	% of Total*	% of Businesses**	% TCF Loans	% of Businesses**	% TCF Loans	% of Businesses**	% TCF Loans	% of Businesses**	% TCF Loans	Overall	Low	Mod	Mid	Upp						
Full-Review:																					
Metro East	337	67.54	3.15	2.08	11.48	15.73	46.56	32.34	38.62	49.26	0.29	0.05	0.54	0.22	0.32						
Southeast	111	22.24	8.76	5.41	12.69	8.11	49.31	44.14	29.19	42.34	0.58	1.08	0.81	0.37	0.83						
Limited-Review:																					
Calhoun-Kalamazoo	8	1.60	5.30	0.00	18.48	50.00	44.27	25.00	29.18	12.50	0.25	0.00	0.23	0.15	0.43						
Jackson	5	1.00	12.52	0.00	16.25	0.00	66.51	100.00	4.70	0.00	0.13	0.00	0.00	0.19	0.00						
Saginaw-Bay	37	7.41	9.66	27.03	15.03	8.11	58.52	64.86	16.79	0.00	0.48	2.14	0.55	0.43	0.00						
Tuscola	1	0.20	0.00	0.00	0.00	0.00	74.00	0.00	26.00	100.00	0.24	0.00	0.00	0.00	0.93						

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

(**) Source of Data-Dunn and Bradstreet.

(***) Based on 1999 Aggregate Small Business Data only.

Table 6. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															State: Michigan		Evaluation Period: October 1, 1997 to September 30, 2000				
MSA/Assessment Area:	Total Small Loans To Farms		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***										
	#	% of Total*	% of Farms**	% TCF Loans	% of Farms**	% TCF Loans	% of Farms**	% TCF Loans	% of Farms**	% TCF Loans	Overall	Low	Mod	Mid	Upp						
Full-Review:																					
Metro East	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA						
Southeast	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA						
Limited-Review:																					
Calhoun-Kalamazoo	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA						
Jackson	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA						
Saginaw-Bay	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA						
Tuscola	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA						

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

(**) Source of Data-Dunn and Bradstreet.

(***) Based on 1999 Aggregate Small Farm Data only.

Table 7. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		State: Michigan					Evaluation Period: October 1, 1997 to September 30, 2000									
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****					
	#	% of Total*	% of Families*	% TCF Loans***	% of Families*	% TCF Loans***	% of Families*	% TCF Loans***	% of Families*	% TCF Loans***	Overall	Low	Mod	Mid	Upp	
Full-Review:																
Metro East	423	19.48	18.25	14.08	16.56	26.70	22.89	27.43	42.30	31.80	0.16	0.19	0.18	0.21	0.13	
Southeast	661	30.43	16.55	8.68	16.79	19.72	25.08	31.23	41.58	40.38	1.61	2.54	1.47	1.65	1.92	
Limited-Review:																
Calhoun-Kalamazoo	586	26.98	22.11	12.65	18.08	29.06	22.57	25.30	37.25	32.99	8.66	9.15	9.29	9.87	9.71	
Jackson	138	6.35	19.56	25.00	18.07	18.38	24.03	30.15	38.34	26.47	1.47	2.53	1.15	2.01	1.37	
Saginaw-Bay	348	16.02	24.08	27.17	16.35	25.72	22.36	22.54	37.21	24.57	2.51	4.78	2.09	2.49	2.42	
Tuscola	16	0.74	16.92	0.00	15.24	26.67	20.68	26.67	47.16	46.67	0.66	0.00	0.71	0.87	0.74	

(*) Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
 (**) Percentage of Families is based on 1990 Census information.
 (***) As a percentage of loans with borrower income information available. No information was available for 2.03% of loans originated and purchased by the bank.
 (****) Based on 1999 Aggregate HMDA Data only.

Table 8. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		State: Michigan		Evaluation Period: October 1, 1997 to September 30, 2000											
MSA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****				
	#	% of Total*	% of Families*	% TCF Loans***	% of Families*	% TCF Loans***	% of Families*	% TCF Loans***	% of Families*	% TCF Loans***	Overall	Low	Mod	Mid	Upp
Full-Review:															
Metro East	187	33.51	18.25	19.88	16.56	25.30	22.89	32.53	42.30	22.29	0.26	0.47	0.27	0.28	0.12
Southeast	132	23.65	16.55	19.20	16.79	29.60	25.08	23.20	41.58	28.00	1.67	4.19	1.58	1.95	0.86
Limited-Review:															
Calhoun-Kalamazoo	54	9.68	22.11	24.53	18.08	16.98	22.57	26.42	37.25	32.08	2.08	5.66	1.13	1.00	2.24
Jackson	40	7.17	19.56	15.38	18.07	20.51	24.03	30.77	38.34	33.33	1.75	3.16	1.81	1.20	1.82
Saginaw-Bay	128	22.94	24.08	19.69	16.35	29.13	22.36	25.20	37.21	25.98	1.30	1.39	1.45	1.16	1.31
Tuscola	17	3.05	16.92	11.76	15.24	11.76	20.68	17.65	47.16	58.82	1.59	4.17	0.00	0.00	2.65

(*) Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
(**) Percentage of Families is based on 1990 Census information.
(***) As a percentage of loans with borrower income information available. No information was available for 5.57% of loans originated and purchased by the bank.
(****) Based on 1999 Aggregate HMDA Data only.

Table 9. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE				State: Michigan				Evaluation Period: October 1, 1997 to September 30, 2000								
MSA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****					
	#	% of Total*	% of Families* *	% TCF Loans***	% of Families* *	% TCF Loans***	% of Families* *	% TCF Loans***	% of Families* *	% TCF Loans***	Overall	Low	Mod	Mid	Upp	
Full-Review:																
Metro East	2,084	27.98	18.25	13.64	16.56	25.36	22.89	27.93	42.30	33.06	0.52	0.73	0.74	0.60	0.54	
Southeast	2,535	34.03	16.55	7.53	16.79	19.52	25.08	28.81	41.58	44.14	4.76	6.41	5.38	5.14	5.95	
Limited-Review:																
Calhoun-Kalamazoo	1,027	13.79	22.11	9.38	18.08	19.59	22.57	28.45	37.25	42.58	8.92	8.67	9.89	11.02	10.95	
Jackson	403	5.41	19.56	6.36	18.07	20.10	24.03	31.30	38.34	42.24	3.68	3.09	3.73	5.28	4.14	
Saginaw-Bay	1,248	16.75	24.08	12.69	16.35	22.28	22.36	26.13	37.21	38.90	4.90	4.79	5.76	5.23	6.21	
Tuscola	152	2.04	16.92	0.68	15.24	15.07	20.68	30.14	47.16	54.11	3.24	1.75	3.21	2.99	4.62	

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

(**) Percentage of Families is based on 1990 Census information.

(***) As a percentage of loans with borrower income information available. No information was available for 3.32% of loans originated and purchased by the bank.

(****) Based on 1999 Aggregate HMDA Data only.

Table 10. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES			State: Michigan		Evaluation Period: October 1, 1997 to September 30, 2000				
MSA/Assessment Area	Total Small Loans to Businesses		Businesses with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share****	
	#	% of Total*	% of Businesses**	% TCF Loans***	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less
Full-Review:									
Metro East	337	67.54	85.07	48.96	29.38	29.38	41.25	0.29	0.37
Southeast	111	22.24	87.28	52.25	36.04	36.04	35.14	0.58	0.81
Limited-Review:									
Calhoun-Kalamazoo	8	1.60	87.98	87.50	62.50	25.00	12.50	0.25	0.44
Jackson	5	1.00	87.50	40.00	40.00	40.00	20.00	0.13	0.00
Saginaw-Bay	37	7.41	88.99	18.92	10.81	29.73	59.46	0.48	0.36
Tuscola	1	0.20	89.94	100.00	0.00	0.00	100.00	0.24	0.39

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

(**) Businesses with revenues of \$1 million or less as a percentage of all businesses.

(***) 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 16.83% of small loans to businesses originated and purchased by the bank.

(****) Based on 1999 Aggregate Small Business Data only.

Table 11. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		State: Michigan		Evaluation Period: October 1, 1997 to September 30, 2000					
MSA/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**	% TCF Loans***	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less
Full-Review:									
Metro East	NA	NA	NA	NA	NA	NA	NA	NA	NA
Southeast	NA	NA	NA	NA	NA	NA	NA	NA	NA
Limited-Review:									
Calhoun-Kalamazoo	NA	NA	NA	NA	NA	NA	NA	NA	NA
Jackson	NA	NA	NA	NA	NA	NA	NA	NA	NA
Saginaw-Bay	NA	NA	NA	NA	NA	NA	NA	NA	NA
Tuscola	NA	NA	NA	NA	NA	NA	NA	NA	NA

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

(**) Farms with revenues of \$1 million or less as a percentage of all farms.

(***) Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

(****) Based on 1999 Aggregate Small Farm Data only.

Table 12. Qualified Investments

QUALIFIED INVESTMENTS State: Michigan Evaluation Period: October 1, 1997 to September 30, 2000									
MSA/Assessment Areas:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$'s	#	\$ (000's)
Full-Review:									
Metro East	4	1,664	91	6,183	95	7,847	87.34	0	0
Southeast	2	160	142	563	144	723	8.05	0	0
Limited-Review:									
Calhoun-Kalamazoo	0	0	42	100	42	100	1.11	0	0
Jackson	0	0	13	147	13	147	1.64	0	0
Saginaw-Bay	1	21	40	145	41	166	1.85	0	0
Tuscola	0	0	4	1	4	1	0.01	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								State: Michigan		Evaluation Period: October 1, 1997 to September 30, 2000							
MSA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in MSA/AA	# of TCF Branches	% of Rated Area Branches in MSA/AA	Location of Branches by Income of Geographies				# of Branch Closings	# of Branch Openings	Net Change in Location of Branches (+ or -)				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Review:																	
Metro East	20.28	28	50.00	0.00	10.71	67.68	21.43	2	8	0	1	5	0	5.98	16.67	45.75	31.50
Southeast	51.62	14	25.00	14.29	14.29	42.86	28.57	4	4	1	-1	0	0	8.46	15.34	48.44	27.37
Limited-Review:																	
Calhoun-Kalamazoo	10.06	4	7.14	0.00	25.00	25.00	50.00	1	0	0	0	0	0	4.12	24.80	43.77	27.29
Jackson	2.25	0	0.00	0.00	0.00	0.00	0.00	0	1	0	1	0	0	5.63	13.71	72.13	6.70
Saginaw-Bay	13.70	9	16.07	11.11	11.11	55.56	22.22	1	0	-1	0	0	0	8.77	18.12	58.10	15.01
Tuscola	2.10	1	1.79	0.00	0.00	100.0	0.00	0	0	0	0	0	0	0.00	0.00	68.67	31.33

Table 1. Lending Volume

LENDING VOLUME		State: Minnesota				Evaluation Period: October 1, 1997 to September 30, 2000						
MSA/Assessment Area:	% of Rated Area Loans (#) in MSA/AA*	Home Mortgage		Small Loans To Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MSA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full-Review:												
Minneapolis-St. Paul	94.06	25,473	3,139,573	290	70,298	0	0	22	11,701	25,785	3,221,572	94.10
Limited-Review:												
Duluth	0.23	63	4,534	0	0	0	0	0	0	63	4,534	0.15
Mankato-New Ulm	1.05	285	19,314	1	162	0	0	1	1,375	287	20,851	2.53
Rochester	1.30	354	32,895	2	1,616	0	0	0	0	356	34,511	1.26
St. Cloud	3.36	918	78,509	4	1,185	0	0	0	0	922	79,694	1.95
U of M Crookston	0.00	0	0	0	0	0	0	0	0	0	0	0.00
U of M Morris	0.00	0	0	0	0	0	0	0	0	0	0	0.00

(*) Rated area refers to either the state or multistate MSA rating area.

(**) The evaluation period for Community Development Loans is October 1, 1997 to December 31, 2000.

(***) Deposit data as of June 30, 1999. Rated area refers to either the state or multistate MSA rating area.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE				State: Minnesota				Evaluation Period: October 1, 1997 to September 30, 2000							
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***				
	#	% of Total*	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans	Overall	Low	Mod	Mid	Upp
Full-Review:															
Minneapolis-St. Paul	11,163	94.31	1.80	1.43	10.35	7.12	63.21	59.66	24.64	31.77	4.03	3.20	3.06	3.76	5.01
Limited-Review:															
Duluth	19	0.16	2.91	0.00	14.84	10.53	44.99	26.32	37.25	63.16	0.33	0.00	0.00	0.12	0.68
Mankato-New Ulm	34	0.29	0.00	0.00	2.86	5.88	58.70	38.24	38.45	55.88	0.86	0.00	1.16	0.77	0.92
Rochester	166	1.40	0.00	0.00	14.39	14.46	66.29	61.45	19.32	24.10	0.64	0.00	0.72	0.35	1.47
St. Cloud	454	3.84	0.03	0.00	3.07	1.10	83.57	74.67	13.33	24.23	3.95	0.00	3.33	3.82	4.48
U of M Crookston	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
U of M Morris	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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

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

(***) Based on 1999 Aggregate HMDA Data only.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT				State: Minnesota				Evaluation Period: October 1, 1997 to September 30, 2000								
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***					
	#	% of Total*	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans	Overall	Low	Mod	Mid	Upp	
Full-Review:																
Minneapolis-St. Paul	1,311	93.38	1.80	3.97	10.35	18.54	63.21	63.31	24.64	14.19	3.48	5.79	7.22	3.51	1.79	
Limited-Review:																
Duluth	9	0.64	2.91	11.11	14.84	33.33	44.99	33.33	37.25	22.22	0.29	0.00	0.00	0.36	0.34	
Mankato-New Ulm	50	3.56	0.00	0.00	2.86	10.00	58.70	62.00	38.45	28.00	8.52	0.00	22.22	7.48	7.62	
Rochester	7	0.50	0.00	0.00	14.39	42.86	66.29	57.14	19.32	0.00	0.45	0.00	0.00	0.68	0.00	
St. Cloud	27	1.92	0.03	0.00	3.07	0.00	83.57	81.48	13.33	18.52	1.39	0.00	0.00	1.49	1.03	
U of M Crookston	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
U of M Morris	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

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

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

(***) Based on 1999 Aggregate HMDA Data only.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE												State: Minnesota		Evaluation Period: October 1, 1997 to September 30, 2000				
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***							
	#	% of Total*	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans	Overall	Low	Mod	Mid	Upp			
Full-Review:																		
Minneapolis-St. Paul	12,909	93.80	1.80	1.15	10.35	6.88	63.21	65.24	24.64	26.73	4.49	2.88	4.22	4.76	4.03			
Limited-Review:																		
Duluth	35	0.25	2.91	2.86	14.84	20.00	44.99	42.86	37.25	34.29	0.87	2.22	1.27	0.97	0.55			
Mankato-New Ulm	201	1.46	0.00	0.00	2.86	5.97	58.70	60.70	38.45	33.33	4.56	0.00	5.80	5.25	3.45			
Rochester	180	1.31	0.00	0.00	14.39	12.22	66.29	71.67	19.32	16.11	2.75	0.00	3.51	2.86	1.93			
St. Cloud	437	3.18	0.03	0.00	3.07	0.23	83.57	79.63	13.33	20.14	3.50	0.00	0.00	3.68	3.18			
U of M Crookston	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00			
U of M Morris	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00			

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

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

(***) Based on 1999 Aggregate HMDA Data only.

Table 5. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												State: Minnesota		Evaluation Period: October 1, 1997 to September 30, 2000				
MSA/Assessment Area:	Total Small Loans To Businesses		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***							
	#	% of Total*	% of Businesses**	% TCF Loans	% of Businesses**	% TCF Loans	% of Businesses**	% TCF Loans	% of Businesses**	% TCF Loans	Overall	Low	Mod	Mid	Upp			
Full-Review:																		
Minneapolis-St. Paul	290	97.64	5.17	9.66	9.96	14.14	61.23	55.86	23.53	20.34	0.30	0.56	0.67	0.30	0.17			
Limited-Review:																		
Duluth	0	0.00	36.31	0.00	10.62	0.00	33.85	0.00	19.22	0.00	0.00	0.00	0.00	0.00	0.00			
Mankato-New Ulm	1	0.34	0.00	0.00	9.50	0.00	64.46	100.00	26.04	0.00	0.10	0.00	0.00	0.22	0.00			
Rochester	2	0.67	0.00	0.00	13.89	50.00	70.59	50.00	15.50	0.00	0.00	0.00	0.00	0.00	0.00			
St. Cloud	4	1.35	4.75	0.00	2.62	0.00	80.86	100.00	11.77	0.00	0.05	0.00	0.00	0.06	0.00			
U of M Crookston	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00			
U of M Morris	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00			

(*) Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.
 (**) Source of Data-Dunn and Bradstreet.
 (***) Based on 1999 Aggregate Small Business Data only.

Table 6. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS				State: Minnesota		Evaluation Period: October 1, 1997 to September 30, 2000									
MSA/Assessment Area:	Total Small Loans To Farms		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***				
	#	% of Total*	% of Farms**	% TCF Loans	% of Farms**	% TCF Loans	% of Farms**	% TCF Loans	% of Farms**	% TCF Loans	Overall	Low	Mod	Mid	Upp
Full-Review:															
Minneapolis-St. Paul	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Limited-Review:															
Duluth	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Mankato-New Ulm	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Rochester	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
St. Cloud	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
U of M Crookston	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
U of M Morris	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

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

(**) Source of Data-Dunn and Bradstreet.

(***) Based on 1999 Aggregate Small Farm Data only.

Table 7. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			State: Minnesota				Evaluation Period: October 1, 1997 to September 30, 2000					Market Share (%) by Borrower Income****				
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% of Families*	% TCF Loans***	% of Families*	% TCF Loans***	% of Families*	% TCF Loans***	% of Families*	% TCF Loans***						
Full-Review:																
Minneapolis-St. Paul	11,163	94.31	16.50	12.55	18.34	26.66	27.74	29.99	37.43	30.80	4.03	3.77	3.47	3.44	4.66	
Limited-Review:																
Duluth	19	0.16	18.32	0.00	17.49	41.18	22.34	29.41	41.84	29.41	0.33	0.00	0.42	0.42	0.33	
Mankato-New Ulm	34	0.29	13.78	3.57	15.28	10.71	23.91	46.43	47.03	39.29	0.86	1.39	0.33	0.54	0.81	
Rochester	166	1.40	15.48	20.43	19.43	30.11	28.55	34.41	36.54	15.05	0.64	0.19	0.17	0.89	0.47	
St. Cloud	454	3.84	17.06	10.06	18.59	29.31	26.92	36.78	37.43	23.85	3.95	2.56	2.43	1.83	2.44	
U of M Crookston	0	0.00	16.88	0.00	18.61	0.00	26.50	0.00	38.01	0.00	0.00	0.00	0.00	0.00	0.00	
U of M Morris	0	0.00	17.82	0.00	12.31	0.00	20.65	0.00	49.22	0.00	0.00	0.00	0.00	0.00	0.00	

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

(**) Percentage of Families is based on 1990 Census information.

(***) As a percentage of loans with borrower income information available. No information was available for 19.98% of loans originated and purchased by the bank.

(****) Based on 1999 Aggregate HMDA Data only.

Table 8. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT				State: Minnesota				Evaluation Period: October 1, 1997 to September 30, 2000								
MSA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****					
	#	% of Total*	% of Families*	% TCF Loans***	% of Families*	% TCF Loans***	% of Families*	% TCF Loans***	% of Families*	% TCF Loans***	Overall	Low	Mod	Mid	Upp	
Full-Review:																
Minneapolis-St. Paul	1,311	93.38	16.50	28.20	18.34	39.77	27.74	22.62	37.43	9.91	3.48	10.65	5.83	2.50	0.72	
Limited-Review:																
Duluth	9	0.64	18.32	25.00	17.49	37.50	22.34	12.50	41.84	25.00	0.29	0.00	0.88	0.00	0.30	
Mankato-New Ulm	50	3.56	13.78	32.00	15.28	34.00	23.91	22.00	47.03	12.00	8.52	33.33	20.00	11.69	1.50	
Rochester	7	0.50	15.48	57.14	19.43	42.86	28.55	0.00	36.54	0.00	0.45	1.45	0.80	0.00	0.00	
St. Cloud	27	1.92	17.06	7.69	18.59	19.23	26.92	53.85	37.43	19.23	1.39	2.04	1.23	1.18	1.23	
U of M Crookston	0	0.00	16.88	0.00	18.61	0.00	26.50	0.00	38.01	0.00	0.00	0.00	0.00	0.00	0.00	
U of M Morris	0	0.00	17.82	0.00	12.31	0.00	20.65	0.00	49.22	0.00	0.00	0.00	0.00	0.00	0.00	

(*) Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
 (**) Percentage of Families is based on 1990 Census information.
 (***) As a percentage of loans with borrower income information available. No information was available for 1.57% of loans originated and purchased by the bank.
 (****) Based on 1999 Aggregate HMDA Data only.

Table 9. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		State: Minnesota		Evaluation Period: October 1, 1997 to September 30, 2000											
MSA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****				
	#	% of Total*	% of Families* *	% TCF Loans***	% of Families* *	% TCF Loans***	% of Families* *	% TCF Loans***	% of Families* *	% TCF Loans***	Overall	Low	Mod	Mid	Upp
Full-Review:															
Minneapolis-St. Paul	12,909	93.80	16.50	13.36	18.34	27.80	27.74	32.00	37.43	26.84	4.49	7.41	6.10	4.93	3.88
Limited-Review:															
Duluth	35	0.25	18.32	17.14	17.49	17.14	22.34	37.14	41.84	28.57	0.87	2.61	0.79	1.52	0.56
Mankato-New Ulm	201	1.46	13.78	7.33	15.28	20.42	23.91	35.08	47.03	37.17	4.56	4.23	6.91	6.10	4.32
Rochester	180	1.31	15.48	15.28	19.43	34.03	28.55	31.25	36.54	19.44	2.75	3.45	2.09	3.58	2.32
St. Cloud	437	3.18	17.06	6.67	18.59	22.50	26.92	32.50	37.43	38.33	3.50	3.49	3.70	2.42	2.63
U of M Crookston	0	0.00	16.88	0.00	18.61	0.00	26.50	0.00	38.01	0.00	0.00	0.00	0.00	0.00	0.00
U of M Morris	0	0.00	17.82	0.00	12.31	0.00	20.65	0.00	49.22	0.00	0.00	0.00	0.00	0.00	0.00

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

(**) Percentage of Families is based on 1990 Census information.

(***) As a percentage of loans with borrower income information available. No information was available for 17.50% of loans originated and purchased by the bank.

(****) Based on 1999 Aggregate HMDA Data only.

Table 10. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES			State: Minnesota		Evaluation Period: October 1, 1997 to September 1, 2000				
MSA/Assessment Area	Total Small Loans to Businesses		Businesses with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share****	
	#	% of Total*	% of Businesses**	% TCF Loans***	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less
Full-Review:									
Minneapolis-St. Paul	290	97.64	84.11	61.03	49.31	19.31	31.38	0.30	0.34
Limited-Review:									
Duluth	0	0.00	88.31	0.00	0.00	0.00	0.00	0.00	0.00
Mankato-New Ulm	1	0.34	89.10	0.00	0.00	100.00	0.00	0.10	0.00
Rochester	2	0.67	89.23	100.00	0.00	0.00	100.00	0.00	0.00
St. Cloud	4	1.35	87.51	25.00	25.00	0.00	75.00	0.05	0.08
U of M Crookston	0	0.00	89.97	0.00	0.00	0.00	0.00	0.00	0.00
U of M Morris	0	0.00	88.30	0.00	0.00	0.00	0.00	0.00	0.00

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

(**) Businesses with revenues of \$1 million or less as a percentage of all businesses.

(***) Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 1.01% of small loans to businesses originated and purchased by the bank.

(****) Based on 1999 Aggregate Small Business Data only.

Table 11. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS			State: Minnesota		Evaluation Period: October 1, 1997 to September 30, 2000				
MSA/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**	% TCF Loans***	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less
Full-Review:									
Minneapolis-St. Paul	NA	NA	NA	NA	NA	NA	NA	NA	NA
Limited-Review:									
Duluth	NA	NA	NA	NA	NA	NA	NA	NA	NA
Mankato-New Ulm	NA	NA	NA	NA	NA	NA	NA	NA	NA
Rochester	NA	NA	NA	NA	NA	NA	NA	NA	NA
St. Cloud	NA	NA	NA	NA	NA	NA	NA	NA	NA
U of M Crookston	NA	NA	NA	NA	NA	NA	NA	NA	NA
U of M Morris	NA	NA	NA	NA	NA	NA	NA	NA	NA

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

(**) Farms with revenues of \$1 million or less as a percentage of all farms.

(***) Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

(****) Based on 1999 Aggregate Small Farm Data only.

Table 12. Qualified Investments

QUALIFIED INVESTMENTS									
		State: Minnesota			Evaluation Period: October 1, 1997 to September 30, 2000				
MSA/Assessment Areas:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$'s	#	\$ (000's)
Full-Review:									
Minneapolis-St. Paul	4	2,150	310	13,152	314	15,302	88.03	0	0
Limited-Review:									
Duluth	0	0	1	414	1	414	2.38	0	0
Mankato-New Ulm	0	0	14	832	14	832	4.79	0	0
Rochester	2	150	7	258	9	408	2.35	0	0
St. Cloud	2	103	7	323	9	426	2.45	0	0
U of M Crookston	0	0	0	0	0	0	0.00	0	0
U of M Morris	0	0	0	0	0	0	0.00	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								State: Minnesota		Evaluation Period: October 1, 1997 to September,30 2000							
MSA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in MSA/AA	# of TCF Branches	% of Rated Area Branches in MSA/AA	Location of Branches by Income of Geographies				# of Branch Closings	# of Branch Openings	Net Change in Location of Branches (+ or -)				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Review:																	
Minneapolis-St. Paul	94.10	75	89.29	4.00	12.00	60.00	24.00	0	12	0	3	7	2	5.55	12.18	60.50	21.65
Limited-Review:																	
Duluth	0.15	1	1.19	0.00	0.00	0.00	100.0	0	0	0	0	0	0	7.70	18.83	40.31	33.15
Mankato-New Ulm	2.53	3	3.57	0.00	33.33	0.00	66.67	0	0	0	0	0	0	0.00	6.36	59.82	33.82
Rochester	1.26	0	0.00	0.00	0.00	0.00	0.00	0	0	0	0	0	0	0.00	17.00	65.42	16.78
St. Cloud	1.95	5	5.95	0.00	0.00	60.00	40.00	0	1	0	0	0	1	0.35	2.62	82.26	14.77
U of M Crookston	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0	0	0	0	0	0.00	0.00	0.00	0.00
U of M Morris	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0	0	0	0	0	0.00	0.00	0.00	0.00

Table 1. Lending Volume

LENDING VOLUME		State: Wisconsin				Evaluation Period: October 1, 1997 to September 30, 2000						
MSA/Assessment Area:	% of Rated Area Loans (#) in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MSA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full-Review:												
Milwaukee-Waukesha	68.26	2,422	130,251	299	59,628	0	0	68	5,219	2,789	192,668	68.23
Limited Review:												
Appleton	14.83	606	36,100	0	0	0	0	0	0	606	36,100	13.79
Racine	15.30	608	27,464	17	2,676	0	0	0	0	625	30,140	15.15
Walworth	1.61	64	3,975	2	90	0	0	0	0	66	4,065	2.83

(*) Rated area refers to either the state or multistate MSA rating area.

(**) The evaluation period for Community Development Loans is January 1, 1998 to December 31, 2000.

(***) Deposit data as of June 30, 1999. Rated area refers to either the state or multistate MSA rating area.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		State: Wisconsin		Evaluation Period: October 1, 1997 to September 30, 2000											
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***				
	#	% of Total*	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans	Overall	Low	Mod	Mid	Upp
Full-Review:															
Milwaukee-Waukesha	226	65.32	4.71	5.31	10.23	14.60	51.28	52.65	33.77	27.43	0.28	0.43	0.55	0.27	0.20
Limited-Review:															
Appleton	43	12.43	0.00	0.00	1.78	6.98	83.09	86.05	15.13	6.98	0.31	0.00	1.00	0.33	0.11
Racine	72	20.81	4.09	4.17	4.26	2.78	81.76	81.94	9.89	11.11	0.78	1.23	0.58	0.74	0.99
Walworth	5	1.45	0.00	0.00	0.00	0.00	49.31	80.00	50.69	20.00	0.11	0.00	0.00	0.10	0.12

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

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

(***) Based on 1999 Aggregate HMDA Data only.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT				State: Wisconsin				Evaluation Period: October 1, 1997 to September 30, 2000							
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***				
	#	% of Total*	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans	Overall	Low	Mod	Mid	Upp
Full-Review:															
Milwaukee-Waukesha	982	73.17	4.71	6.21	10.23	15.89	51.28	50.92	33.77	26.99	5.35	5.36	6.07	5.48	4.93
Limited-Review:															
Appleton	129	9.61	0.00	0.00	1.78	1.55	83.09	87.60	15.13	10.85	4.26	0.00	0.00	4.49	3.49
Racine	215	16.03	4.09	7.91	4.26	7.44	81.76	77.21	9.89	7.44	9.09	6.82	12.90	9.45	5.26
Walworth	16	1.19	0.00	0.00	0.00	0.00	49.31	25.00	50.69	75.00	2.80	0.00	0.00	1.29	4.22

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

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

(***) Based on 1999 Aggregate HMDA Data only.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE				State: Wisconsin				Evaluation Period: October 1, 1997 to September 30, 2000								
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***					
	#	% of Total*	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans	% Owner Occ Units**	% TCF Loans	Overall	Low	Mod	Mid	Upp	
Full-Review:																
Milwaukee-Waukesha	1,193	60.04	4.71	4.44	10.23	18.27	51.28	50.38	33.77	26.91	1.39	1.33	2.68	1.38	1.05	
Limited-Review:																
Appleton	434	21.84	0.00	0.00	1.78	3.69	83.09	84.79	15.13	11.52	2.33	0.00	6.25	2.43	1.40	
Racine	317	15.96	4.09	6.62	4.26	4.73	81.76	81.07	9.89	7.57	2.62	5.02	1.09	2.63	1.87	
Walworth	43	2.16	0.00	0.00	0.00	0.00	49.31	65.12	50.69	34.88	0.62	0.00	0.00	0.54	0.70	

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

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

(***) Based on 1999 Aggregate HMDA Data only.

Table 5. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												State: Wisconsin		Evaluation Period: October 1, 1997 to September 30, 2000				
MSA/Assessment Area:	Total Small Loans To Businesses		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***							
	#	% of Total*	% of Businesses**	% TCF Loans	% of Businesses**	% TCF Loans	% of Businesses**	% TCF Loans	% of Businesses**	% TCF Loans	Overall	Low	Mod	Mid	Upp			
Full-Review:																		
Milwaukee-Waukesha	299	94.03	7.16	10.70	9.26	16.05	48.60	46.82	34.65	26.09	0.68	1.12	1.07	0.70	0.54			
Limited Review:																		
Appleton	0	0.00	0.00	0.00	9.00	0.00	66.00	0.00	25.00	0.00	0.00	0.00	0.00	0.00	0.00			
Racine	17	5.35	11.94	5.88	5.45	0.00	75.75	94.12	6.73	0.00	0.06	0.00	0.00	0.08	0.00			
Walworth	2	0.63	0.00	0.00	0.00	0.00	56.28	0.00	43.72	100.00	0.15	0.00	0.00	0.00	0.31			

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

(**) Source of Data-Dunn and Bradstreet.

(***) Based on 1999 Aggregate Small Business Data only.

Table 6. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS												State: Wisconsin		Evaluation Period: October 1, 1997 to September 30, 2000				
MSA/Assessment Area:	Total Small Loans To Farms		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***							
	#	% of Total*	% of Farms**	% TCF Loans	% of Farms**	% TCF Loans	% of Farms**	% TCF Loans	% of Farms**	% TCF Loans	Overall	Low	Mod	Mid	Upp			
Full-Review:																		
Milwaukee-Waukesha	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA			
Limited Review:																		
Appleton	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA			
Racine	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA			
Walworth	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA			

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

(**) Source of Data-Dunn and Bradstreet.

(***) Based on 1999 Aggregate Small Farm Data only.

Table 7. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		State: Wisconsin		Evaluation Period: October 1, 1997 to September 30, 2000											
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****				
	#	% of Total*	% of Families*	% TCF Loans***	% of Families*	% TCF Loans***	% of Families*	% TCF Loans***	% of Families*	% TCF Loans***	Overall	Low	Mod	Mid	Upp
Full-Review:															
Milwaukee-Waukesha	226	65.32	19.55	15.42	17.66	28.50	25.59	31.78	37.21	24.30	0.28	0.54	0.41	0.24	0.23
Limited Review:															
Appleton	43	12.43	13.67	2.38	17.28	33.33	30.24	40.48	38.81	23.81	0.31	0.00	0.34	0.48	0.18
Racine	72	20.81	18.61	13.89	17.50	27.78	27.26	29.17	36.63	29.17	0.78	0.92	1.02	0.52	1.13
Walworth	5	1.45	11.43	0.00	15.64	20.00	23.35	20.00	49.58	60.00	0.11	0.00	0.00	0.24	0.10

(*) Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
 (**) Percentage of Families is based on 1990 Census information.
 (***) As a percentage of loans with borrower income information available. No information was available for 3.76% of loans originated and purchased by TCF.
 (****) Based on 1999 Aggregate HMDA Data only.

Table 8. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		State: Wisconsin		Evaluation Period: October 1, 1997 to September 30, 2000											
MSA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****				
	#	% of Total*	% of Families*	% TCF Loans***	% of Families*	% TCF Loans***	% of Families*	% TCF Loans***	% of Families*	% TCF Loans***	Overall	Low	Mod	Mid	Upp
Full-Review:															
Milwaukee-Waukesha	982	73.17	19.55	11.79	17.66	26.15	25.59	32.10	37.21	29.95	5.35	3.74	6.48	5.58	5.84
Limited Review:															
Appleton	129	9.61	13.67	5.51	17.28	26.77	30.24	40.94	38.81	26.77	4.26	3.60	5.78	5.00	2.96
Racine	215	16.03	18.61	11.85	17.50	29.86	27.26	29.38	36.63	28.91	9.09	9.30	12.38	8.90	8.08
Walworth	16	1.19	11.43	0.00	15.64	18.75	23.35	18.75	49.58	62.50	2.80	0.00	2.56	3.23	3.16

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

(**) Percentage of Families is based on 1990 Census information.

(***) As a percentage of loans with borrower income information available. No information was available for 0.97% of loans originated and purchased by the bank.

(****) Based on 1999 Aggregate HMDA Data only.

Table 9. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		State: Wisconsin		Evaluation Period: October 1, 1997 TO September 30, 2000											
MSA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****				
	#	% of Total*	% of Families* *	% TCF Loans***	% of Families* *	% TCF Loans***	% of Families* *	% TCF Loans***	% of Families* *	% TCF Loans***	Overall	Low	Mod	Mid	Upp
Full-Review:															
Milwaukee-Waukesha	1,193	60.04	19.55	10.30	17.66	25.49	25.59	32.59	37.21	31.62	1.39	2.13	2.28	1.88	1.30
Limited Review:															
Appleton	434	21.84	13.67	7.26	17.28	28.81	30.24	37.94	38.81	26.00	2.33	2.31	4.16	2.86	1.64
Racine	317	15.96	18.61	12.09	17.50	26.80	27.26	36.60	36.63	24.51	2.62	5.53	3.16	3.93	1.89
Walworth	43	2.16	11.43	0.00	15.64	26.83	23.35	26.83	49.58	46.34	0.62	0.00	1.71	0.55	0.69

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

(**) Percentage of Families is based on 1990 Census information.

(***) As a percentage of loans with borrower income information available. No information was available for 4.38% of loans originated and purchased by the bank.

(****) Based on 1999 Aggregate HMDA Data only.

Table 10. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		State: Wisconsin		Evaluation Period: October 1, 1997 to September 30, 2000					
MSA/Assessment Area	Total Small Loans to Businesses		Businesses with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share****	
	#	% of Total*	% of Businesses**	% TCF Loans***	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less
Full-Review:									
Milwaukee-Waukesha	299	94.03	84.69	39.46	47.83	29.43	22.74	0.68	0.56
Limited Review:									
Appleton	0	0.00	86.94	0.00	0.00	0.00	0.00	0.00	0.00
Racine	17	5.35	86.93	58.82	58.82	23.53	17.65	0.06	0.11
Walworth	2	0.63	88.06	0.00	100.00	0.00	0.00	0.15	0.00

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

(**) Businesses with revenues of \$1 million or less as a percentage of all businesses.

(***) 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 3.77% of small loans to businesses originated and purchased by the bank.

(****) Based on 1999 Aggregate Small Business Data only.

Table 11. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		State: Wisconsin		Evaluation Period: October 1, 1997 to December 31, 2000					
MSA/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**	% TCF Loans***	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less
Full-Review:									
Milwaukee-Waukesha	NA	NA	NA	NA	NA	NA	NA	NA	NA
Limited Review:									
Appleton	NA	NA	NA	NA	NA	NA	NA	NA	NA
Racine	NA	NA	NA	NA	NA	NA	NA	NA	NA
Walworth	NA	NA	NA	NA	NA	NA	NA	NA	NA

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

(**) Farms with revenues of \$1 million or less as a percentage of all farms.

(***) Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

(****) Based on 1999 Aggregate Small Farm Data only.

Table 12. Qualified Investments

QUALIFIED INVESTMENTS State: Wisconsin Evaluation Period: October 1, 1997 to December 31, 2000									
MSA/Assessment Areas:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$'s	#	\$ (000's)
Full-Review:									
Milwaukee-Waukesha	1	70	178	1,581	179	1,651	58.61	0	0
Limited Review									
Appleton	0	0	2	0	2	0	0.00	0	0
Racine	0	0	24	1,054	24	1,054	37.41	0	0
Walworth	0	0	1	112	1	112	3.98	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								State: Wisconsin		Evaluation Period: October 1, 1997 to September 30, 2000							
MSA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in MSA/AA	# of TCF Branches	% of Rated Area Branches in MSA/AA	Location of Branches by Income of Geographies				# of Branch Closings	# of Branch Openings	Net Change in Location of Branches (+ or -)				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Review:																	
Milwaukee-Waukesha	68.23	23	85.19	4.35	13.04	52.17	30.43	1	10	0	1	4	4	12.73	13.58	46.59	27.05
Limited Review:																	
Appleton	13.79	0	0.00	0.00	0.00	0.00	0.00	0	0	0	0	0	0	0.00	3.04	82.12	14.84
Racine	15.15	4	14.81	0.00	0.00	100.0	0.00	0	0	0	0	0	0	9.02	6.05	74.46	10.12
Walworth	2.83	0	0.00	0.00	0.00	0.00	0.00	0	0	0	0	0	0	0.00	0.00	46.74	53.26