Closing the Credit Gap and Expanding the Credit Opportunity:

The CRA and Fair Lending Performance of Financial Institutions in the City of Cincinnati

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The National Community Reinvestment Coalition

The National Community Reinvestment Coalition (NCRC) is the nation's trade association for economic justice whose members consist of local community based organizations. Since its inception in 1990, NCRC has spearheaded the economic justice movement. NCRC's mission is to build wealth in traditionally underserved communities and bring low- and moderate-income populations across the country into the financial mainstream. NCRC members have constituents in every state in America, in both rural and urban areas.

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Section I.
Executive Summary

Using a number of robust publicly-available data sets, this report attempts to determine the effectiveness of financial institutions in the City of Cincinnati in reaching minority, low- and moderate-income, and female consumers. Over the years, financial institutions have become more effective in reaching minority and low-income people. For example, minority homeownership in the US is at an all-time high.[1] In the 1990s, the Community Reinvestment Act (CRA) and Home Mortgage Disclosure Act (HMDA) have been strengthened to affirm financial institutions' mandate to serve people of varying races and incomes.[2]

Yet despite these advances, stubborn and persistent disparities exist. The data examined in this report illustrate that African-Americans and low-and moderate income borrowers in the City of Cincinnati receive a greater proportion of subprime (high-cost) loans than white and high-income borrowers. Furthermore, banks locate fewer branches in minority and low-income neighborhoods than in white and high-income areas. This has the effect of making affordable financial products – home loans, checking accounts, and savings products – less available to the people who need them most. Without these services, the ability for low-income people to build assets and rise out of poverty is impeded.

NCRC believes that it is very important that the City of Cincinnati has commissioned this report. Local action is imperative in eliminating lingering and significant disparities in lending and access to banking services. Below are the major findings of this report. They are broken into five groups, which correspond to the five major sections of this report: aggregate home lending, aggregate small business lending, home lending ranking, small business lending, and branch analysis.

This analysis makes use of Home Mortgage Disclosure Act data from 2004, CRA small business data from 2004, and FDIC financial institution branch data from 2004. Two geographical areas were examined: the City of Cincinnati (the legal boundaries of the city) and Suburban Cincinnati, an area that covers all of the Cincinnati metropolitan statistical area (MSA) less the city.

Aggregate Home Lending

The first section of this study analyzed home loan pricing and denial data to determine if disparities exist among borrowers of varying race, gender, and income. Homeownership is the major form of wealth for the majority of Americans. Further, homeowners have an increased stake in their communities in addition to a sense of pride and responsibility. When a particular group is less able to obtain reasonably-priced home loans, their ability to build wealth is impeded. The report broke this analysis into four categories based on the *purpose* of the loan: all-single family (a category that includes the three purposes of home lending), home purchase, refinance, and home improvement.

- For all-single family lending, a number of indicators exhibited how African-Americans received a disproportionately greater amount of subprime (high-cost) loans than did whites in the City of Cincinnati. For example, only 9.59 percent of all-single family loans to whites were subprime, whereas 33.23 percent of loans to African-Americans were subprime. Furthermore, while whites

[1] Patrick A. Simmons, "Changes in Minority Homeownership During the 1990s," Fannie Mae Foundation Census Note 07, September 2001.

[2] During 2005 and 2006, however, the federal regulatory agencies diluted CRA exams and small business lending data reporting requirements for mid-size banks and thrifts with assets between $250 million and $1 billion in assets The Office of Thrift Supervision also weakened CRA exams for savings and loans above $1 billion in assets. Please visit www.ncrc.org for more information.

comprised 63.88 percent of the households in the City of Cincinnati, they received 81.99 percent of total prime loans made, a ratio of 1.28. In contrast, African-Americans comprised 33.56 percent of households but received only 16.41 percent of total prime loans, a ratio of 0.49 (see Table 3).

- Data on loan denials showed that African-Americans in the City of Cincinnati were 1.86 times more likely than whites to be denied for a home loan.

- Differences existed between whites and other races as well; however, they are not quite as severe as the differences between whites and African-Americans on some of the indicators. For example, 89.91 percent of loans to Latinos were prime (market-rate), 94.17 percent of loans to Asians were prime, and 90.41 percent of the loans to whites were prime, in contrast to 66.67 percent for African-Americans.

- These differences were manifested in a similar way in Suburban Cincinnati, even when considering that 93.32 percent of the households in Suburban Cincinnati were white. Whereas African-Americans comprised 5.06 percent of households, they received 10.84 percent of subprime loans, a ratio of 2.14 (see Table 8).

- Stubborn inconsistencies also existed among borrowers of various income groups; generally, as income level increases, the likelihood of subprime lending decreases dramatically. That is, while moderate-income[3] households (regardless of their race) in the City of Cincinnati constituted 19.06 percent of households, they received 40.00 percent of total subprime loans made, a ratio of 2.10. In contrast, upper-income households comprised 29.94% of the City of Cincinnati's households but received just 11.36% of subprime single family loans, a ratio of 0.38 (see Table 5).

- Joint male/female borrowers enjoyed more favorable outcomes than either male and female borrowers in the City of Cincinnati. The data show that 89.46 percent of loans to joint applicants were prime, whereas 83.45 percent of loans to males and 80.84 percent of loans to females were prime (see Table 7).

Aggregate Small Business Lending

Small business loans have numerous benefits for communities. Credit for small businesses may aid an enterprise in staying profitable, which in turn increases employment opportunities. Furthermore, small businesses foster a greater sense of pride and well-being given that small business owners have an increased interest in a clean, habitable, and thriving neighborhood. However, this report illustrates that lenders in Hamilton County[4] and Suburban Cincinnati need to improve their capacity to lend to businesses in low-income census tracts and to the smallest of small businesses.

- Consider that 31.59 percent of small businesses in the City of Cincinnati were located in predominantly minority census tracts; however, they received only 25.67 percent of small business loans in 2004. On the other hand, the remaining 68.41 percent of small businesses in predominantly nonminority census tracts received 74.33 percent of small business loans (see Table 51).

[3] This report uses CRA definitions for income level. See the methodology section of this report for more information.

[4] Due to regulatory issues, Hamilton County was used for the small business analyses in lieu of the City of Cincinnati. See the methodology section for more details.

- Disparities existed among businesses located in census tracts of varying income levels. For example, whereas 23.67 percent of small businesses in the City of Cincinnati were in low-income census tracts, only 20.74 percent of small business loans were made to businesses in these census tracts. These figures are in contrast to upper-income census tracts, which contained 14.97 percent of all small businesses and received 17.58 percent of small business loans (see Table 52).

- Lenders also had difficulty reaching the smallest of small businesses. While 51.79 percent of businesses in the City of Cincinnati had revenues less than $1 million, only 33.58 percent of loans went to businesses in this category (see Table 53).

Home Lending Ranking

A ranking system of thirteen indicators was devised to determine which financial institutions in the City of Cincinnati were most effective in reaching minority, low- and moderate-income (LMI), and female borrowers. These thirteen indicators measure percent of loans, market share, and denial disparity ratios for these categories of borrowers. The seventeen lenders selected for the analysis had the largest loan volumes in 2004; they can roughly be grouped into three categories: national lenders, regional lenders, and local lenders.

- Counterintuitively, the national and regional lenders were more effective than local lenders in reaching traditionally underserved groups. When considering all prime (market-rate) single-family loans in the City of Cincinnati, PNC, Washington Mutual, and Fifth Third scored highest across all thirteen indicators, which measured lending to minorities, low- and moderate-income borrowers, and women. The data show that Third Federal Savings and Loan and Union Savings Bank, both local lenders, lagged their peers (see Table 43).

- The performance of Ameriquest and Accredited in prime lending was surprising. These two lenders are well-known subprime specialists, but performed well in the prime ranking analysis. Interestingly, their prime and subprime lending was reasonably balanced in the City of Cincinnati: Accredited, for instance, issued 99 prime loans and 112 subprime loans in 2004. Given that large subprime lenders have been under increased scrutiny by community advocates and attorneys general in recent years regarding their responsible lending practices, many have diversified their portfolios by increasing their volume of prime and near-prime loans. One important finding emerges – these two lenders may have found an effective channel for directing significant percentages of their prime or near-prime lending to traditionally underserved borrowers.

- Lenders' performance in home purchase lending (as opposed to refinance and home improvement lending) indicates their capacity to extend loans to first-time homebuyers and those borrowers seeking to move to a new home. For most Americans, homeownership is the main means of asset-building. When ranked on home purchase lending, large depository institutions were most effective on the thirteen aforementioned indicators. Most notably, Fifth Third, Washington Mutual, Huntington, and National City performed best, while local lenders again lagged.

- An analysis of all single family lending to low- and moderate-income (LMI) and minority borrowers shows that national and regional lenders again were most effective. For example, Huntington, PNC, and Fifth Third dedicated high percentages of their loans to LMI borrowers, whereas KeyCorp and First Financial lagged the group.

- The lenders receiving City deposits (depositories) performed reasonably well, but their performance could be improved. For example, the depositories are third (PNC), fifth (Fifth

Third), and eighth (US Bank) out of 17 lenders in prime single family lending. In prime refinance lending, the performance of the depositories dropped when compared to all single family lending. In prime home purchase lending, one of the depositories (Fifth Third) finished in first place. The City ought to work with the depositories on products and practices in an effort to make the performance more uniformly towards the top of major lenders in the City (see Table 49).

Small Business Lending Ranking

In order to gauge the performance of individual financial institutions on small business lending performance, this report makes use of a ranking system of five performance measures to determine how well an institution reaches small businesses in low-income census tracts as well as to the smallest of small businesses. Nine lenders met criteria for inclusion in this ranking analysis. While no one lender greatly outperformed its peers, certain institutions exhibited that they are especially capable of reaching either low-income areas or the smallest of small businesses.

- Two of the five ranking indicators dealt with income level. They show that Fifth Third, KeyCorp, and National City outperformed the other lenders in the City of Cincinnati, while JPMorgan Chase and First Financial lagged their peers. For example, the first indicator, percent of loans in low- and moderate-income (LMI) census tracts, showed that the three top institutions made a higher percent of their loans to businesses in these neighborhoods than all lenders as a group (see Table 54).

- A handful of lenders showed their capacity to reach small businesses with revenues less than $1 million. PNC, Wells Fargo, and First Financial all exceeded the aggregate set by all lenders as a whole.

- With a few notable exceptions, institutions that performed well in Hamilton County performed similarly in the suburban area. Overall, the best performers were PNC, which ranked number one in Hamilton County and number three in the suburban area, and Wells Fargo, which ranked number two in Hamilton County and number one in the suburban area (see Table 55).

- In small business lending in the City of Cincinnati, PNC, a depository, was the first place finisher. But the other two depositories did not perform as well, falling into the second half of the nine lenders. Again, the City should work with its depositories to make the performance of the depositories more uniform and very good, if not excellent (see Table 54).

Branch Analysis

Without proper financial services, it is difficult for low-income people to build assets and accumulate wealth; thus, it follows that mainstream bank branches ought to be located in low-income neighborhoods. Branches offer essential financial tools such as basic checking and savings accounts; and furthermore, other studies[5] have shown that banks make more prime loans when they issue loans through branches as opposed to brokers. In the absence of branches, households are likely to use the "fringe banking industry" – the check cashers, payday lenders, and rent-to-own stores that often charge up to three times more for the same services provided by a bank.

[5] See Avery, Robert B., Glenn B. Canner, and Robert E. Cook, "New Information Reported under HMDA and Its Application in Fair Lending Enforcement." *Federal Reserve Bulletin*, Summer 2005.

In order to gauge how effectively mainstream serve low-income and minority neighborhoods, this report compared nine institutions on two performance measures.

- Despite the fact that 51.02 percent of the City of Cincinnati's population live in LMI census tracts, only 28.3 percent of bank branches were located there. National City, US Bank, and Fifth Third were especially effective in locating branches in LMI areas. As the leader, National City located 43.8 percent of its branches in LMI tracts, well over the benchmark of 28.3 percent of all institutions' branches. On the other end of the scale, four institutions with branches in the City of Cincinnati – First Financial, Huntington, JP Morgan Chase,[6] and Union Savings Bank – located none of their branches in LMI tracts (see Table 56).

- While 33.90 percent of the City of Cincinnati's population resided in predominantly minority census tracts, a small 13.80 percent of branches were located there. However, US Bank, JP Morgan Chase, and Fifth Third exceed this benchmark. On the other hand, First Financial, Huntington, and Union Savings Bank located none of their branches in predominantly minority tracts.

- In Suburban Cincinnati, it was JP Morgan Chase and Third Federal that were most successful in reaching LMI tracts. Both of these institutions exceeded the mark set by all lenders, which was 22.0 percent of branches in LMI tracts (see Table 57).

Recommendations

- The City should commission annual studies of CRA and fair lending performance. Annual studies on CRA and fair lending performance will prod major lenders to make more prime and affordable loans to traditionally undeserved borrowers and populations. If major lenders do indeed make more prime and affordable loans to traditionally underserved borrowers, the rest of the market may follow. The result could then be an overall increase in prime lending to underserved borrowers and a narrowing of lending disparities.

- The City should work with its depositories to increase the prime home lending and small business lending of the depositories to traditionally undeserved borrowers. The City should think about using HOME and CDBG funding in a strategic manner to leverage more loans by depositories and other major lenders to minority and low- and moderate-income communities. In addition, building more bank branches in minority and low- and moderate income neighborhoods should be a formal part of community development strategy.

- The City should also implement a CRA goal statement program for its depositories. The City of Philadelphia has required its depositories to issue CRA goals regarding the number and percent of loans they will make to traditionally underserved borrowers. This program has worked to increase lending to underserved borrowers.

- The City should work with major lenders to place more branches in minority and low- and moderate-income neighborhoods. Branches are a major means of offering deposit accounts and affordable loans to neighborhoods. Minority and low- and moderate-income neighborhoods experience overall shortages of branches, as this report documents. In addition, there are a number of major lenders in the City that do not have branches in minority and low- and moderate-income neighborhoods.

[6] JPMorgan Chase operates under Bank One in the Cincinnati MSA market.

- The City should also consider reports on foreclosures, similar to one issued in March 2006 by Working In Neighborhoods (WIN).[7] By gathering data from the *Cincinnati Court Index*, WIN found that foreclosures have steadily increased from 2002 to 2005. In 2005, 3,528 properties in Hamilton County were foreclosed upon; 1,694 of these were in the City of Cincinnati. In addition, the report compared HMDA data and foreclosure records from 2004. Lenders were engaged in wealth building and safe and sound lending when their number of loans far exceeded their number of foreclosures. On the other hand, some other lenders were not making as clear a contribution to wealth building and may be destabilizing neighborhoods when their number of foreclosures was almost at the same level as their number of loans.

[7] Homeownership: Is It a Fading American Dream? A Study of Foreclosures in Hamilton County in 2005 with Selected Information from 2004, Working In Neighborhoods, 2005. Available online at http://www.wincincy.org/PRforeclosure.htm.

Section II.
Methodology

Terminology

Of crucial importance to this report is the difference between a prime loan and a subprime loan. Prime loans are market-rate loans made at the prevailing interest rate to borrowers with good credit. On the other hand, subprime lending is the portion of mortgage lending intended to serve borrowers who do not qualify for prime loans because of credit problems or a limited credit history. Thus, subprime loans have higher rates to compensate for the added risk of lending to borrowers with imperfect credit.[8] While a significant amount of subprime lending is needed and responsible, certain groups of people face possible price discrimination if they receive a disproportionately high amount of subprime loans relative to other groups of borrowers. Furthermore, virtually all predatory lending is done within the subprime market. That is, borrowers who receive subprime loans are more likely to face predatory schemes such as excessive or hidden fees, terms designed to trap borrowers in debt, refinances that do not provide any net benefit to the borrower, and interest rates that exceed an amount justified by the risk of the loan.[9]

This study compares home lending and small business lending in two geographic areas, which are shown in Figure 1 (see next page). The first area is the legal entity of the City of Cincinnati[10]; it will heretofore be referred to as "the City of Cincinnati." The second area is "Suburban Cincinnati;" this is defined as the remainder of the Cincinnati Metropolitan Statistical Area (Cincinnati MSA)[11] not included in the City of Cincinnati. This includes the parts of Hamilton County, Ohio, which are not in the City of Cincinnati; the Ohio counties of Brown, Butler, Clermont, and Warren; the Indiana counties of Dearborn, Franklin, and Ohio; and the Kentucky counties of Boone, Bracken, Campbell, Gallatin, Grant, Kenton, and Pendleton. (See "Demographic Profile of Cincinnati" below for more information on the demographics of these areas.)

Sources of Information

Three major publicly-available data sets were accessed for this report.

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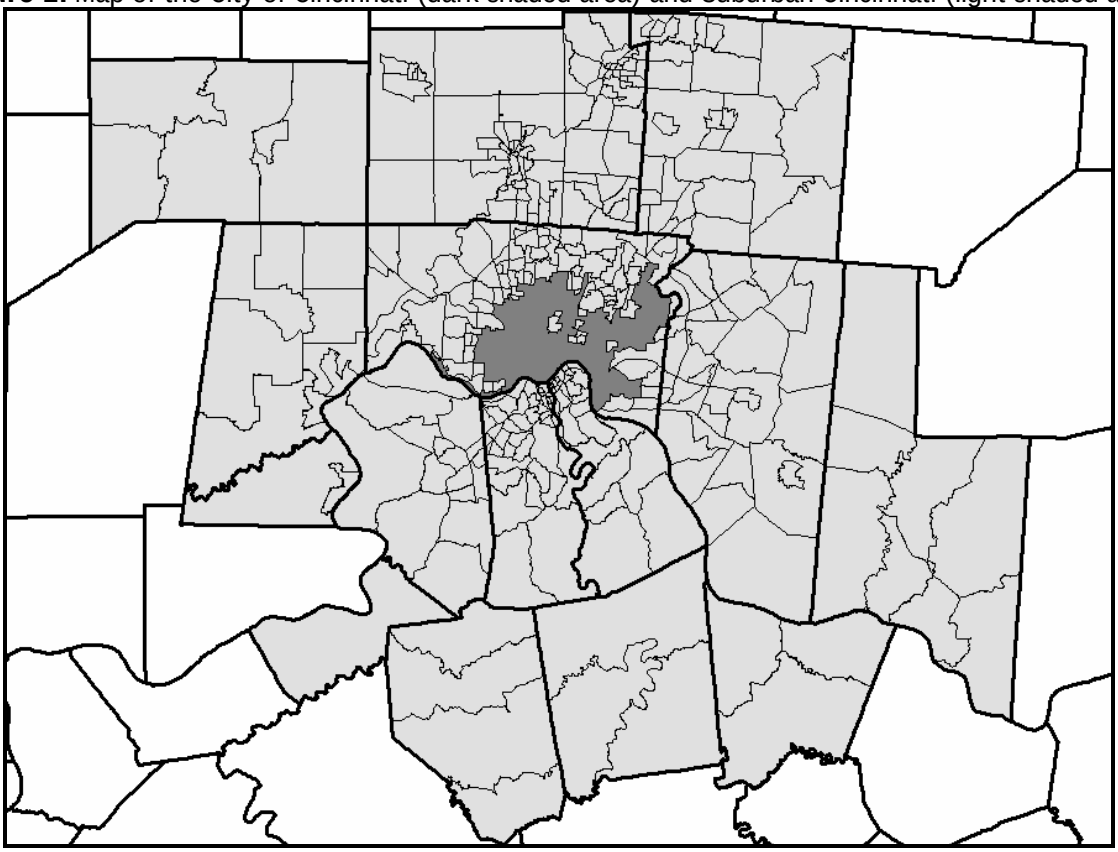
[8] In this study, subprime loans are defined as loans in which the price was "reported" under the Home Mortgage Disclosure Act; that is, loans that were three or more percentage points above the Treasury rate at the time the loan was originated. For 2004, the Federal Reserve stated that the vast majority of subprime loans were loans in which the price was reported in HMDA data (see Avery, Canner, and Cook, op cit., Federal Reserve Bulletin, Summer 2005).

[9] For more information about predatory mortgage lending practices, see multiple reports available at http://www.ncrc.org/pressandpubs/pressAndPubList.php, as well as Paul S. Calem, Kevin Gillen, and Susan Wachter, *Neighborhood Patterns of Subprime Lending: Evidence from Disparate Cities,* Housing Policy Debate 15:3, 2004.

[10] More specifically, the first area is the group of 133 census tracts that are either wholly contained or partially contained within the legal boundaries of the City of Cincinnati.

[11] The United States Office of Management and Budget (OMB) define metropolitan statistical areas according to published standards that are applied to Census Bureau data. The general concept of a metropolitan statistical area is that of a core urban area containing a substantial population nucleus, together with adjacent counties having a high degree of economic and social integration with that core.

Figure 1. Map of the City of Cincinnati (dark shaded area) and Suburban Cincinnati (light shaded area)



For analysis of home lending trends, this study makes use of Home Mortgage Disclosure Act Data (HMDA Data) from 2004. HMDA, enacted by Congress in 1975, requires that certain financial institutions, including banks, savings associations, credit unions, and other mortgage lending institutions, report data annually on the home loans originated during that year. Each HMDA record contains information on the product and the borrower, including the borrower's race, ethnicity, income, and gender. In 2004, 8,121 financial institutions in the US reported approximately 41.6 million loan records for the 2003 calendar year. HMDA data is collected by the Federal Financial Institutions Examination Council (FFIEC), which makes the data available to the public. NCRC uses CRA Wiz, a software program authored by PCI Services, Inc., to analyze HMDA data.[12] CRA Wiz is widely used across the mortgage industry for tracking and submitting HMDA data. All home lending refers to first-lien loans to owner-occupants in 1-4 family dwellings during 2004.

For analysis of small business lending trends, this study makes use of small business peer data reported under the Community Reinvestment Act (CRA) in 2004. In 1995, an amendment to Regulation BB, which implements CRA, required that banks and thrifts with assets over $250 million report data on small business lending. In 2005, a new amendment raised this threshold to $1 billion. Unfortunately, many small financial institutions are exempt from the new data disclosure requirements. For example, only 1,911 lenders reported small business data in 1999 - a year in which there were 10,221 banks and thrifts. Fortunately, for this report, major banks in Cincinnati do report small business data. The data include

[12] For more information about HMDA, see the FFIEC's HMDA website at http://www.ffiec.gov/hmda/. Last accessed 22 February 2006.

only the census tract in which the small business loan was made, and not information on the race, income, and gender of the borrower. Thus, CRA small business data can determine whether small business loans are being directed to low-income and minority neighborhoods, but not necessarily whether they are going to low-income and minority individuals.[13]

For analysis of bank branch trends, data were secured from the Federal Deposit Insurance Corporation's Summary of Deposit download function on its website.[14] The FDIC requires that all financial institutions report certain data about its branches, including address, parent institution, summary of deposit information, and the like. NCRC was then able to geocode these addresses and assign each branch information based on the income level and minority level of the census tract it occupies.

For demographic information, data from the US Census Bureau was used from the year 2004.

Definition of Indicators

These definitions are intended to aid the reader in understanding the performance measures in the three ranking analyses: home lending ranking, small business ranking, and branch analysis.

The following definitions for income apply to all three analyses. First, the definitions used for low-, moderate-, middle-, and upper-income correspond to CRA definitions, which are as follows. Low-income borrowers have incomes up to 50 percent of Metropolitan Statistical Area (MSA) median income. Moderate-income borrowers have incomes between 50 to 80 percent of MSA median income. Middle-income borrowers have income between 80 and 120 percent of MSA median income. Upper-income borrowers have income greater than 120 percent of MSA median income. "LMI" stands for "low and moderate income," and "MUI" stands for "middle and upper income." When these terms are applied to the income level of census tracts, it reflects in which income category the given tracts' median income lies.

The following definitions of race and ethnicity apply to all sections of this report. Given that the 2004 HMDA data used new definitions of race and ethnicity, the following definitions were developed to apply to this report. First, the term "white" refers to a non-Hispanic white borrower, regardless of whether (s)he reported a second, third, or fourth, or fifth race, and regardless of the race of the co-applicant (if applicable). Likewise, the term "black" or "African American" refers to a non-Hispanic black or African-American borrower, regardless of whether (s)he reported a second, third, or fourth, or fifth race, and regardless of the race of the co-applicant (if applicable). "Hispanic or Latino" refers to a borrower who considered himself/herself Hispanic or Latino. Finally, the term "Asian" refers to a non-Hispanic Asian borrower, regardless of whether (s)he reported a second, third, or fourth, or fifth race, and regardless of the race of the co-applicant (if applicable). The other races that can be reported under HMDA were excluded from this report given that the study areas did not have enough applicants of these races to draw any reliable conclusions. Last, "minority" refers to any person other than Non-Hispanic whites.

Branch Location Analysis

1. Number of census tracts refers to the total number in the given geography (City of Cincinnati or Suburban Cincinnati).

[13] For more information about CRA small business data, see http://www.ncrc.org/policy/cra/smallbiz.php. Last accessed 27 February 2006. CRA also requires certain financial institutions to submit data on small farm loans.

[14] For more information, see the FDIC's Summary of Deposit site at http://www2.fdic.gov/sod/index.asp. Last accessed 13 March 2006.

2. Total refers to total number of branches of a given financial institution.

Small Business Lending Ranking Analysis

1. Number of Loans to LMI Census Tracts: Number of a financial institution's loans to businesses located in a census tract in which the median income of the census tract is below 80% of MSA median income.

2. Percent to LMI: The percent of a financial institution's loans to businesses located in LMI tracts. Another way to think about this indicator is the portion of the institution's loan portfolio devoted to businesses in LMI tracts.

3. LMI Market Share: Market share refers to the institution's share or percent of all loans made by all lenders to businesses in LMI tracts.

4. MUI Market Share: Market share refers to the institution's share or percent of all loans made by all lenders to businesses in MUI tracts.

5. Ratio: LMI/MUI: A given institution's LMI market share divided by its MUI market share.

6. Number of loans under $100,000: The number of loans a given financial institution made under $100,000 in size.

7. Percent of loans under $100,000: The percent of loans a given financial institution made under $100,000 in size.

8. Number of Loans to Small Businesses with Revenues less than $1 million: The number of loans a given financial institution made to small businesses with revenues less than $1 million.

9. Percent of Loans to Small Businesses with Revenues less than $1 million: The percent of loans a given financial institution made to small businesses with revenues less than $1 million.

10. Market Share: Number of Loans to Small Businesses with Revenues less than $1 million: Market share refers to the institution's share or percent of all loans made by all lenders to small businesses with revenues less than $1 million.

11. Market Share: Loans to All Small Businesses: Market share refers to the institution's share or percent of all loans made by all lenders to all small businesses.

Home Lending Ranking Analysis

All Loan Originations: All loans originated by a financial institution.

1. Percent of loans to African-American Borrowers: The percent of a financial institution's loans that are made to African-Americans. Another way to think about this indicator is the portion of the institution's loan portfolio devoted to African-Americans.

2. Percent of Loans to Low- and Moderate-Income (LMI) Borrowers: The percent of a financial institution's loans that is made to LMI borrowers. Another way to think of this indicator is the share of a lender's portfolio devoted to LMI borrowers.

3. Percent of Loans to Female Borrowers: The percent of a financial institution's loans that are made to women. Another way to think about this indicator is the portion of the institution's loan portfolio devoted to women.

4. Percent of Loans to 50-100% Minority Tracts: The percent of a financial institution's loans that are made to residents of substantially minority census tracts. Another way to think about this indicator is the portion of the institution's loan portfolio devoted to residents of substantially minority census tracts.

5. Percent of Loans to LMI Tracts: The percent of a financial institution's loans that are made to residents of LMI census tracts. Another way to think about this indicator is the portion of the institution's loan portfolio devoted to residents of LMI census tracts.

6. African-American/White Borrower Market Share: This ratio shows the institution's market share to African-Americans, divided by its market share to whites. Market share refers to the institution's share or percent of all the loans made by all lenders to a particular group of borrowers. Higher ratios indicate better performance.

7. MUI African-American/MUI White Borrower Market Share: This ratio shows the institution's market share to Middle- and Upper-Income (MUI) African-Americans, divided by its market share to MUI whites. Market share refers to the institution's share or percent of all the loans made by all lenders to a particular group of borrowers. Higher ratios indicate better performance.

8. LMI Tract/MUI Tract Market Share: This ratio shows the institution's market share to residents of LMI tracts, divided by its market share to residents of MUI tracts. Market share refers to the institution's share or percent of all the loans made by all lenders to a particular group of borrowers. Higher ratios indicate better performance.

9. LMI/MUI Borrower Market Share: This ratio shows the institution's market share to LMI borrowers, divided by its market share to MUI borrowers. Market share refers to the institution's share or percent of all the loans made by all lenders to a particular group of borrowers. Higher ratios indicate better performance.

10. Minority Tract/Nonminority Tract Market Share: This ratio shows the institution's market share to residents of minority tracts, divided by its market share to residents of nonminority tracts. Market share refers to the institution's share or percent of all the loans made by all lenders to a particular group of borrowers. Higher ratios indicate better performance.

11. African-American to White Denial Disparity Ratio: This indicator divides the African-American denial rate by the white denial rate. Higher ratios are worse. Higher ratios indicate that a lender is denying African-Americans at higher rates relative to whites.

12. MUI African-American to MUI White Denial Disparity Ratio: This indicator divides the MUI African-American denial rate by the MUI white denial rate. Higher ratios are worse. Higher ratios indicate that a lender is denying MUI African-Americans at higher rates relative to whites.

13. Minority Tract to Nonminority Tract Denial Disparity Ratio: This indicator divides the denial rate for applicants from minority tracts (more than 50 percent of the tract population is minority) by the denial rate for applicants from white tracts. Higher ratios are worse. Higher ratios indicate that a lender is denying African-Americans at higher rates relative to whites.

Ranking System – Lowest Score is the Best

For the home lending analysis, NCRC ranked institutions on 13 measures of lending performance including percent of loans to various groups of borrowers, denial disparity ratios, and ratios of market shares to different groups of borrowers and communities. A description of the indicators is immediately above.

The ranking analysis is conducted for all single family lending considered together, and for home purchase, and refinance lending separately.

Lenders receiving the lowest score overall performed better on our analysis. A score of "1" means the lending institution performed best on an indicator of performance such as percent of loans to minorities. A score of "17" means the institution performed the worst on an indicator or came in "last" place on an indicator. Therefore, the worst possible score is 221 (13 indicators multiplied by 17 for the possible rank for each indicator). The best possible score is 13, or 13 indicators multiplied by 1, the top rank. NCRC included a lender on any of the ranking analyses if the lender had more than 25 loans. Less than 25 total loans does not allow for meaningful analysis of a financial institution's lending patterns to various demographic groups. Lenders are not ranked on home improvement lending because only one lender (PNC) made more than 25 home improvement loans in the City.

In some cases, it is not possible to issue a ranking on a particular indicator for a particular lender. For example, on the denial disparity ratios, a lender may not deny any white applicants. In this case, it is not possible to calculate a denial disparity ratio since this would involve dividing by zero (cannot divide the African-American denial rate by a zero white denial rate). For the rankings on which this occurs, NCRC adds the scores for the number of indicators for which a ranking is possible and then divides by the number of indicators for which a ranking is possible. An average score is then presented as the final score for each lender. Lowest scores remain the best scores.

The subprime home lending analysis and the small business analysis follows a similar scoring regime. Lower scores are better. There are not as many indicators so the lowest (or best) and highest (or worst) scores are lower numbers.

Appendices

Three appendices are attached to this report: Appendix A contains maps, Appendix B contains charts, and Appendix C contains tables. On some occasions, the most poignant of these figures appear within the text, and on other occasions references are made throughout the text to a particular figure in the appendix.

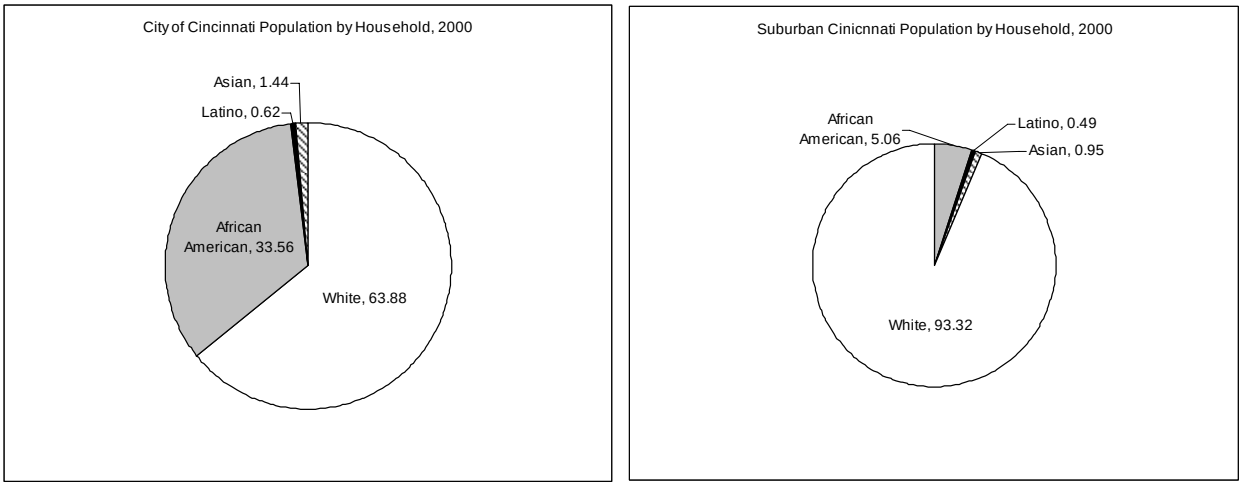
Demographic Profile of Cincinnati

To give context to lending analysis, it is helpful to understand the demographics of the City of Cincinnati and Suburban Cincinnati.

With a population of 331,285 as of the 2000 census, the City of Cincinnati is the 59th largest city in the US by population and the third largest in Ohio. Historically, Cincinnati was an excellent location for commerce given that it was situated on the Ohio River and was the focal point of a canal system that formed a network across Ohio and Indiana. Long noted for its heavy manufacturing base, most notably machine tools and soap products, Cincinnati has since fallen upon difficult economic times. Cincinnati faces the same challenge as many American "rust belt" cities such as Cleveland and Pittsburgh: how to include its low-income population in the mainstream economy, given that other large cities have become the focal points of a globalizing economy. As figure 2 shows, in 2000 the city's households were 63.88 percent white non-Hispanic, 33.56 percent African American non-Hispanic, 0.62 percent Latino, and 1.44 percent Asian non-Hispanic.[15] Estimated median household income in 2004 was $35,815, a number much lower than the median income of the MSA of $54,771. See Table 1 (in the appendix) for additional information on Cincinnati demographics.

With a population of 2,058,221 as of the 2000 census, the Cincinnati MSA is the 25th largest metropolitan area in the US by population. Given that Cincinnati is near the point at which three states come together, this region includes portions of Ohio, Kentucky, and Indiana. The Cincinnati MSA encompasses a number of differing communities. It is comprised of middle- and upper-income suburban communities, especially to the north and east of the city. A few older satellite cities, such as the cities of Hamilton and Middletown in Ohio and Covington and Newport in Kentucky, have sizeable low-income and minority populations. Further, some regions, such as Brown County in Ohio and Franklin County in Indiana, are predominantly rural. As figure 2 shows, in 2000 Suburban Cincinnati's households were 93.32 percent white non-Hispanic, 5.06 percent African American non-Hispanic, 0.49 percent Latino, and 0.95 percent Asian non-Hispanic (see Table 2).

Figure 2. Demographics of the Study Areas



[15] Data on demographics in this section from the 2000 census. Information is presented in households rather than absolute population to conform with the analysis below.

Section III.
Aggregate Home Lending

Overview

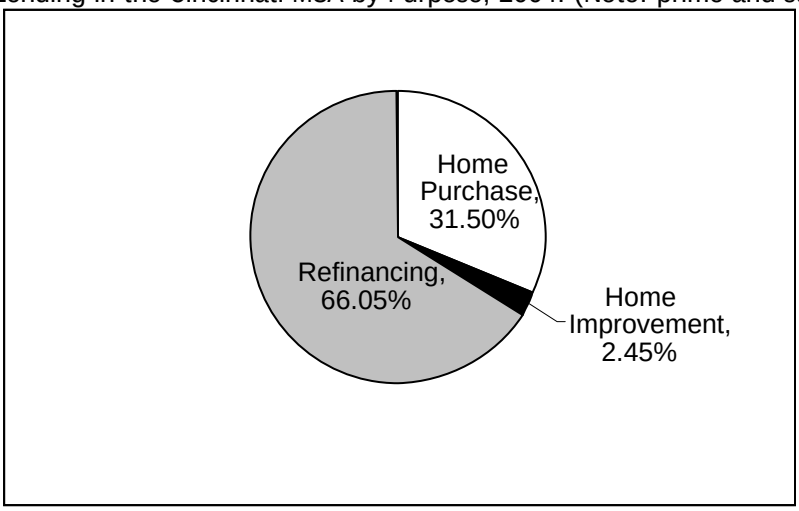
An analysis of home lending data in the Cincinnati area shows significant disparities based on race, income level, and gender. This section will analyze all HMDA-reported home lending activity in 2004 in separately the two aforementioned geographical areas: the City of Cincinnati and Suburban Cincinnati. In 2004, HMDA-reporting institutions in the two areas received 143,200 applications and originated 80,251 home loans. Of these originations, 71,075 loans (88.6 percent) were prime and 9,176 loans (11.4 percent) were subprime (see Figure 3).

Figure 3. Summary of All Single-Family Loans, City of Cincinnati and Suburban Cincinnati

	Applications	Originations	Prime Originations	Subprime Originations
City of Cincinnati	22,589	11,812	9,996	1,816
Suburban Cincinnati	120,611	68,439	61,079	7,360
Total	143,200	80,251	71,075	9,176

This aggregate home lending analysis is broken into four sections of this report based on the *purpose* of the loan. The first section examines *all single family* lending, a category that includes all three purposes: home purchase, refinancing, and home improvement. The second section examines *home purchase* lending; as defined by FFIEC,[16] a home purchase loan is any loan secured by and made for the purpose of purchasing a dwelling. As Figure 4 shows, home purchase lending accounted for 31.50 percent of home lending in the Cincinnati MSA in 2004. The third section examines *refinance* loans; a refinance is a loan transaction in which the existing obligation, involving either a home purchase or a home improvement loan, is satisfied and replaced by a new obligation. This accounts for 66.05 percent of the loans in the analysis. The fourth section examines *home improvement* lending; A home improvement loan, as classified by the reporting institution, is a loan that will be used for repairing, rehabilitating, remodeling, or improving a dwelling or the real property on which it is located. Home improvement loans constituted only 2.45 percent of the total loan volume.

Figure 4. Home Lending in the Cincinnati MSA by Purpose, 2004. (Note: prime and subprime included)



[16] Definitions for the purposes of loans found at http://www.ffiec.gov/hmda/glossary.htm. Last accessed 22 February 2006.

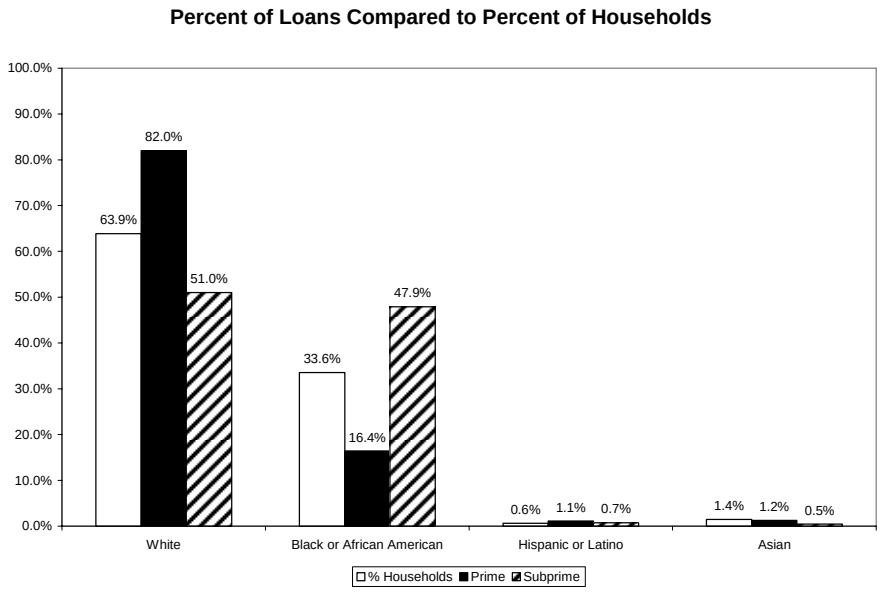
All Single Family Lending

Given that all-single family lending is a category that includes all purposes of home lending, it is a useful category for illustrating deep-seated trends of lending among racial, income, and gender groups. As shown in the sections below, the all single family analysis uncovered unyielding differences among members of these groups.

Race / Minority Indicators

A number of indicators exhibited how African-Americans received a greater portion of subprime loans and were denied more frequently than whites in the City of Cincinnati. The lending outcomes for Latinos were more similar, although slightly worse, to whites. First, an examination of the portfolio share[17] of all-single family loans shows that whereas whites comprised 63.88 percent of the households, they received 81.99 percent of total prime loans made, a prime-to-population ratio of 1.28.[18] In contrast, African-Americans comprised 33.56 percent of the households but received only 16.41 percent of total prime loans, a prime-to-population ratio of 0.49 (see Figure 5). In other words, African-Americans received an amount of loans that was significantly smaller than its percent of the population, whereas whites received a share of all prime loans that was much greater than their population. Another way to measure the white to African-American difference is to examine subprime market share disparity. Only 9.59 percent of loans to whites were subprime, while 33.23 percent of loans to African-Americans were subprime, a portion nearly three times greater (see Table 3).

Figure 5. All Single Family Lending in the City of Cincinnati, 2004.



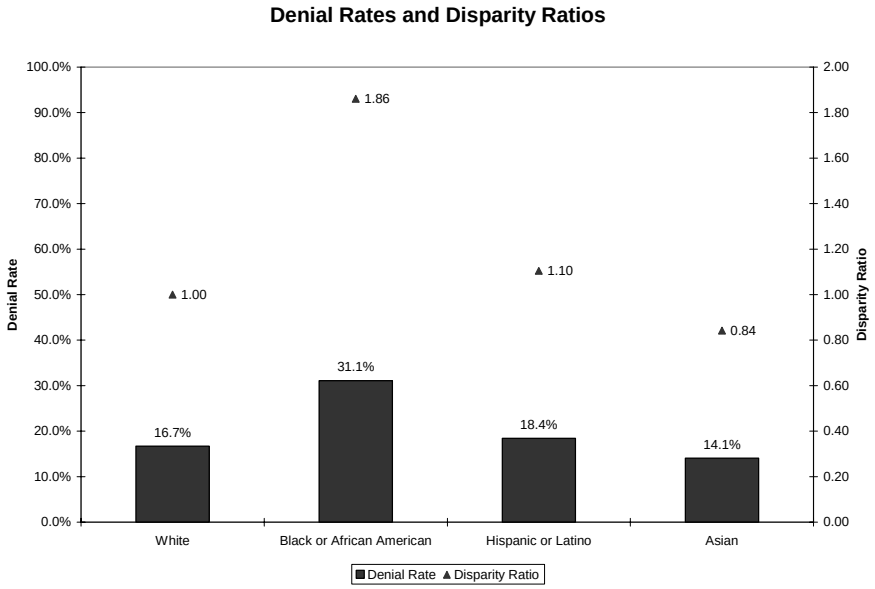
[17] The phrase "portfolio share" as used in this section refers to portion of the total loans (i.e. total portfolio) devoted to a particular group.

[18] Note that this prime-to-population ratio is calculated by dividing prime portfolio share of a given race by percent of households of that race. It is useful in determining if the prime loans are proportional to the households of that race. If the ratio is under 1.00, that racial group receives a share of loans lower than their share of the City of Cincinnati's or Suburban Cincinnati's share of households.

Second, a look at market share[19] shows that 90.41 percent of loans to whites were prime. Comparatively, only 66.77 percent of loans to African-Americans were prime. Other minority groups performed relatively well in the market share indicator: 89.91 percent of loans to Latinos were prime, and 94.17 percent of loans to Asians were prime.

Third, data on loan denials show that African-Americans were 1.86 times more likely than whites to be denied for a home loan. Latinos were only 1.10 times more likely than whites to be denied; Asians were 0.84 times *less* likely than whites to be denied (see Figure 6).

Figure 6. All Single Family Lending in the City of Cincinnati, 2004.



In sum, these indicators show that African-Americans received a greater proportion of subprime loans and were denied more frequently than whites. Latinos' received a share of subprime loans slightly greater than whites, and they were denied at a rate slightly higher; Asians received slightly fewer subprime loans than whites and were denied less frequently.

These differences were manifested in a similar way in Suburban Cincinnati, even when considering that 93.32 percent of the households in Suburban Cincinnati were white. First, portfolio share shows that whereas whites comprised 93.32 percent of households, they received 94.54 percent of total prime loans made, a ratio of 1.01. In contrast, this indicator is worse for African-American borrowers. African-Americans, who comprised only 5.06 percent of all households, received only 3.59 percent of prime loans, a ratio of 0.71. Second, market share shows that 90.34 percent of loans to whites were prime, whereas only 74.29 percent of loans to African-Americans were prime. Of the loans to Latinos, 86.45 percent were prime, and 96.04 percent of loans to Asians were prime. In fact, the data show that whereas African-Americans comprised 5.06 percent of households, they received 10.84 percent of subprime loans, a ratio of 2.14. In contrast, whites received only 88.27 percent of subprime loans despite the fact that they comprised 93.32 percent of households. Third, data on denials show that African-Americans were 1.62 times more likely than whites to be denied for a loan. Thus, African-Americans in Suburban Cincinnati received proportionately more subprime loans and were denied more frequently than suburban whites (see Table 8).

[19] The phrase "market share" as used in this section refers to the share or percent of all loans made by all lenders to a certain group.

Given that HMDA data includes the census tract in which each loan was made, differences can be found when considering the minority level of the census tract in the City of Cincinnati. For example, portfolio share shows that whereas 76.91 percent of the owner-occupied housing units (OOHU) in the City of Cincinnati were in predominantly non-minority tracts, borrowers in these households received 81.29 percent of prime loans, a ratio of 1.06. In contrast, OOHUs in predominantly minority tracts comprised 23.09 of all OOHUs but received only 18.71 percent of prime loans, a ratio of 0.81. Applicants in predominantly minority tracts were denied at a rate 1.55 times that of applicants in predominantly non-minority tracts. Thus, not only do minority borrowers in the City of Cincinnati experience lending disparities, but also borrowers that lived in minority tracts also encountered disparities (see Table 4).

In Suburban Cincinnati, the contrast by minority level of census tract is similar to the City of Cincinnati. In the case of the suburbs, 97.36 percent of OOHUs were in predominantly non-minority tracts; these OOHUs received 98.05 percent of total prime loans made, a ratio of 1.01. While only 2.64 percent of OOHUs were located in predominantly minority tracts, these households received just 1.95 percent of total prime loans made, a ratio of 0.74. Applicants in predominantly minority tracts were denied at a rate 1.63 times that of applicants in non-minority tracts (see Table 9).

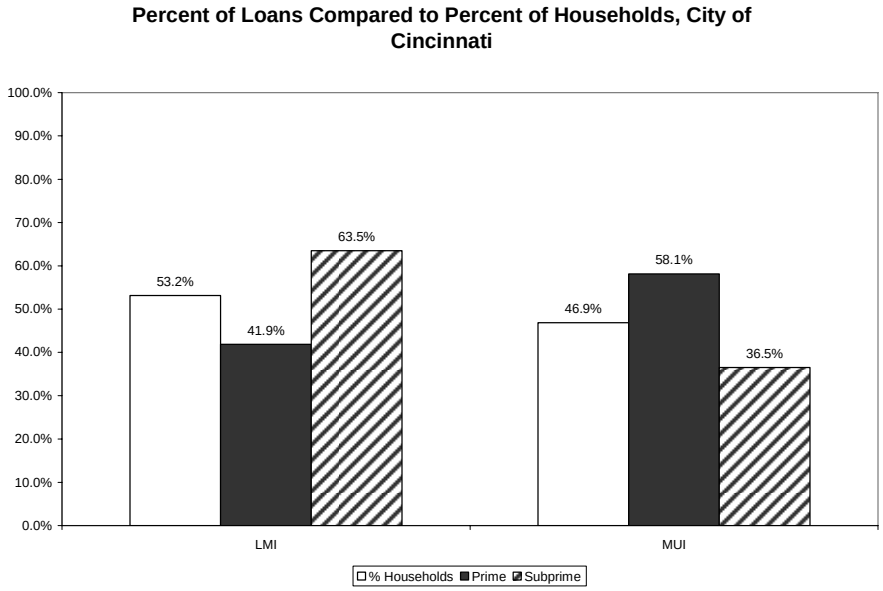
Income Indicators

The indicators that expressed difference among racial groups also show stubborn differences among borrowers of the four income groups: low-, middle-, moderate-, and upper-income borrowers.[20] Generally, as income level increases, the likelihood of subprime lending decreased dramatically, which shows that subprime lending was concentrated among the City of Cincinnati's low-income households. First, in the City of Cincinnati, an examination of portfolio share shows that whereas moderate-income households constituted 19.06 percent of the households, they received 40.00 percent of total subprime loans made, a ratio of 2.10. In contrast, upper-income households comprised 29.94 percent of the households in the City of Cincinnati but received only 11.36 percent of total subprime loans, a ratio of 0.38. Second, a look at market share shows that 25.13 percent of loans to low-income borrowers were subprime (see Figure 7 below). Comparatively, only 6.10 percent of loans to upper-income borrowers were subprime. Third, data on denials show that low-income borrowers were 2.19 times more likely than upper-income borrowers to be denied for a home loan (see Table 5).

These disparities manifested themselves similarly in Suburban Cincinnati. First, portfolio share shows that whereas low-income households comprised 19.17 percent of households, they received 16.67 percent of total subprime loans made, a ratio of 0.87. In comparison, upper-income households comprised 44.80 percent of all suburban households and received only 19.12 percent of subprime loans, a ratio of 0.43. Second, market share shows that 18.89 percent of loans to low-income borrowers were subprime, whereas only 5.96 percent of loans to upper-income borrowers were subprime. Third, data on denials show that low-income borrowers were 2.14 times more likely than upper-income borrowers to be denied for a loan (see Table 10).

[20] The definitions used for low-, moderate-, middle-, and upper-income borrowers correspond to CRA definitions, which are as follows. Low-income borrowers have incomes up to 50 percent of MSA median income. Moderate-income borrowers have incomes between 50 to 80 percent of MSA median income. Middle-income borrowers have income between 80 and 120 percent of MSA median income. Upper-income borrowers have income greater than 120 percent of MSA median income. "LMI" stands for "low and moderate income," and "MUI" stands for "middle and upper income."

Figure 7. All Single Family Lending in the City of Cincinnati, 2004.



Differences can also be found when considering the income level of the census tract[21] in the City of Cincinnati. For example, a look into portfolio share shows that whereas only 10.10 percent of the OOHUs in the City of Cincinnati were in low-income census tracts, borrowers in these OOHUs received 18.18 percent of subprime loans, a ratio of 1.80. In contrast, OOHUs in upper-income census tracts comprised 19.33 percent of all OOHUs but received only 4.83 percent of subprime loans. This shows that borrowers who reside in low-income census tracts in the City of Cincinnati received a disproportionately high amount of subprime loans, whereas upper-income borrowers received relatively very few subprime loans. Applicants in predominantly low-income tracts were denied at a rate 2.79 times that of applicants in upper-income tracts (see Table 6).

In Suburban Cincinnati, the contrast by income level of census tract is similar to the City of Cincinnati. In the case of the suburbs, 0.64 percent of OOHUs were in low-income tracts; these OOHUs received 1.58 percent total subprime loans made, a ratio of 2.48. In contrast, 30.95 percent of all OOHUs were located in upper-income tracts, but these tracts received only 20.54 percent of subprime loans, a ratio of 0.66. Applicants in low-income tracts were denied at a rate 2.17 times that of applicants in upper-income tracts (see Table 11).

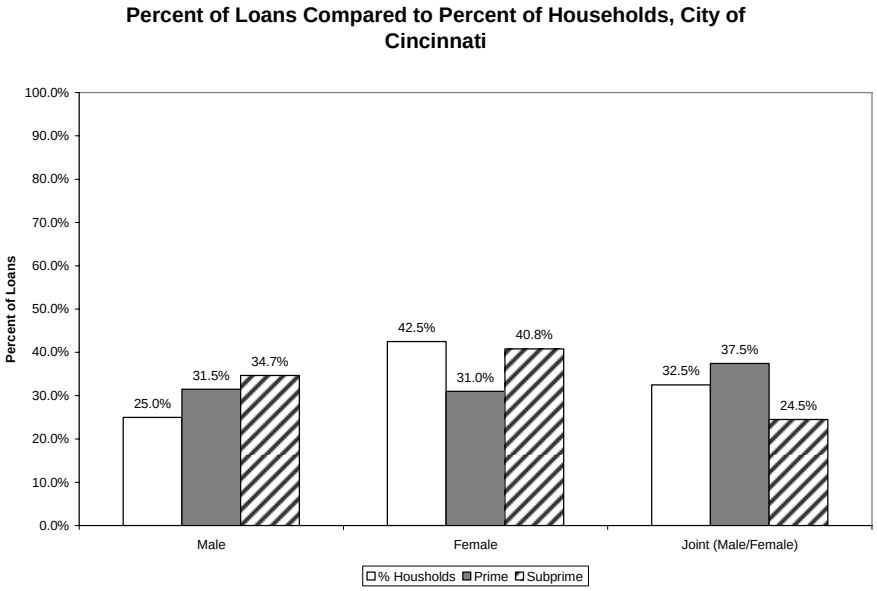
Gender Indicators

The data also show joint male/female borrowers enjoyed the most favorable outcomes. Males and females both received greater percentages of subprime than prime loans. In contrast, joint borrowers received a greater percentage of prime than subprime loans. Second, a look at market share shows that only 80.84 percent of loans to female borrowers were prime and 83.45 percent of loans to males were prime. Comparatively, 89.46 percent of loans to joint applicants were prime. Joint borrowers most likely enjoy better outcomes because two incomes are combined in contrast to males and females applying for loans on their own (see Table 7).

[21] The definitions used for income level of census tract are the same as those used for income level of borrower. See above footnote for these definitions.

In Suburban Cincinnati these disparities were evident as well. Portfolio share showed that while female-headed households comprise 25.39 percent of all households, they received only 19.50 percent of prime loans, a ratio of 0.77. In comparison, male-headed households made up 15.96 percent of households and received 25.69 percent of prime loans, a ratio of 1.61 (see Table 12).

Figure 8. All-Single Family Lending in the City of Cincinnati, 2004.



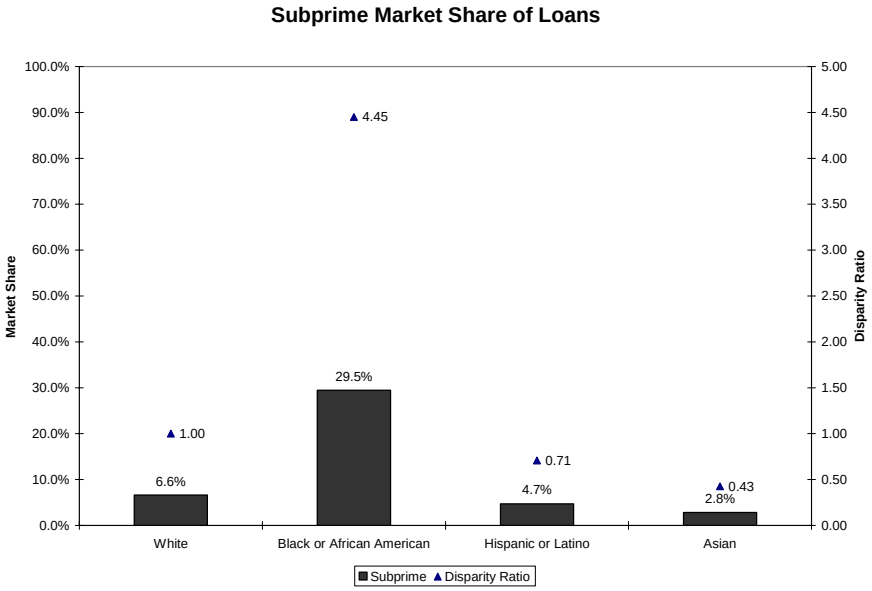
Home Purchase Lending

Home purchase loans, which are made for the purpose of purchasing a dwelling, indicates lenders' capacity to extend loans to both first-time homeowners and those seeking to move to a new home. Unlike refinance and home improvement loans, home purchase lending is the means by which most Americans acquire wealth. Homeownership is the major form of wealth for the majority of Americans. Thus, when a particular group is less able to obtain reasonably-priced home purchase loans, their ability to build wealth is impeded. Home purchase lending accounted for 31.50 percent of all loans made in the Cincinnati MSA in 2004.

Race/Minority Indicators

As was the case in the above analysis on all-single family lending, the indicators show that African-Americans receive a higher percentage of subprime loans and were denied more frequently than whites in the City of Cincinnati. Interestingly, Latinos and Asians outperformed whites on a number of indicators. First, an examination of the portfolio share of home purchase loans shows that whereas whites comprised 63.88 percent of the households, they received 80.87 percent of total prime loans made, a ratio of 1.27. In contrast, African-Americans comprised 33.56 percent of the households but received only 15.76 percent of total prime loans, a ratio of 0.47. In other words, African-Americans received a share of loans about half the size of their share of the city's households. Second, a look at market share shows that 93.38 percent of loans to whites were prime. Comparatively, only 70.54 percent of loans to African-Americans were prime. In addition, 29.46 percent of the home purchase loans to African-Americans were subprime, but only 6.62 percent of the loans to whites were subprime (see Figure 9). African-Americans were 4.45 times move likely than whites to receive subprime loans. Other minority groups performed relatively well in the market share indicator: 95.31 percent of loans to Latinos were prime, and 97.18 percent of loans to Asians were prime (see Table 13).

Figure 9. Home Purchase Lending in the City of Cincinnati, 2004.



Third, data on loan denials show that African-Americans were 2.07 times more likely than whites to be denied for a home loan. Latinos were only 1.25 times more likely than whites to be denied; Asians were 0.55 times *less* likely than whites to be denied. In sum, these indicators show that African-Americans received a greater percentage of subprime loans and were denied more frequently than whites.

These differences were also evident in Suburban Cincinnati. First, portfolio share shows that whereas whites comprised 93.32 percent of households, they received 93.78 percent of total prime loans made, a ratio of 1.00. While this shows that prime lending is proportional to whites' share of suburban households, this indicator is worse for African-American borrowers. African-Americans, while comprising only 5.06 percent of all households, received a mere 3.72 percent of prime loans, a ratio of 0.74. Second, market share shows that 92.80 percent of loans to whites were prime, whereas only 77.66 percent of loans to African-Americans were prime. Of loans to Latinos, 87.42 percent of loans were prime, and 97.05 percent of loans to Asians were prime. Third, data on denials show that African-Americans were 2.06 times more likely than whites to be denied for a loan, whereas Latinos were 1.48 times more likely and Asians 0.89 times *less* likely than whites to be rejected for a loan. Thus, African-Americans in Suburban Cincinnati received higher-rate loans and were denied more frequently than suburban whites (see Table 18).

Stubborn differences can likewise be found among home purchase lending when one considers the minority level of the census tract in the City of Cincinnati. For instance, portfolio share shows that whereas 76.91 percent of the OOHUs in the City of Cincinnati were in predominantly non-minority tracts, borrowers in these households received 83.49 percent of prime loans, a ratio of 1.09. In contrast, OOHUs in predominantly minority tracts comprised 23.09 of all OOHUs but received only 16.51 percent of prime loans, a ratio of 0.72. Applicants in predominantly minority tracts were denied at a rate 1.83 times that of applicants in predominantly non-minority tracts. Thus, not only do minority borrowers in the City of Cincinnati experience lending disparities, but also borrowers of any race that lived in minority tracts do as well (see Table 14).

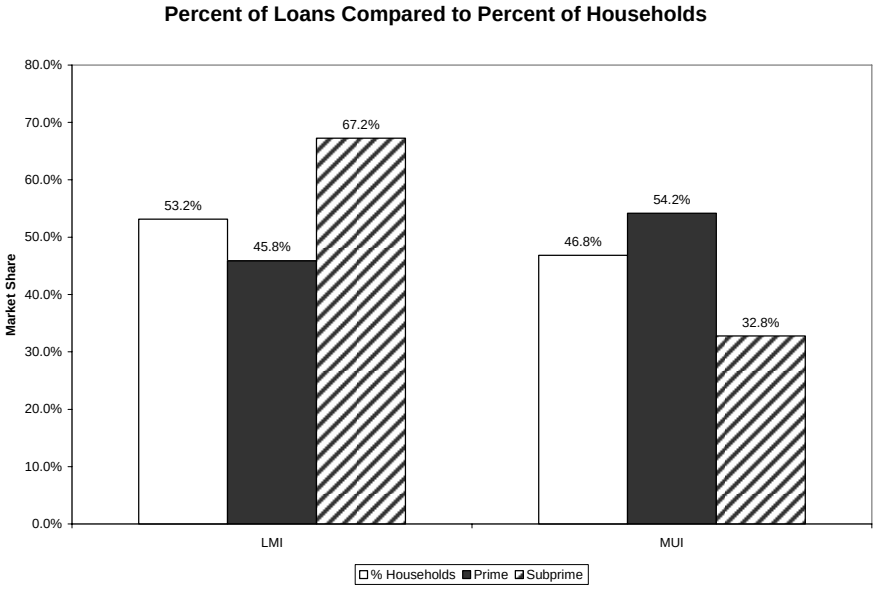
The contrast by minority level of census tract in Suburban Cincinnati is similar to the City of Cincinnati. In Suburban Cincinnati, 97.36 percent of OOHUs were in predominantly non-minority tracts; these OOHUs received 98.44 percent of total prime loans made, a ratio of 1.01. While only 2.64 percent of OOHUs were located in predominantly minority tracts, these households received a slim 1.56 percent of total

prime loans made, a ratio of 0.59. Applicants in predominantly minority tracts were denied at a rate 1.97 times that of applicants in non-minority tracts (see Table 19).

Income Indicators

The indicators for home purchase lending also show stubborn differences among borrowers of the four income groups. Just as in the case of all single family lending, the likelihood of subprime lending decreased dramatically as income level increased. Once again, this shows that subprime lending was concentrated among the City of Cincinnati's low-income households. First, in the City of Cincinnati, an examination of portfolio share shoes that whereas low-income households constituted 34.09 percent of the households, they received only 13.23 percent of total prime loans made, a ratio of 0.39. In contrast, upper-income households, which comprised 29.94 percent of the households in the City of Cincinnati, received 30.16 percent of total prime loans, a ratio of 1.01 and an amount proportionate to percent of households. Second, a look at market share shows that 19.65 percent of loans to low-income borrowers were subprime. Comparatively, only 4.01 percent of loans to upper-income borrowers were subprime. Third, data on denials show that low-income borrowers were 2.46 times more likely than upper-income borrowers to be denied for a home loan (see Table 15).

Figure 10. Home Purchase Lending in the City of Cincinnati, 2004.



These disparities are present as well when one examines the incomes of borrowers in Suburban Cincinnati. First, portfolio share shows that whereas low-income households comprised 19.17 percent of households, they received just 9.31 percent of prime loans made, a ratio of 0.49. In comparison, upper-income households, which comprised 44.80 percent of all suburban households, received 36.03 percent of prime loans, a ratio of 0.80. Second, market share shows that 86.69 percent of loans to low-income borrowers were prime, whereas 96.03 percent of loans to upper-income borrowers were prime. Third, data on denials show that low-income borrowers were 2.98 times more likely than upper-income borrowers to be denied for a loan (see Table 20).

Disparities were again present when examining home purchase lending by the income level of the census tract in which it was originated. In the City of Cincinnati, a look into portfolio share shows that whereas only 10.10 percent of the OOHUs in Suburban Cincinnati were in low-income census tracts, borrowers in these OOHUs received 6.94 percent of prime loans, a ratio of 0.69. In contrast, OOHUs in upper-income

census tracts comprised 19.33 of all OOHUs but received 22.36 percent of prime loans. Applicants in predominantly low-income tracts were denied at a rate 3.33 times that of applicants in upper-income tracts (see Table 16).

In Suburban Cincinnati, the contrast by income level of census tract is similar to the City of Cincinnati. In the case of the suburbs, 0.64 percent of OOHUs were in low-income tracts; these OOHUs received 0.45 percent total prime loans made, a ratio of 0.71. In contrast, 30.95 percent of all OOHUs were located in upper-income tracts and received 40.52 percent of prime loans, a ratio of 1.31. Applicants in low-income tracts were denied at a rate 2.84 times that of applicants in upper-income tracts (see Table 21).

Gender Indicators

The data also show that women applicants received disproportionately low portions of prime loans. First, in the City of Cincinnati, an examination of portfolio share shows that whereas female-headed households constitute 42.52 percent of all households, they received 33.00 percent of total prime loans made, a ratio of 0.78. In contrast, males, which headed 25.00 percent of households in the City of Cincinnati, received an overwhelming 35.51 percent of prime loans, a ratio of 1.42. Second, a look at market share shows that only 85.48 percent of loans to female borrowers were prime. Comparatively, 93.78 percent of loans to joint applicants were prime (see Table 17).

In Suburban Cincinnati these disparities were evident as well. Portfolio share showed that while female-headed households comprised 25.39 percent of all households, they received 20.92 percent of prime loans, a ratio of 0.82 (see Table 22).

Refinance Lending

As mentioned above, refinance loans are transactions in which the existing obligation, involving either a home purchase or a home improvement loan, is satisfied and replaced by a new obligation. Oftentimes a homeowner will use a refinance loan to obtain more favorable terms and a lower rate. However, a large segment of predatory lending occurs in the subprime refinance market. For example, unscrupulous lenders encourage consumers to refinance without any net benefit to the consumer; the lender profits from excessive fees. Refinance loans accounted for 66.05 percent of all lending done in the Cincinnati MSA in 2004.

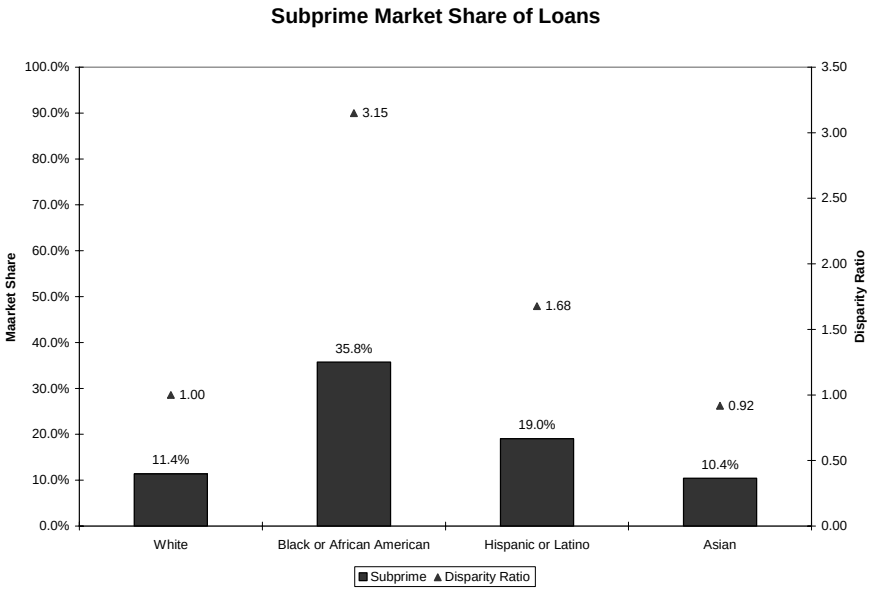
Race/Minority Indicators

The racial disparities evident in all-single family lending and home purchase lending were also pronounced in refinance lending.

First, an examination of the portfolio share of refinance loans shows that whereas whites comprised 63.88 percent of the households, they received 81.87 percent of total prime loans made, a ratio of 1.28. In contrast, African-Americans made up 33.56 percent of the households but received only 16.13 percent of total prime loans, a ratio of 0.48. In addition, 45.15 percent of subprime loans were made to these African-American households, a ratio of 1.35. That is, African-Americans received a disproportionate amount of subprime loans (see Figure 11). Second, a look at market share shows similar results. That is, 88.65 percent of refinance loans to whites were prime, while only 64.24 percent of refinance loans to African-Americans were prime. Latinos performed better than African-Americans but worse than whites in market share: 80.95 percent of refinance loans to Latinos were prime. Asians, in fact, received the highest proportion of prime loans: 89.58 percent of loans to Asians were prime. Third, data on loan denials show that African-Americans were 1.74 times more likely than whites to be denied for a home

loan. Latinos were only 1.15 times and Asians 1.11 times more likely than whites to be denied (see Table 23).

Figure 11. Refinance Lending in the City of Cincinnati, 2004.



These differences were evident in Suburban Cincinnati as well. First, portfolio share shows that whereas whites comprised 93.32 percent of households, they received 95.12 percent of total prime loans made, a ratio of 1.02. In contrast, African-Americans, who comprised 5.06 percent of all households, received 9.99 percent of subprime loans, a ratio of 1.98. Second, market share shows that only 11.02 percent of loans to whites were subprime, whereas 27.70 percent of loans to African-Americans were subprime. The data show that 14.07 percent of loans to Latinos were subprime, and only 4.90 percent of loans to Asians were subprime. Third, data on denials show that African-Americans were 1.51 times more likely than whites to be denied for a loan (see Table 28).

Stubborn differences were furthermore present when examining the minority level of the census tract in which loans were made. In the City of Cincinnati, for instance, portfolio share shows that whereas 76.91 percent of the OOHUs were in predominantly non-minority tracts, borrowers in these households received 57.97 percent of subprime loans, a ratio of 0.75. In contrast, OOHUs in predominantly minority tracts comprised 23.09 of all OOHUs but received 42.03 percent of subprime loans, a ratio of 1.82. Applicants in predominantly minority tracts were denied at a rate 1.40 times that of applicants in predominantly non-minority tracts (see Table 24).

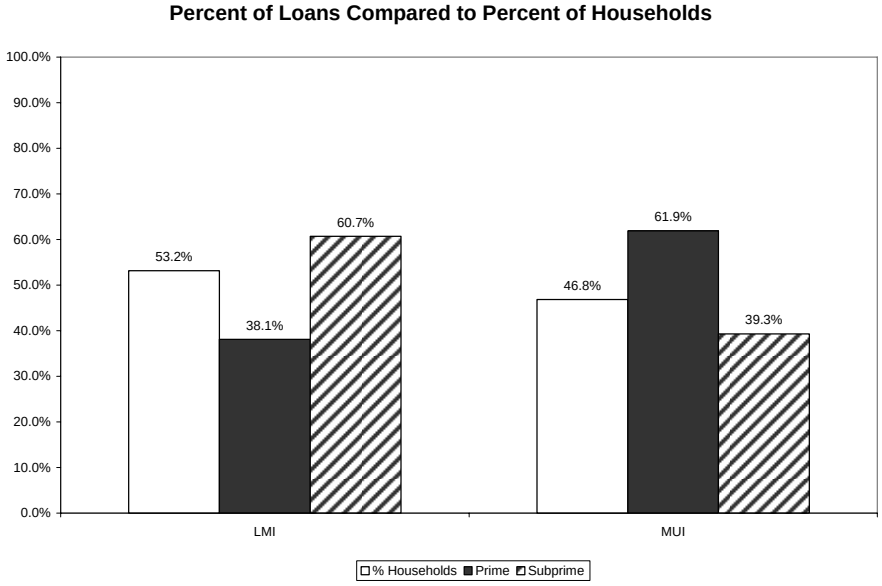
The contrast by minority level of census tract in Suburban Cincinnati is similar to the City of Cincinnati. In Suburban Cincinnati, 97.36 percent of OOHUs were in predominantly non-minority tracts; these OOHUs received 93.80 percent of total subprime loans made, a ratio of 0.96. While only 2.64 percent of OOHUs were located in predominantly minority tracts, these households received a disproportionately high 6.20 percent of total subprime loans made, a ratio of 2.35. Applicants in predominantly minority tracts were denied at a rate 1.48 times that of applicants in non-minority tracts (see Table 29).

Income Indicators

The indicators show that low- and moderate-income borrowers were most likely to receive high-priced loans. First, in the City of Cincinnati, an examination of portfolio share shoes that whereas moderate-

income households constituted 19.06 percent of the households, they received 37.71 percent of total subprime loans made, a ratio of 1.98. This contrasts greatly with the numbers for upper-income households, which comprised 29.94 percent of the households in the City of Cincinnati and received 12.78 percent of total subprime loans, a ratio of 0.43 (see Figure 12). A look at market share shows that 28.84 percent of loans to low-income borrowers were subprime. Comparatively, only 7.38 percent of loans to upper-income borrowers were subprime. Third, data on denials show that low-income borrowers were 2.08 times more likely than upper-income borrowers to be denied for a home loan (see Table 25).

Figure 12. Refinance Lending in the City of Cincinnati, 2004.



These trends existed in Suburban Cincinnati as well; that is, the lower the income, the greater the likelihood for subprime lending. First, portfolio share shows that whereas moderate-income households comprised 16.02 percent of households, they received a high 33.39 percent of subprime loans for a ratio of 2.08. In contrast, upper-income households comprised 44.80 percent of all suburban households and received only 20.22 percent of subprime loans, a ratio of 0.45. Second, market share shows that 77.52 percent of loans to low-income borrowers were prime, compared to 92.89 percent of prime loans to upper-income borrowers. Third, data on denials show that low-income borrowers were 1.96 times more likely than upper-income borrowers to be denied for a loan (see Table 30).

Disparities were again present when examining refinance lending by the income level of the census tract in which it was originated. In the City of Cincinnati, a look into portfolio share shows that whereas only 10.10 percent of the OOHUs were in low-income census tracts, borrowers in these OOHUs received 17.88 percent of subprime loans, a ratio of 1.77. In contrast, OOHUs in upper-income census tracts comprised 19.33 of all OOHUs but received 5.52 percent of subprime loans. Applicants in low-income tracts were denied at a rate 2.49 times that of applicants in upper-income tracts (see Table 26).

In Suburban Cincinnati, the contrast by income level of census tract was similar to the City of Cincinnati. In the case of the suburbs, 0.64 percent of OOHUs were in low-income tracts; these OOHUs received 1.76 percent total subprime loans made, a ratio of 2.76. In contrast, 30.95 percent of all OOHUs were located in upper-income tracts and received 20.08 percent of subprime loans, a ratio of 0.65. Applicants in low-income tracts were denied at a rate 1.93 times that of applicants in upper-income tracts (see Table 31).

Gender Indicators

The data also show that, like home purchase lending, female refinance borrowers received a lower proportion of prime loans than male borrowers and joint male/female borrowers. First, portfolio share in the City of Cincinnati shows that whereas female-headed households constituted 42.52 percent of all households, they received just 28.99 percent of total prime loans made, a ratio of 0.78. In contrast, males, which headed 25.00 percent of households in the City of Cincinnati, received 28.57 percent of prime loans, a ratio of 1.42. Second, a look at market share shows that only 77.79 percent of loans to female borrowers were prime while 87.31 percent of loans to joint applicants were prime. In Suburban Cincinnati these disparities were apparent as well. Portfolio share showed that while female-headed households comprised 25.39 percent of all households, they received just 18.34 percent of prime loans, a ratio of 0.72. Males, in contrast, obtained 23.47 percent of prime loans, and constituted 15.96 percent of the households, for a ratio of 1.47 (see Tables 27 and 32).

Home Improvement Lending

A home improvement loan, as classified by the reporting institution, is a loan that will be used for repairing, rehabilitating, remodeling, or improving a dwelling or the real property on which it is located. Given that home improvement loans constituted only 2.45% of the total loan volume in the Cincinnati MSA in 2004, this section is not as detailed as the previous sections.

Race/Minority Indicators

First, an examination of the portfolio share of home improvement loans shows that whereas whites comprised 63.88 percent of the households, they received 70.19 percent of total prime loans made, a ratio of 1.10. African-Americans, on the other hand, made up 33.56 percent of the households but received only 28.37 percent of total prime loans, a ratio of 0.85. Second, a look at market share shows similar results. That is, 78.07 percent of home improvement loans to whites were prime, while only 64.13 percent of home improvement loans to African-Americans were prime. Third, data on loan denials show that African-Americans were 1.42 times more likely than whites to be denied for a home loan. In sum, these indicators show that African-Americans received higher-rate home improvement loans and were denied more frequently than whites. The home improvement volume to Latinos and Asians was too small to make any legitimate conclusions (see Table 33).

The data for home improvement lending in Suburban Cincinnati exhibited disparities that are significantly less pronounced. First, portfolio share shows that whereas whites comprise 93.32 percent of households, they received 94.10 percent of prime home improvement loans, a ratio of 1.01. This indicator shows that African-American borrowers outperformed whites: they comprised 5.06 percent of all households and received 5.45 percent of prime loans, a ratio of 1.08. Second, market share shows that 77.77 percent of loans to whites were prime, whereas only 63.16 percent of loans to African-Americans were prime. Third, data on denials show that African-Americans were 1.39 times more likely than whites to be denied for a loan (see Table 38).

Stubborn differences were furthermore present when examining the minority level of the census tract in which loans were made. In the City of Cincinnati, for instance, portfolio share shows that whereas 76.91 percent of the OOHUs were in predominantly non-minority tracts, borrowers in these households received 57.50 percent of subprime loans, a ratio of 0.75. In contrast, OOHUs in predominantly minority tracts comprised 23.09 of all OOHUs but received 42.50 percent of subprime loans, a ratio of 1.84. Applicants in predominantly minority tracts were denied at a rate 1.32 times that of applicants in predominantly non-minority tracts (see Table 34).

Income Indicators

As in the case of home purchase lending and refinance lending, the likelihood of subprime lending in the home improvement lending market increased dramatically as income level decreased. First, in the City of Cincinnati, an examination of portfolio share shoes that whereas moderate-income households constitute 19.06 percent of the households, they received almost half (45.00 percent) of total subprime loans made, a ratio of 2.36. This contrasts greatly with the numbers of upper-income households, which comprised 29.94 percent of the households in the City of Cincinnati and received just 7.50 percent of total subprime loans, a ratio of 0.25. A look at market share shows that 38.30 percent of loans to moderate-income borrowers were subprime. Comparatively, only 9.84 percent of loans to upper-income borrowers were subprime. Third, data on denials show that low-income borrowers were 1.58 times more likely than upper-income borrowers to be denied for a home loan (see Table 35).

These trends are still prevalent yet slightly muted in Suburban Cincinnati. First, portfolio share shows that whereas moderate-income households comprised 16.02 percent of households, they received 25.76 percent of prime loans, for a ratio of 1.61. Upper-income households comprised 44.80 percent of all suburban households and received 29.95 percent of prime loans, a ratio of 0.67. Second, market share shows that these groups performed similarly: 71.19 percent of loans to low-income borrowers were prime, whereas 85.63 percent of loans to upper-income borrowers were prime. Third, data on denials show that low-income borrowers were 1.44 times more likely than upper-income borrowers to be denied for a loan (see Table 40).

Disparities were again present when examining home improvement lending by the income level of the census tract in which it was originated. In the City of Cincinnati, a look into portfolio share shows that whereas only 10.10 percent of the OOHUs were in low-income census tracts, borrowers in these OOHUs received 20.00 percent of subprime loans, a ratio of 1.98. In contrast, 19.33 percent of all OOHUs were in upper-income census tracts, yet received 5.00 percent of subprime loans. Applicants in low-income tracts were denied at a rate 1.58 times that of applicants in upper-income tracts (see Table 36).

In the case of Suburban Cincinnati, 15.91 percent of OOHUs were in moderate-income tracts; these OOHUs received 26.46 percent total subprime loans made, a ratio of 1.66. In contrast, 30.95 percent of all OOHUs were located in upper-income tracts and received 17.53 percent of subprime loans, a ratio of 0.57. Applicants in low-income tracts were denied at a rate 1.44 times that of applicants in upper-income tracts (see Table 41).

Section IV.
Aggregate Small Business Lending

Overview

An analysis of small business lending data in the Cincinnati area shows substantial disparities based on race and income level of the census tract in which loans were made. Small business loans have numerous benefits for communities. First, credit for small businesses may aid an enterprise in staying profitable or increasing its number of employees or expanding its production capacity, which in turn increases employment opportunities in inner-city areas. Second, small businesses foster a greater sense of pride and well-being in the community. That is, small business owners have an increased interest in a clean, habitable neighborhood.

This section will analyze all CRA-reported small business lending activity in 2004 separately in the City of Cincinnati and Suburban Cincinnati. In 2004, CRA-reporting small business lenders in the Cincinnati MSA received originated 46,517 loans; 10,000 in the City of Cincinnati and 36,517 in Suburban Cincinnati. As mentioned above,[22] the data include only the census tract in which the small business loan was made, and not information on the race, income, and gender of the borrower. Thus, CRA data can determine whether small business loans are being directed to low-income and minority neighborhoods, but not necessarily whether they are going to low-income and minority individuals.

This aggregate small business lending analysis is broken into three sections: first, an examination of the minority level of census tract; second, a section that examines the income level of census tract; and finally, an examination of the revenue size of the small business.

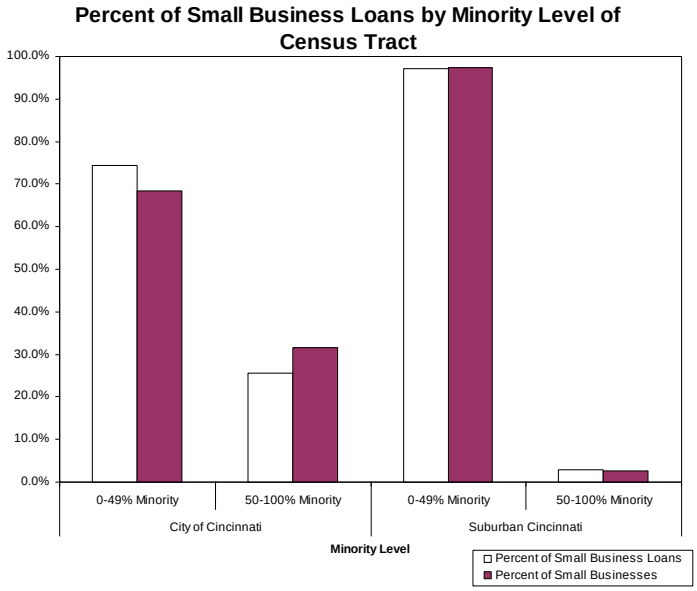
Race Indicators

In the City of Cincinnati, the data show that the businesses in predominantly minority census tracts received proportionally fewer loans than businesses in predominantly nonminority tracts. For example, consider that 31.59 percent of small businesses in the City of Cincinnati were located in predominantly minority tracts; however, they received only 25.67 percent of small business loans made in 2004. On the other hand, the remaining 68.41 percent of small businesses in predominantly nonminority census tracts received 74.33 percent of small business loans (see Figure 13 and Table 51).

This disparity was evident in Suburban Cincinnati although it was muted considerably. That is, 3.14 percent of small businesses in Surburban Cincinnati were located in predominantly minority census tracts, but they received 2.98 percent of small business loans. In contrast, 96.86 percent of small businesses were located in predominantly nonminority census tracts, while they received 97.02 percent of small business loans (see Table 51).

[22] For a more complete discussion on the source and nature of CRA small business data, see the methodology section above.

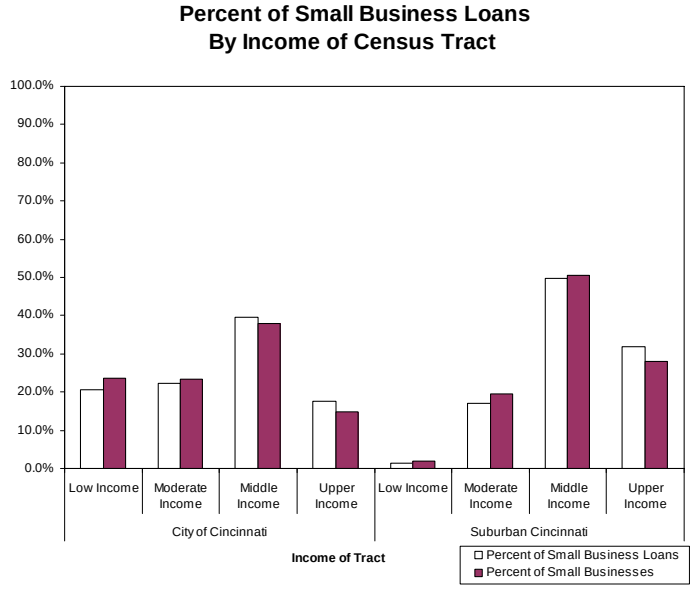
Figure 13. Aggregate Small Business Lending in the City of Cincinnati, 2004.



Income Indicators

Using similar indicators, disparities were evident when considering the income level[23] of the census tract in which small business loans were made, although these disparities were not quite as strong. For example, whereas 23.67 percent of small businesses in the City of Cincinnati were in low-income census tracts, only 20.74 percent of small business loans were made to businesses in these census tracts, as Figure 14 shows. These figures are in contrast to upper-income census tracts, which contained 14.97 percent of all small businesses and received 17.58 percent of small business loans (see Table 52).

Figure 14. Aggregate Small Business Lending in the City of Cincinnati, 2004.



[23] The definitions used for low-, moderate-, middle-, and upper-income borrowers correspond to CRA definitions.

The disparity was evident in Suburban Cincinnati although it was muted considerably. In the case of moderate-income census tracts, 19.50 percent of small businesses in Suburban Cincinnati were located in these census tracts, but they received 16.90 percent of small business loans. In contrast, 27.94 percent of small businesses were located in upper-income census tracts, while they received 31.97 percent of small business loans (see Table 52).

Size of Business

Another indication that a financial institution is community-oriented is its capacity to make loans to the smallest of small businesses. To measure this notion, it is useful to analyze if banks are reaching small businesses with revenues less than $1 million. Unfortunately, in the City of Cincinnati, the number of loans to small businesses with revenues less than $1 million was far fewer than the number of small businesses under that threshold. That is, whereas 51.79 percent of small businesses had revenues less than $1 million, only 33.58 percent of loans were made to these businesses. Not surprisingly, the situation in Suburban Cincinnati was similar. That is, 62.41 percent of small businesses had revenues less than $1 million, while only 36.43 percent of small business loans went to businesses of this size (see Table 53).

Section V.
Home Lending Ranking

Overview

The City of Cincinnati asked NCRC to provide a comprehensive analysis and comparison of the CRA and fair lending performance of 17 lending institutions. This analysis compares the performance of national, regional, and local institutions. The following three banks received City deposits: Fifth Third Bank, PNC Bank, and US Bank. The regional banks include Huntington Bank, Keybank, National City Bank, Fifth Third Bank, PNC Bank, and US Bank. The national lending institutions active in Cincinnati and the surrounding suburbs are ABN Amro, Accredited, Ameriquest, Countrywide, JP Morgan Chase, Washington Mutual, and Wells Fargo & Co. Finally, the local lenders are First Financial, Guardian Savings Bank, Union Savings Bank, and Third Federal Savings & Loan.

For this analysis, NCRC ranked institutions on 13 measures of lending performance including percent of loans to various groups of borrowers, denial disparity ratios, and ratios of market shares to different groups of borrowers and communities. A complete description of the indicators is contained in the methodology section of the report.

The ranking analysis is conducted for all single family lending considered together, and for home purchase, and refinance lending separately.

Lenders receiving the lowest score overall performed better on our analysis. A score of "1" means the lending institution performed best on an indicator of performance such as percent of loans to minorities. For all single family lending, a score of "17" means the institution performed the worst on an indicator or came in "last" place on an indicator. Therefore, the worst possible score is 221 (13 indicators multiplied by 17 for the possible rank for each indicator). The best possible score is 13, or 13 indicators multiplied by 1, the top rank. NCRC included a lender on any of the ranking analyses if the lender had more than 25 loans. Lenders are not ranked on home improvement lending because only one lender (PNC) made more than 25 home improvement loans in the City of Cincinnati.

All Single Family Lending - Prime

The overall rankings for the City of Cincinnati prime single family lenders in order from best to worst on the 13 lending performance indicators (see Table 43):

Figure 15. Overall Rankings for Prime All Single Family Lending in the City of Cincinnati, 2004.

Rank	Name	Lender Scope
1	Ameriquest	National Lender
2	Accredited	National Lender
3	PNC Financial Services Group Inc	Regional Lender, Depository
4	Washington Mutual	National Lender
5	Fifth Third	Regional Lender, Depository
5	National City Corp	Regional Lender
7	Countrywide	National Lender
8	US Bank	Regional Lender, Depository
9	Huntington Bancshares	Regional Lender
10	Keycorp	Regional Lender
11	ABN Amro	National Lender
12	JPMorgan Chase	National Lender
13	Wells Fargo & Co	National Lender
14	Guardian Savings Bank	Local Lender
15	Union Savings Bank	Local Lender
16	Third Federal Savings & Loan	Local Lender
17	First Financial Bancorp	Local Lender

The overall rankings for the Suburban Cincinnati prime single family lenders on the 13 indicators (see Table 45):

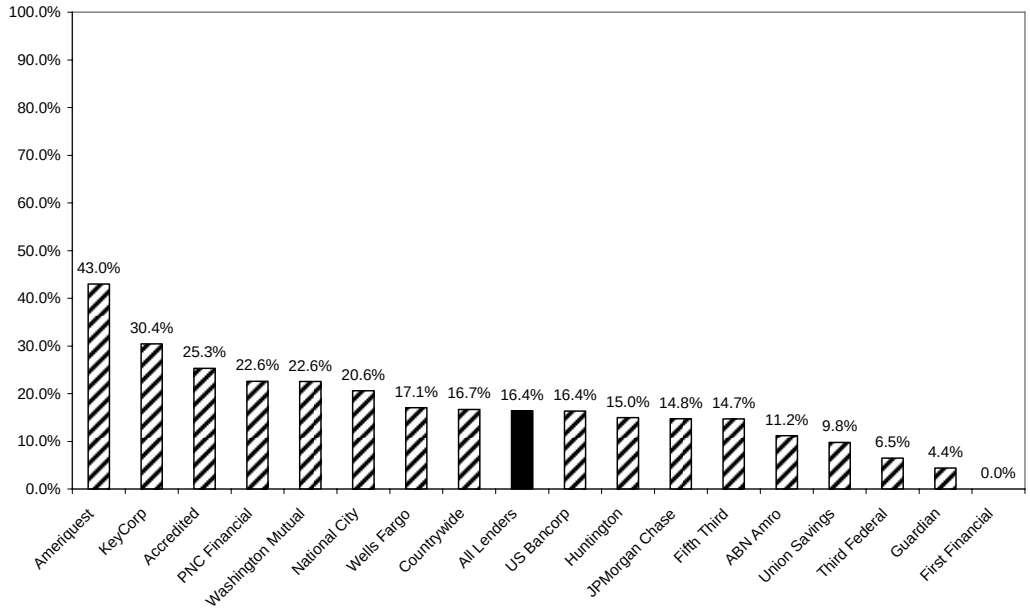
Figure 16. Overall Rankings for Prime All Single Family Lending in Suburban Cincinnati, 2004.

Rank	Name	Lender Scope
1	Ameriquest	National Lender
2	Accredited	National Lender
3	Keycorp	Regional Lender
4	National City Corporation	Regional Lender
5	Huntington National Bancshares	Regional Lender
6	JPMorgan Chase	National Lender
7	Washington Mutual	National Lender,
8	Countrywide	National Lender
9	US Bank	Regional Lender, Depository
10	Fifth Third	Regional Lender, Depository
11	PNC Financial Services Group Inc	Regional Lender, Depository
12	First Financial Bancorp	Local Lender
13	Wells Fargo & Co	National Lender
14	ABN Amro	National Lender
15	Third Federal Savings and Loan	Local Lender
16	Guardian Savings Bank	Local Lender
17	Union Savings Bank	Local Lender

Single Family Lending to African-Americans borrowers

Ameriquest had the best performance on the indicator of prime lending to African-Americans, issuing 43.0 percent of its single family loans to African-Americans in the City of Cincinnati during 2004 (see Figure 17). In contrast, all lenders, as a group, made 16.4 percent of their prime loans to African-Americans. The 16.4 percent all lender figure turned out to be the median of the 17 banks analyzed as well, so there were 8 that were above this percentage and 8 below. Keycorp was second with 30.4 percent loans to African-American borrowers; Accredited, 25.3 percent; and PNC, 22.6 percent. First Financial was the lowest at 0 percent of its loans to African-Americans, Guardian Savings Bank was at 4.4 percent, and Third Federal Savings & Loan was at 6.5 percent (see Table 43).

Figure 17. Prime All Single-Family Lending Ranking in the City of Cincinnati, 2004.



The result of the Suburban Cincinnati rankings of loans to African-Americans was similar to the city ones, but the percentages were much smaller, reflecting the smaller number of African-American households and African-American loan applications in the Cincinnati suburbs. Ameriquest was again the top lender with 9.7 percent of their loans to African-Americans. Second was Accredited at 6.6 percent, then Washington Mutual at 5.9 percent, and National City at 5.2 percent. The percentage of all lenders was 3.6 percent; the lender ranked number 8 in our 17 had that percentage. Guardian Savings Bank was the lowest with 0.6 percent, First Financial had 1.2 percent, Union Savings had 1.6 percent, and ABN Amro had 2.0 percent (see Table 45).

Another measure of performance in reaching African-American borrowers was comparing a lender's market share to African-American borrowers versus its market share to white borrowers. The top performer in this regard was Ameriquest in both the city and the suburban lending market. Its share of all loans made to African-Americans in the city was 3.91 times greater than its share of all single family loans issued to whites, and 2.86 times greater in the suburbs. Similarly, Keycorp's and Accredited's city market share to African-American borrowers were 2.19 and 1.72 times greater than their market share to whites, respectively. In the suburbs, Accredited's and Washington Mutual's market shares to African-American borrowers were 1.96 and 1.69 times greater than their market shares to whites, respectively. The median market share of the 17 lenders to African-Americans was 0.99 times its market share to

whites in the city and 0.95 in the suburbs. On the other end of the scale of performance, First Financial had no loans to African-Americans in the city. Guardian Savings Bank's and Third Federal Savings & Loan's market share to African-American borrowers were 0.23 and 0.36 of their market share to whites, respectively. In the suburbs, Guardian Savings Bank's, First Financial's and Union Savings Bank's market share to African-Americans were 0.16, 0.31, and 0.45, of their market share to whites, respectively.

An additional measure of performance of the banks' lending to African-American borrowers was the analysis of loans by market share to MUI African-American borrowers compared to market share to MUI white borrowers. Ameriquest was the top performer in that category with a ratio of 6.14, or a 6 to 1 ratio of loans to MUI African-Americans compared to MUI white borrowers, based on market share of those borrowers in the City of Cincinnati. Second was Keycorp with a 2.81 ratio of loans to MUI African-American borrowers compared to MUI white borrowers. Eight of the 17 lending institutions analyzed had ratios above 1.0 with the ninth and tenth in the rankings having a ratio of 0.99. The lowest performers in this category were First Financial with no loans to African-Americans in the City, Guardian Savings Bank with a 0.32 ratio, and Union Savings with a 0.39 ratio of MUI African-American borrowers by market share compared to MUI white borrowers by market share (see Table 43).

Ameriquest was the top lender for this performance indicator of the ratio of MUI African-Americans by market share to MUI white borrowers by market share for Suburban Cincinnati with 3.04 ratio. Accredited was next with 2.64, and Washington Mutual with 1.93. Eight of the 17 lending institutions had ratios greater than 1.0 as was the case in the City. The lowest performer for this indicator was Guardian Savings Bank with a 0.18 ratio, followed by First Financial (0.43), Union Savings (0.46) and ABN Amro (0.47).

Prime Single Family Lending to Low- and Moderate-Income Borrowers

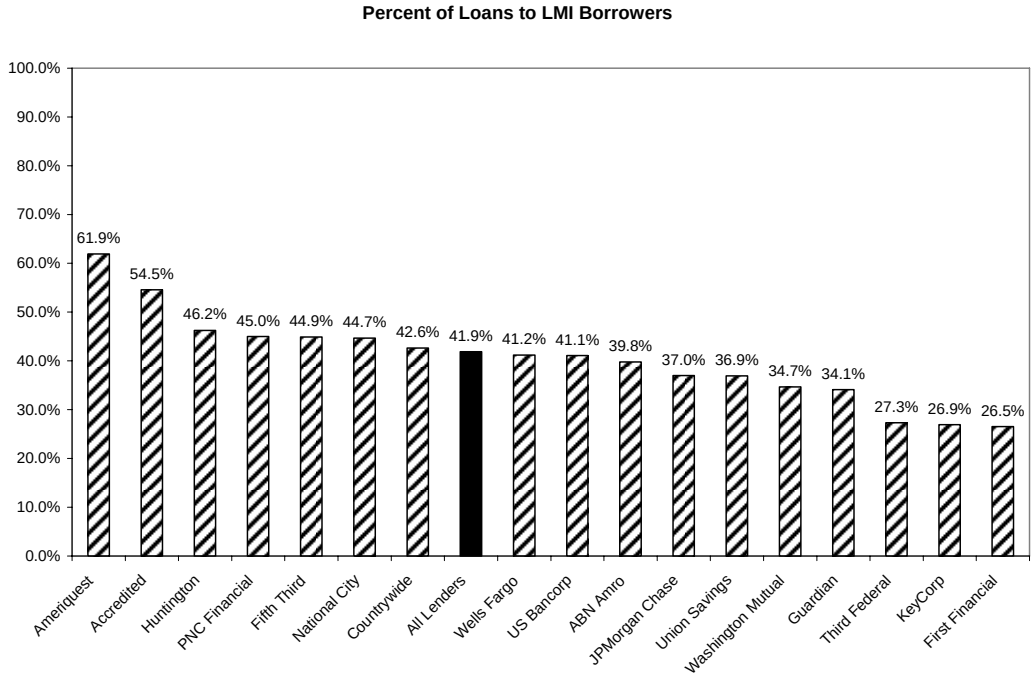
In the City of Cincinnati, Ameriquest issued 61.9 percent of its loans to LMI borrowers, and Accredited issued 54.5 percent (see Figure 18). The percent of all lenders' loans to LMI borrowers in the City was 41.9 percent. Seven lenders were above that all lender benchmark and the remaining ten below. The lowest ranked lenders were First Financial with 26.5 percent, Keycorp at 26.9 percent, and Third Federal Savings & Loan at 27.3 percent (see Table 43).

In the suburbs, the benchmark for all lenders was 33.9 percent of their loans to LMI borrowers. Ten of the 17 lenders in our analysis had a higher percentage of loans to LMI borrowers than all lenders as a group. Ameriquest made 43.8 percent of its loans to LMI borrowers. At the other end of the scale, Third Federal Savings & Loan made 17.8 percent of their loans to LMI borrowers; Union Savings Bank had 27.2 percent; Guardian Savings Bank, 28.2 percent, and Wells Fargo issued 28.9 percent of their suburban loans to LMI borrowers.

Comparing LMI market share to MUI (middle- and upper-income) market share in the city, Ameriquest's market share of loans to LMI borrowers was 2.26 times their market share to MUI borrowers. The median market share ratio of the 17 lenders was .97. Accredited's ratio was 1.67; Huntington's was 1.19; PNC and Fifth Third were at 1.13. First Financial had the lowest LMI to MUI market share ratio of .5; meaning First Financial's market share of loans to LMI borrowers was just half of its market share of loans to MUI borrowers. Keycorp had a ratio 0.51 and Third Federal Savings & Loan had a ratio of 0.52.

Ameriquest also had the most favorable market share ratio of LMI to MUI borrowers in the suburbs of 1.51. First Financial had 1.35 and US Bank had 1.31. The median ratio among the 17 banks was 1.12. The lowest was Third Savings & Loan at 0.42. The next lowest were Union Savings at 0.73, Guardian Savings Bank at 0.77, and Wells Fargo at 0.79 (see Table 43).

Figure 18. Prime All Single-Family Lending Ranking in the City of Cincinnati, 2004.



Prime Single Family Lending to Females

All city prime lenders, as a group, made 31.0 percent of their loans to females. Ten of the 17 banks in this study had a higher percentage than that. The lenders with the highest percentage were Accredited with 40.7 percent, PNC with 37.8 percent, Ameriquest with 35.2 percent, and Countrywide with 34.9 percent. First Financial was the poorest performer on this measure with 24.0 percent; Third Savings & Loan was the next lowest performer with 25.0 percent.

In the suburbs, all prime lenders made 19.5 percent of their loans to females. Ten of the 17 lending institutions in the analysis had a higher percentage than that. The lenders with the highest percentage were Countrywide with 25.4 percent, Accredited with 25.0 percent, Keycorp with 24.5 percent, and Ameriquest with 24.3 percent. The poorest performers on this measure were Third Federal Savings & Loan with 15.6 percent and ABN Amro with 16.1 percent (see Table 43).

Prime Single Family Lending to Minority Neighborhoods

All prime lenders made 18.7 percent loans to minority neighborhoods in the City of Cincinnati. Ameriquest made 45.7 percent of their loans to minority neighborhoods, followed by Keycorp with 34.6 percent, Accredited served 33.3 percent, and PNC offered 26.6 percent. Those performing at the other end of the scale were Third Federal Savings & Loan, First Financial with 10.0 percent each, and Guardian Savings Bank with 10.9 percent.

In Suburban Cincinnati, the portion of all financial institutions' loans to minority neighborhoods was 2 percent. Ameriquest was again the front runner with 5.8 percent of their suburban loans to minority neighborhoods. Keycorp had 5.4 percent, and Accredited had 3.8 percent. Those at the other end of the performance scale were Guardian Savings Bank with 0.8 percent, and Third Federal Savings & Loan and First Financial, each with 1.1 percent (see Table 43).

Prime Single Family Lending to Low- and Moderate-Income Neighborhoods

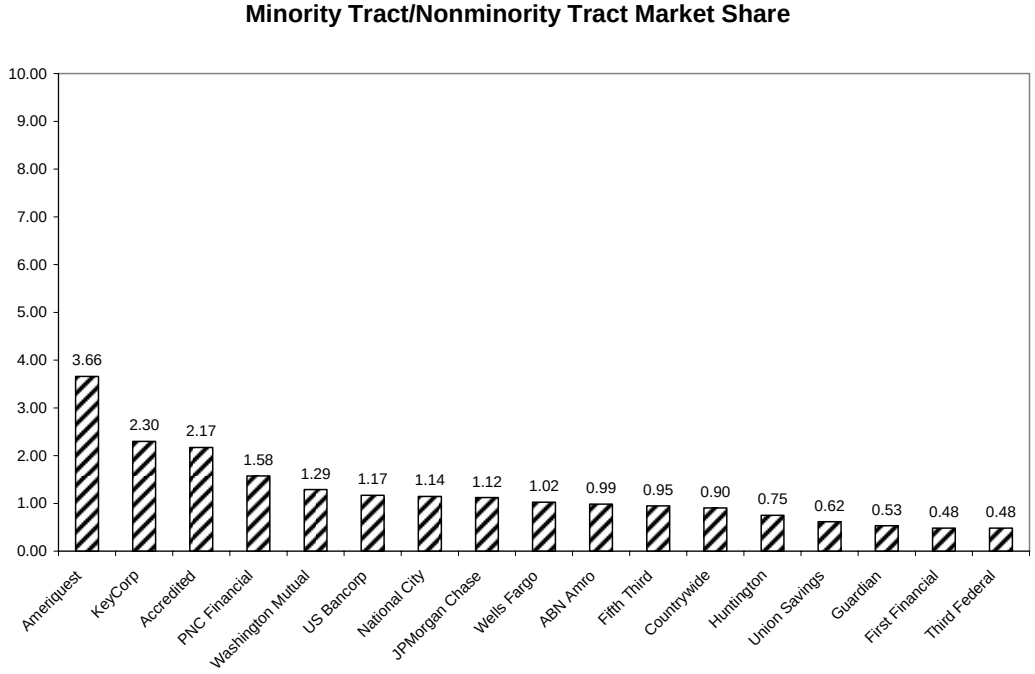
All prime lenders in the City of Cincinnati made 29.2 percent of their loans in LMI census tracts. Eleven of the seventeen lenders in our analysis had a percentage higher than that with Ameriquest the highest at 60.0 percent of their city loans in LMI neighborhoods. Huntington Nation Bancshares had 41.6 percent, Accredited had 39.4 percent, and PNC had 35.5 percent. Those performing the worst on this indicator were Third Federal Savings & Loan with 15.0 percent, First Financial with 16.0 percent, and Guardian Savings Bank with 17.0 percent.

In Suburban Cincinnati, 11.0 percent of all loans went to LMI neighborhoods. Of our seventeen lenders, nine were above that percentage, with Ameriquest at 18.1 percent, US Bank at 14.8 percent, Keycorp at 13.5 percent, JP Morgan Chase at 13.4 percent, and Huntington at 13.4 percent. Those at the other end of the scale were Third Federal Savings & Loan at 4.2 percent, Union Savings Bank at 6.5 percent and Guardian Savings Bank at 7.4 percent (see Table 43).

Prime Additional Market Share Indicators for Neighborhoods

Two additional market share indicators compared 1) a lender's share of all loans made to LMI tracts compared to its share of loans to MUI tracts, and 2) a lender's share of loans issued to minority census tracts compared to its share of loans to white census tracts (see Figure 19). Ratios above 1 are commendable. For example, if a lender made 5 percent of all loans in LMI tracts and 4 percent of all loans in MUI tracts, its ratio would be 1.25. Conversely, ratios below 1 indicate that a lender needs to improve its performance. For instance, if a lender made 4 percent of all loans in LMI tracts and 5 percent in MUI tracts, its ratio would be 0.8.

Figure 19. Prime All Single-Family Lending Ranking in the City of Cincinnati, 2004.



The good news is that many lenders in our ranking had market share ratios above one for the city. Eleven of the 17 lenders analyzed had ratios for LMI Tract/MUI Tract Market Share higher than 1.00 in

the City of Cincinnati. In addition, 9 lenders had ratios higher than 1.00 for the LMI Tract/MUI Tract indicator.

Ameriquest was the top performer in these market share indicators. This lender had a 3.63 ratio for the LMI tract/MUI tract market share indicator, and a ratio of 3.66 on the minority/white census tract market share measure. Accredited was ranked third in LMI tract/MUI tract market share indicator with a ratio of 1.57, and third in minority/non-minority tract market share indicator with a ratio of 2.17. Most of the other lending institutions' ranks did not vary much within the three indicators with a few exceptions. For example, Huntington was ranked second in LMI/MUI tract with a ratio of 1.73, but was ranked 13th place in the rankings for minority /non-minority tract with a 0.75 ratio. Keycorp had second place for minority/non-minority tract, with a 2.30 ratio; however it was 14th in LMI Tract/MUI Tract with a 0.58 ratio.

Other banks did not vary widely on the indicators or were in the middle of the range. Third Federal Savings & Loan was at the bottom of the rankings with 0.43 ratio for LMI Tract/MUI Tract and 0.48 ratio for minority /non-minority tract, along with First Financial with ratios of 0.46 and 0.48 respectively.

In the suburbs, again the top performer for the indicators analyzed by market share was Ameriquest with a ratio of 1.78 for LMI Tract/MUI Tract and 3.08 for minority tract/non-minority tract. US Bank was second in LMI Tract/MUI Tract at 1.40, followed by Keycorp at 1.26. Keycorp was second in minority/non-minority tract with 2.87 followed by Accredited with 1.99.

The rest of the rankings for these two market share indicators in the suburbs were not as consistent as they were for the city. For example, First Financial was seventh in LMI/MUI tract lending market share and fifteenth in minority/non-minority tract lending market share. The exception to this lack of consistency was the performance of the bottom 3 lenders. The lowest performer on the indicators was Third Federal Savings & Loan with a 0.35 ratio on LMI Tract/MUI Tract and 0.54 on minority tract/non-minority tract. Union Savings Bank was slightly above Third Federal Savings & Loan with 0.56 on LMI Tract/MUI Tract. Guardian Savings Bank was the lowest on minority/non-minority tract with 0.65.

The good news is that many lenders had ratios above 1 on the suburban market share indicators. Nine of the 17 banks analyzed had ratios for LMI Tract/MUI Tract Market Share higher than 1.00 in the suburbs. Nine had ratios higher than 1.00 for minority census tract/white census tract market share (see Table 45).

Prime Denial Disparity Ratios

NCRC constructed three performance measures involving denial disparity ratios. A denial disparity ratio compares the denial rates of various targeted groups with the white denial rate. The three measures in this analysis include the denial disparity ratio of African-Americans compared to white borrowers, middle- and upper-income (MUI) African-Americans compared to MUI whites, and minority tract borrowers compared to non-minority tract borrowers.

In the City of Cincinnati, all lenders denied African-American borrowers compared to white borrowers by a ratio of 2.02, or twice as often. All city lenders denied MUI African-Americans 2.18 times more often than MUI whites. When comparing minority tract to non-minority tract denial rates, all lenders were 1.62 times more likely to deny a loan for a minority tract than a non-minority tract.

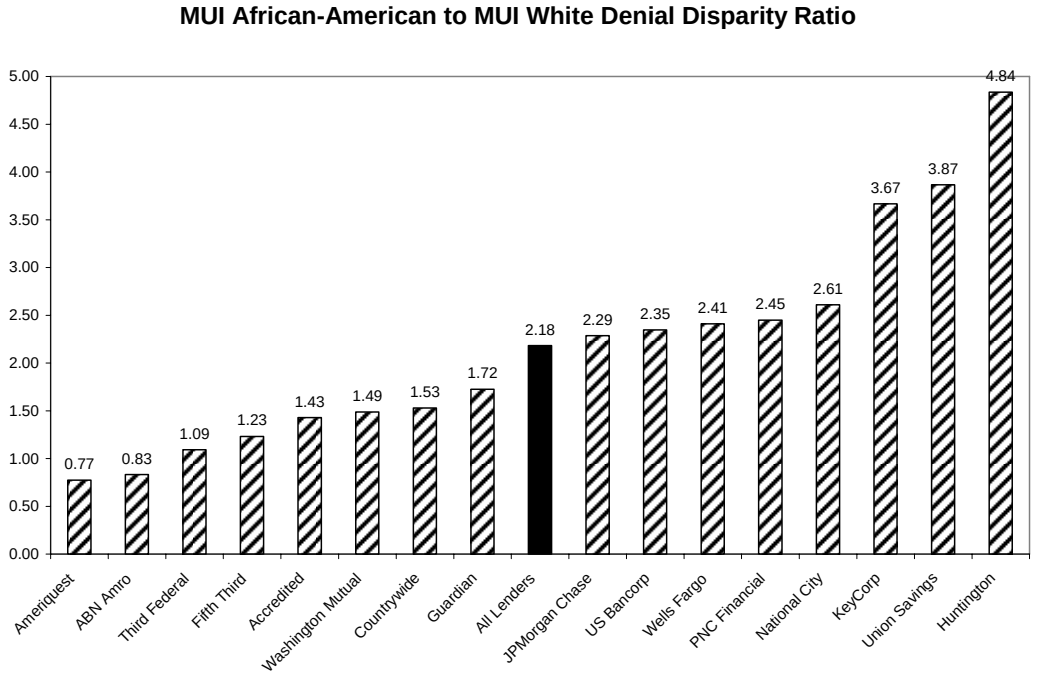
In the City of Cincinnati, of the 17 banks that we analyzed, Ameriquest had the lowest denial rate for African-Americans compared to whites with a .85 ratio, and the lowest MUI African-Americans compared to MUI whites, with a 0.77 ratio. ABN Amro had the next lowest denial rate for both African-Americans

compared to whites with a 0.95 ratio, and for MUI African-American compared to MUI white borrowers with a 0.83 ratio.

The lender with the third lowest denial disparity ratio for African-Americans compared to white borrowers was Countrywide with 1.48, followed by Accredited with 1.50 and Fifth Third with 1.63 ratio. Of the seventeen banks, nine had a greater denial disparity ratio for African-Americans compared to whites than the all-lender benchmark of 2.02. Huntington Bancshares had the worst disparity at 3.05, or three times more likely to deny an African-American borrower than a white borrower. Other lenders with high denial disparity ratios were Guardian Savings Bank at 3.02, US Bank at 2.72, and Keycorp at 2.71.

For MUI African-Americans compared to MUI whites, the lender with the lowest denial disparity ratio after Ameriquest (0.77) and ABN Amro (0.83) was Third Federal Savings & Loan with a 1.09 ratio and then Fifth Third with 1.23 ratio (see Figure 20). Eight of the lenders analyzed had higher denial disparity ratios than the city benchmark of 2.18. Huntington had a 4.84 denial rate in this category. Next to this were 3.87 for Union Savings Bank, Keycorp at 3.67, and National City at 2.61.

Figure 20. Prime All Single-Family Lending Ranking in the City of Cincinnati, 2004.



For minority tract to non-minority tract denials, First Financial was the top performer technically with zero denials for 5 loans to minority tracts. First Financial did not show up in the other 2 denial disparity ratios because they had no loan applications from African-Americans. Ameriquest was second in minority tract to non-minority tract denial disparity ratios with a .88 denial rate; ABN Amro and Guardian Savings Bank each had 0.99. Nine of the 17 banks that we focused on had a denial disparity ratio under the 1.62 ratio of all city lenders for minority to non-minority tracts. Those with high disparity ratios were Huntington with 3.16, Wells Fargo with 2.33, and US Bank with 1.87. Eight of the 17 lenders performed worse than the 1.62 minority all lender to white tract denial disparity ratio.

Interestingly, lenders with the lowest African-American/white denial disparity ratios in the City had high ratios in the suburbs. Two of the better city lenders in the African-American to white Denial Disparity Ratio - ABN Amro and Fifth Third - were ranked 16th and 15th respectively in Suburban Cincinnati. Conversely, the better performers in the suburbs were among the worse performers in the City on the

African-American compared to white denial disparity ratio indicator. Huntington and Third Federal Savings & Loan, were ranked 1 and 2 in the denial disparity ratio of African-Americans versus whites in the suburbs, but were ranked 15th and 11th, respectively in the city (see Table 45).

Subprime All Single Family Lending

NCRC ranked the subprime lenders with the same performance measures as the prime lenders but we used different labels for subprime lenders in this report. Instead of calling subprime lenders "best" as we did for the prime lenders, NCRC reveals the subprime lenders that made the highest percentage of their loans to underserved populations. Instead of calling subprime lenders "worst" as we did for prime lenders, NCRC's rankings show the subprime lenders making the lowest percentage of their loans to underserved populations.

Significant concerns about abusive lending and market failure in the subprime sector compel us to use different labels than best or worst to describe subprime performance. It is not necessarily the case that a subprime lender concentrating its lending to underserved populations is a "best" lender unless it has been rigorously demonstrated that the lender makes responsible loans. All too often, regulatory oversight of subprime institutions making high portions of loans to underserved populations is lax and actually enables abusive lending.

Rankings for subprime lenders in the City of Cincinnati (see Table 44):

Figure 21. Overall Rankings for Subprime All Single Family Lending in the City of Cincinnati, 2004.

Rank	Name	Lender Scope
1	National City Corporation	Regional Lender
2	Ameriquest	National Lender
3	Wells Fargo	National Lender
4	Accredited	National Lender
5	Countrywide	National Lender

Rankings for subprime lenders in Suburban Cincinnati (see Table 46):

Figure 22. Overall Rankings for Subprime All Single Family Lending in Suburban Cincinnati, 2004.

Rank	Name	Lender Scope
1	National City Corporation	Regional Lender
2	Ameriquest	National Lender
3	US Bank	Regional Lender, Depository
4	Wells Fargo	National Lender
5	Countrywide Financial	National Lender
6	Fifth Third	Regional Lender, Depository
7	Accredited	National Lender
8	Huntington National Bancshares	Regional Lender
8	JPMorgan Chase	National Lender

The narrative for the prime single family ranking analysis above described results for each of the 13 indicators. For the remaining ranking analyses, the narrative will focus on key indicators.

Subprime All Single Family Loans

Five of the lenders in our analysis made more than 25 subprime loans in the City, and were therefore included in the ranking. In regards to the Percent of Loans to African-American borrowers, all city lenders made 47.9 percent of their total subprime loans to African-American borrowers. Two lenders, National City at 58.9 percent and Wells Fargo at 50.0 percent were higher than this aggregate. Three of the lenders were lower, with Accredited the lowest of the five at 40.4 percent of their subprime loans to African-American borrowers.

As for the Percent to LMI borrowers, the aggregate percentage of subprime loans in the City was 63.5 percent to LMI borrowers. National City was far ahead of the rest at 77.4 percent of their subprime loans to LMI borrowers. National City also had the highest ratio of African-American market share to white borrower market share ratio of 1.55. As for the MUI African-American market share to MUI white borrower market share, National City was far ahead of the rest at 1.89.

National City was the top subprime lender in seven of the ten indicators, and was also in the top third in the prime lending indicators. Thus it appears that National City was making an effort to serve all the borrowers rather than just the subprime market. In contrast, Wells Fargo, which was third in the indicators for lending in the subprime market, was further behind on prime lending at 13th of 17 in the indicators for prime lending.

In the suburban subprime lending, nine of the lenders that we analyzed made more than 25 subprime loans in the suburbs. With relatively small number of African-American borrowers in the suburbs, only 10.8 percent of subprime loans made by all lenders were to African-Americans. Countrywide, National City, and Ameriquest made a higher percent of their subprime loans to African-Americans than the all lender percentage. Fifty-one percent of subprime suburban loans by all lenders were made to LMI borrowers, with Huntington at 57.7 percent and National City at 57.0 percent. The percent of all suburban subprime loans to minority tracts was only 5.7 percent, with Wells Fargo ahead of the others at 7.9 percent of subprime loans in minority tracts. Wells Fargo also had the top ratio of minority tract market share to non-minority tract with a 1.4 ratio. The other ratios were clustered around 1.00.

Prime Refinance Loan Ranking

Rankings for the City of Cincinnati prime refinance lenders in order from best to worst on the 13 lending performance indicators (see Table 49):

Figure 23. Overall Rankings for Subprime Refinance Lending in the City of Cincinnati, 2004.

Rank	Name	Lender Scope
1	Ameriquest	National Lender
2	Accredited	National Lender
3	Countrywide	National Lender
4	ABN Amro	National Lender
5	JPMorgan Chase	National Lender
6	PNC Financial Services	Regional Lender, Depository
7	US Bank	Regional Lender, Depository
8	Wells Fargo	National Lender
9	National City Corp	Regional Lender
10	Washington Mutual	National Lender
11	Fifth Third	Regional Lender, Depository
12	Union Savings	Local Lender
13	Guardian Savings	Local Lender
14	Huntington Bancshares	Regional Lender
15	Third Federal Savings & Loan	Local Lender

NCRC analyzed the same indicators for prime and subprime for refinance lending. The analysis included only loans in the city of Cincinnati, not the suburbs. We will focus on a few key indicators in order to avoid repetition.

Ameriquest was again number one in the overall rankings for prime refinance lending. All city lenders made 16.3 percent of their refinance loans to African-American borrowers; PNC made 82.2 percent of their refinance loans to African-American borrowers, and Ameriquest was second with 27.4 percent. The lowest percentage of loans to African-American borrowers was Third Federal Savings & Loan with 3.7 percent of their loans to African-Americans; Guardian Savings Bank was next lowest with 4.7 percent.

The percent of all lenders' refinance loans to LMI borrowers was 38.1 percent. The top three lenders in our analysis were ABN Amro (64.0 percent), Ameriquest (63.4 percent), and Accredited (53.4 percent). The lowest performers for this category were Third Federal at 28.8 percent, Huntington at 28.9 percent and Fifth Third at 31.3 percent.

Prime Home Purchase Ranking

Rankings for the City of Cincinnati prime home purchase lenders in order from best to worst on the 13 lending performance indicators (see Table 47):

Figure 24. Overall Rankings for Prime Home Purchase Lending in the City of Cincinnati, 2004.

Rank	Name	Lender Scope
1	Fifth Third	Regional Lender, Depository
2	Washington Mutual	National Lender
3	Accredited	National Lender
4	Huntington National	Regional Lender
5	National City Corp	Regional Lender
6	Wells Fargo	National Lender
7	Union Savings	Local Lender
8	Countrywide	National Lender
9	Guardian Savings	Local Lender
10	US Bank	Regional Lender, Depository
11	ABN Amro	National Lender
12	JPMorgan Chase	National Lender
13	Third Federal Savings & Loan	Local Lender
14	First Financial	Local Lender

A few key performance indicators are described here in order to economize on space.

ABN Amro was the best performer in the denial disparity ratio indicator. Although they only made 6.3 percent of their loans to African-Americans, they did not deny any loans to them. Of their 6.82 percent of loans to minority tracts, they had no denials in their minority tract lending either. Second to ABN Amro in the African-American to white denial disparity ratio was Wells Fargo with .78 denial rate. Of the fourteen banks that made home purchase loans, ten of them had denial ratios for African-Americans compared to whites greater than 1.00.

For MUI African-American to MUI white denial disparity ratio, seven of the lenders had a zero rate of denying loans to MUI African-Americans, including ABN Amro. At the other end of the spectrum, the poor performers were JPMorgan Chase, US Bancorp, and Union Savings Bank. JPMorgan Chase had a

MUI African-American to MUI white denial ratio of 16.80. JP Morgan Chase issued 2 denials out of 5 applications to African-Americans; its white denials were 2 out of 84 applications. The other poor performers on this ratio were US Bancorp at 4.86 and Union Savings Bank at 4.44 MUI African-American to MUI white denial disparity rate.

The best performers on minority tract to non-minority tract denial disparity ratio were ABN Amro and Guardian with zero denials. Washington Mutual was next with a 0.65 denial disparity ratio for minority tract to non-minority tracts. Fifth Third Bancorp had 0.98 minority to non-minority tract denial disparity ratio, followed by the rest of the lenders, (eight of them), with ratios greater than 1.00. The poorest was JPMorgan Chase with a 5.47 minority tract to non-minority tract denial disparity ratio.

Subprime Refinance and Home Purchase Lending

Five lenders were active in the subprime refinance loans in the city, with National City with the highest ranking, followed by Wells Fargo, and Ameriquest. National City was actually number one in every indicator except for MUI African-American to MUI white borrower market share where it had a 0.23 ratio. National City had the highest percentage of refinance subprime loans to African-American borrowers with 60.3 percent, to LMI borrowers with 72.4 percent, to female borrowers with 48.7 percent, in minority tracts with 48.7 percent, and in LMI tracts with 65.8 percent (see Table 50).

There were three lending institutions in subprime ranking for home purchase lenders. Ameriquest was ranked number one, with National City Corporation second and Accredited number three (see Table 48).

The small number of lenders on the subprime home purchase ranking is due to only three lenders making more than the threshold number of loans (25) to be included in a ranking analysis.

Section VI.
Small Business Lending Ranking

Overview

In order to gauge the performance of individual financial institutions on small business lending performance, this report makes use of a ranking system of five performance measures.

The geographic areas used in this analysis are slightly different than the rest of this report. Due to federal regulatory decisions, CRA small business data cannot be examined on a geographical level smaller than the county level for individual lending institutions. Thus, for the sake of the small business lending ranking analysis the two areas were modified slightly. Rather than the City of Cincinnati, this section will use Hamilton County; and rather than Suburban Cincinnati, this section will use the Cincinnati MSA, minus Hamilton County.

Further, as mentioned above, the data include only the census tract in which the small business loan was made, and not information on the race, income, and gender of the borrower. [24] Thus, CRA small business data can determine whether small business loans are being directed to low-income and minority neighborhoods, but not necessarily whether they are going to low-income and minority individuals.

The following financial institutions were included in the analysis (in order of rank in Hamilton Co.):

Figure 25. Overall Rank of Small Business Lending in Two Study Areas, 2004

No.	Institution	Scope of Lender	Rank, Hamilton Co.[25]	Rank, Cincinnati MSA less Hamilton Co.
1	PNC Financial Services Group Inc.	Regional, Depository	1	3
2	Wells Fargo & Co.	National	2	1
3	KeyCorp	Regional	3	7
4	Huntington National Bancshares	Regional	4	4
5	Fifth Third Bancorp	Regional, Depository	4	4
6	National City Corporation	Regional	4	4
7	US Bancorp	Regional, Depository	7	7
8	First Financial Bancorp	Local	8	2
9	JP Morgan Chase &Co.	National	9	9

This small business lending ranking analysis is broken into three sections: an analysis of trends in Hamilton County, an analysis of trends in the Cincinnati MSA less Hamilton County, and finally a section that compares the two.

[24] For a more complete discussion on the source and nature of CRA small business data, see the methodology section.

[25] When a number is listed twice, it indicates a tie. These ranks were compiled by summing the ranks of each indicator.

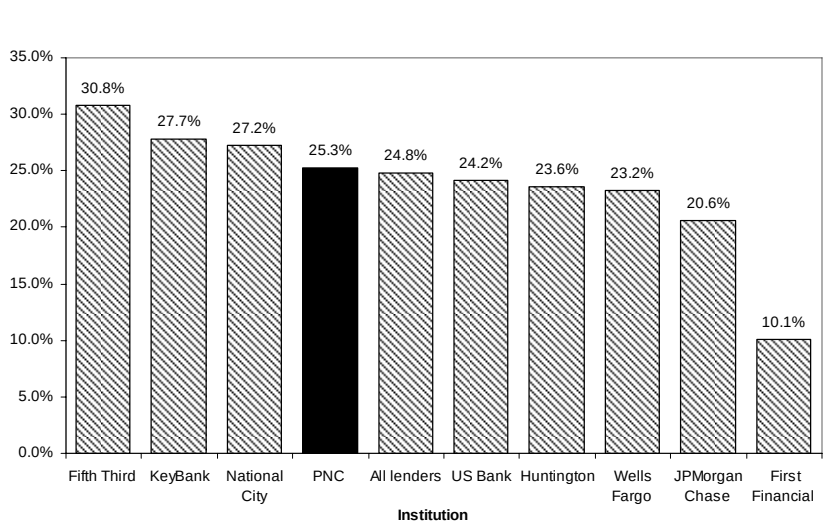
Hamilton County

This section will describe income indicators, size of small business indicators, and overall rank of institutions' performance in Hamilton County.

Income Indicators

Two of the five ranking indicators dealt with income level; they show that Fifth Third, KeyCorp, and National City outperformed the other lenders, while JPMorgan Chase and First Financial lagged their peers. The first indicator, percent of loans in LMI tracts, measures the percent of a financial institution's loans to businesses located in a census tract with a median income that is below 80 percent of MSA median income (see Figure 26). The performance of all lenders as a whole can be used as a benchmark for performance for the selected nine institutions. In this case, this benchmark is 24.79 percent. Fifth Third performed best on this measure, and at 30.80 percent greatly exceed its peers. KeyCorp and National City were second and third with 27.75 percent and 27.23 percent respectively. On the other hand, First Financial greatly lagged the group at 10.06 percent. The other lenders clustered around the aggregate of 24.79 percent (see Table 54).

Figure 26. Small Business Lending Ranking in Hamilton County, 2004.



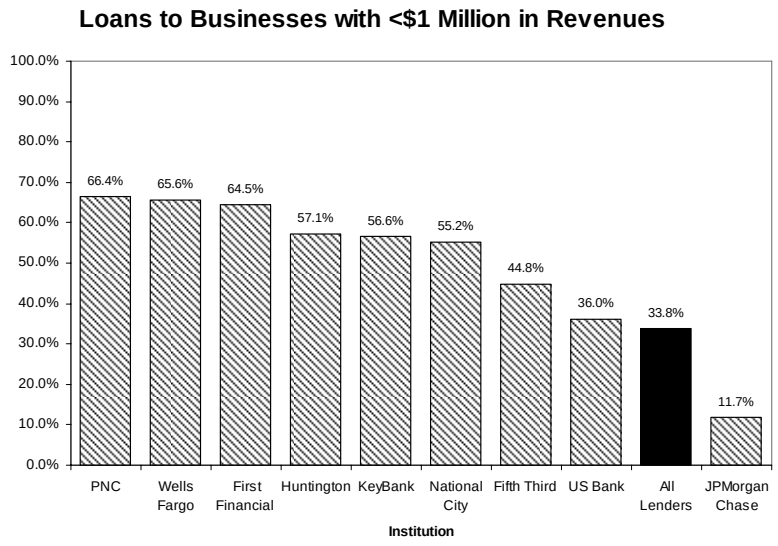
The second income indicator, ratio of LMI/MUI Market share, again showed that Fifth Third and KeyCorp excelled in relation to their peers. LMI/MUI Market share is defined as a given institution's LMI market share divided by its MUI market share; that is, it shows the institution's percent of all loans made by all lenders to businesses in LMI tracts divided by the institution's percent of loans made by all lenders to businesses in MUI tracts. A ratio above 1.00 illustrates that an institution serves LMI tracts more effectively than MUI tracts; a ratio under 1.00 shows that the institution more effectively serves its MUI tracts. Fifth Third outperformed its peers with a ratio of 1.33, whereas KeyCorp and National City both performed admirably at 1.15 and 1.12 respectively. Of special note was First Financial, which at 0.33 was the least effective. The second-last institution on this indicator was JP Morgan Chase, with an LMI/MUI market share ratio of 0.77.

Size of Business

As mentioned above, another indication that a financial institution is community-oriented is its capacity to make loans to the smallest of small businesses; the remaining three indicators illustrate that Wells Fargo outrivaled the other institutions on these indicators. In fact, a high degree of variation existed among the lenders. The first indicator, Percent of Small Business Loans under $100,000, is an indicator intended to illustrate an institution's efficacy in executing small loans. As a benchmark, 87.64 percent of loans made by all lenders were under $100,000. The rankings illustrate that 100.00 percent of Wells Fargo's small business loans were under $100,000, while JPMorgan Chase was not far behind at 96.20 percent. KeyCorp and Fifth Third lagged the performance of the rest of the group at 49.77 percent and 55.49 percent respectively. Notably, Huntington, First Financial, and National City all had numbers considerably lower than the benchmark of 87.64 percent.

The next indicator, Percent of Small Business Loans made to Small Businesses with Revenues less than $1 million, shows that PNC performed best with Wells Fargo and First Financial not too far behind (see Figure 27). This indicator is intended to measure how well an institution can reach the smallest of small businesses; all lenders as a group made 33.82 percent of loans to small businesses with revenues less than $1 million. The aforementioned lenders greatly exceeded this benchmark: PNC had a mark of 66.36 percent, Wells Fargo was second at 65.59 percent, and First Financial was third at 64.50 percent. Only one lender was below the benchmark of 33.82 percent; this was JP Morgan Chase, which came in at a low 11.71 percent.

Figure 27. Small Business Lending Ranking in Hamilton County, 2004.



The final indicator, Ratio of Loans to Small Businesses with revenues less than $1 million to Loans to all Small Businesses, is intended to show how well an institution can reach small businesses with very small revenues with respect to how well it reaches all small businesses. In other words, this ratio shows an institution's market share of loans to small businesses with revenues less than $1 million divided by its market share of loans to all small businesses. A ratio above 1.00 illustrates that an institution serves very small businesses more effectively than all small businesses; a ratio under 1.00 shows that the institution more effectively serves all small businesses. PNC, Wells Fargo, and First Financial were in a virtual tie for the best performance, with ratios of 1.96, 1.94, and 1.91 respectively. Five of the institutions had very good performances with numbers over 1.00. However, JP Morgan Chase has a need for improvement with a low ratio of 0.35.

Overall Rank

As mentioned above, when considering the sum of performance on all five indicators, no one lender greatly outperformed the group of nine, and none performed especially poorly. Nevertheless, PNC and Wells Fargo finished in first and second place, which is due in large part to their ability to reach very small businesses. While Fifth Third demonstrated its ability to reach businesses in LMI census tracts on the income indicators, it has room to improve its capacity to serve very small businesses and thus had a fourth place performance.

Cincinnati MSA Less Hamilton County

This section will analyze income indicators, size of small business, and overall rank of institutions' performance in the Cincinnati MSA less Hamilton County.

Income Indicators[26]

Two of the five ranking indicators dealt with income level; they show that Fifth Third, First Financial, and National City outperformed the other lenders, while PNC and KeyCorp lagged the rest. On the first indicator, percent of loans in LMI tracts, Fifth Third, First Financial, and National City excelled. All lenders as a whole made 24.79 percent of all small business loans in LMI tracts; these three institutions turned in performances considerably above this number. Most of the institutions were clustered around the benchmark, while KeyCorp and PNC had especially low marks of 15.04 percent and 14.46 percent respectively (see Table 55).

The second income indicator, ratio of LMI/MUI Market share, again showed that Fifth Third performed best at 1.29, First Financial was second-best at 1.23, and National City was right behind at 1.22. Given that a ratio of 1.00 shows average performance, these three institutions performed especially well. Three of the nine institutions clustered just above 1.00. The final three were considerably below the 1.00 benchmark: JP Morgan Chase was in seventh place with 0.83, KeyCorp was in eighth with 0.65, and PNC was last at 0.61.

Size of Business

As mentioned above, another indication that a financial institution is community-oriented is its capacity to make loans to the smallest of small businesses; the remaining three indicators illustrate that Wells Fargo excelled at this. The first indicator, Percent of Small Business Loans under $100,000 had an all-lender benchmark of 91.02. Two lenders exceeded this number: Wells Fargo made 100.00 percent of its loans under $100,000, while JP Morgan Chase came in at 95.86 percent. KeyCorp and Fifth Third lagged their peers at 61.06 percent and 50.09 percent.

The next indicator, Percent of Small Business Loans made to Small Businesses with Revenues less than $1 million, shows a veritable tie among three lenders, although there was a great deal of variation among all of the lenders. PNC was first at 76.08 percent, Wells Fargo was second at 75.89 percent, and First

[26] For a more complete definition of each of the indicators discussed in this section, please see the section above on Small Business Lending Ranking in Hamilton County. The lengthy definitions were omitted here to avoid repetition.

Financial was not far behind at 73.27. The benchmark, the aggregate of all lenders, was set at 37.24 percent. Only one institution, JP Morgan Chase at 13.86, underperformed this mark.[27]

The final indicator, Ratio of Loans to Small Businesses with revenues less than $1 million to Loans to all Small Businesses, is intended to show how well an institution can reach small businesses with revenues less than $1 million compared to how well it reaches all small businesses. PNC and Wells Fargo led on this indicator, both with ratios of 2.04. First Financial was not far behind with 1.97. The other institutions ranged from 1.78 to 1.37, with the exception of JP Morgan Chase. It was last at 0.37.

Overall Rank

As mentioned above, no one lender greatly outperformed the group of nine, and none performed especially poorly. Nevertheless, when the performance on all five indicators are taken into account, Wells Fargo and First Financial excelled. Wells Fargo's performance was due primarily to its ability to reach very small businesses, while First Financial did well by performing above average on all indicators. The institution most in need of improvement was JP Morgan Chase, which performed at or near the bottom on all but one indicator.

Ranking in Hamilton County vs. Suburbs

With a few notable exceptions, institutions that performed well in Hamilton County performed similarly in the Cincinnati MSA less Hamilton County. Notably, KeyCorp had a better performance in the city; it ranked 3rd in Hamilton County but dropped to eighth in the suburban locale. On the other hand, First Financial performed poorly in Hamilton County in seventh place but was third in the suburban location. However, overall the best performers were PNC (which ranked number one in Hamilton County and number three in the suburbs) and Wells Fargo (which ranked number two in Hamilton County and number one in the suburbs).

[27] The CRA regulations permit lenders not to report whether they made loans to small businesses with less than $1 million in revenue if they did not consider revenue size of the small businesses in loan underwriting decisions. The data therefore includes loans in which the revenue size of the business is unknown. Despite this limitation, it is instructive to compare lenders on how well they are reaching businesses with revenues under $1 million. This exercise will hopefully encourage all the banks to report whether the revenue size of the small business is greater or less than $1 million for all of their loans.

Section VII.
Branch Analysis

Overview

Without proper financial services, it is difficult for low-income people to build assets and accumulate wealth; thus, it follows that mainstream bank branches ought to be located in low-income neighborhoods. Branches offer essential financial tools such as basic checking and savings accounts, certificates of deposit (CDs), and savings products, and often offer a range of consumer loans and home mortgages. According to a report by the US General Accounting Office,[28] nearly 21% of all households in the US (approximately 22 million households) have no relationship with a bank or credit union. Furthermore, an unknown number of additional households may have limited relationships with banks; while they may have a checking account, they do not utilize other financial services, such as savings accounts, CDs, or wealth management tools. Thus, many low-income neighborhoods are in great need of institutions that can provide these services.

Instead, many lower-income households are likely to use the "fringe banking industry" – primarily check-cashing outlets (CCOs) – to carry out their financial business. A check casher often can provide the same service as a bank but at a cost up to three times higher. Instead of providing checking accounts, which are easy to manage, CCOs will often charge exorbitant fees for check-cashing, money orders, bill payment services, and the like. Furthermore, unlike banks, CCOs do not offer asset-building tools, such as savings accounts, CDs, and low-priced small loans and mortgage loans. Further, neighborhoods without bank branches are more likely to have high-cost lending services, such as payday lenders, pawnshops, car title loans, and rent-to-own stores.[29]

In order to gauge how effectively mainstream banks serve low-income and minority neighborhoods, this section will accomplish the following. First, it will note how banks in the aggregate serve LMI and minority communities in both the City of Cincinnati and Suburban Cincinnati. Second, it will compare nine institutions on two indicators to determine how well banks reach low-income and minority neighborhoods.

Branches in Aggregate

In sum, banks as a whole need to improve their effectiveness in reaching persons in LMI and minority census tracts (see Figure 28). Despite the fact that 51.02 percent of the City of Cincinnati's population live in LMI census tracts, only 28.3 percent of bank branches are located there. In contrast, 48.98 percent of the population resides in MUI tracts, where the remaining 71.7 percent of branches are located.[30] These numbers are similar when considering minority level of census tract. That is, while 33.90 percent of the City of Cincinnati's population resided in predominantly minority census tracts,[31] a small 13.8 percent of branches were located there. This translates into only 19 branches (see Table 56).

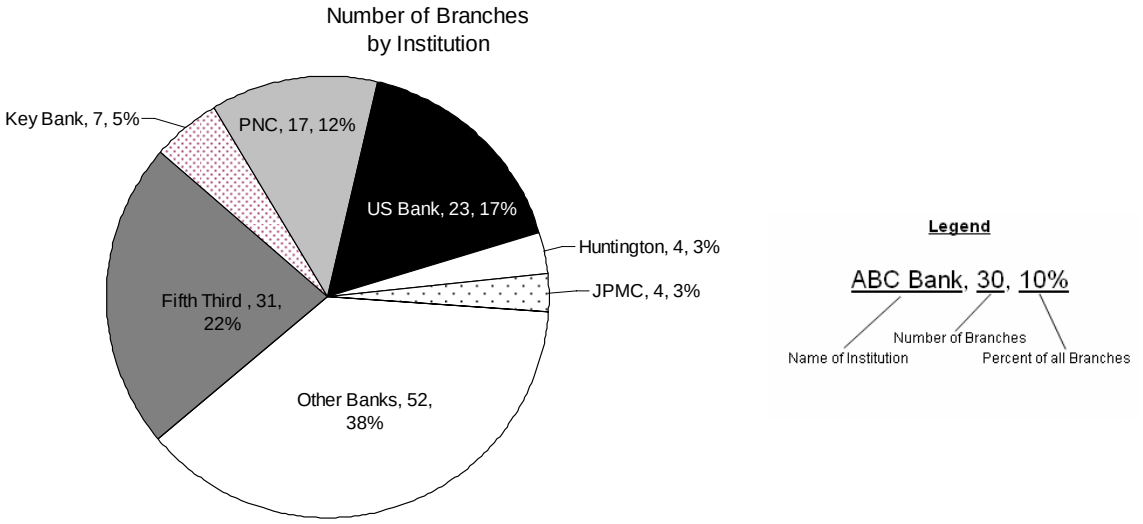
[28] "Electronic Transfers: Use by Federal Payment Recipients Has Increased But Obstacles to Greater Participation Remain. U.S. General Accounting Office, GAO-02-913, September 2002.

[29] For more information about the fringe banking industry, see James H. Carr and Jenny Schuetz, "Financial Services in Distressed Communities: Framing the Issue, Finding Solutions." Fannie Mae Foundation, 2001.

[30] Fifty-nine percent of all census tracts are LMI, and 40.6 percent of all tracts are MUI.

[31] Forty percent of all census tracts are minority, and 59.4 percent of all tracts and nonminority.

Figure 28. Branch Analysis in the City of Cincinnati, 2004.



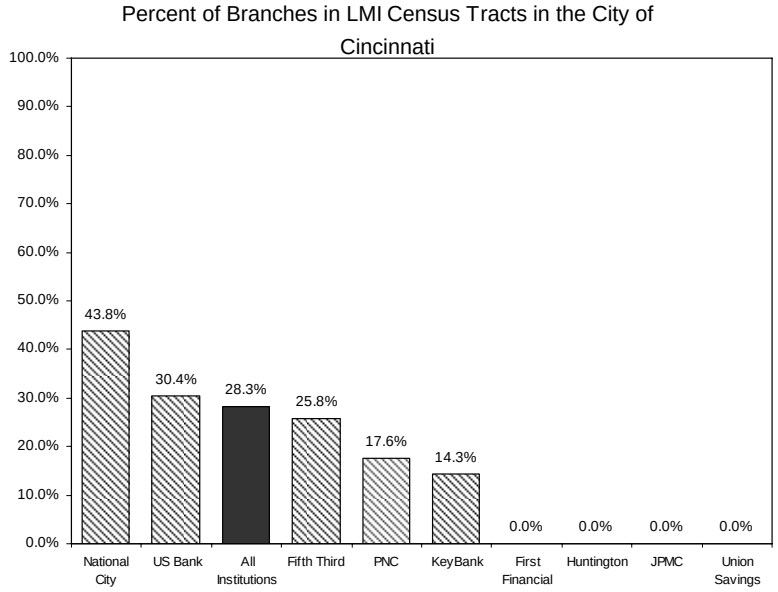
In Suburban Cincinnati, however, these statistics show that banks are very effective in locating branches in LMI and minority tracts, but still have room for improvement. Whereas 20.31 percent of the suburban population lived in LMI tracts, 22.0 percent of bank branches were located there. Further, whereas only 3.25 percent of the suburban population lived in predominantly minority census tracts, 1.8 percent of bank branches were located there (see Table 57).

Income Indicators

The nine institutions were examined by number of branches in LMI tracts, both in the City of Cincinnati and Suburban Cincinnati; this showed that National City, US Bank, and Fifth Third were especially effective in locating branches in LMI areas. Given that all institutions located 28.3 percent of their branches (39 of 138 branches) in LMI tracts, National City greatly exceeded this benchmark by locating 43.8 percent of its branches in LMI tracts (see Figure 29). This may be due in large part to its recent acquisition of Provident Bank, formerly a Cincinnati-based institution with close ties to the community. US Bank was right above the benchmark with a performance of 30.4 percent, and Fifth Third was slightly under the benchmark with a performance of 25.8 percent. While these three aforementioned institutions are to be commended on their performance, the remaining nine are in great need of improvement. PNC located only 17.6 percent of its branches in LMI tracts; KeyCorp had 14.3 percent; and the remaining four institutions located none of their branches in LMI tracts.

In Suburban Cincinnati, it was JP Morgan Chase and Third Federal that were most successful in reaching LMI tracts. Lenders as a whole located 22.0 percent of their branches in LMI tracts; JP Morgan Chase and Third Federal were the only two institutions to surpass this number with 28.0 percent and 25.0 percent respectively. Three institutions were just below the 22.0 percent benchmark: US Bank, First Financial, and National City had numbers between 21.2 percent and 21.9 percent. Four institutions were between 14.3 percent and 16.8 percent. Turning in the worst performances were PNC at a low 6.5 percent and Union Savings Bank, which located none of its branches in LMI tracts.

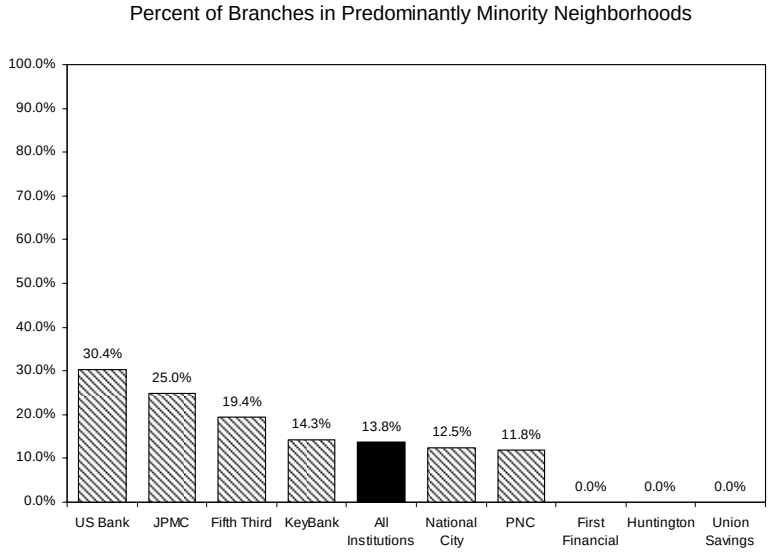
Figure 29. Branch Analysis in the City of Cincinnati, 2004.



Race Indicators

The nine institutions were furthermore compared to see which is most effective in locating branches in predominantly minority census tracts. In the City of Cincinnati, the analysis showed that US Bank, JP Morgan Chase, and Fifth Third exceeded its peers. Similar to the above analysis on income indicators, this was determined by observing how many branches were located in predominantly minority census tracts (see Figure 30). All lenders in aggregate located 13.8 percent of their branches in predominantly minority tracts. The three aforementioned institutions exceeded this mark: US Bank had 30.4 percent; JP Morgan Chase had 25.0 percent; and Fifth Third had 19.4 percent. Additionally, three institutions were clustered around the benchmark; these were KeyCorp, National City, and PNC. On the low end of the group, First Financial, Huntington, and Union Savings located none of their branches in predominantly minority census tracts.

Figure 30. Branch Analysis in the City of Cincinnati, 2004.



In Suburban Cincinnati, the number of observations of branches in predominantly minority census tracts was too low to make any meaningful conclusions. Only 4.0 percent (14 of 353) census tracts in Suburban Cincinnati were predominantly minority, and only 1.8 percent (11 of 595) bank branches were located in these tracts.

Bank Performance in City of Cincinnati vs. Suburban Cincinnati

Overall, this analysis showed that a handful of the lenders were particularly effective in locating branches in LMI and minority census tracts, while others are not effective. National City was especially able to locate its branches in LMI tracts, particularly in the City of Cincinnati. US Bank furthermore ranked very high in placing its branches in both LMI and minority communities. JP Morgan Chase was able to locate their branches in minority communities, although they tended not to have branches in LMI communities.

Section VIII.
Census Tract Analysis

In addition to the above analyses, lending trends can be described on a more micro level by analyzing lending trends by census tract, which is the smallest geographic unit at which lending data can be obtained in aggregate. NCRC has provided the tables (Tables 58 and 59 of the appendix) and a succinct analysis here.

Home Lending by Census Tract

As seen in Table 58 and 59, each of the 134 census tracts of the City of Cincinnati were listed, and three categories of information provided about each census tract: home lending information, demographic information, and housing information. First, the count and percent of prime, subprime, and total home loans were listed. These include all owner-occupied 1-4 family first lien loans originated in 2004. Second, four types of demographic information is listed: percent minority, percent African-American, median household income, and CRA income category. Last, two types of housing information is provided: percent owner-occupied housing units, and median housing value. The entire list is displayed in two ways: in Table 58 it is sorted by median housing value, and in Table 59 it is sorted by number of branches.

A relationship between the percent of prime loans and the number of branches is apparent from the data, but more research is needed to further probe this relationship. The census tracts with the greatest number of branches had the highest percentage of prime loans. One hundred percent of the census tracts in the City that contained four or more branches had a percentage of prime lending over 75 percent. In contrast, only 14.2 percent of the census tracts with 3 branches had a percentage of prime lending over 75 percent. However, a higher percent (28.5 percent) of the census tracts with 2 branches had a percentage of prime lending over 75 percent. But then the relationship resumes as expected with just 24 percent of the tracts with one branch exceeding the 75 percent benchmark.

Interestingly, 47 percent of the census tracts with no branches had prime lending over the 75 percent threshold. The relatively high level of prime lending in census tracts with no branches is somewhat misleading. It is probably the case that census tracts are not the best measurement unit for assessing the impacts of branches. One or more branches could be on an edge of a particular census tract so could therefore be serving adjacent census tracts that technically have no branches. Further research should investigate whether constructing circles with diameters of 2 miles would better illustrate the relationship between branching and prime lending. Alternatively, probing the relationship between branching and prime lending on a neighborhood level (up to 8 census tracts in each neighborhood) could possibly account for the phenomena of branches being on census tract boundaries. At this point, a relationship between branching and prime lending is apparent from this research and Federal Reserve Board research, but further investigations in Cincinnati would be warranted.

Using the above example as a template, many other conclusions could be drawn using this data set.

Small Business Lending by Census Tract

As seen in Tables 60 and 61, each of the 134 census tracts in the City of Cincinnati were likewise listed to provide information about small business lending on a micro level. Two categories of information were listed: small business lending information and demographic information. First, the table lists count of small business loans per census tract, count of small business loans, and a ratio showing the percent of small businesses that received a loan. Then, the table shows these same three columns but for small businesses with revenues less than $1 million. Second, demographic information is shown: percent minority, percent African-American, median household income, and CRA income category.

Section IX.
Lender Interviews

In order to include the perspective of the lenders ranked in the previous analyses, NCRC conducted interviews with six major Cincinnati lenders in March and April 2006. An additional group of lenders were asked to review the study and provide any substantive feedback. The lenders interviewed were asked about any special lending products and marketing designed to reach low-income and minority consumers, as well as their branching patterns.

This section will first describe the methodology for conducting the interviews. Following this, it will summarize the conversations on four topics: branches and other delivery channels, home lending, small business lending, and challenges in the Cincinnati market.

Methodology

Interviews were conducted by NCRC and its subcontractor, TWG Consultants. NCRC attempted to obtain a good sample of local, regional, and national banks. Six lenders agreed to interviews. In three of these cases, interviews were conducted via conference call and included representatives from the institution, NCRC, and TWG Consultants. In another three cases, TWG met directly with the lenders in their Cincinnati offices and NCRC joined via conference call. For the privacy of these institutions, specific comments were made generic in this report.

Branches and Other Delivery Channels

NCRC specifically sought to assess the importance of branches and other delivery channels in making home and small business loans to traditionally underserved borrowers. The local and regional banks in the sample seemed to rely on traditional branches, whereas the national banks were more likely to use brokers and loan offices. One institution was embarking on a program to use nonprofit organizations as brokers in order to catalyze competition among traditional brokers. Yet another institution stressed its relationship with realtors and nonprofits as the primary channel used to reach LMI borrowers. Last, banks that were less visible in the city were more likely to rely on call centers and internet applications for a large proportion of their business in Cincinnati.

A number of the local lenders mentioned that they intend to increase their lending in LMI neighborhoods through brokers to between 20 and 40 percent of their intake. This would be done to increase their market share in LMI neighborhoods; these lenders asserted that brokers are more prevalent than branches in city neighborhoods. But given that broker business has a higher incidence of subprime lending, upon further questioning most of these institutions insisted that they closely monitored their brokers' pricing and other lending practices.

A few of the institutions seemed to have particularly creative ideas on how to market themselves to LMI communities. One institution noted a specially-designed bus owned by the bank and equipped with computers and staff that open basic bank accounts and provide outreach. This bus was designed partly for the purpose of collecting data in LMI and minority communities and to determine where a new bank branch might be located. Another institution relied on a direct mail strategy focusing on LMI neighborhoods. Yet another institution mentioned that it had started check-cashing and bill-pay services at a branch in an LMI community at a price cheaper than check-cashing outlets. In this way, it had hoped to increase its visibility and eventually start full-fledged accounts and other services for these customers.

A couple of lenders emphasized the importance of branches in small business lending. Small business owners depend on branches so that they can make regular deposits. The deposit accounts and other banking services establish a relationship that can then lead to a loan. In addition to building relationships with existing small business customers, branches also appeared to be platforms from which loan officers made visits and cold calls to small businesses in the neighborhood. In contrast to small business lending, branches did not seem to play as prominent a role in home lending. Other delivery channels (realtors, call centers, mailings, and community groups) were mentioned more frequently than branches for home lending.

The lesson of the discussions on delivery channels was that branches are important but perhaps underutilized for lending. Branches appeared to be very important for small business lending but less so for home lending, based on the interviews. Branches could play a larger role in home lending if counseling sessions and other community events were conducted at the branches. Neighborhood residents would be more likely to approach branch loan officers for home loans.

NCRC and TWG Consultants asked lenders if they will be adding branches to LMI and minority communities, and, if so, what strategy is used to add them. A few institutions mentioned their plans to expand to LMI and minority communities, but some obstacles to branch building were noted. The CRA officers sometimes stated that their candidates for branch locations had to be vetted by other departments. A couple of interviews also discussed the difficulties of assembling land. The City of Cincinnati should do whatever it can to promote branch building and should formally incorporate branch building as apart of its community development strategy.

Home Lending

Lenders were asked if they offered any special affordable home loan products to reach low- and moderate-income persons and minorities. Many were able to fully explain their affordable products. The typical product was restricted to persons under a particular income, or to persons buying in LMI tracts. Usually, one or more of the following applied: private mortgage insurance (PMI) was waived; a down payment assistance program applied; or underwriting guidelines for debt-to-income ratio and loan-to-value ratios were relaxed. Judging from these special affordable loan products, a number of lenders are making CRA-related prime loans to borrowers who would otherwise get subprime loans. In one case, a lender implemented below-market rates as one of the features of its affordable products. Several lenders mentioned that their products were geared specifically towards first-time homebuyers, and one even mentioned it had started ITIN (Individual Taxpayer Identification Number) lending[32] for recent immigrants. It is likely that disparities in prime and subprime lending to traditionally underserved populations would be worse were it not for CRA and the efforts of some of these lenders in Cincinnati.

Some lenders required one-on-one counseling for special affordable loans for borrowers with high loan-to-value ratios. One lender was able to offer counseling in thirty languages. Another lender had a team of "high touch" underwriters specifically designed to consider borrowers with imperfect credit. The underwriters did work-outs and loan modifications on the spot to increase the number of approvals given to traditionally underserved borrowers. A few institutions noted they have special loan officers, most often located in branches rather than the central office, that are particularly equipped to offer the loans in their affordable lending toolbox.

[32] ITIN lending involves an immigrant receiving a home loan by using his/her Individual Taxpayer Identification Number, a number issued to them by the federal government for taxpaying purposes, rather than using a social security number. In addition to expanding homeownership, this program was also beneficial in quelling the number of mortgages made using fraudulent social security numbers.

The lenders were also asked about their relationships with Fannie Mae and Freddie Mac. From these discussions, it appeared that lenders had to hold loans with the most underwriting flexibility in their portfolios rather than sell them on the secondary market. However, Fannie Mae and Freddie Mac were engaged in underwriting experiments on a pilot basis. One lender stated that a government-sponsored enterprise (GSE) allowed them to use a GSE-sponsored product for borrowers with credit scores as low as 580. Another lender mentioned that a GSE is buying loans without PMI also on a pilot basis.[33]

Small Business Lending

Similar to home lending, the institutions were first asked if they offered any special products to small businesses in LMI and minority neighborhoods. Of note, few were able to name any products in particular. Nevertheless, a few pointed out the existence of Small Business Administration (SBA) designed products such as Community Express. One institution in particular mentioned that SBA products are especially useful in reaching small businesses under $1 million in revenue, and allows them to make especially small loans.

The institutions were then asked about the process in which small business loans were made. A common concern is that financially sound small businesses applying for loans are turned down because lenders mainly consider credit scores. However, the institutions surveyed were quick to quell this concern, saying that they also employ character-based lending that considers non-credit score factors. Most institutions noted that bank employees trained in small business lending were strategically located in branch locations. In fact, one institution was particularly ardent in outreach to small business: it engaged in cold-calling and visits to local small business in an attempt to drum up business.

Partnerships with Community Organizations

Of particular import to the interviewers were the institutions' partnerships or relationships with community groups in Cincinnati. The institutions' response to this question ranged from a list of robust community partners to a lack of knowledge of the city and its institutions. Among these partnerships, one institution noted that it partners with the University of Cincinnati to sponsor an 11-week financial education course for fifth graders in schools across the city. Another institution sponsored a land co-op in one of the city's low-income neighborhoods and also provided support to a nonprofit that helped the elderly keep up their homes. A particularly innovative idea was an institution that funded a capacity-building training event for nonprofits working in low-income neighborhoods. Yet another institution was also offering classes for small business owners on topics such as financial planning and business operations.

Challenges in the Cincinnati Market

The interviewers furthermore asked if the institutions faced any particular challenges that prevented them from performing at the level they desired. One institution mentioned that the existing housing stock in the city was predominantly multifamily buildings, which makes it more difficult for persons to become homeowners. Oftentimes, this institution found that a first-time homeowner may have the added responsibility of becoming a landlord for a second or third unit on the property. These persons may require additional counseling or coaching to handle these challenges. According to another institution, the age of the housing stock in the city is a challenge, given that many older buildings require renovation or constant maintenance on the part of the homeowner.

[33] Fannie Mae and Freddie Mac are GSEs. We use GSE here to preserve the privacy of Fannie Mae and Freddie Mac.

Appendix A: Maps

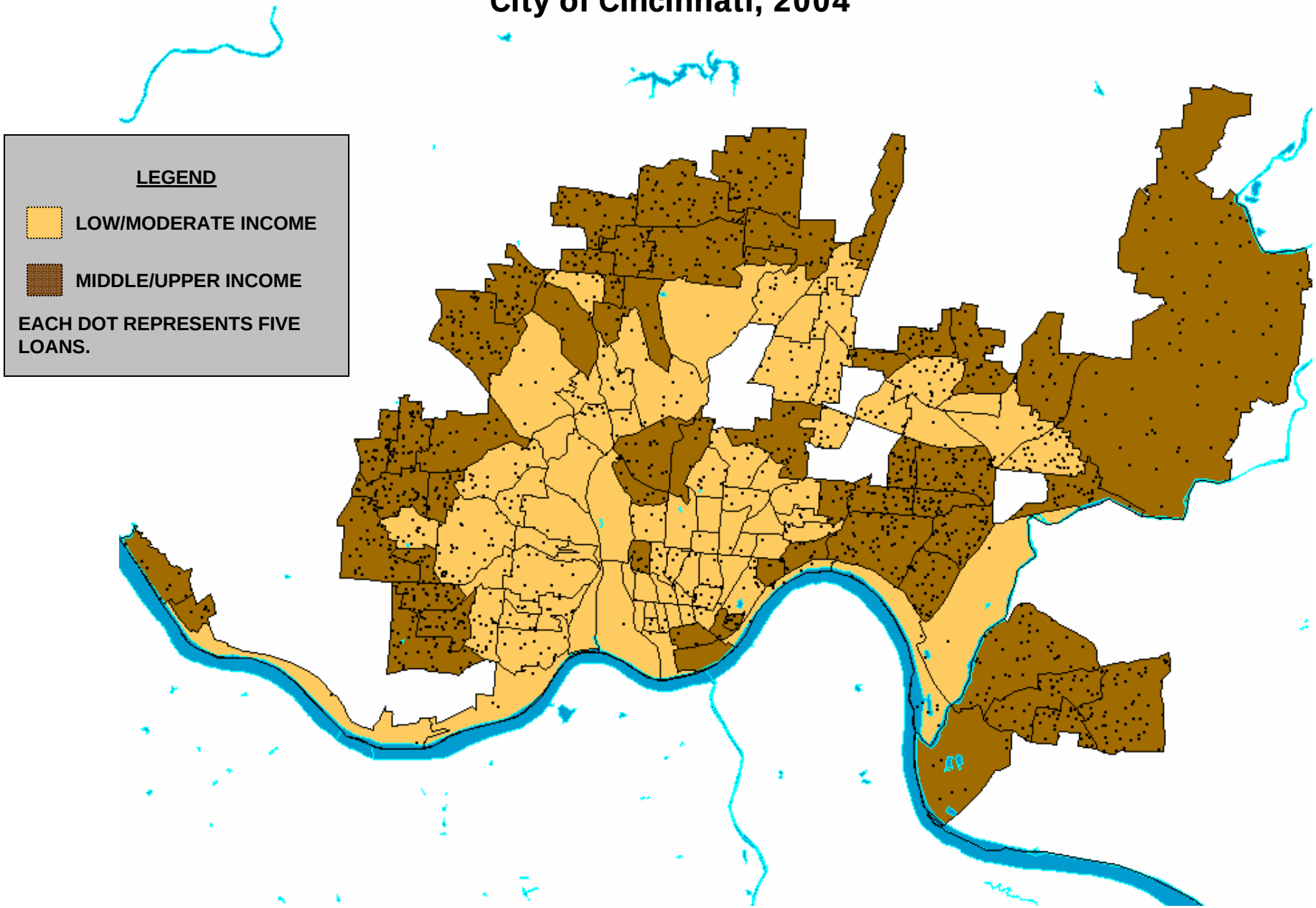
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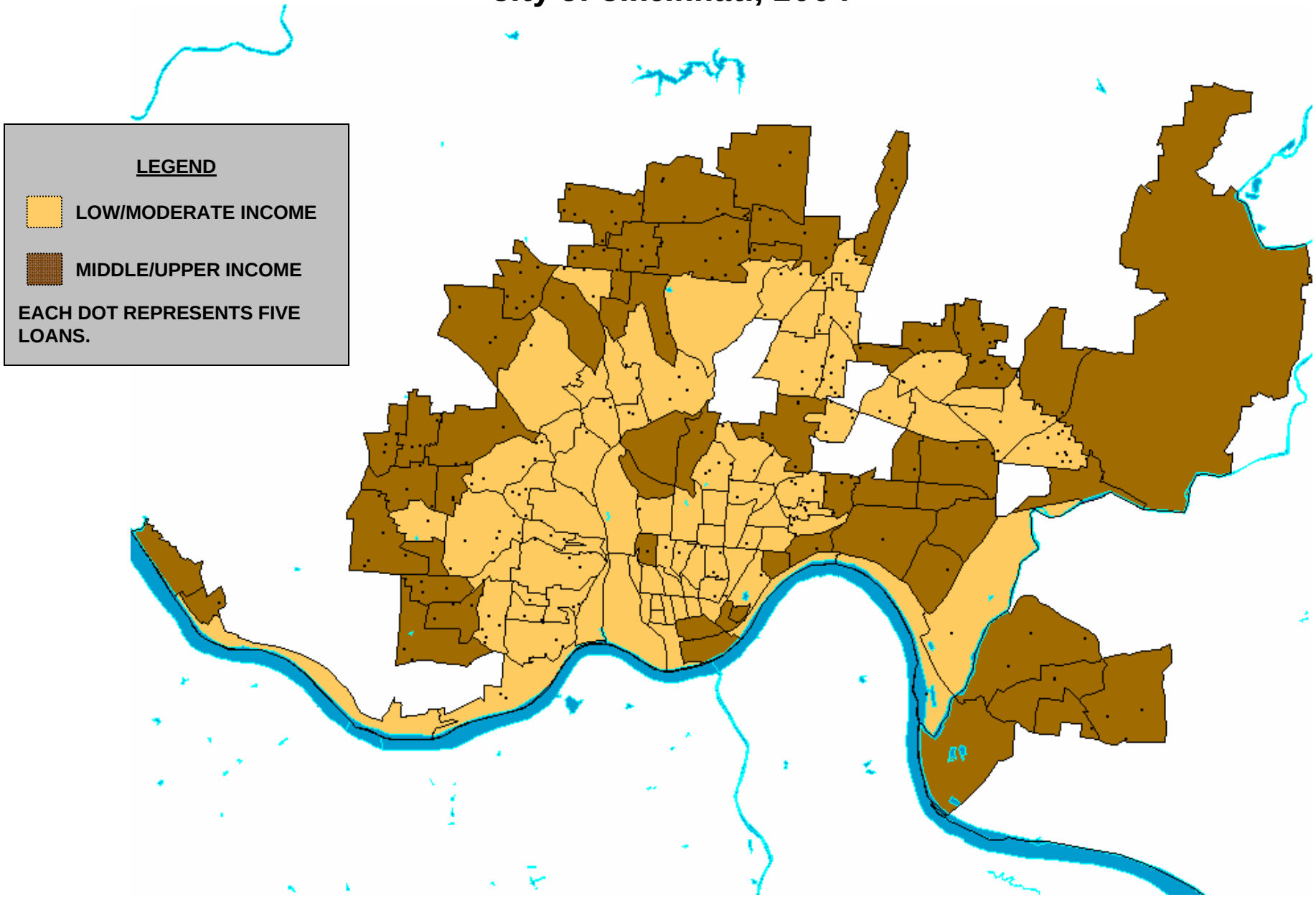
Prime Home Loans by Income Level of Census Tract

City of Cincinnati, 2004



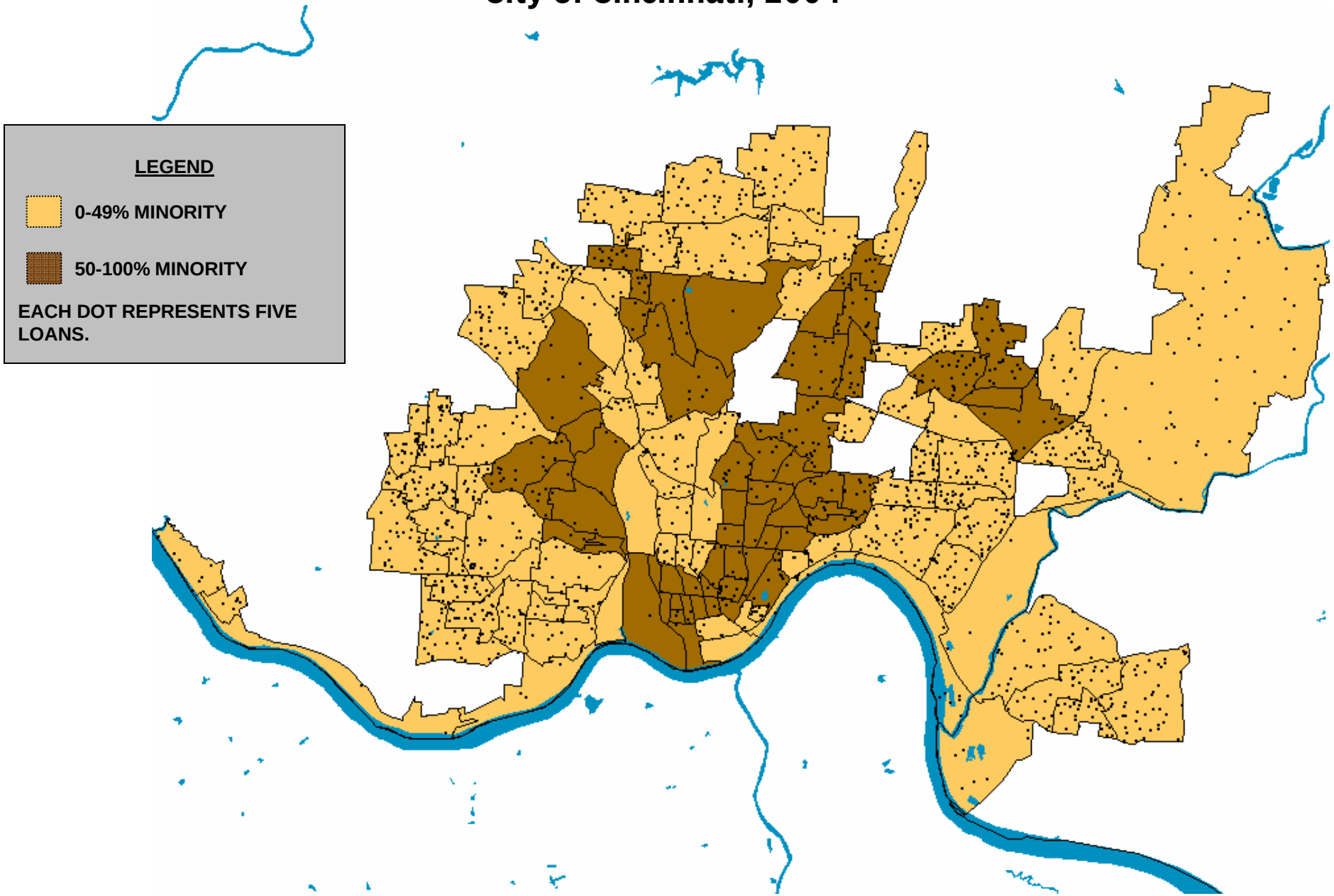
Subprime Home Loans by Income Level of Census Tract

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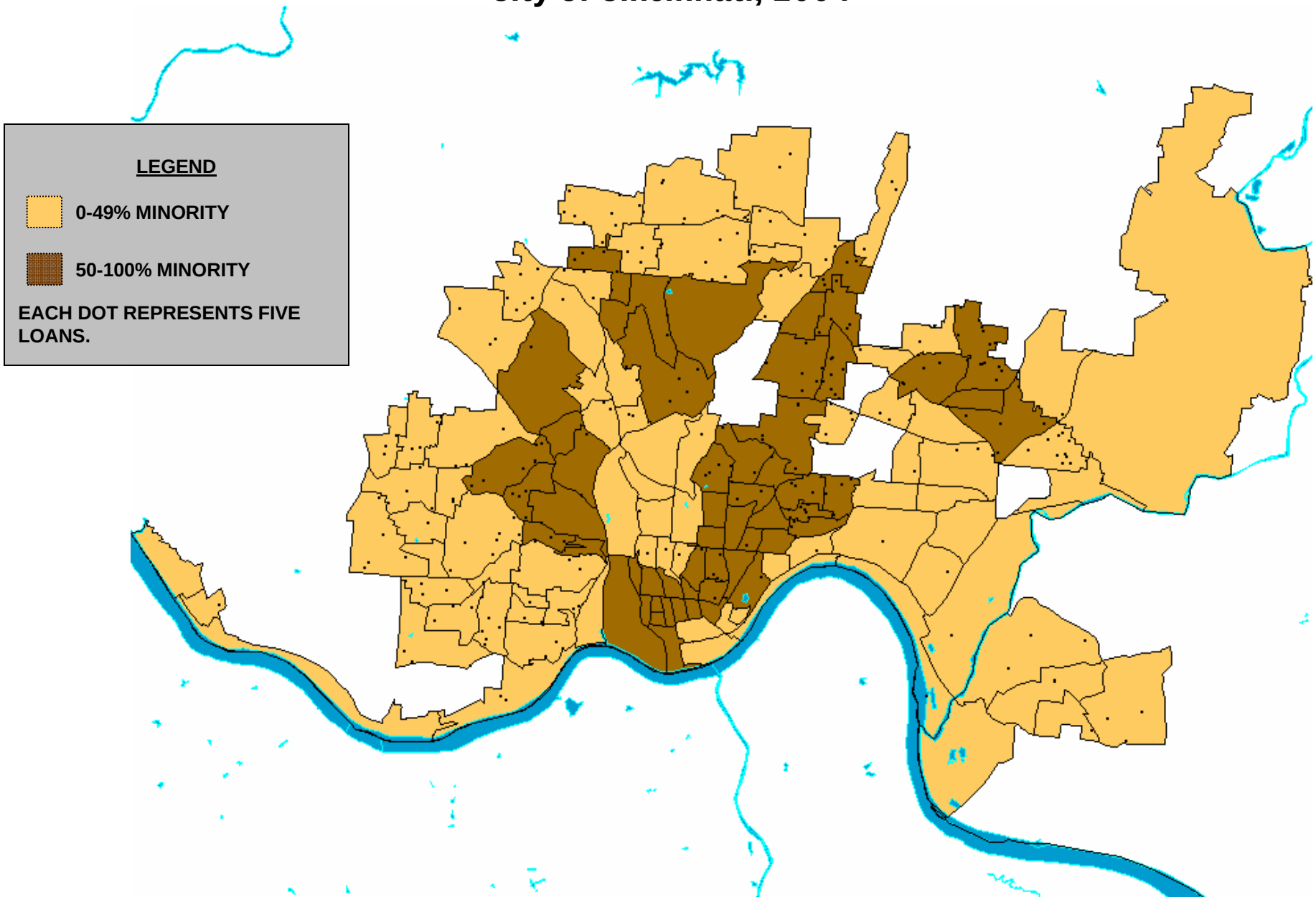
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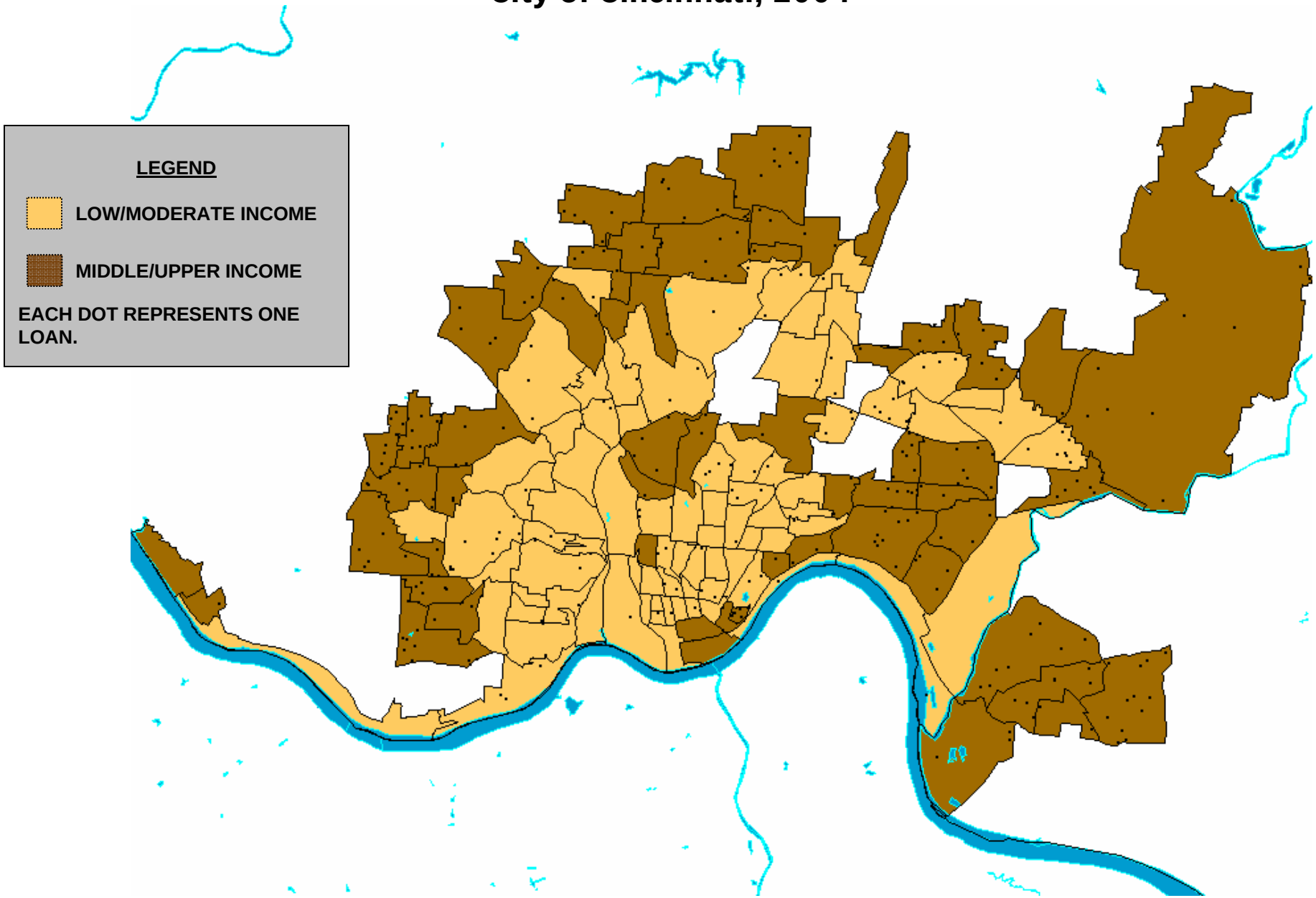
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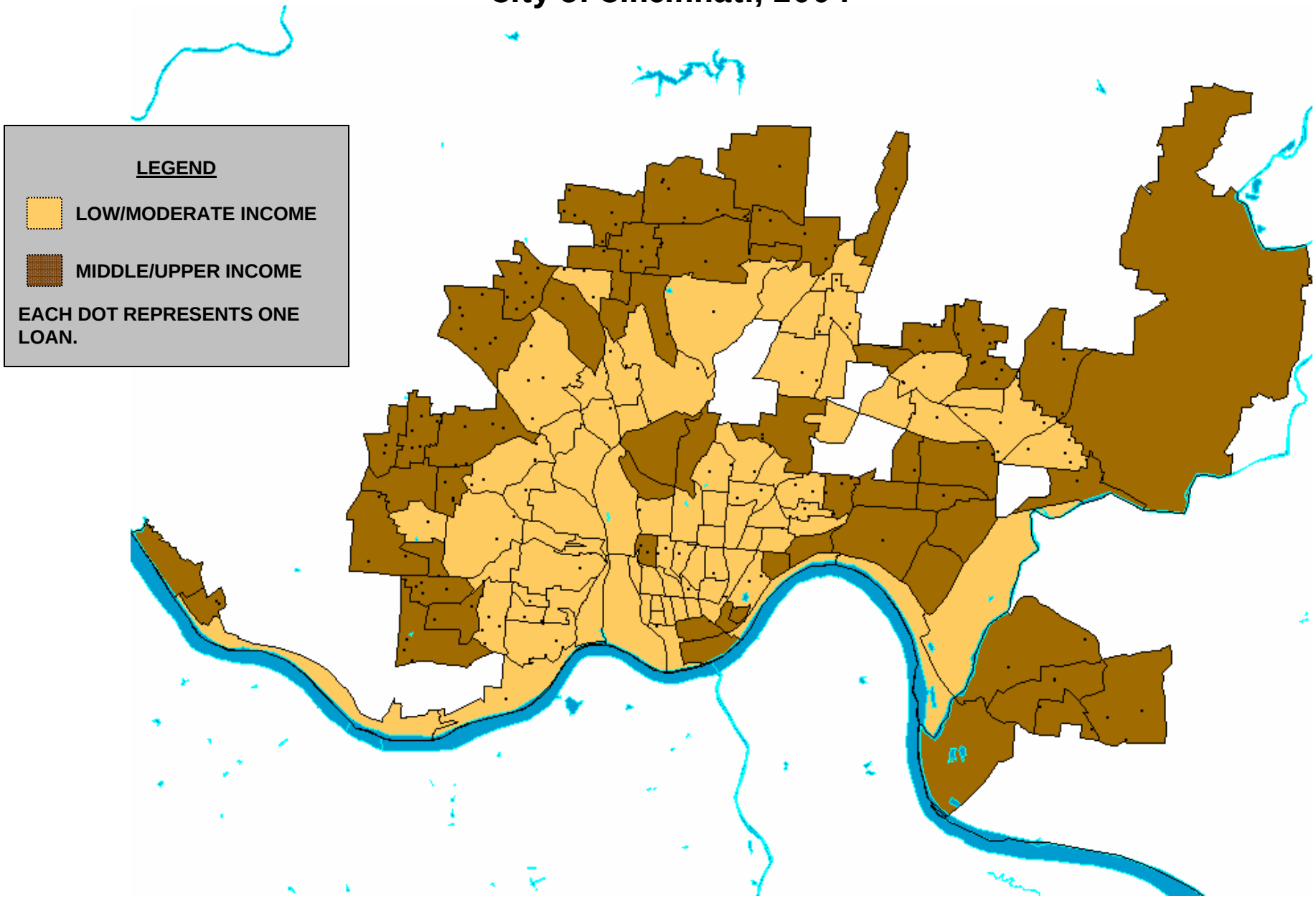
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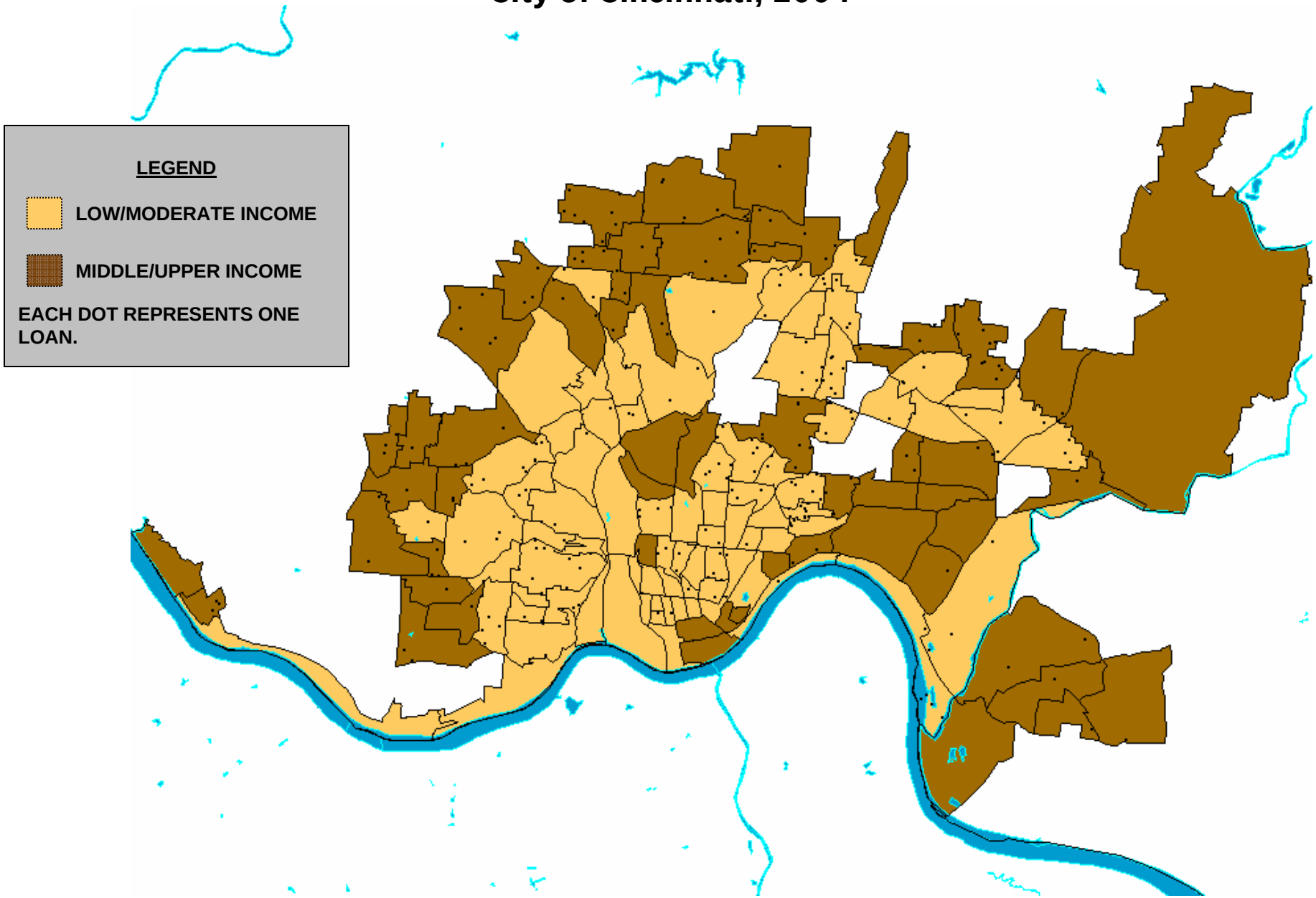
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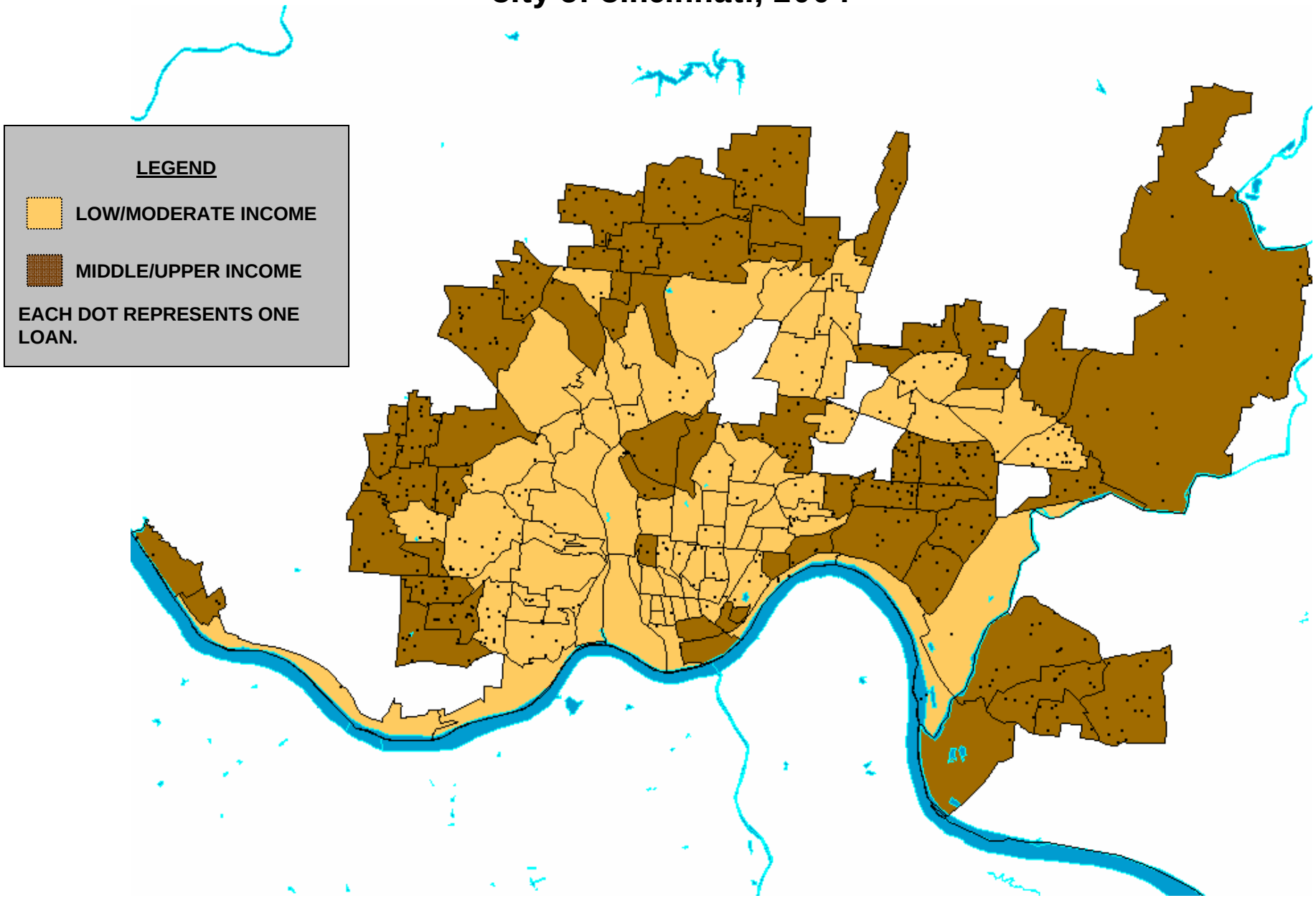
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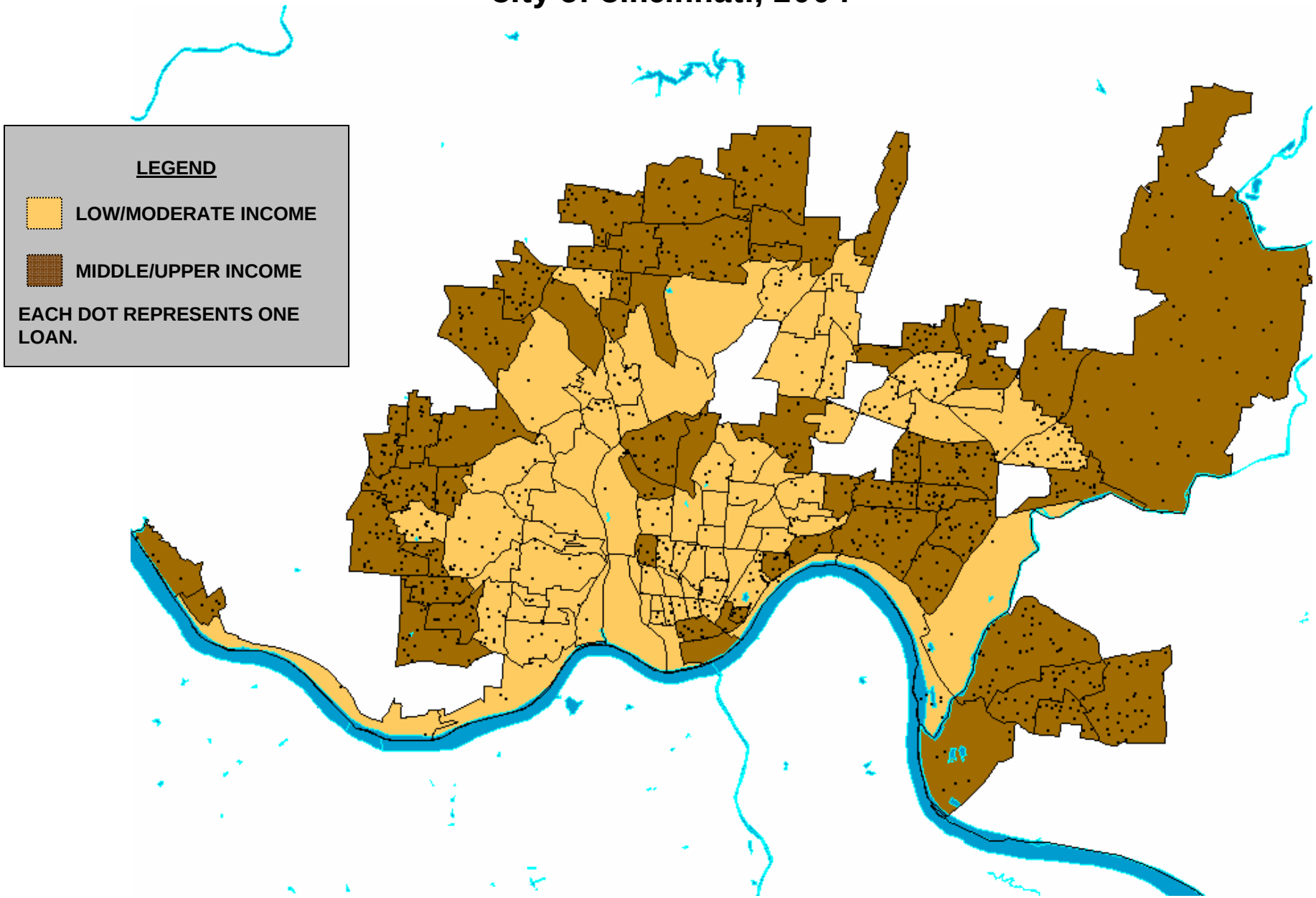
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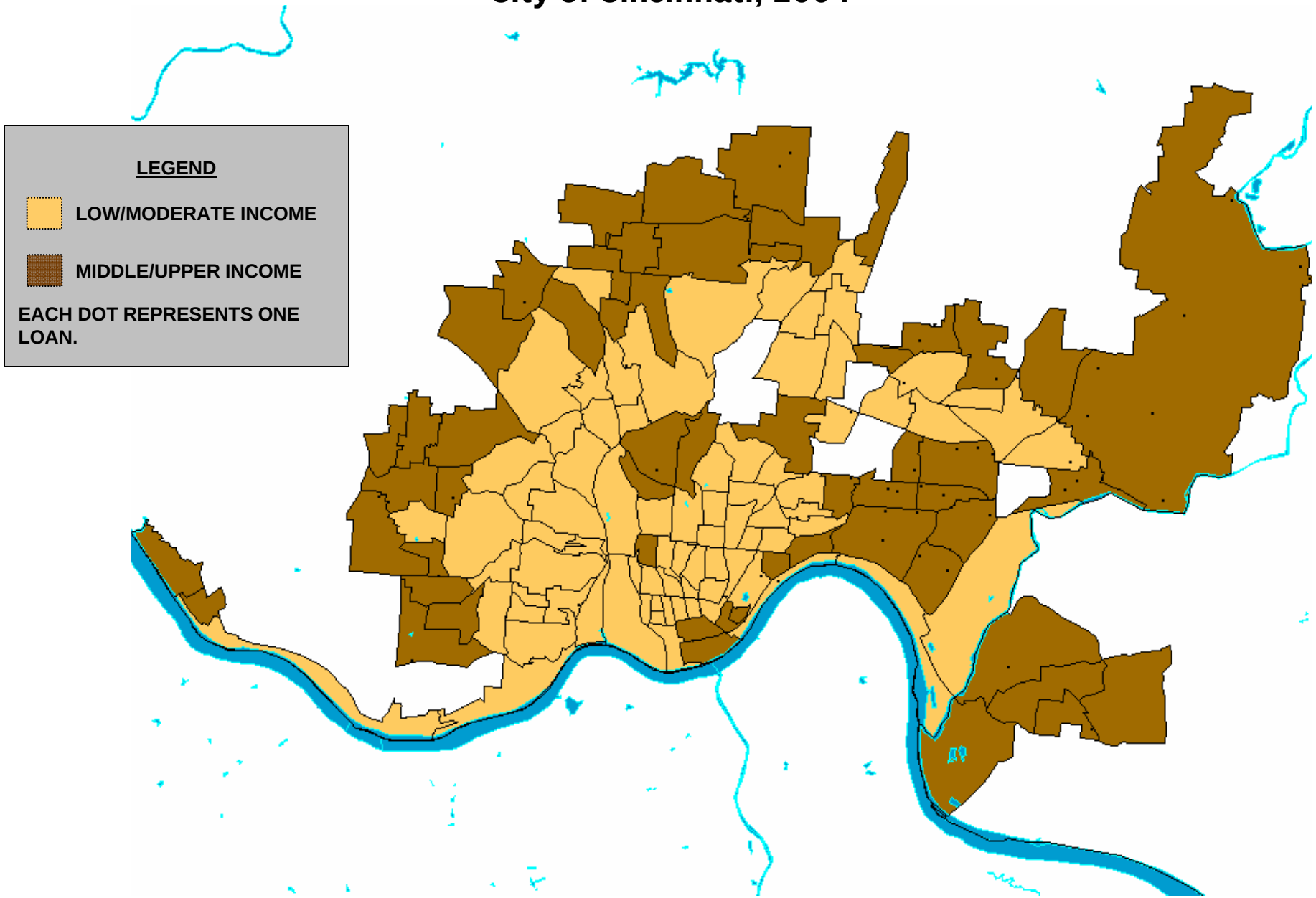
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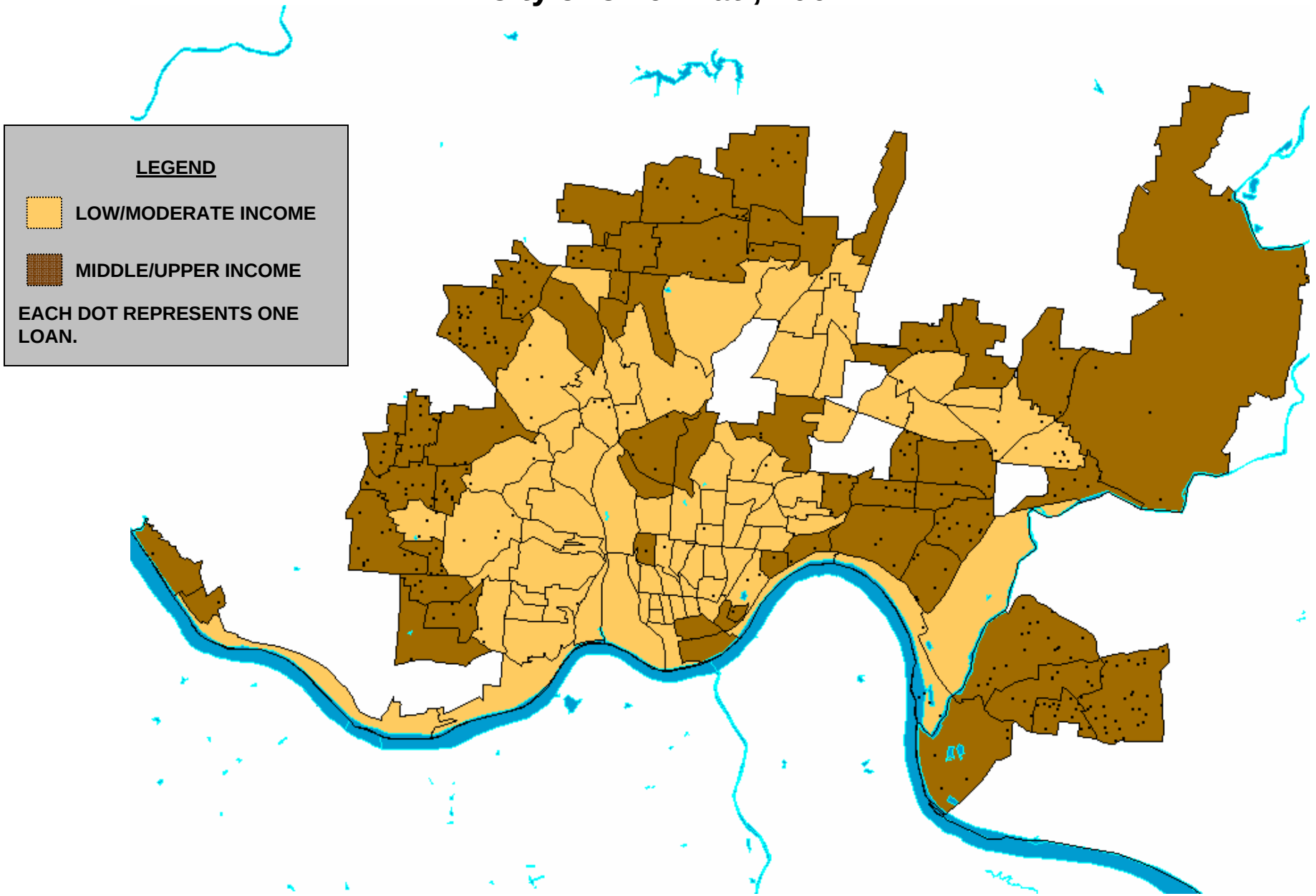
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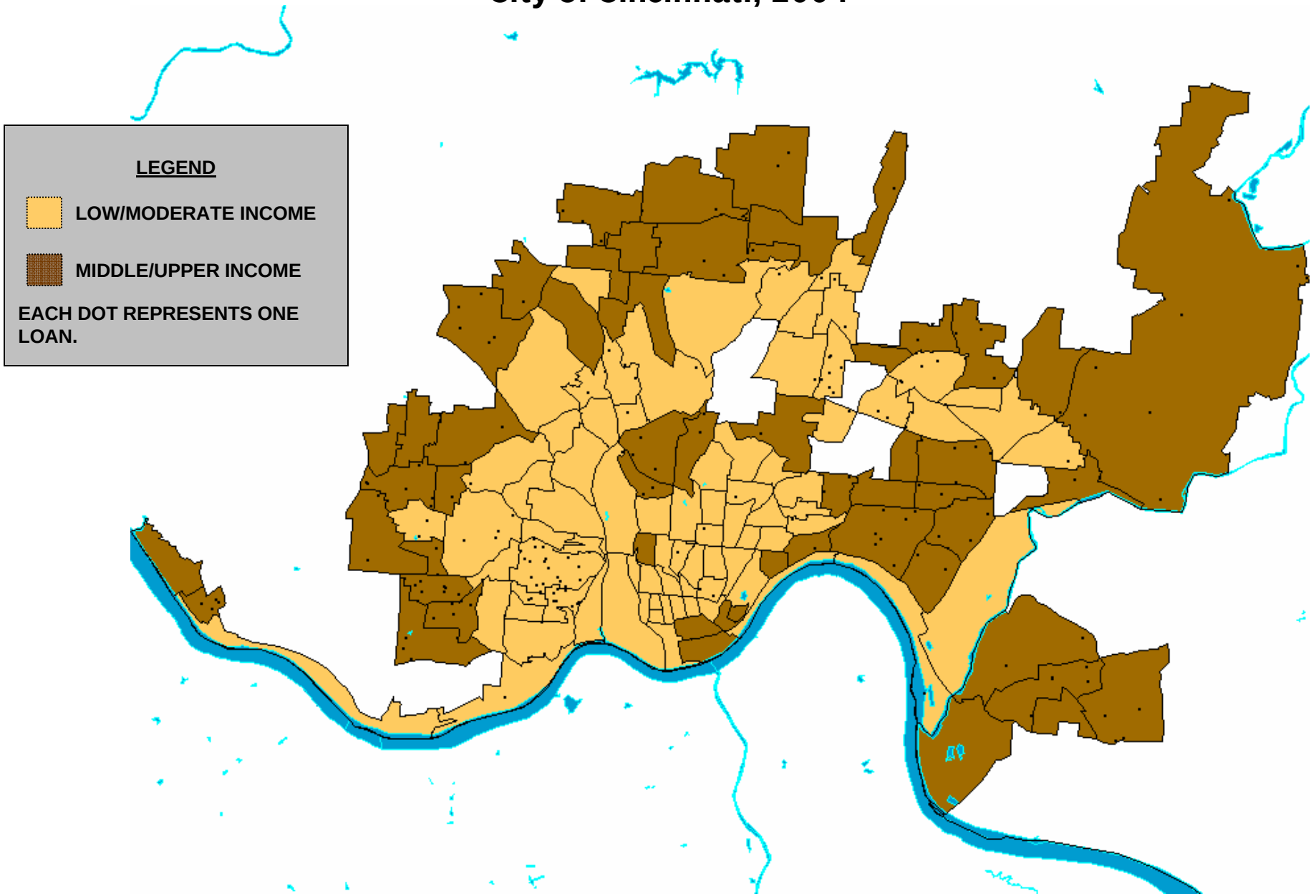
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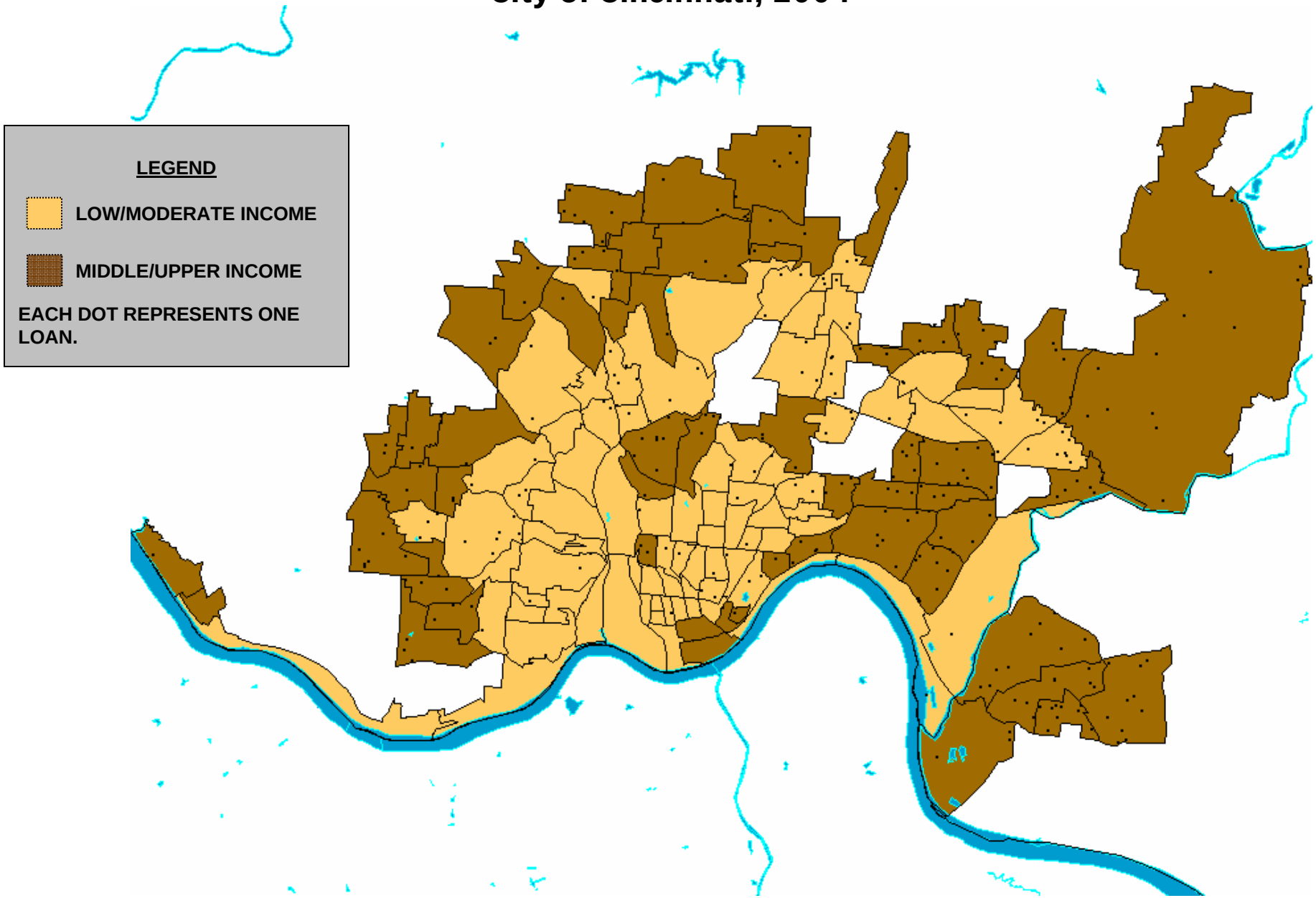
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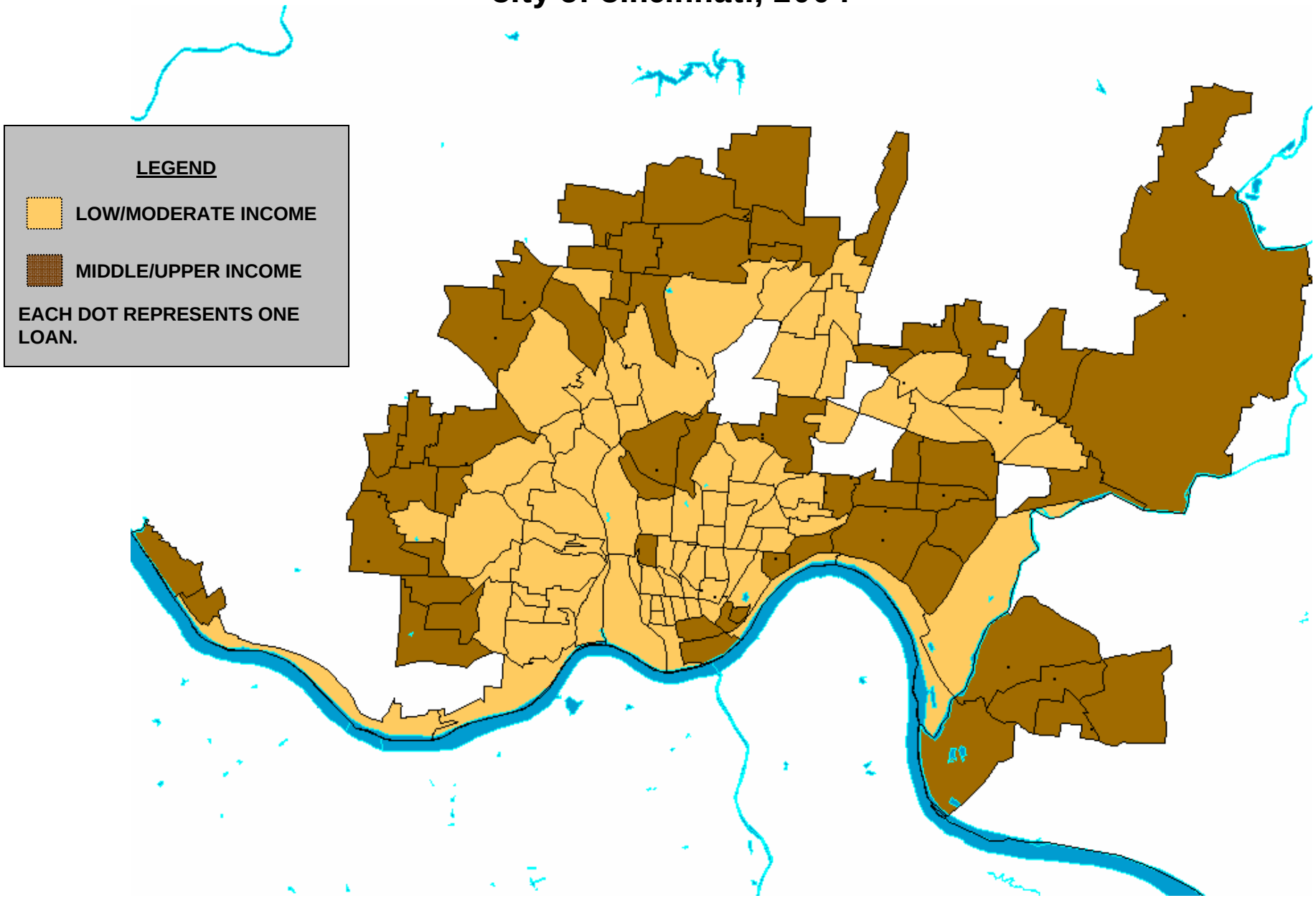
JPMorgan Chase Home Loans by Income Level of Census Tract

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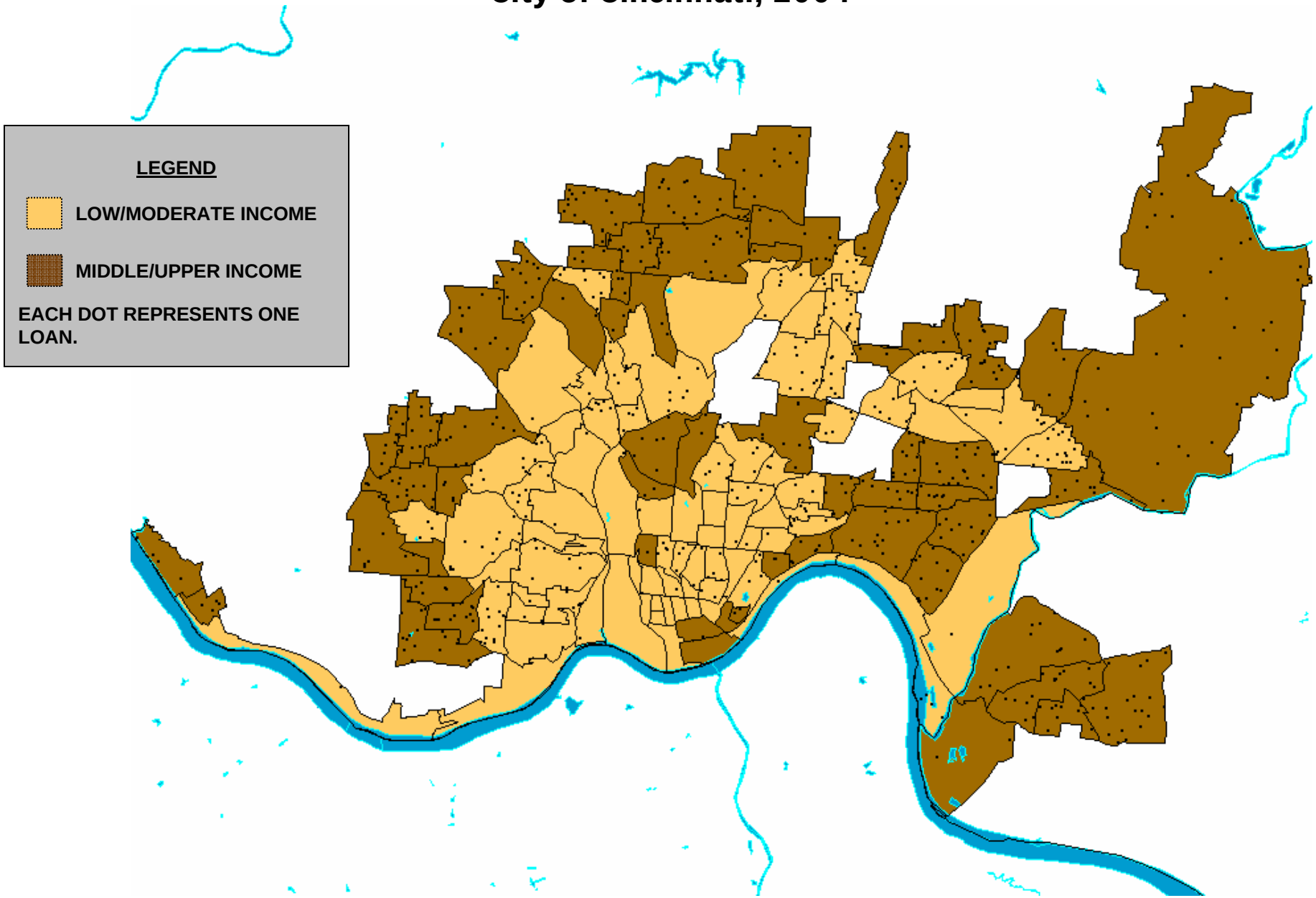
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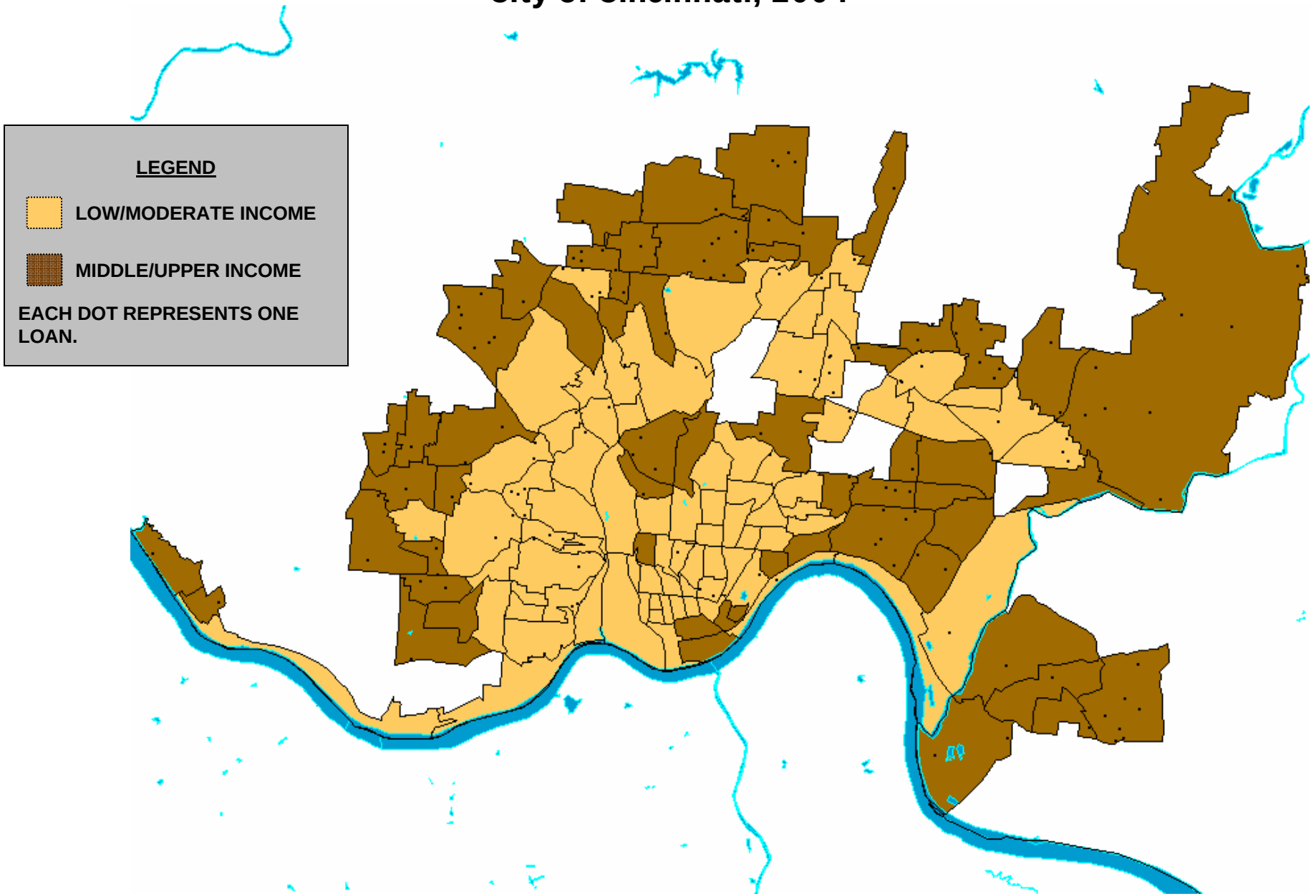
National City Home Loans by Income Level of Census Tract

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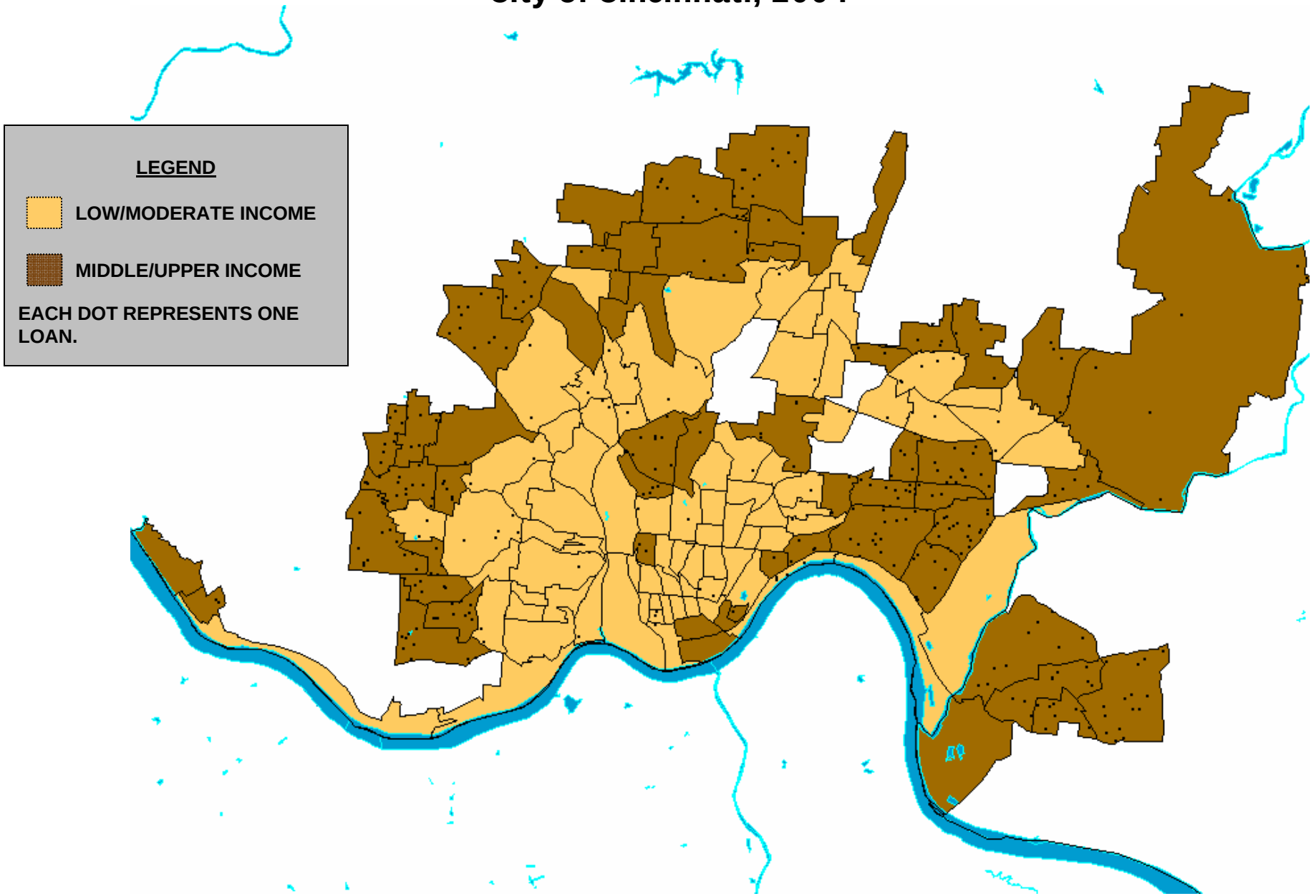
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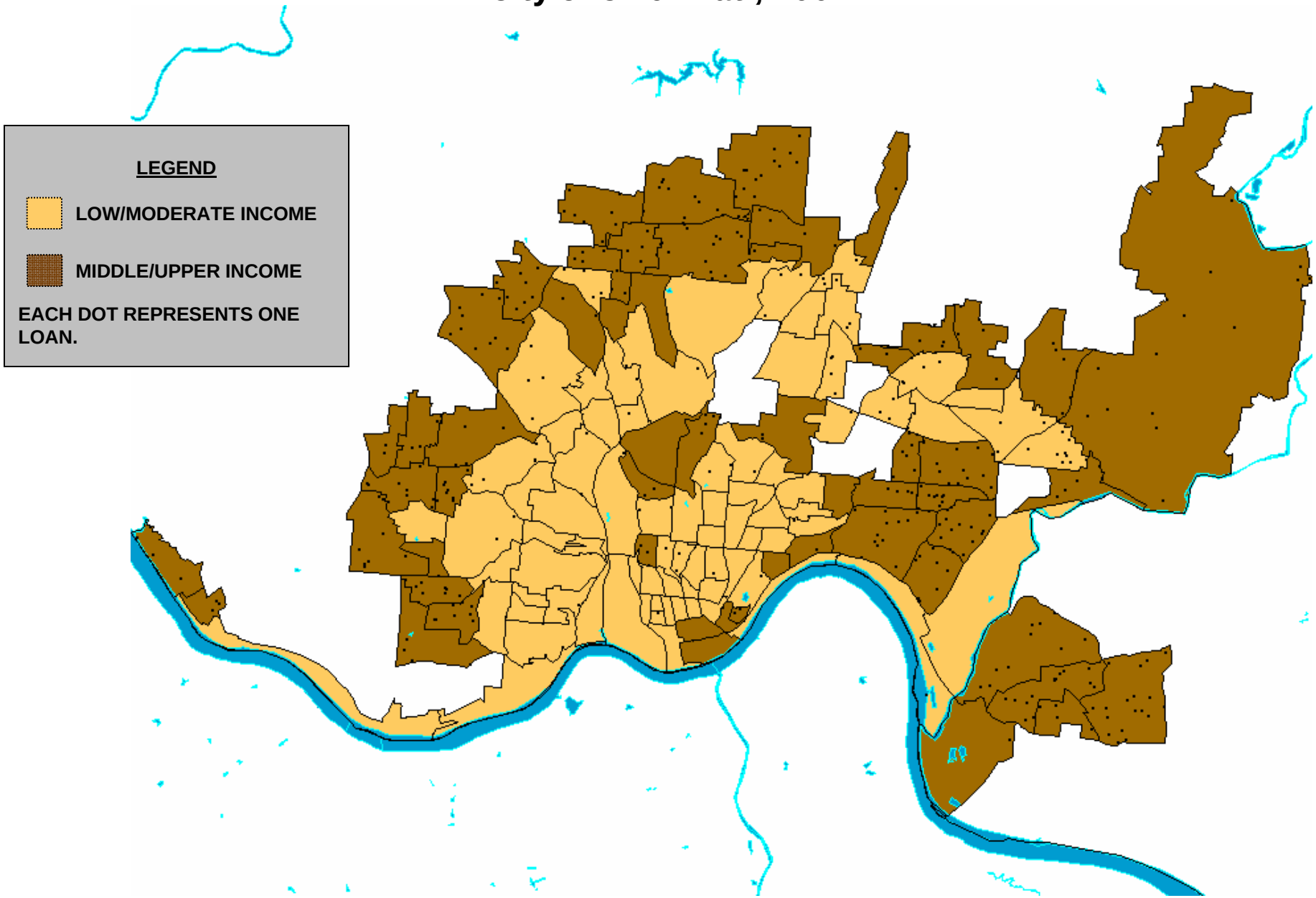
Third Federal S&L Home Loans by Income Level of Census Tract

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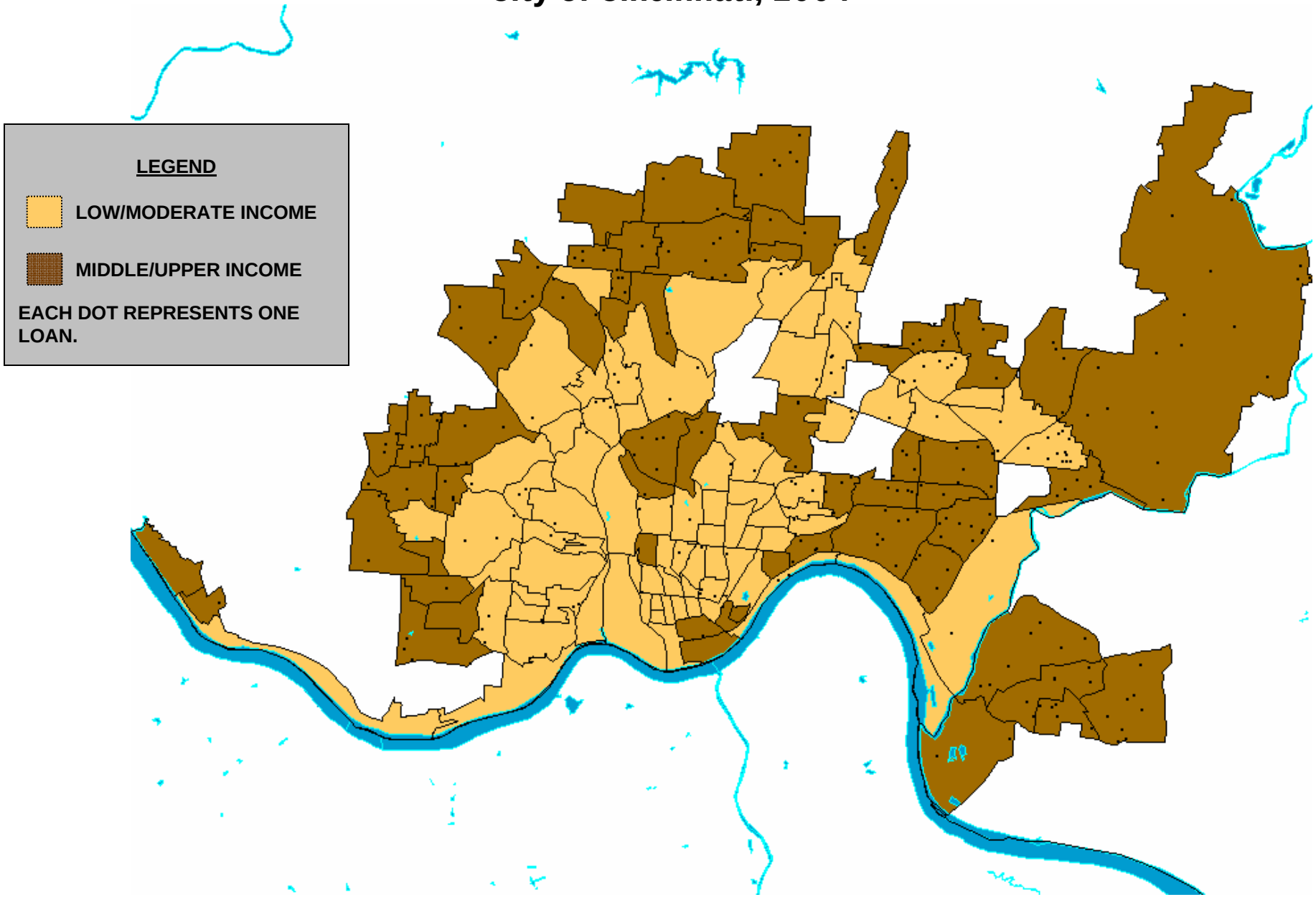
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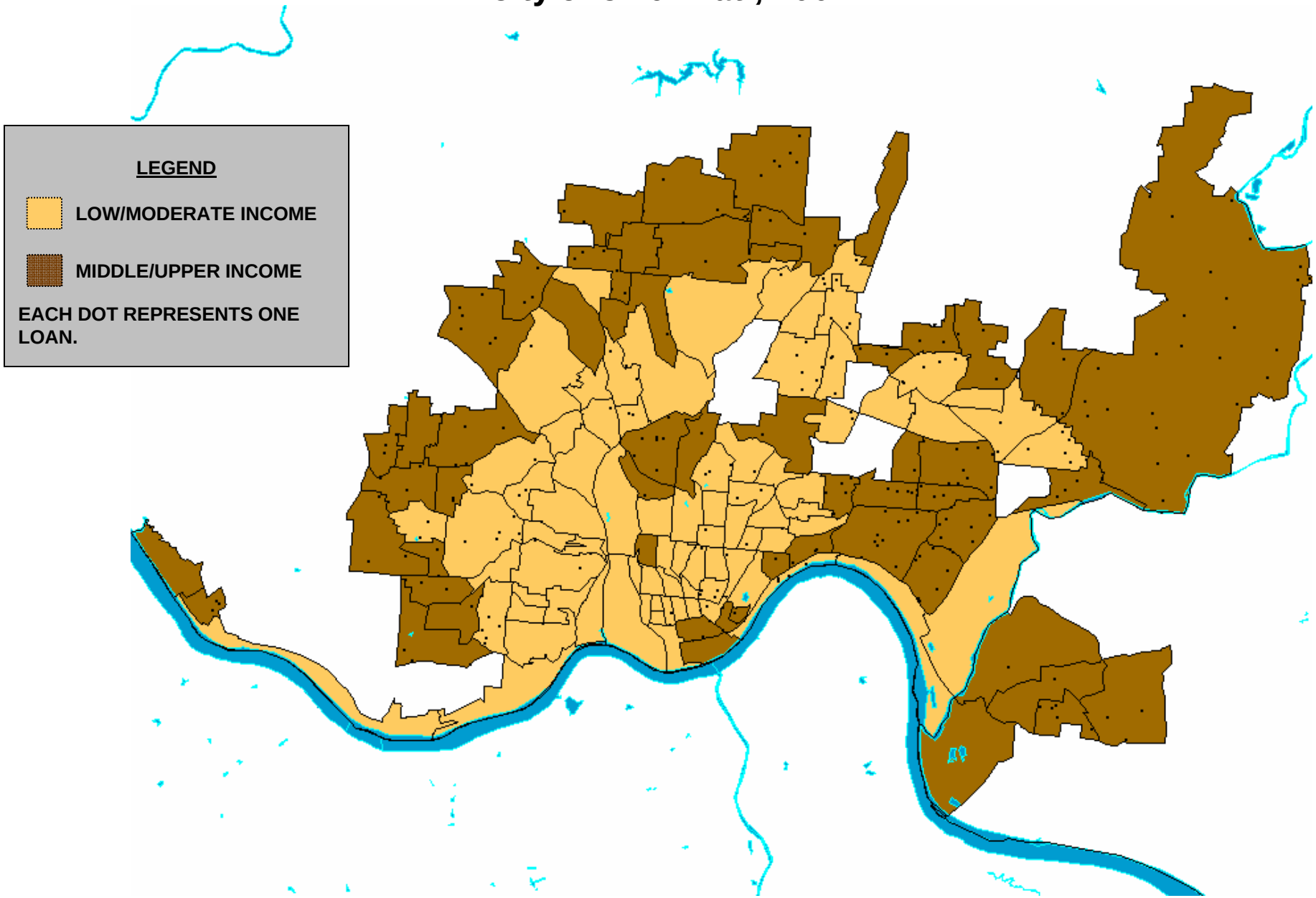
US Bank Home Loans by Income Level of Census Tract

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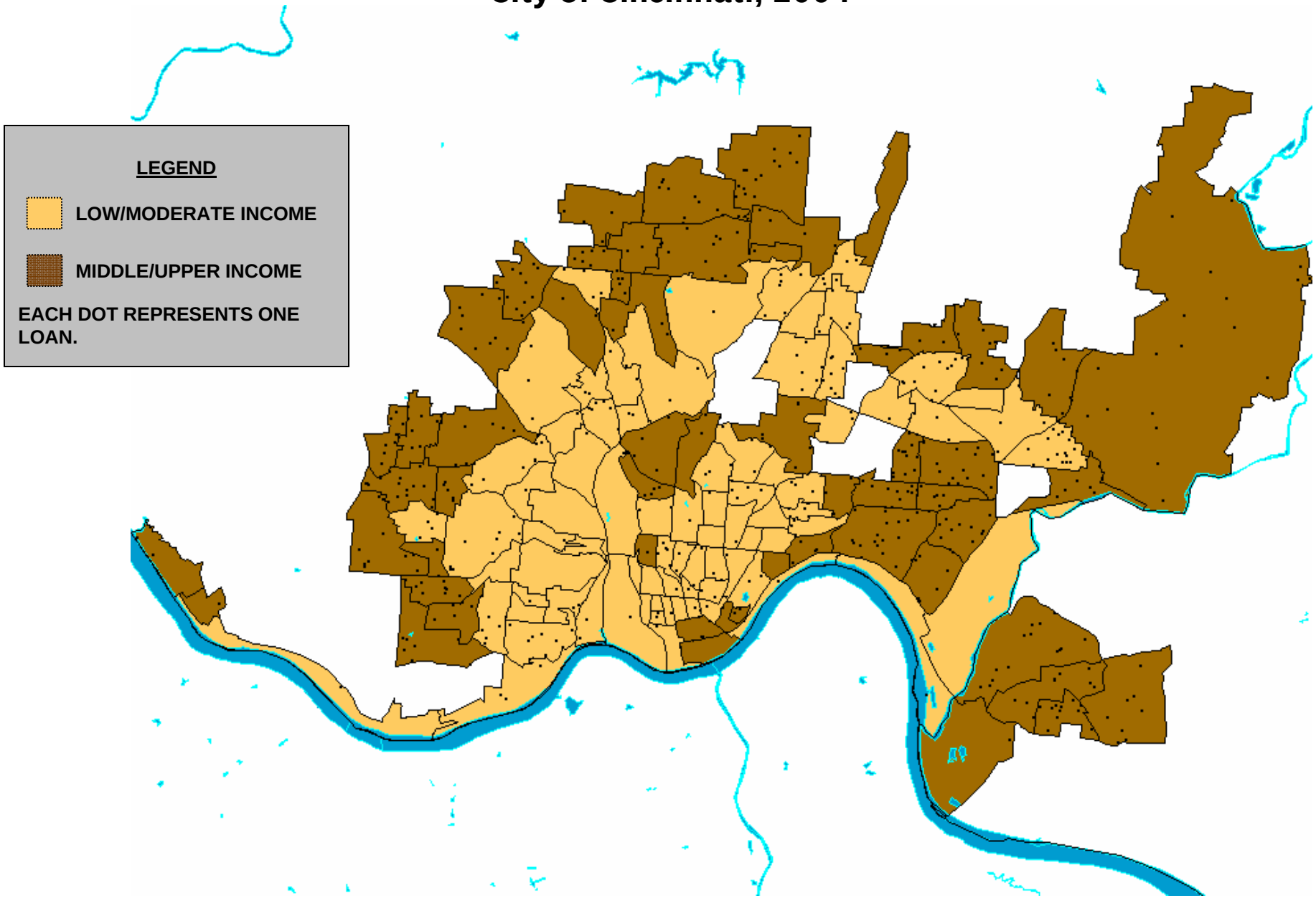
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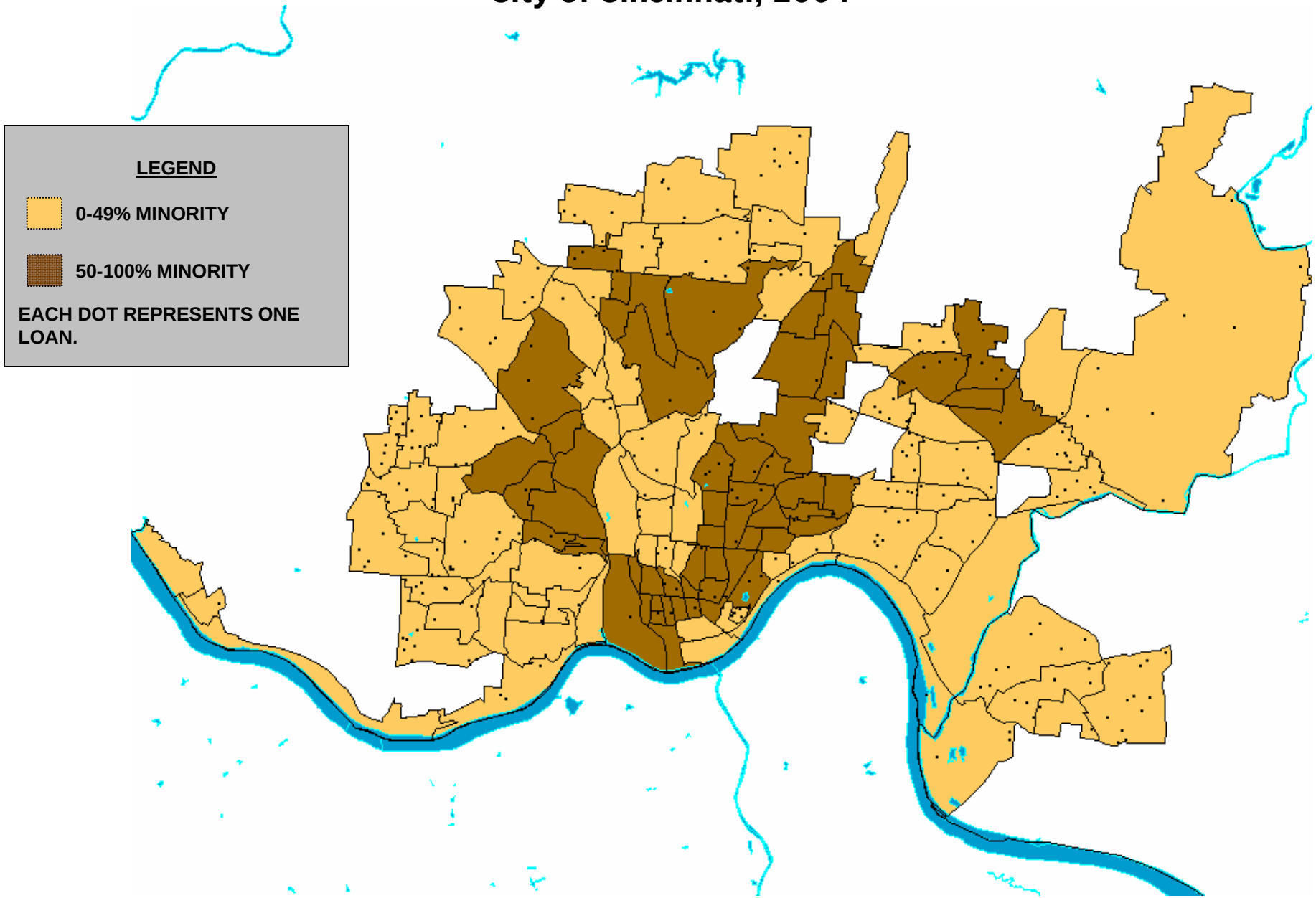
Wells Fargo Home Loans by Income Level of Census Tract

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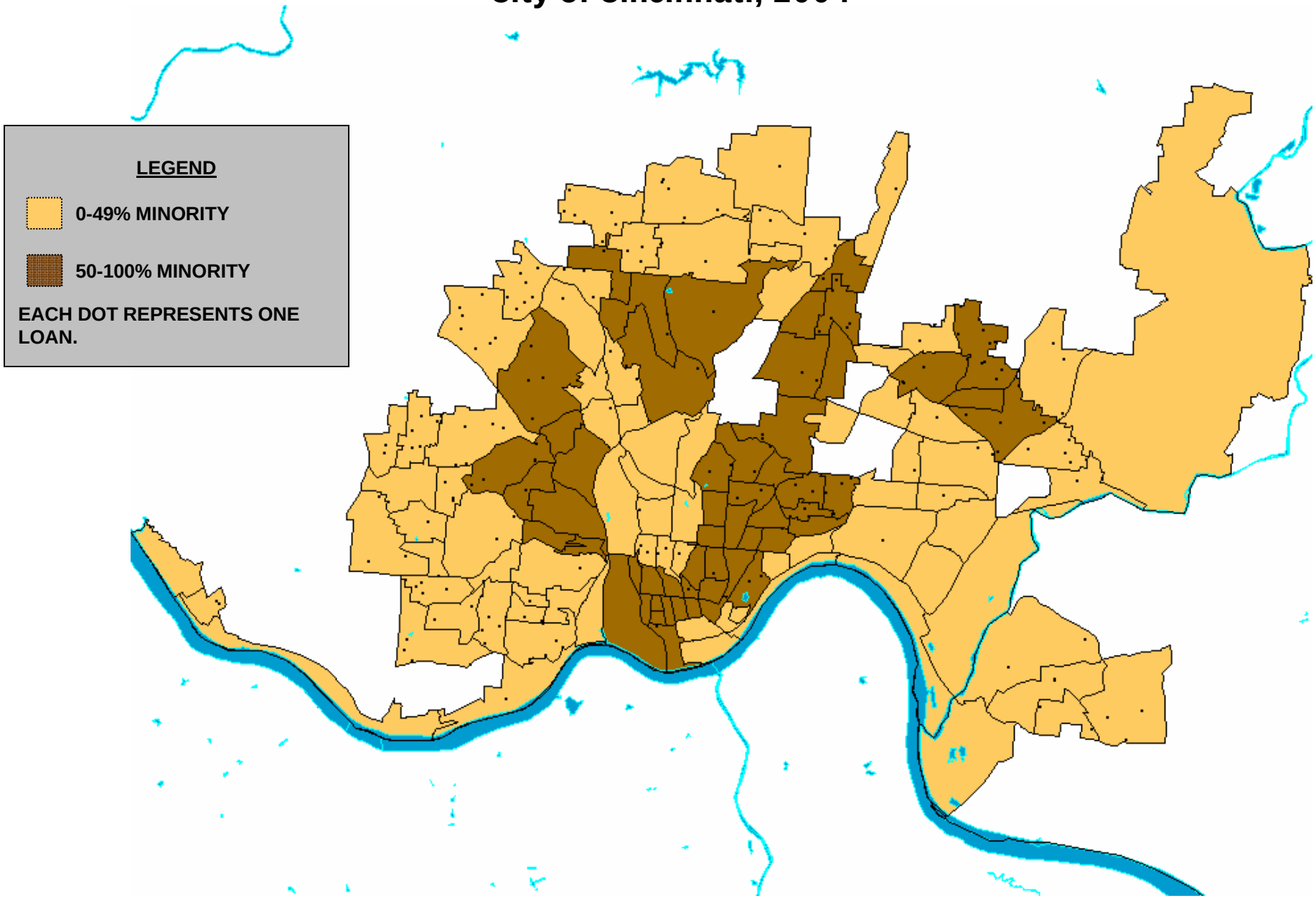
ABN Amro Home Loans by Minority Level of Census Tract

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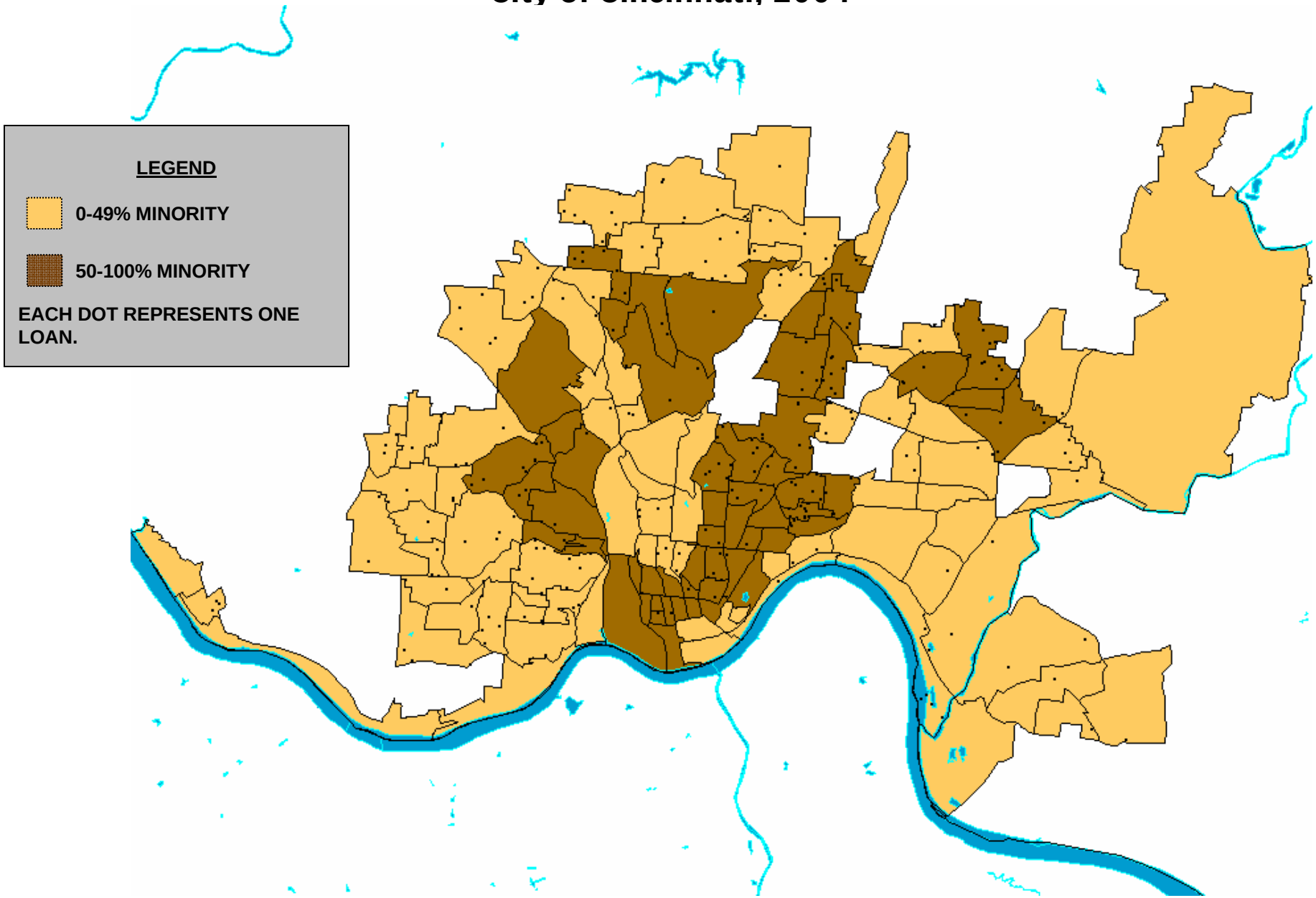
Accredited Home Loans by Minority Level of Census Tract

City of Cincinnati, 2004



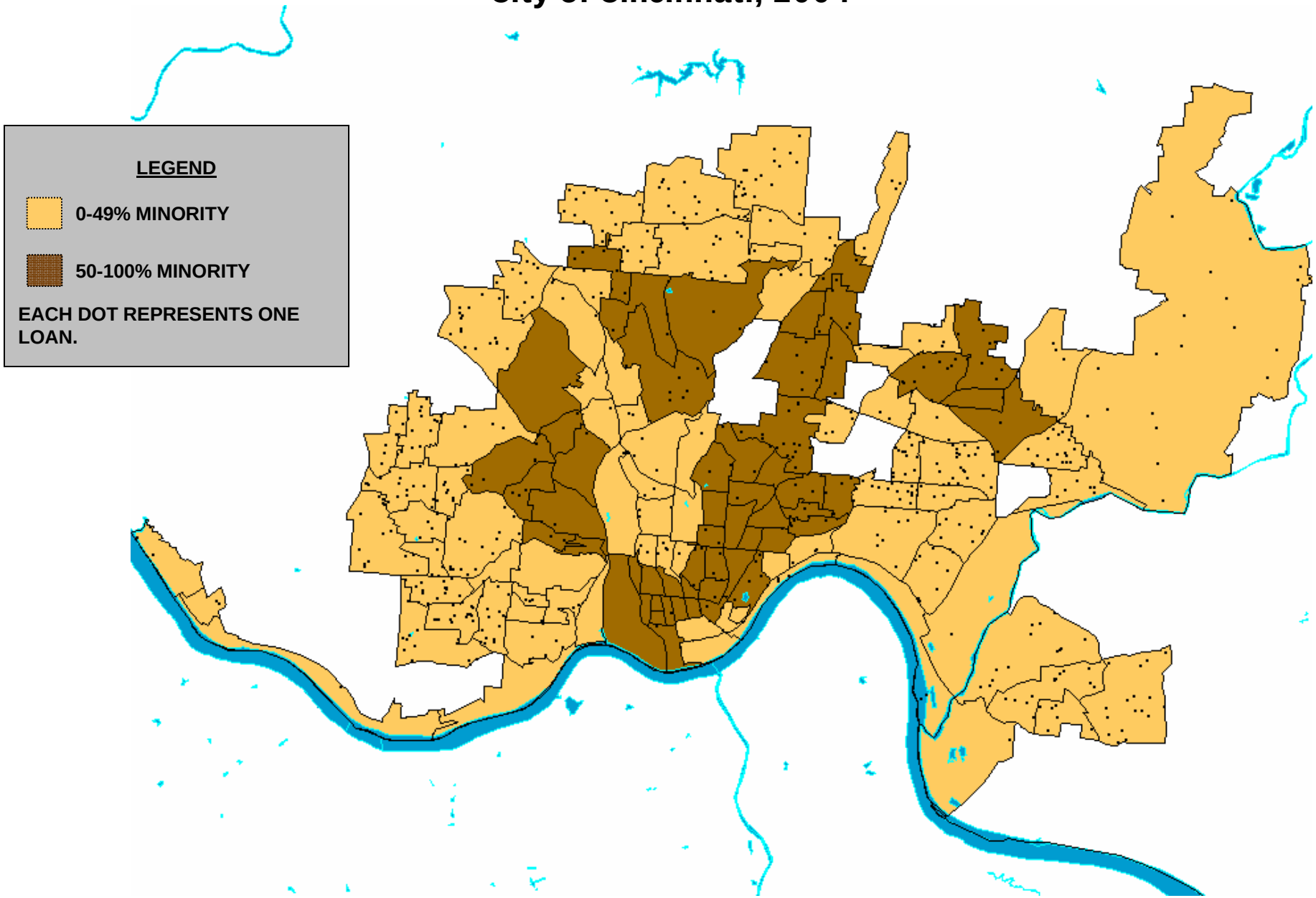
Ameriquest Home Loans by Minority Level of Census Tract

City of Cincinnati, 2004



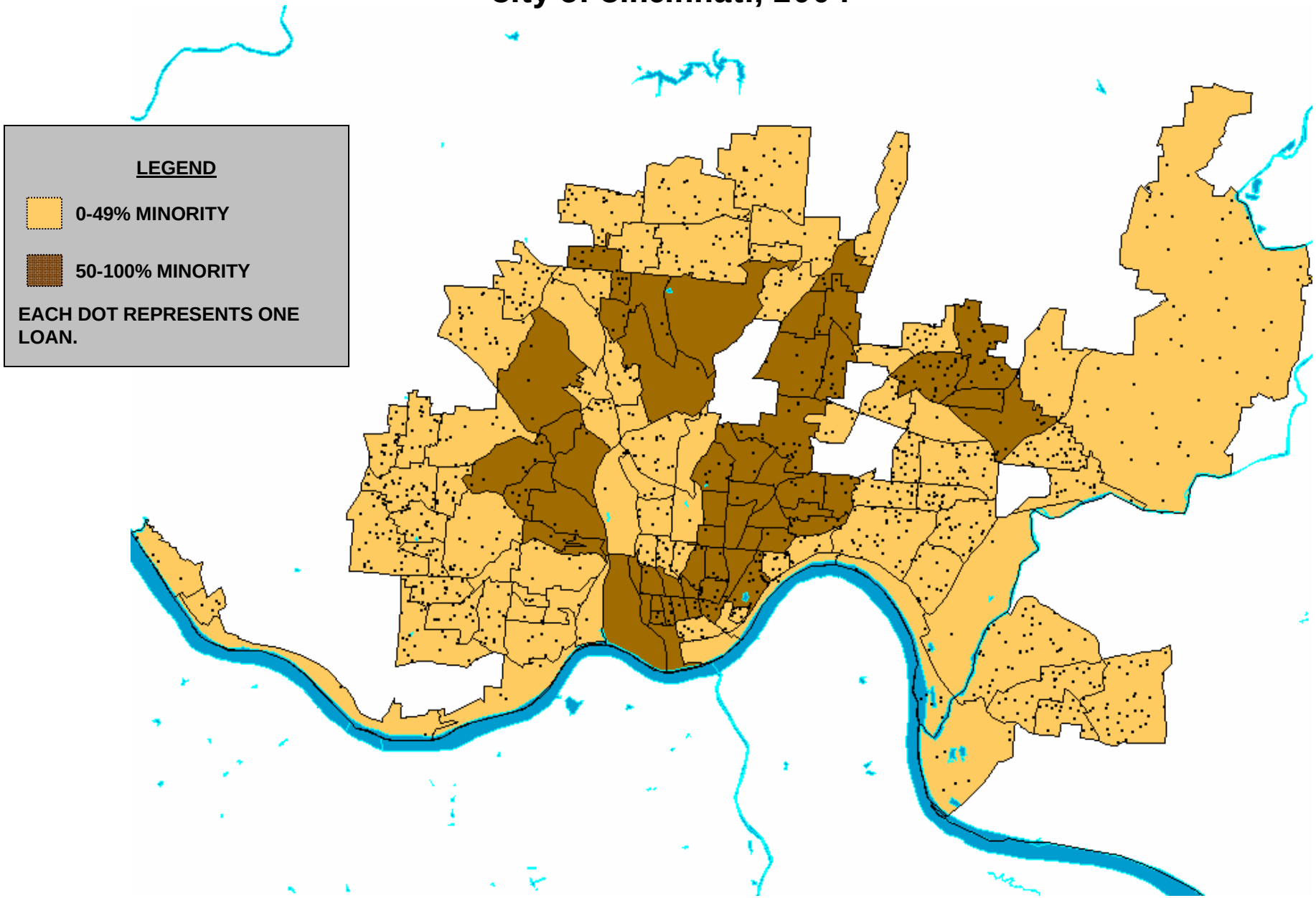
Countrywide Home Loans by Minority Level of Census Tract

City of Cincinnati, 2004



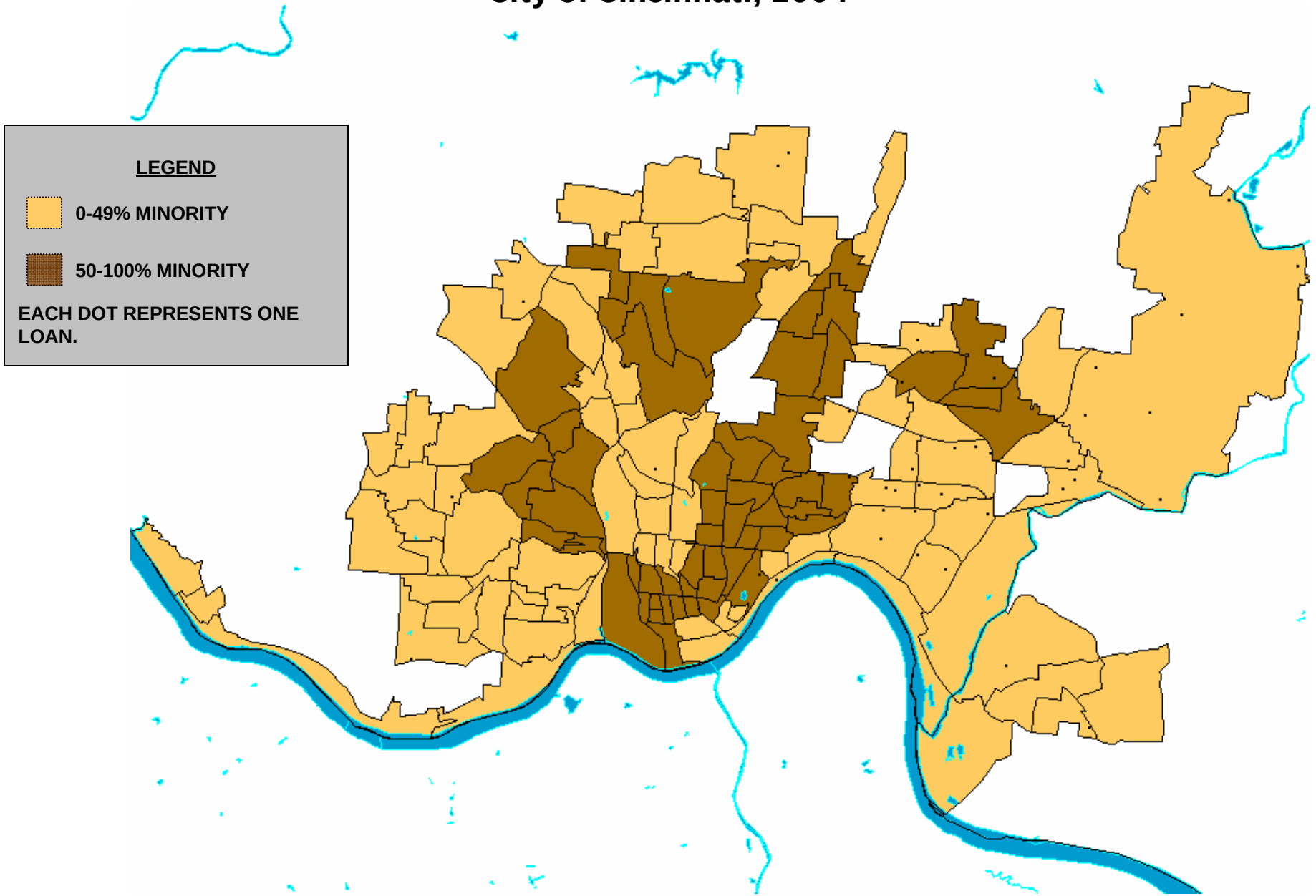
Fifth Third Home Loans by Minority Level of Census Tract

City of Cincinnati, 2004



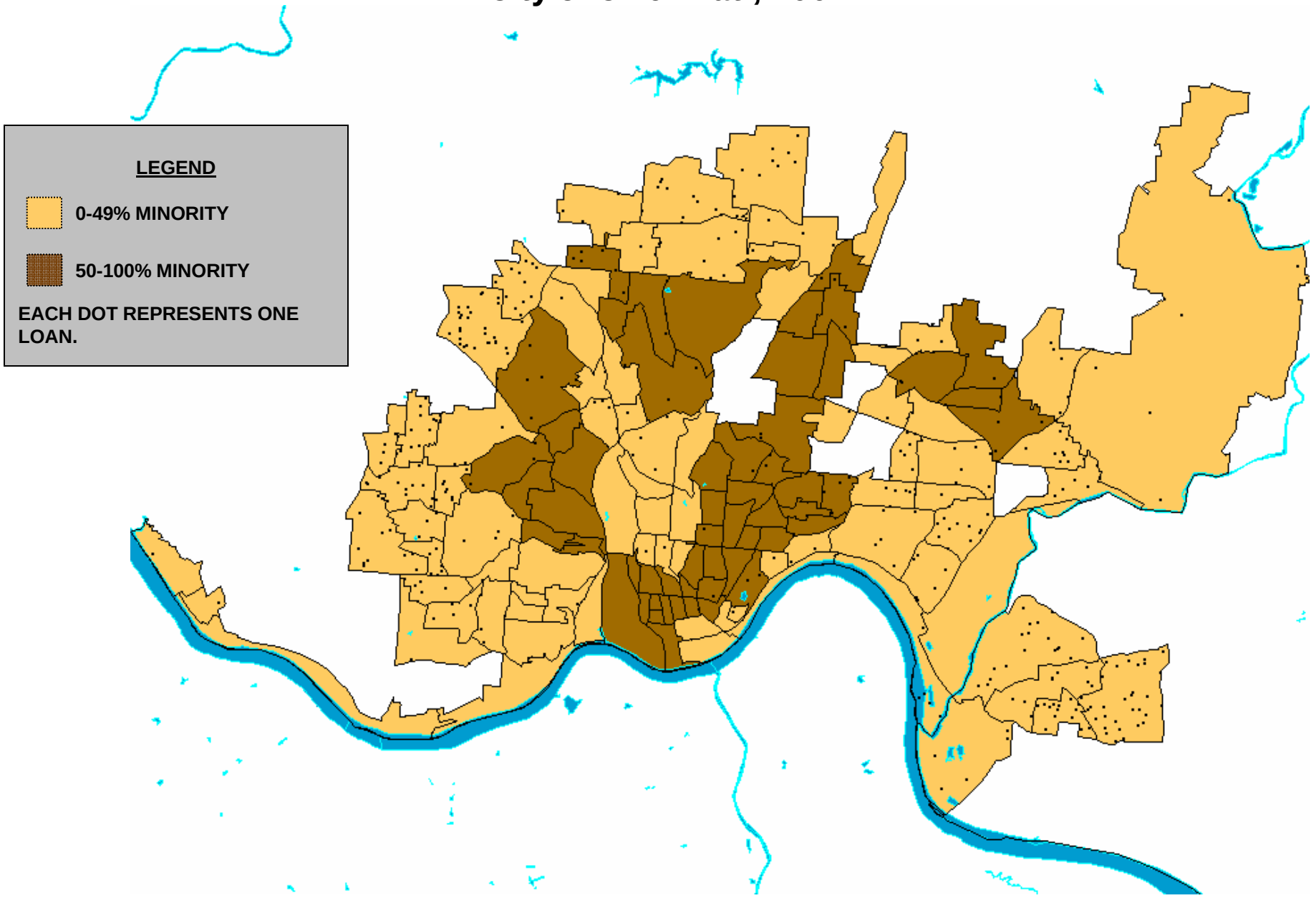
First Financial Home Loans by Minority Level of Census Tract

City of Cincinnati, 2004



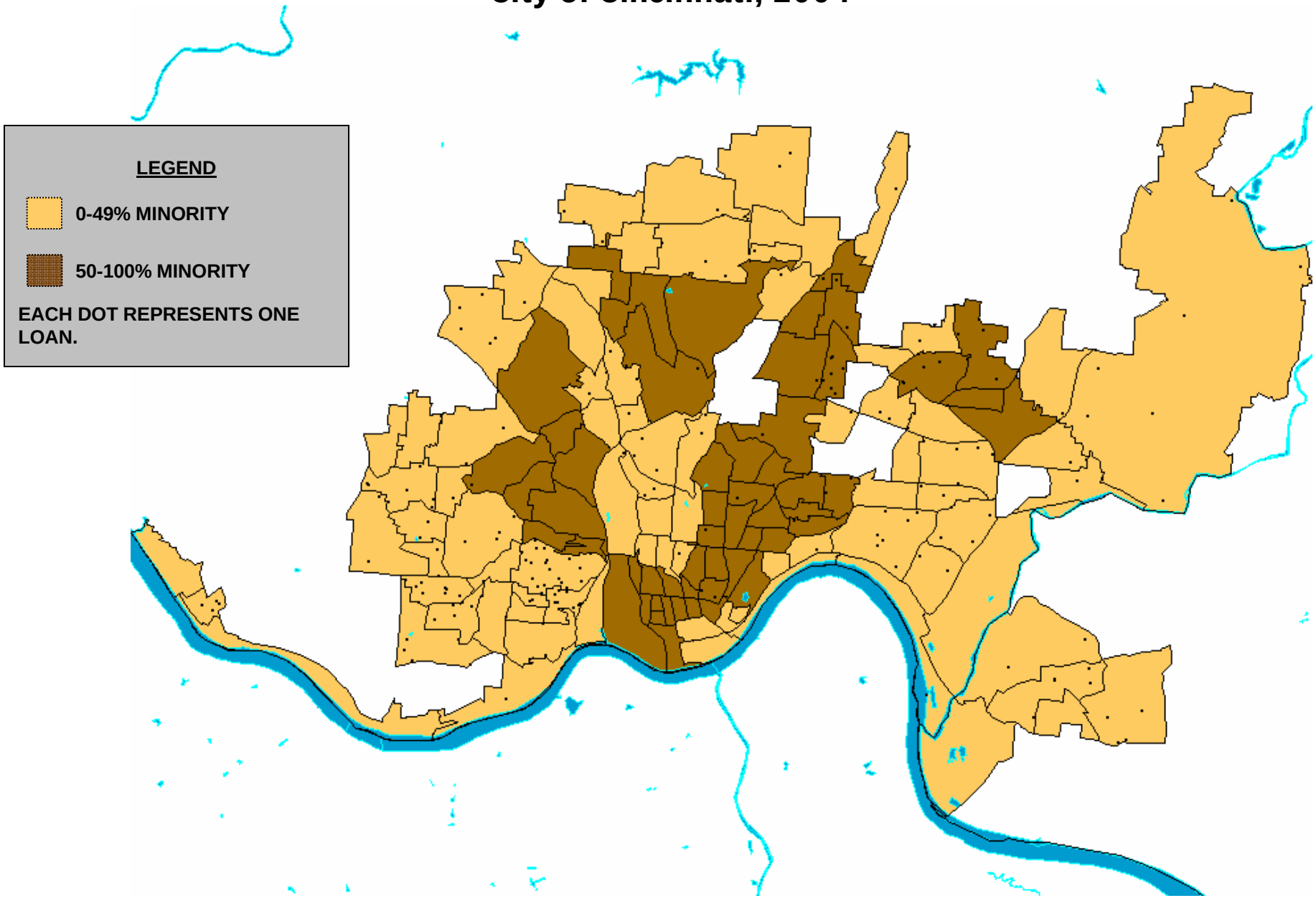
Guardian Savings Bank Home Loans by Minority Level of Census Tract

City of Cincinnati, 2004



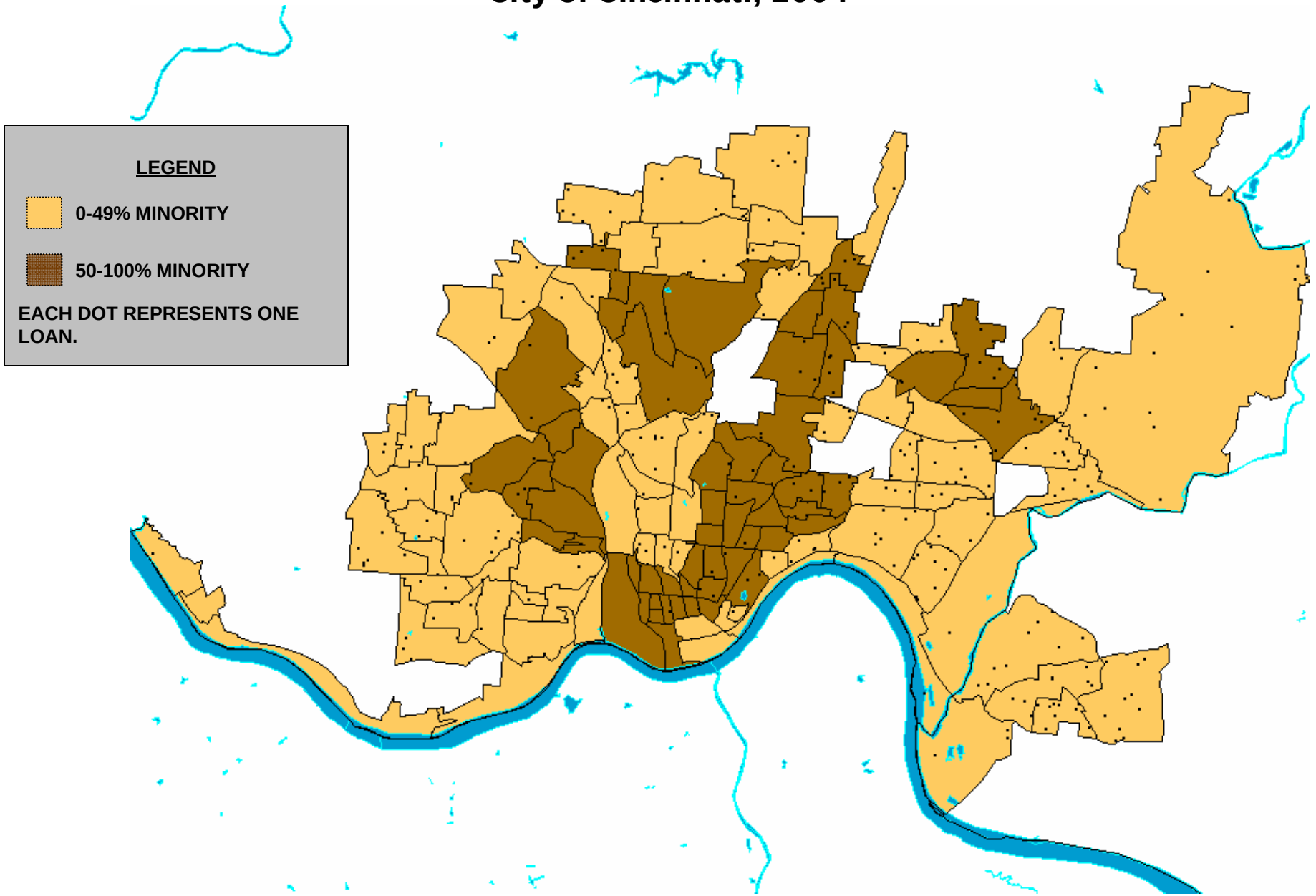
Huntington Home Loans by Minority Level of Census Tract

City of Cincinnati, 2004



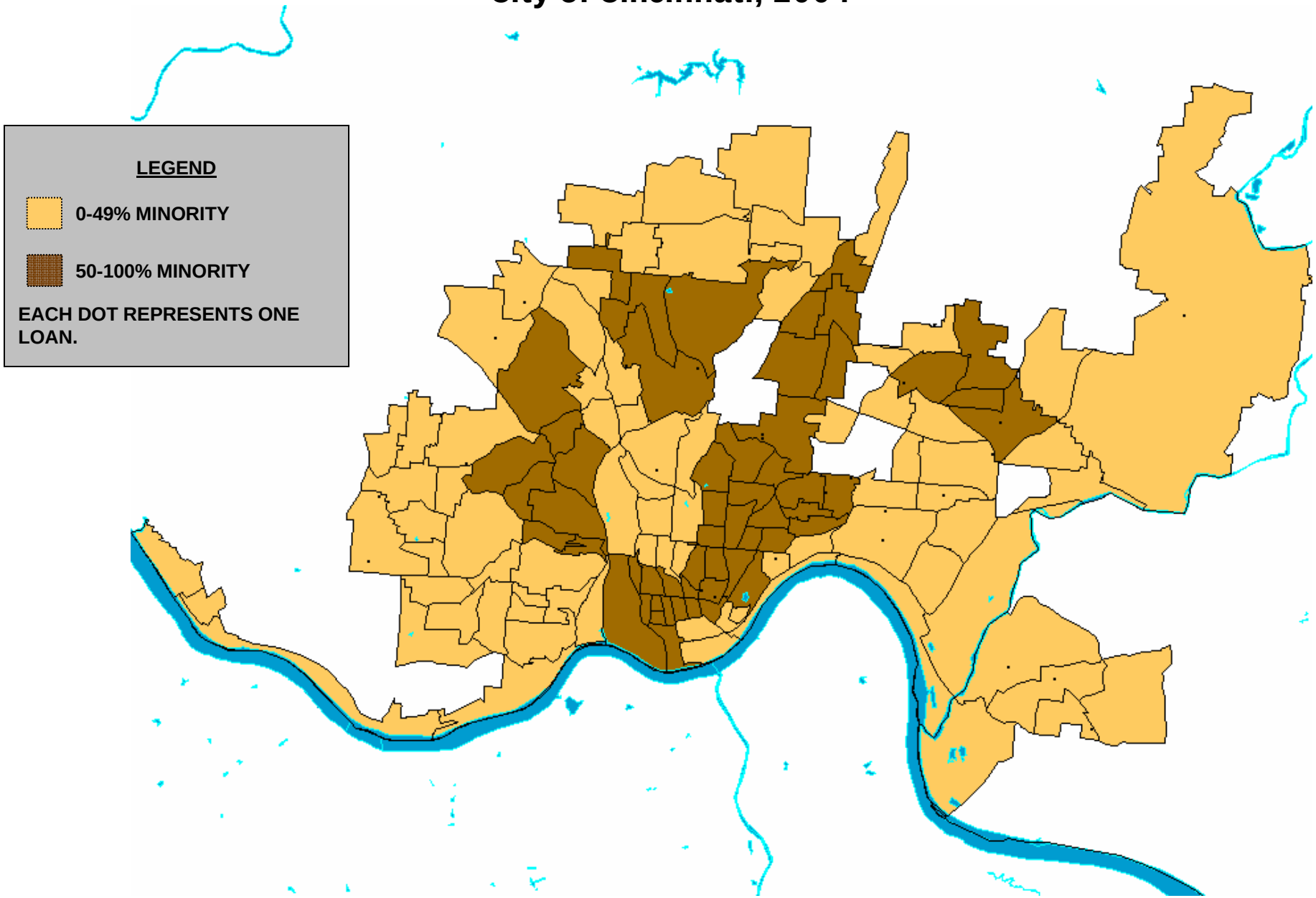
JPMorgan Chase Home Loans by Minority Level of Census Tract

City of Cincinnati, 2004



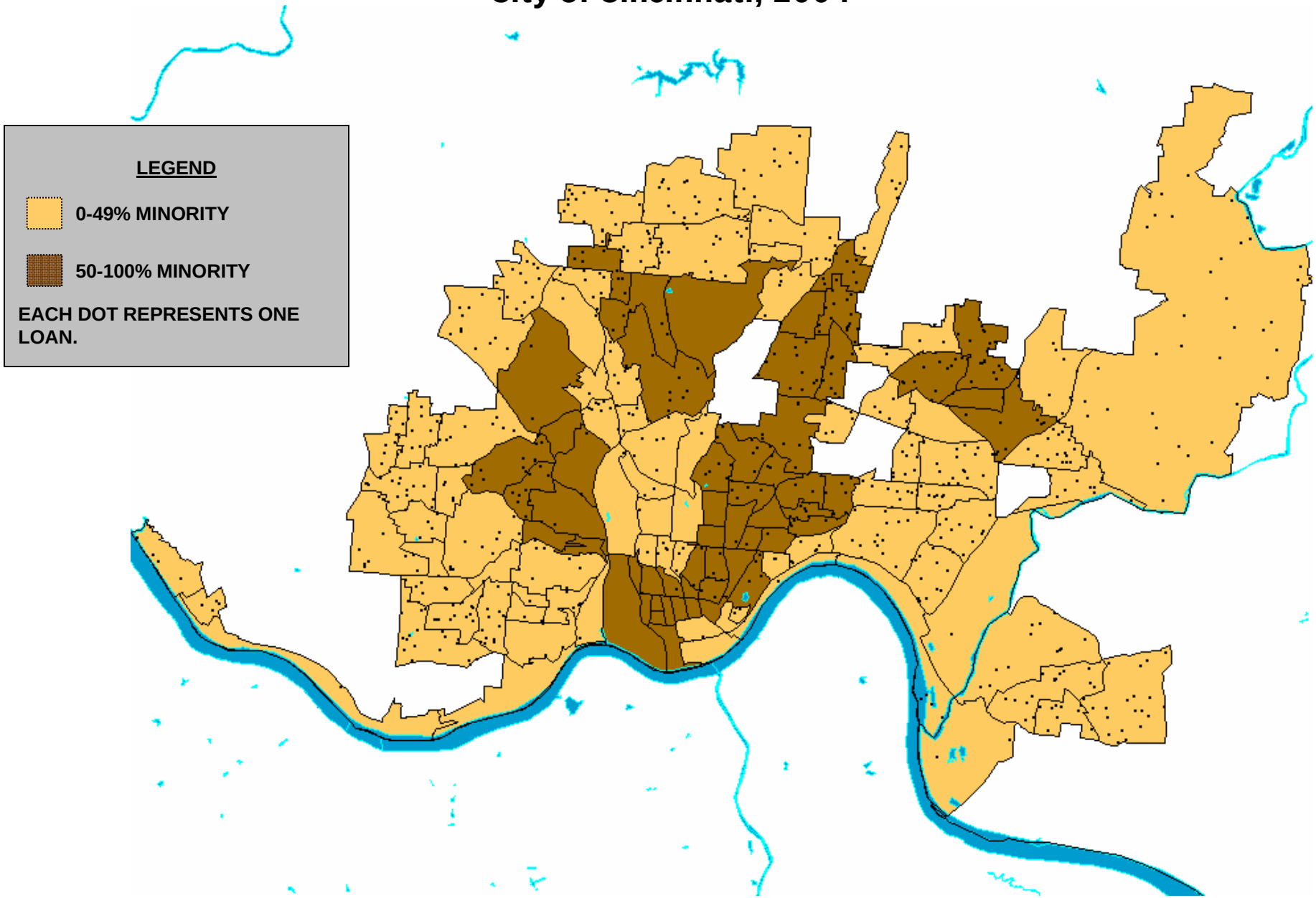
KeyBank Home Loans by Minority Level of Census Tract

City of Cincinnati, 2004



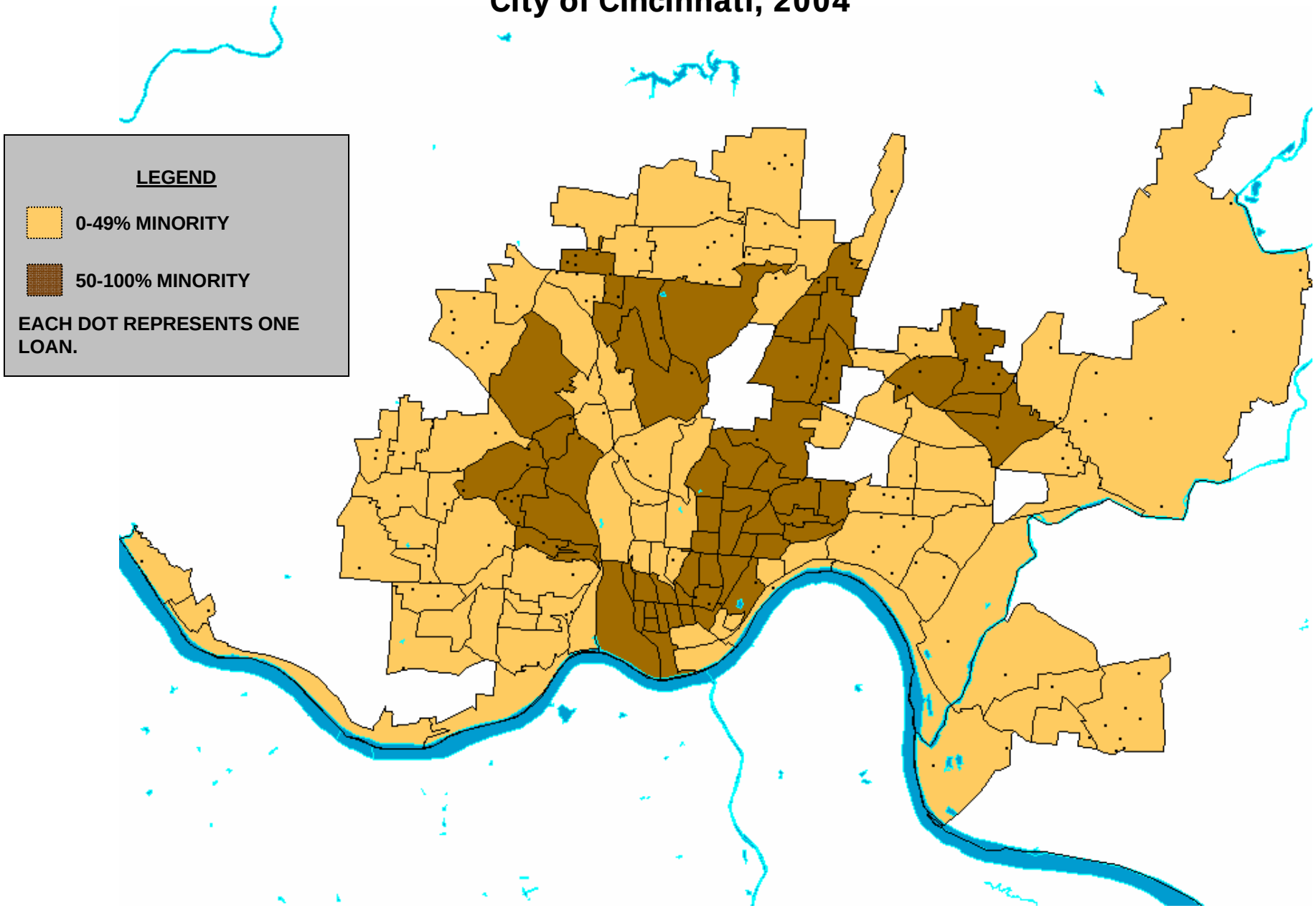
National City Home Loans by Minority Level of Census Tract

City of Cincinnati, 2004



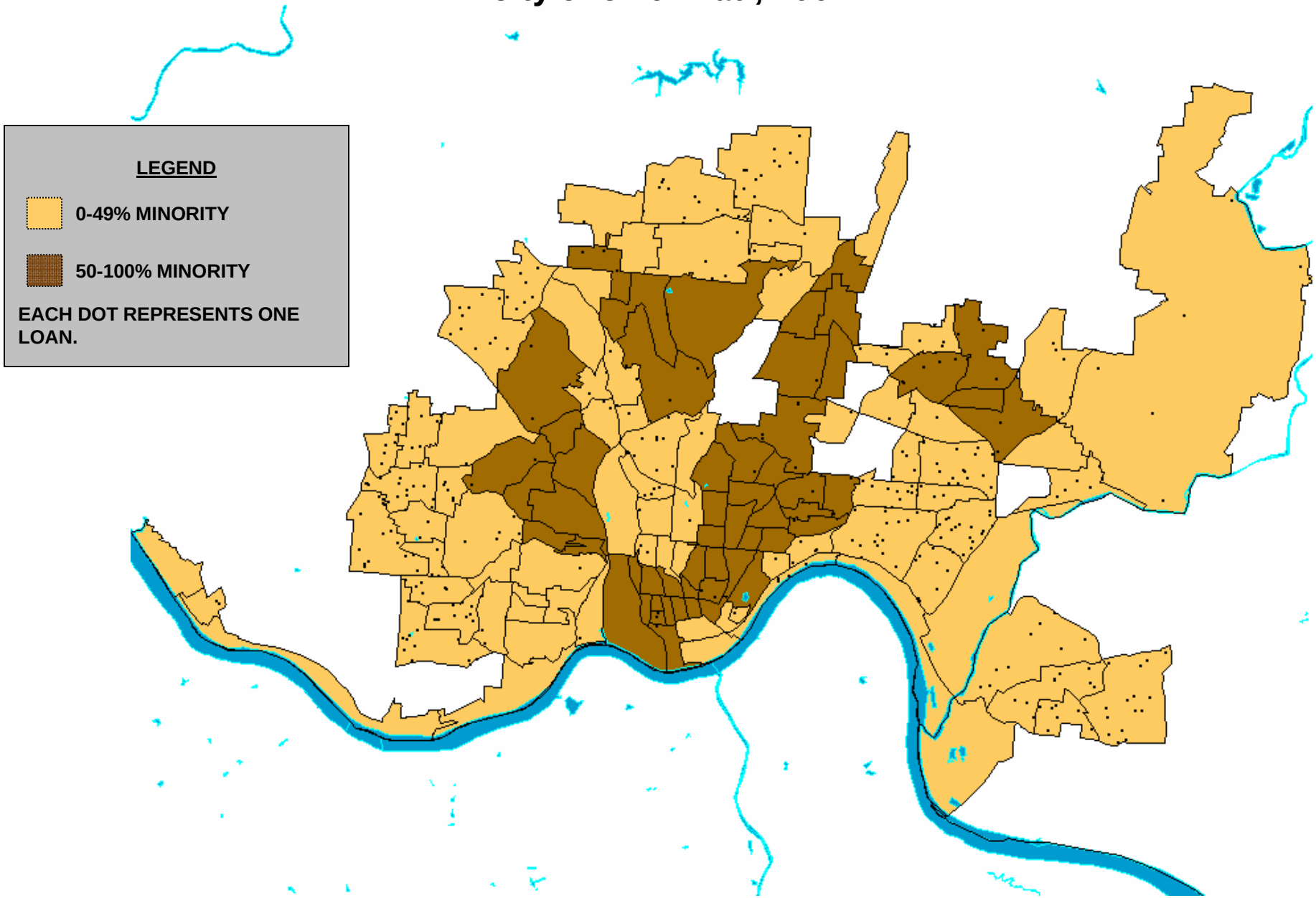
PNC Bank Home Loans by Minority Level of Census Tract

City of Cincinnati, 2004



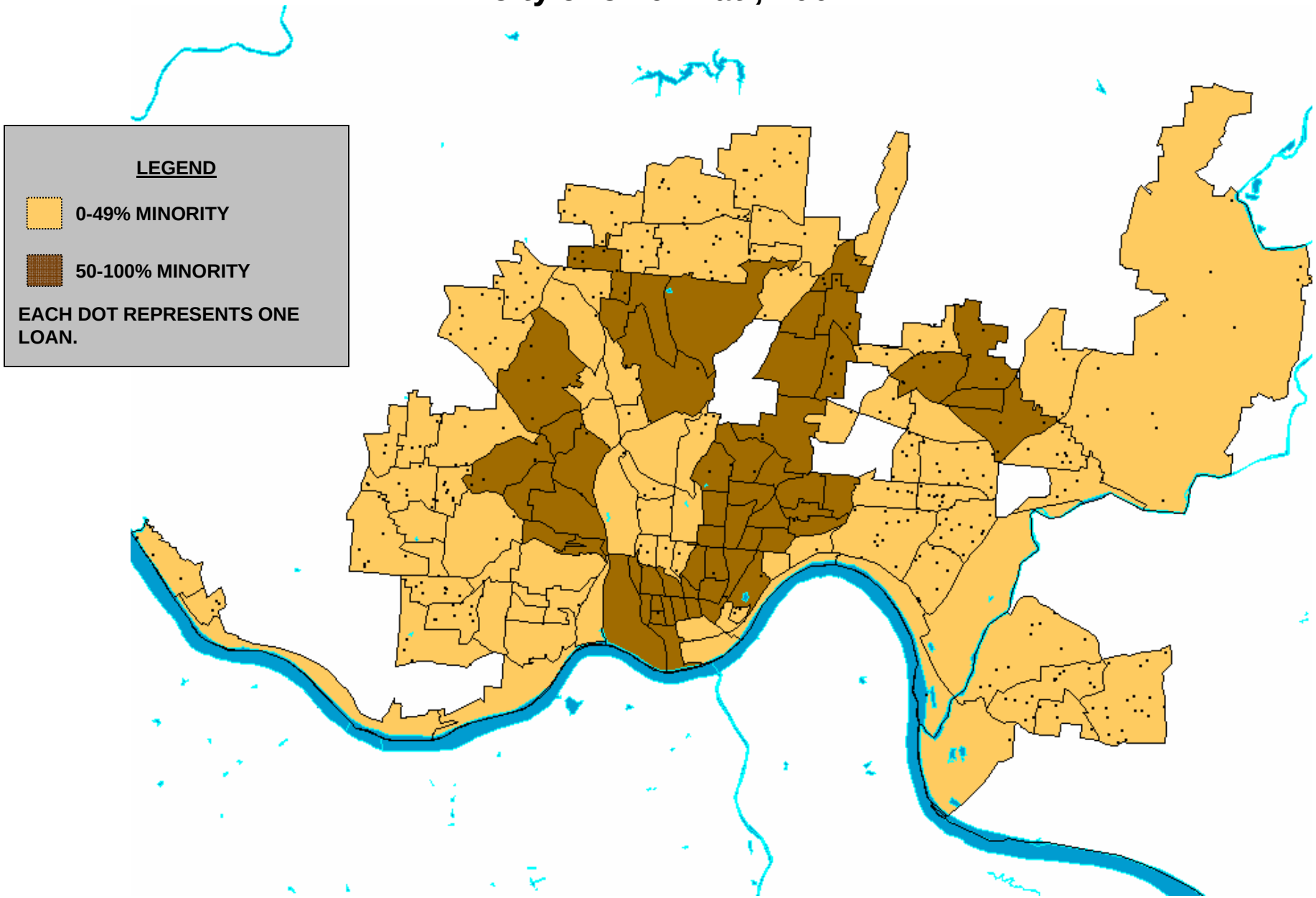
Third Federal S&L Home Loans by Minority Level of Census Tract

City of Cincinnati, 2004



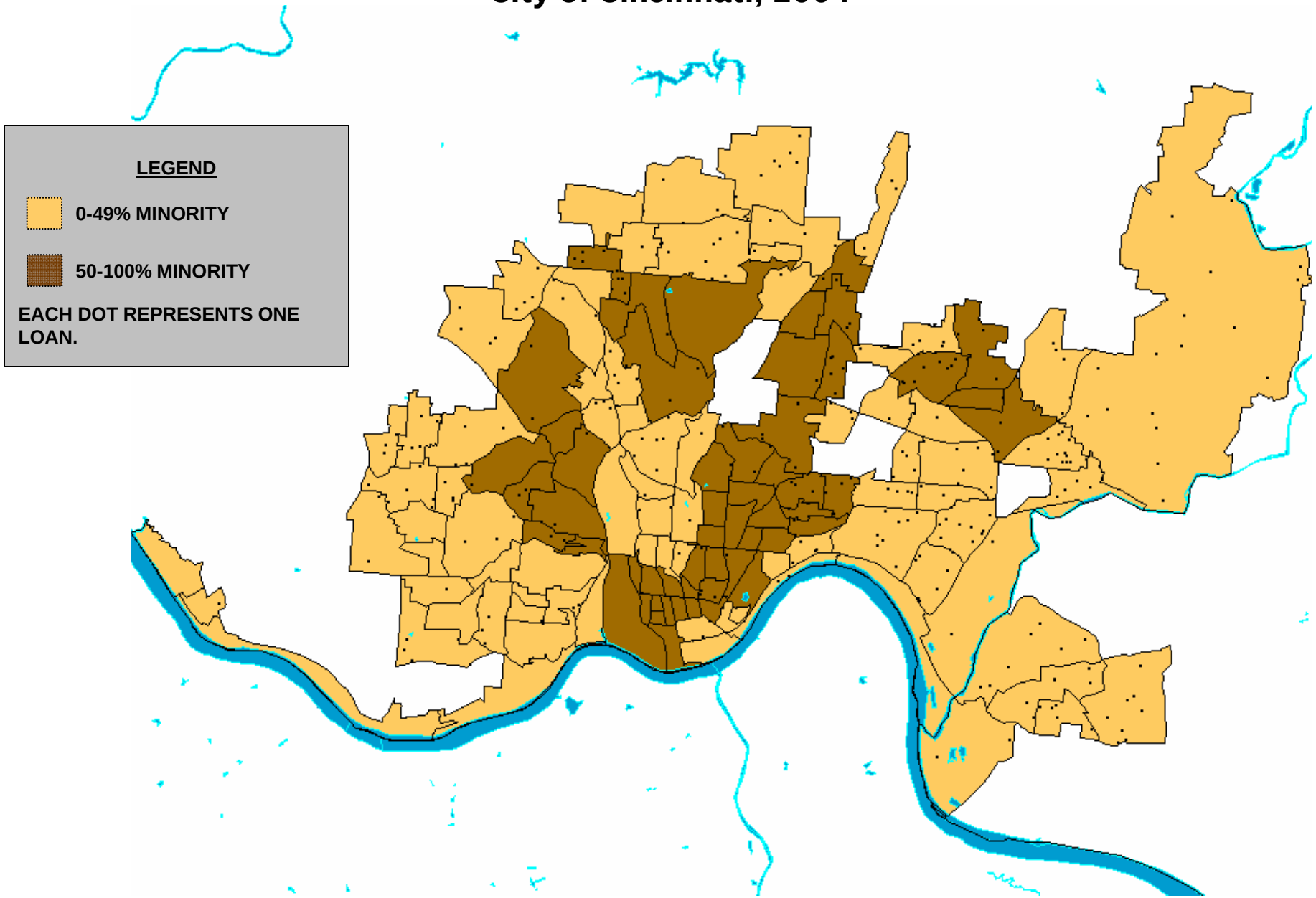
Union Savings Bank Home Loans by Minority Level of Census Tract

City of Cincinnati, 2004



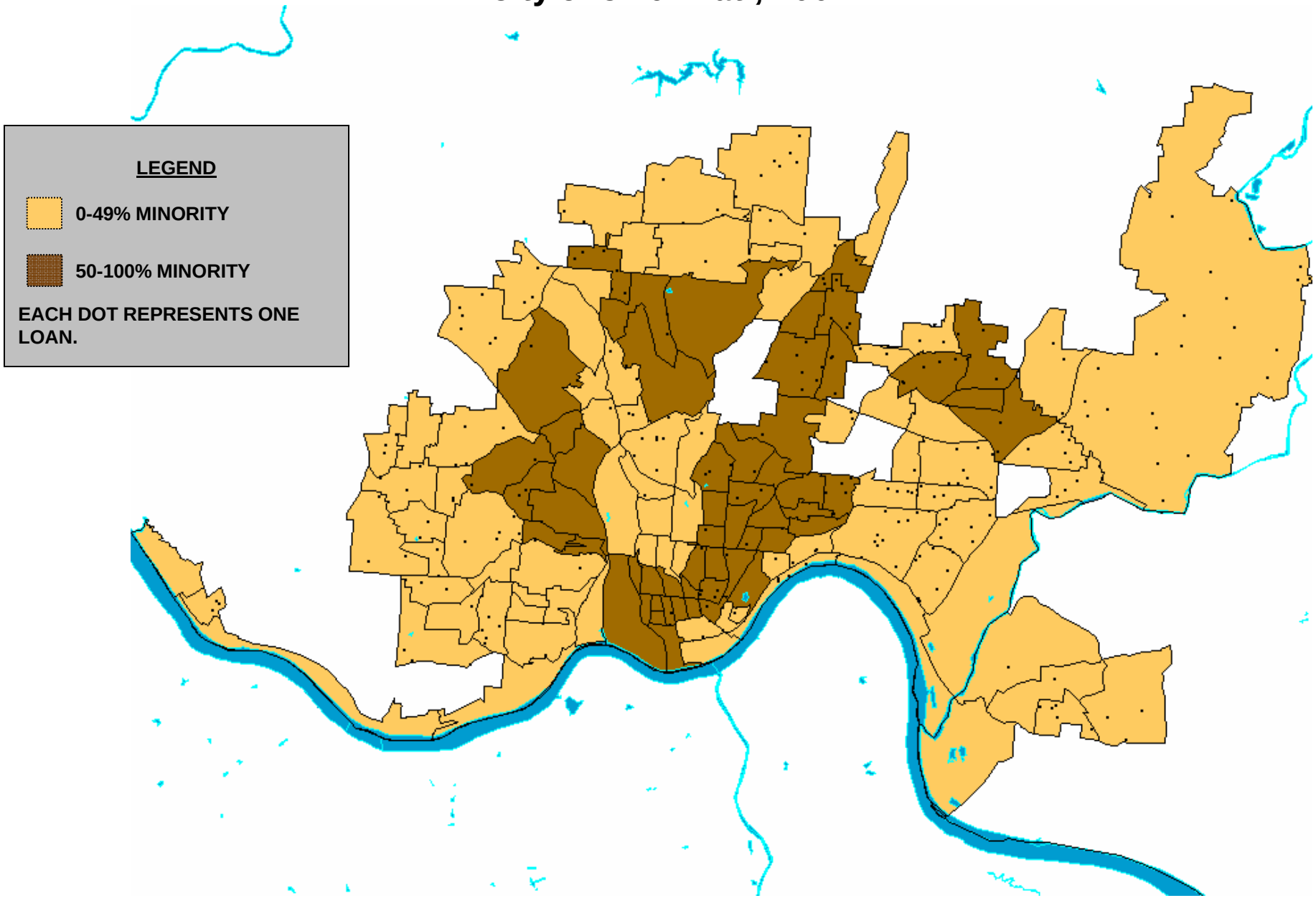
US Bank Home Loans by Minority Level of Census Tract

City of Cincinnati, 2004



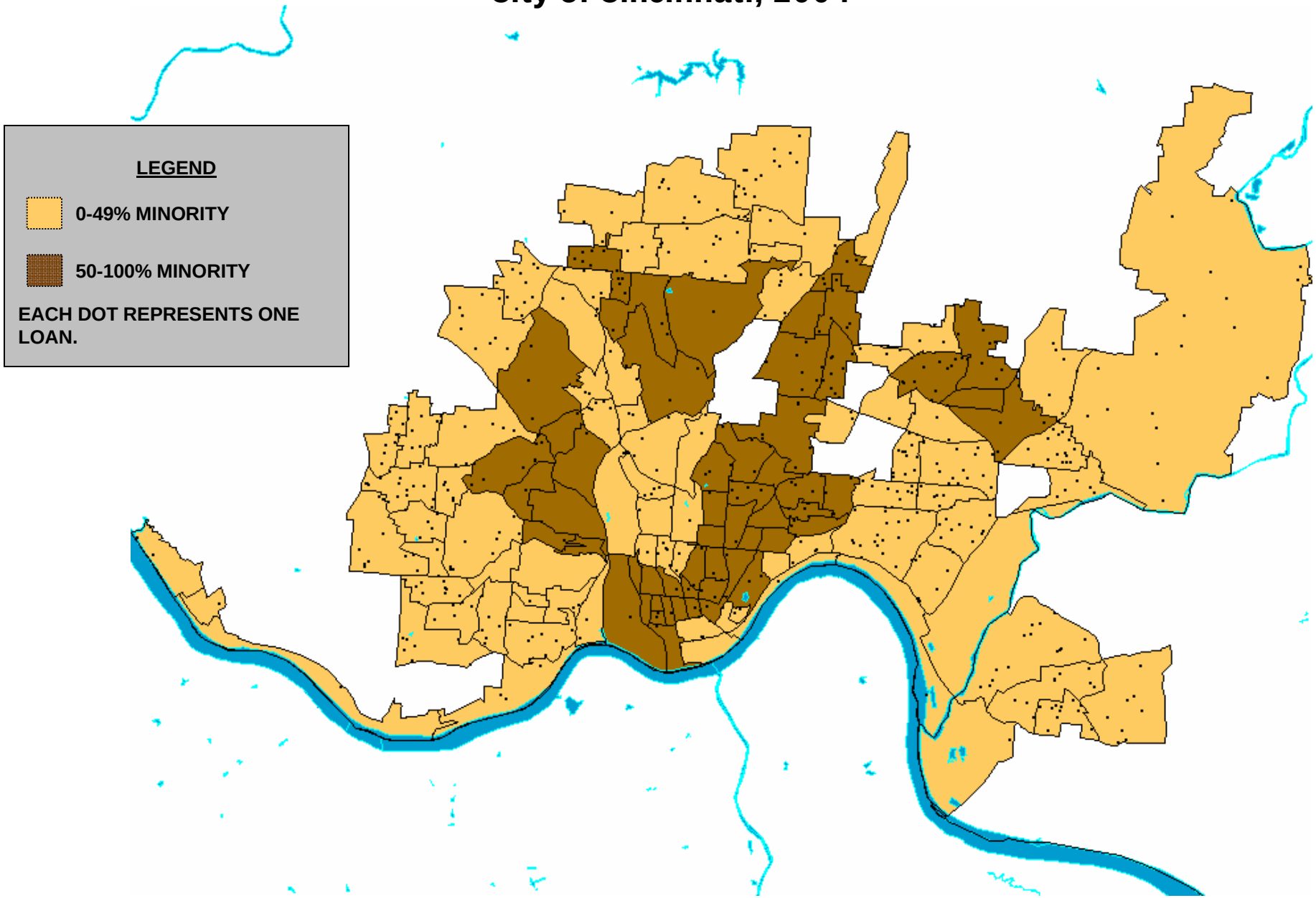
Washington Mutual Home Loans by Minority Level of Census Tract

City of Cincinnati, 2004



Wells Fargo Home Loans by Minority Level of Census Tract

City of Cincinnati, 2004

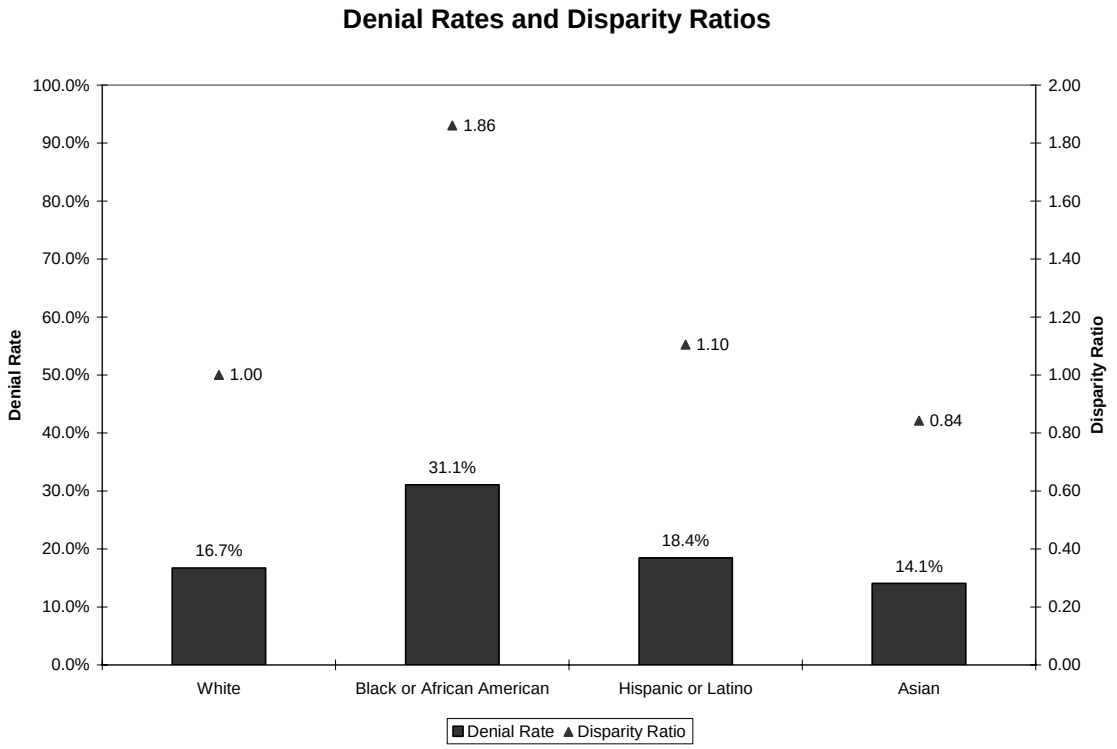


Appendix B: Charts

Appendix 1: **Charts**

Chart 1: All Single Family Lending by Race of Borrower, City of Cincinnati
Chart 2: All Single Family Lending by Race of Borrower, Suburban Cincinnati
Chart 3: All Single Family Lending by Minority Level of Census Tract, City of Cincinnati and Suburban Cincinnati
Chart 4: All Single Family Lending by Income of Borrower, City of Cincinnati and Suburban Cincinnati
Chart 5: All Single Family Lending by Income Level of Census Tract, City of Cincinnati and Suburban Cincinnati
Chart 6: All Single Family Lending by Gender, City of Cincinnati and Suburban Cincinnati
Chart 7: Home Purchase Lending by Income of Borrower, City of Cincinnati
Chart 8: Home Purchase Lending by Race of Borrower, City of Cincinnati
Chart 9: Refinance Lending by Income of Borrower, City of Cincinnati
Chart 10: Refinance Lending by Race of Borrower, City of Cincinnati
Chart 11: Home Improvement Lending by Income of Borrower, City of Cincinnati
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Chart 13: All Single Family Lending Ranking Analysis, City of Cincinnati and Suburban Cincinnati
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Chart 16: Small Business Lending Ranking in the City of Cincinnati
Chart 17: Bank Branch Analysis in the City of Cincinnati, 2004

Chart 1: All Single Family Lending by Race of Borrower, City of Cincinnati



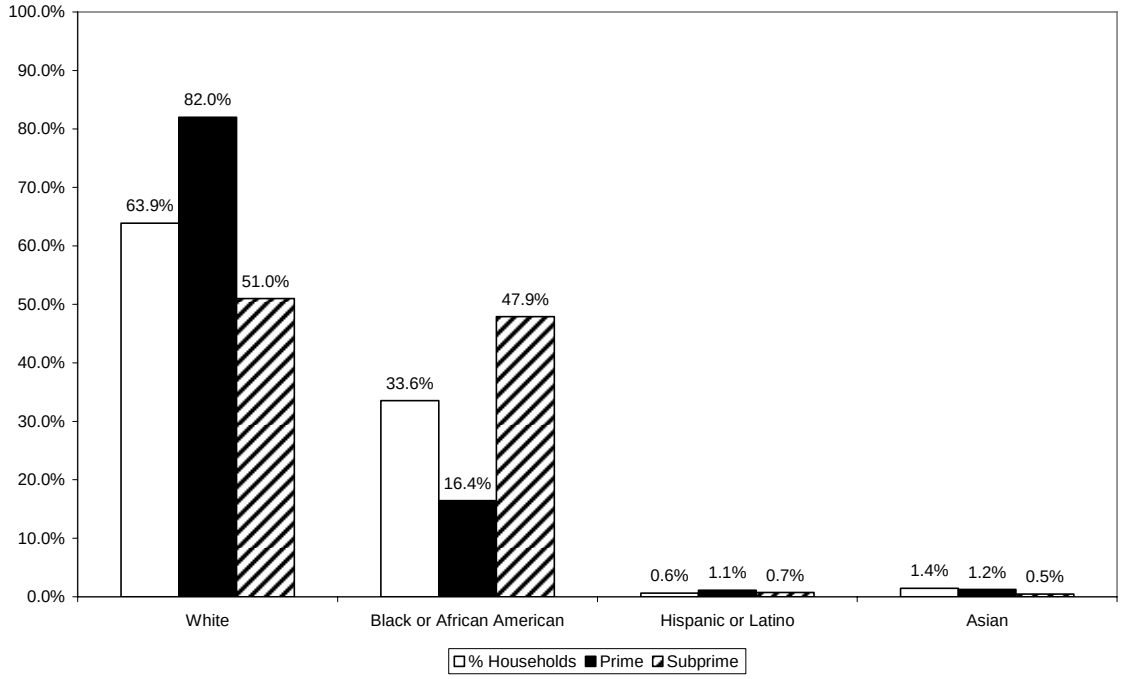


Chart 1: All Single Family Lending by Race of Borrower, City of Cincinnati, cont.

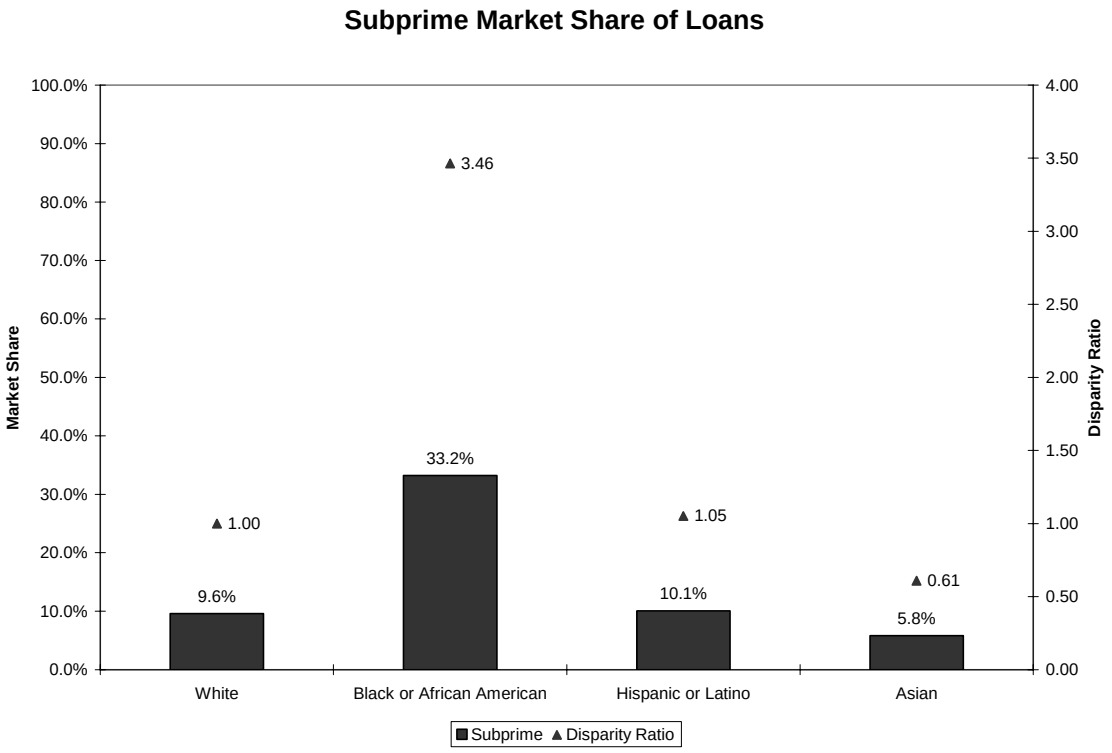
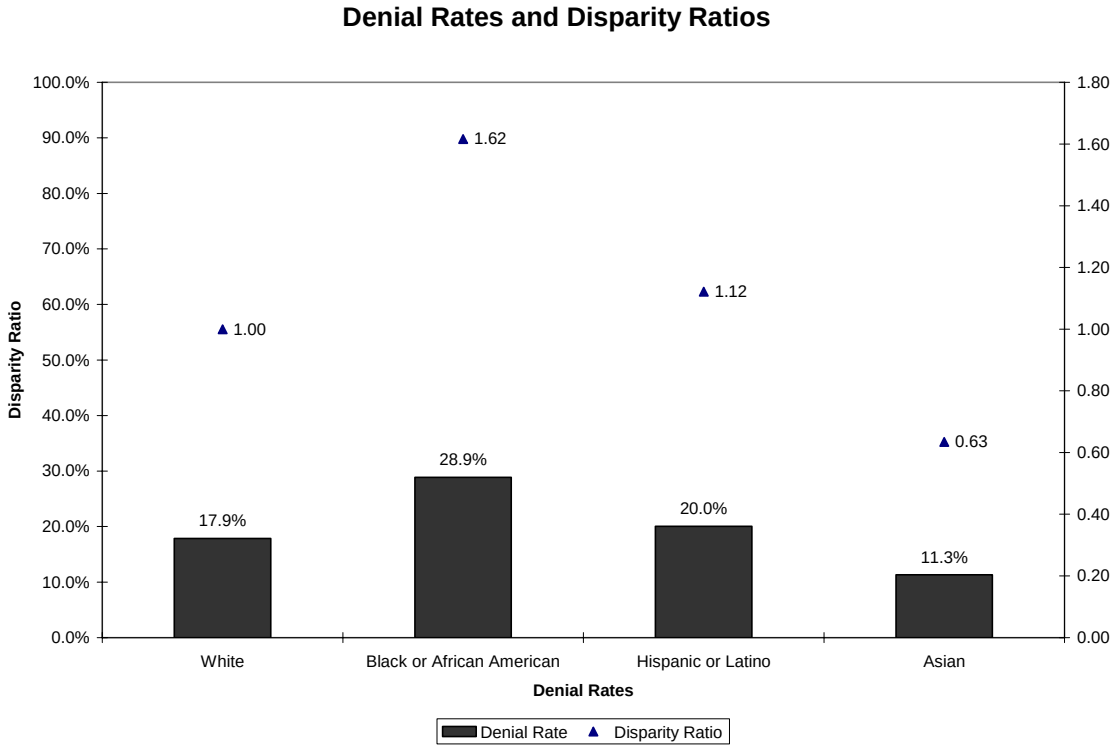


Chart 2: All Single Family Lending by Race of Borrower, Suburban Cincinnati



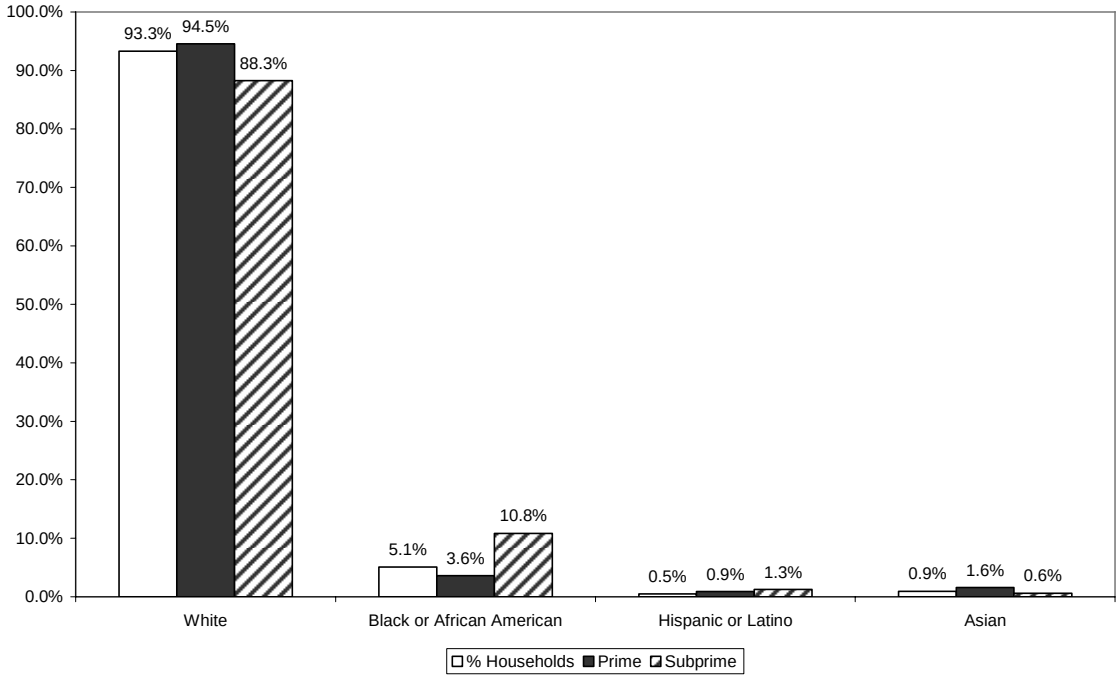


Chart 2: All Single Family Lending by Race of Borrower, Suburban Cincinnati, cont.

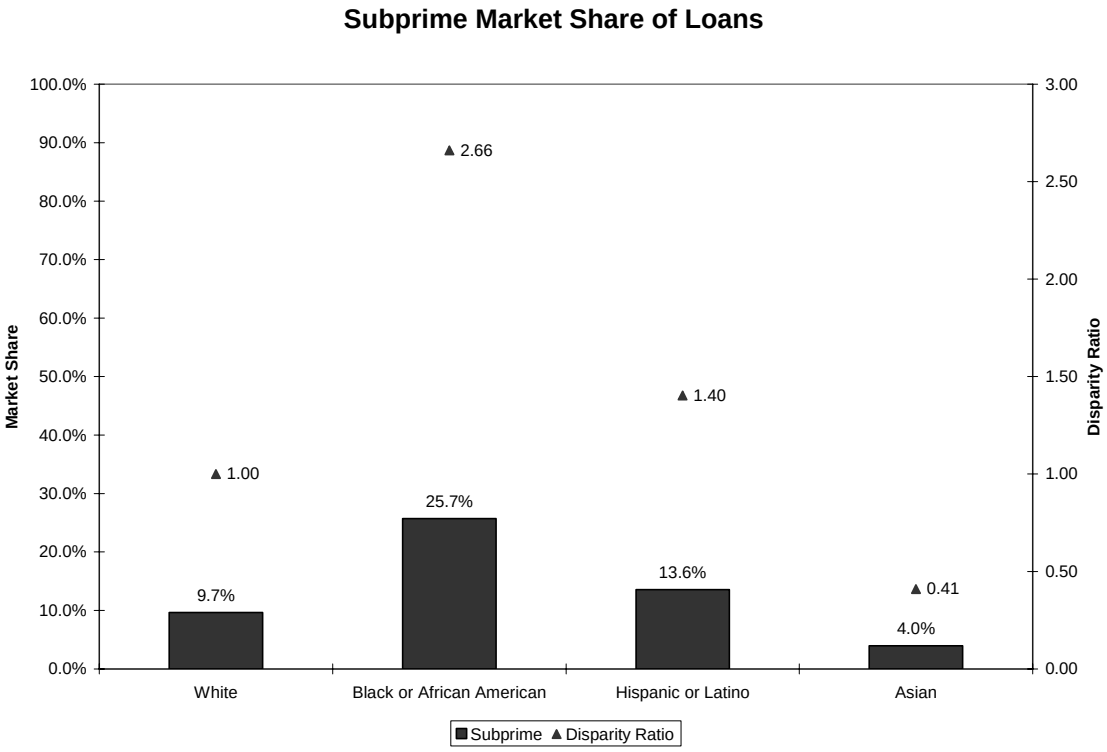
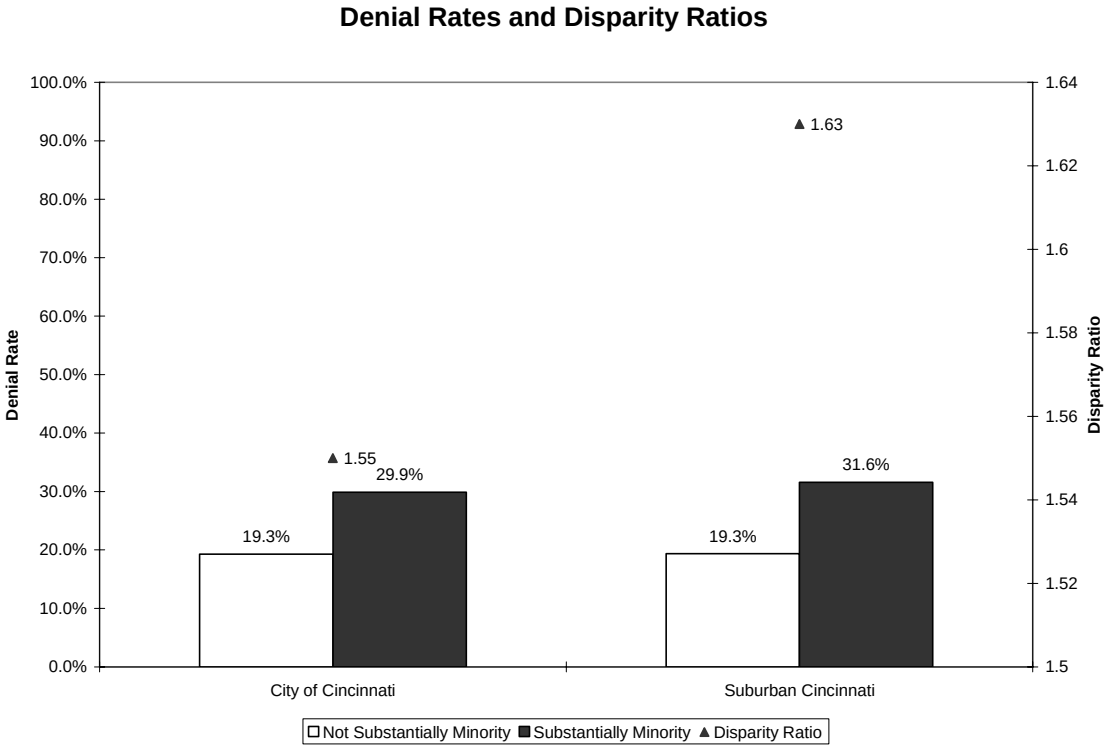


Chart 3: All Single Family Lending by Minority Level of Census Tract, City of Cincinnati and Suburban Cincinnati



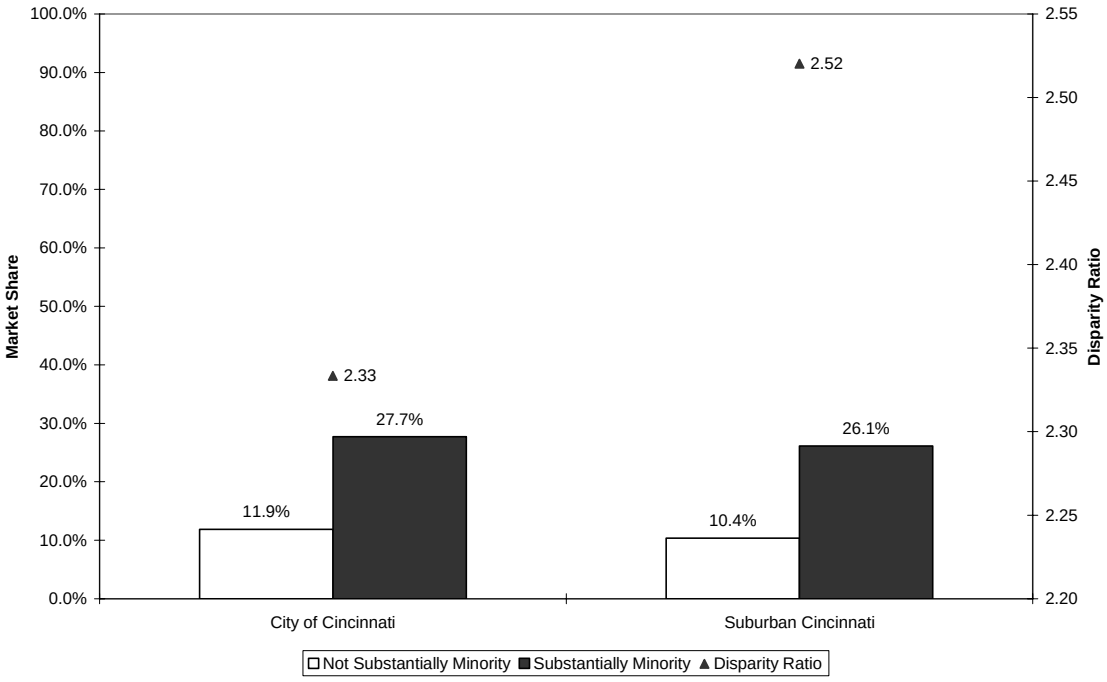
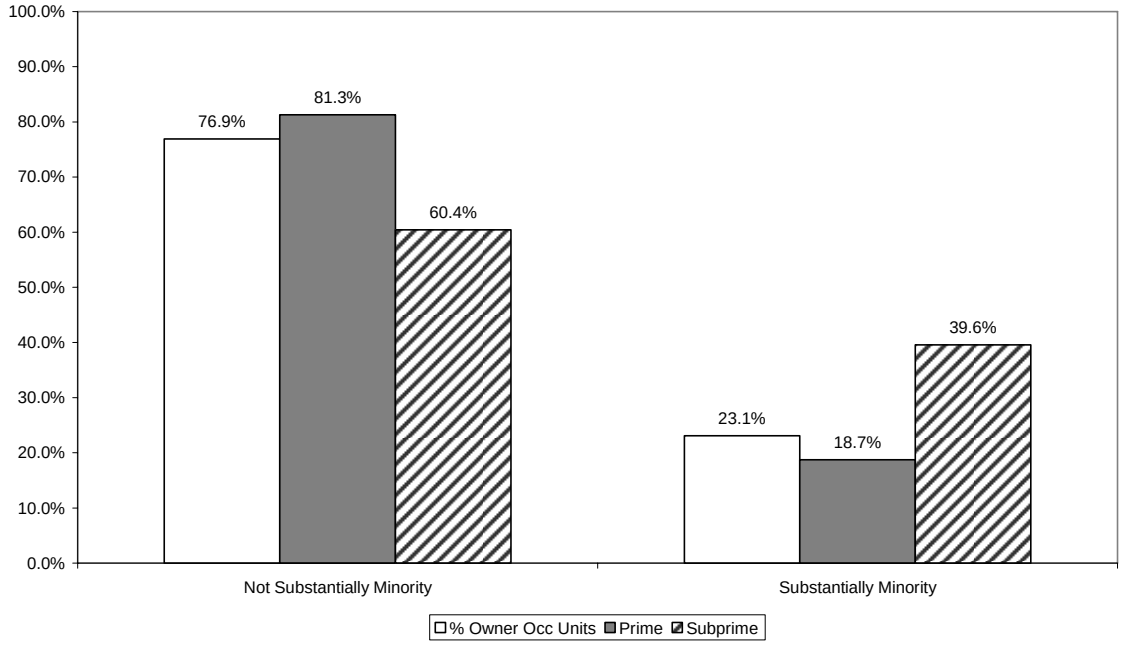


Chart 3: All Single Family Lending by Minority Level of Census Tract, City of Cincinnati and Suburban Cincinnati, cont.

Percent of Loans Compared to Percent of Owner Occupied Units, City of Cincinnati



Percent of Loans Compared to Percent of Owner Occupied Units, Suburban Cincinnati

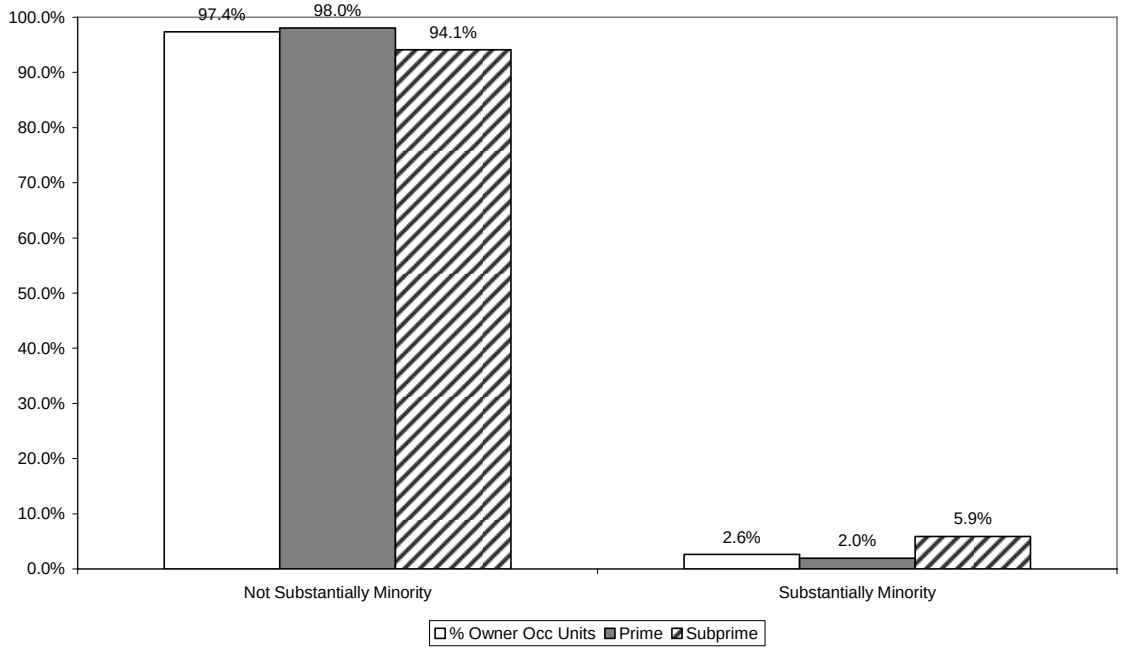
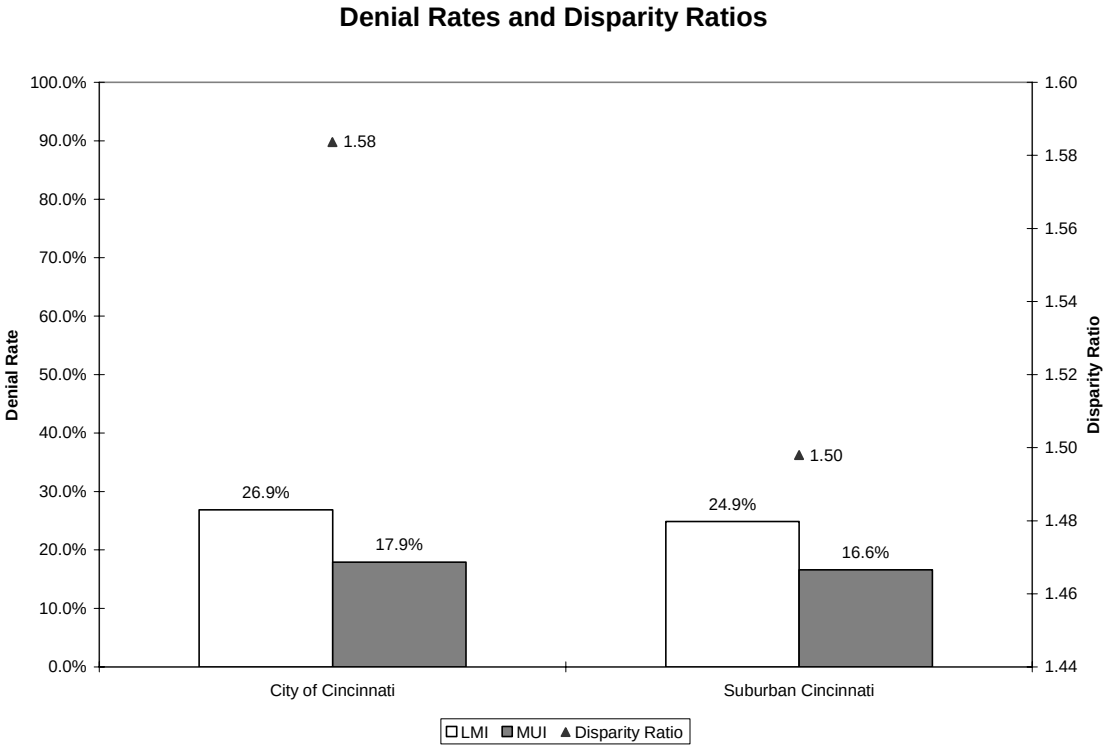


Chart 4: All Single Family Lending by Income of Borrower, City of Cincinnati and Suburban Cincinnati



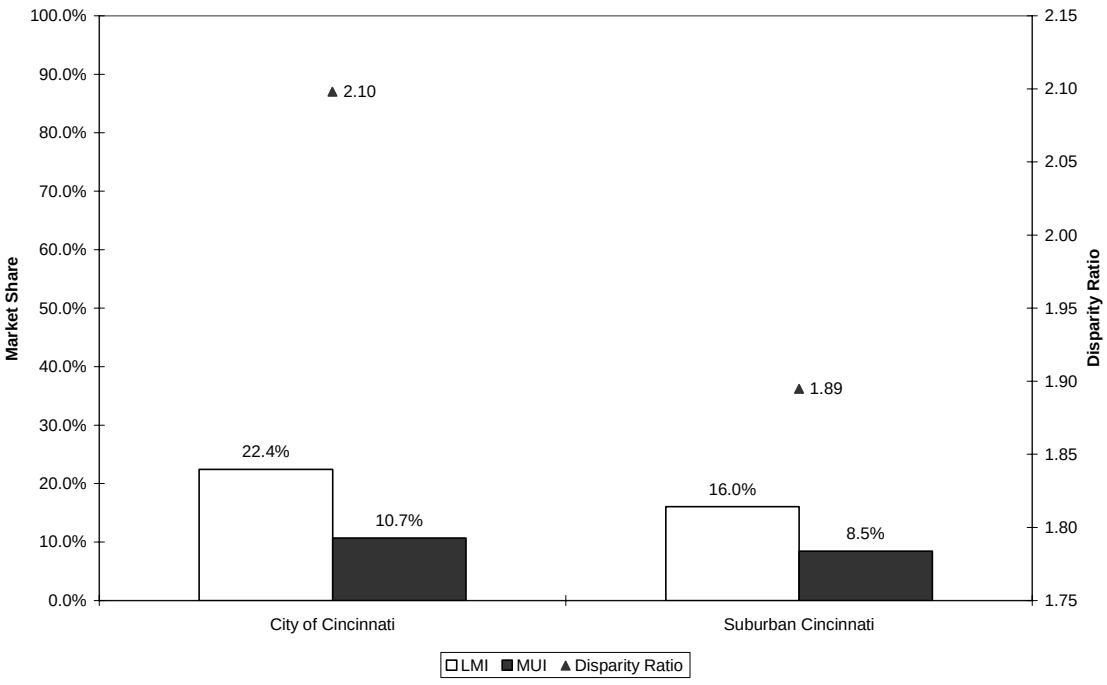
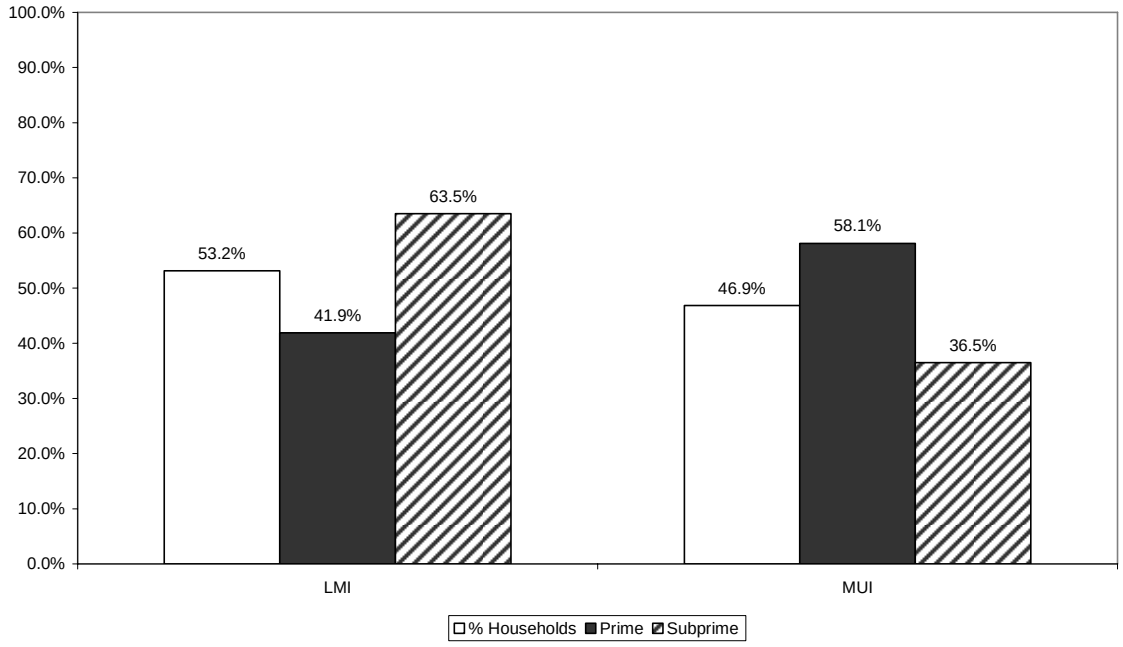


Chart 4: All Single Family Lending by Income of Borrower, City of Cincinnati and Suburban Cincinnati, cont.

Percent of Loans Compared to Percent of Households, City of Cincinnati



Percent of Loans Compared to Percent of Households, Suburban Cincinnati

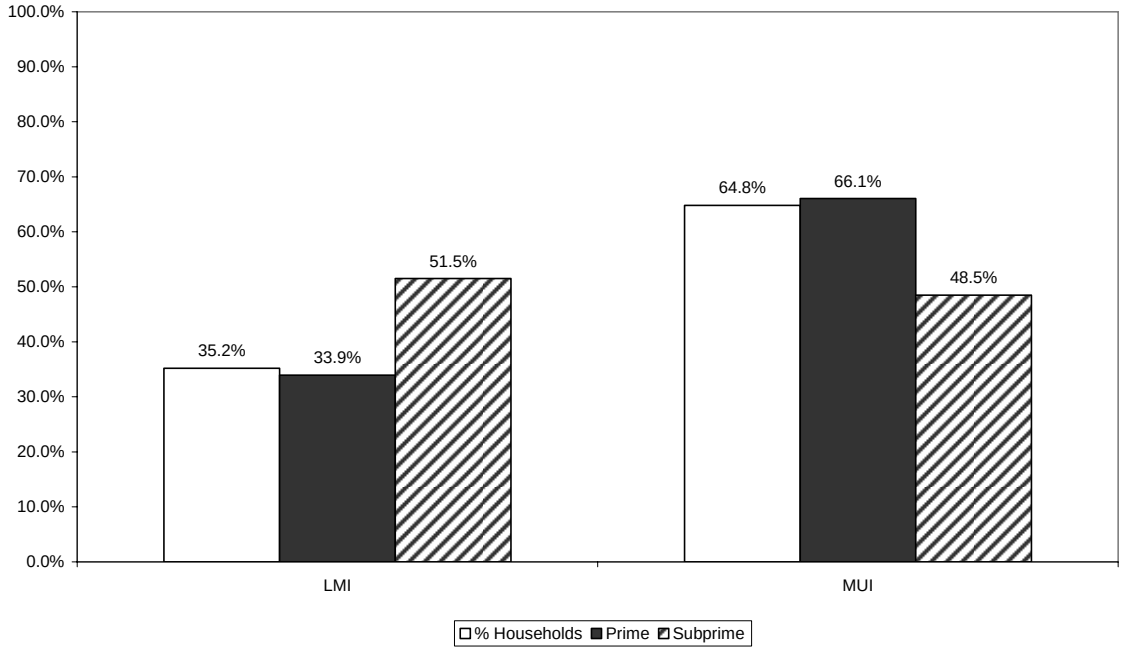
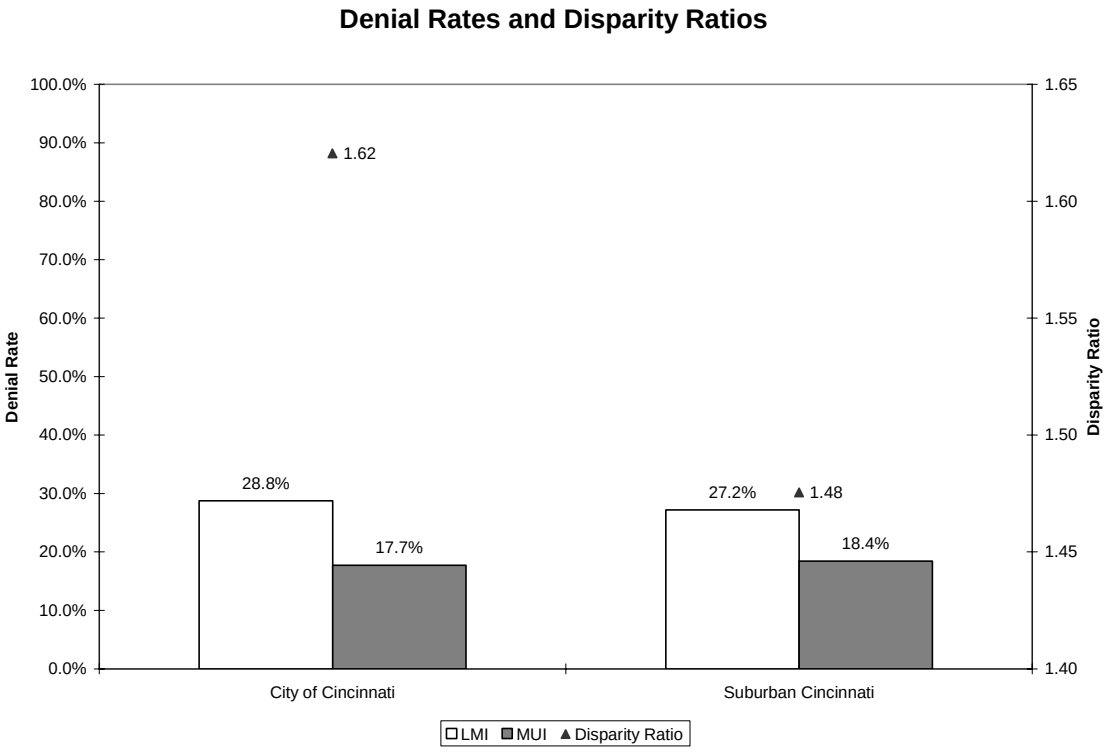


Chart 5: All Single Family Lending by Income Level of Census Tract, City of Cincinnati and Suburban Cincinnati



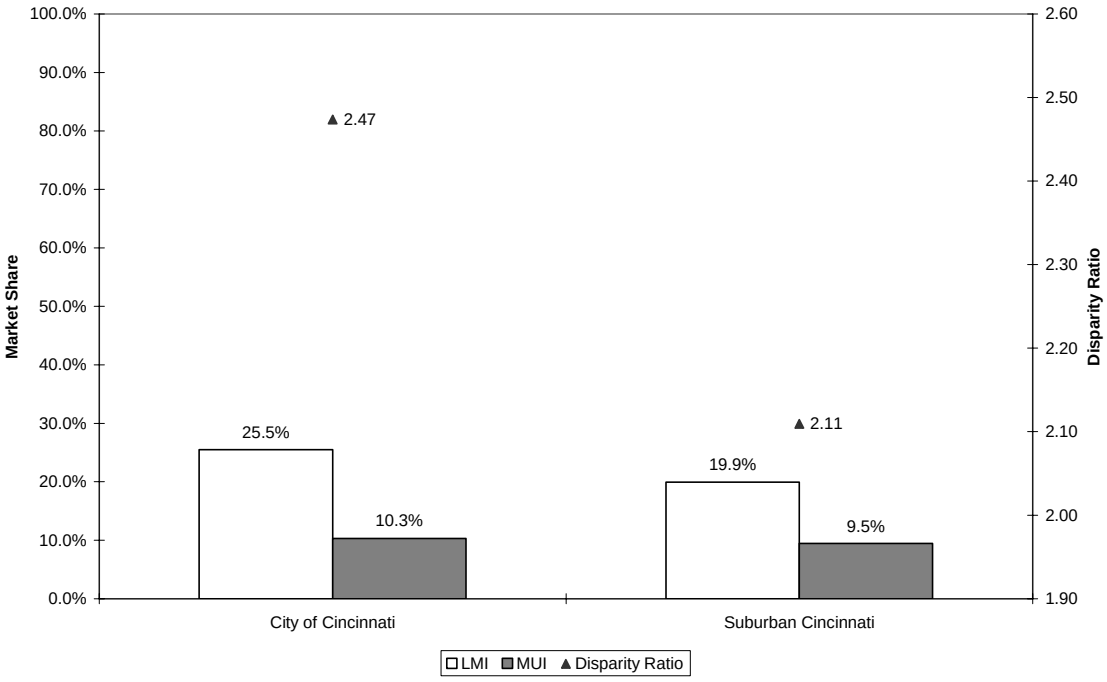
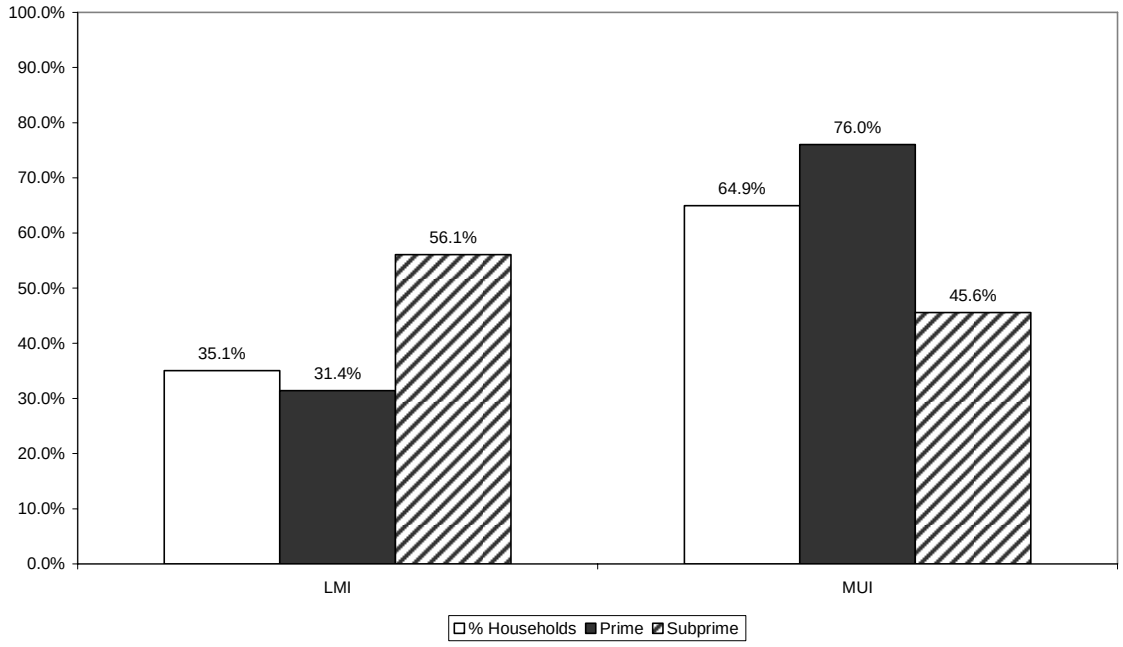


Chart 5: All Single Family Lending by Income Level of Census Tract, City of Cincinnati and Suburban Cincinnati, cont.

Percent of Loans Compared to Percent of Households, City of Cincinnati



Percent of Loans Compared to Percent of Households, Suburban Cincinnati

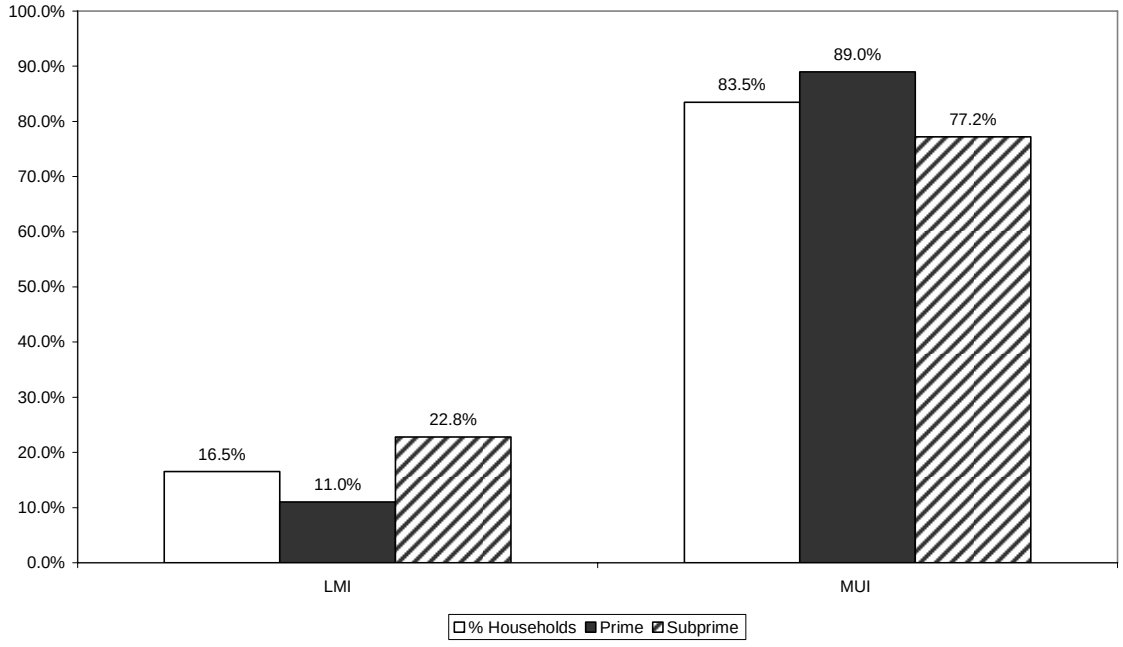
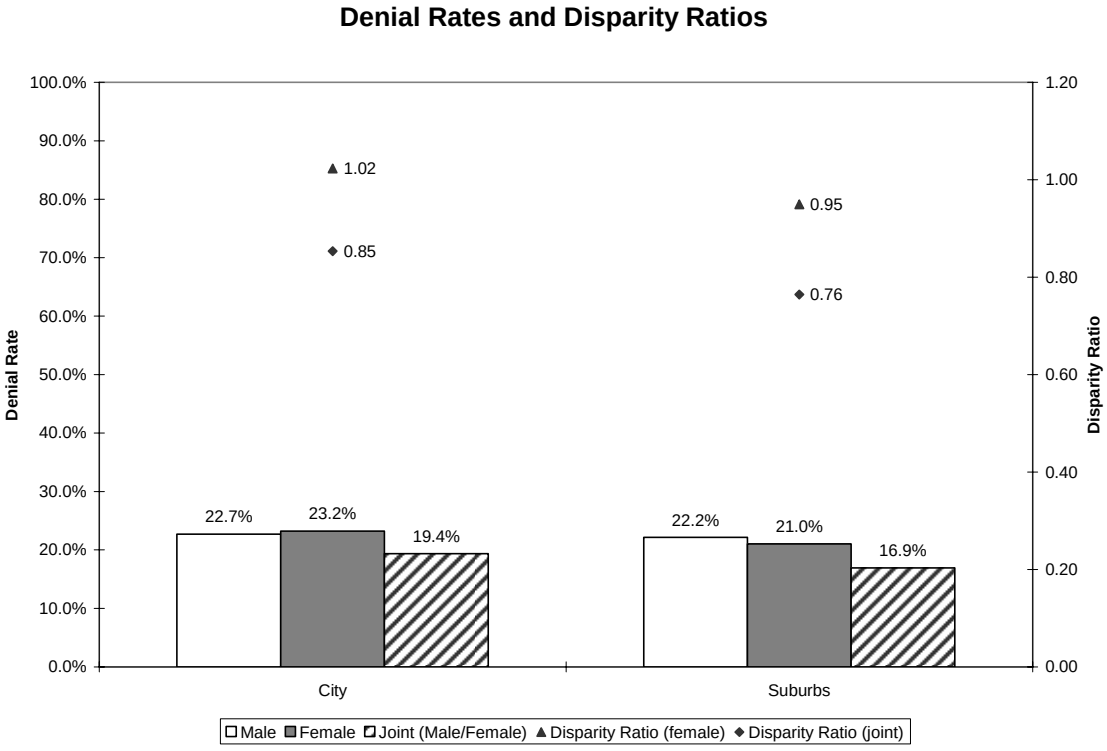


Chart 6: All Single Family Lending by Gender, City of Cincinnati and Suburban Cincinnati



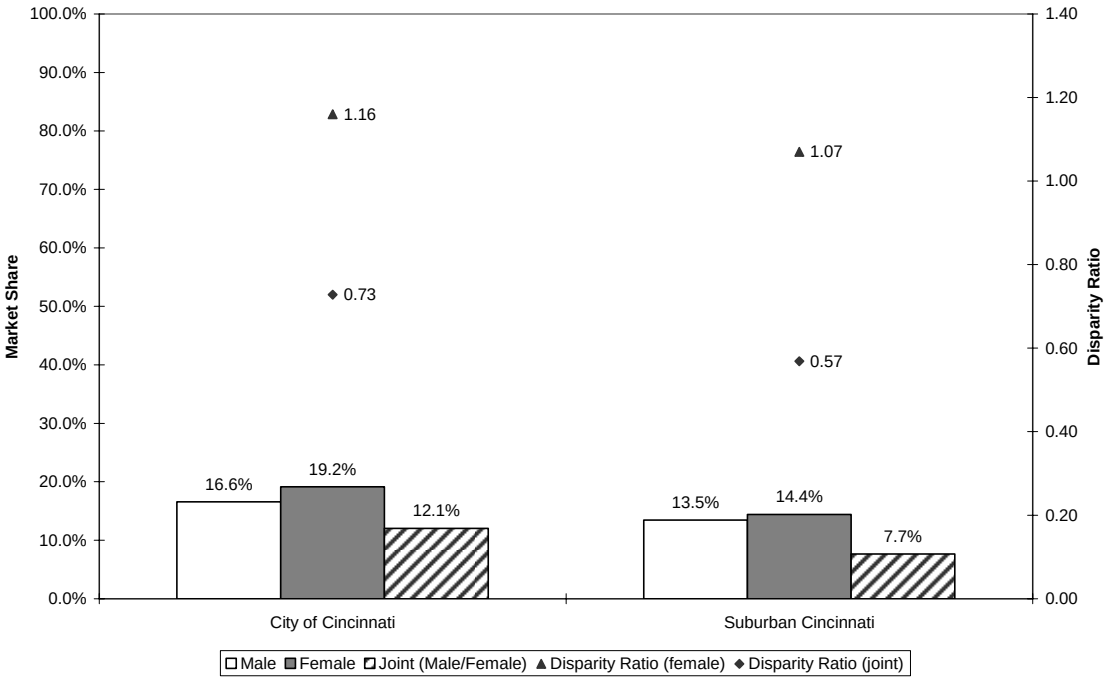
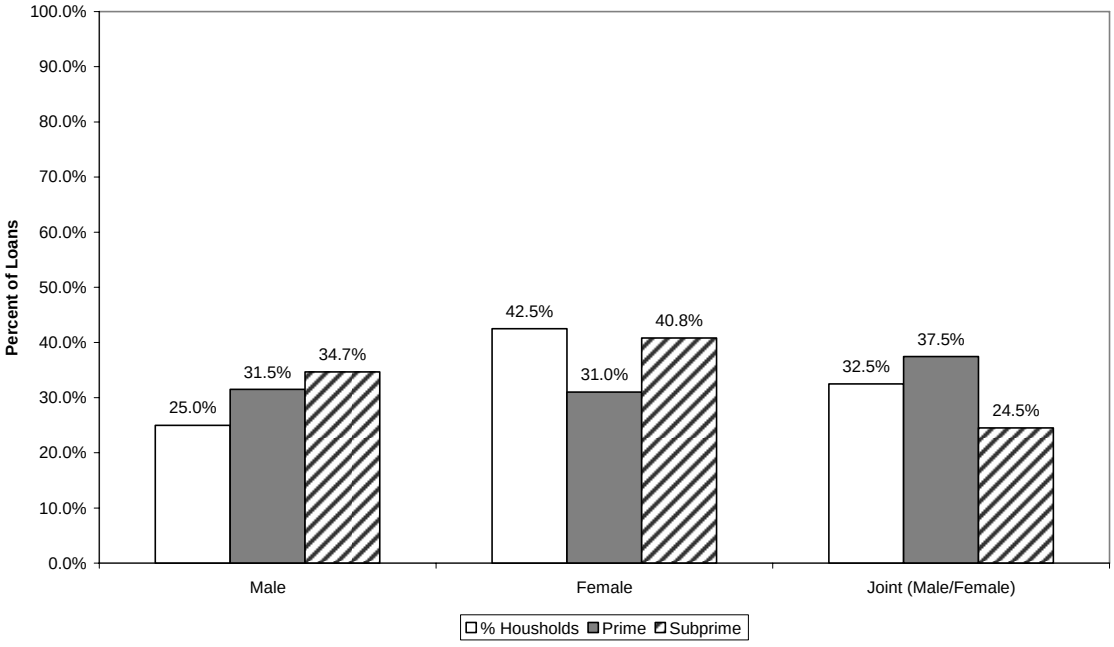


Chart 6: All Single Family Lending by Gender, City of Cincinnati and Suburban Cincinnati, cont.

Percent of Loans Compared to Percent of Households, City of Cincinnati



Percent of Loans Compared to Percent of Households, Suburban Cincinnati

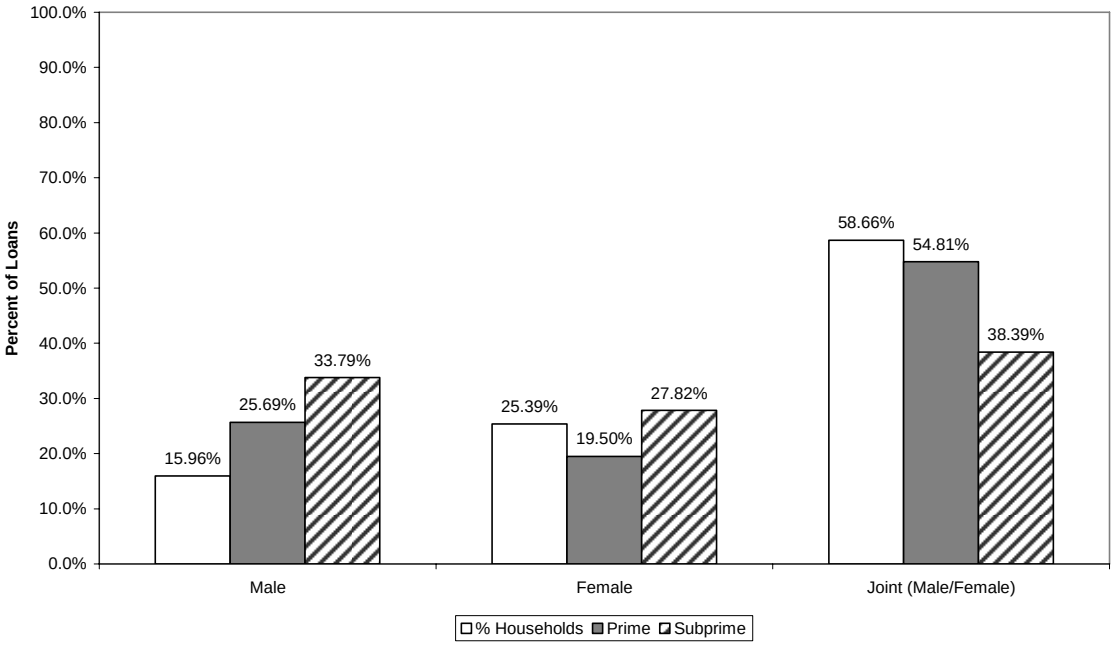
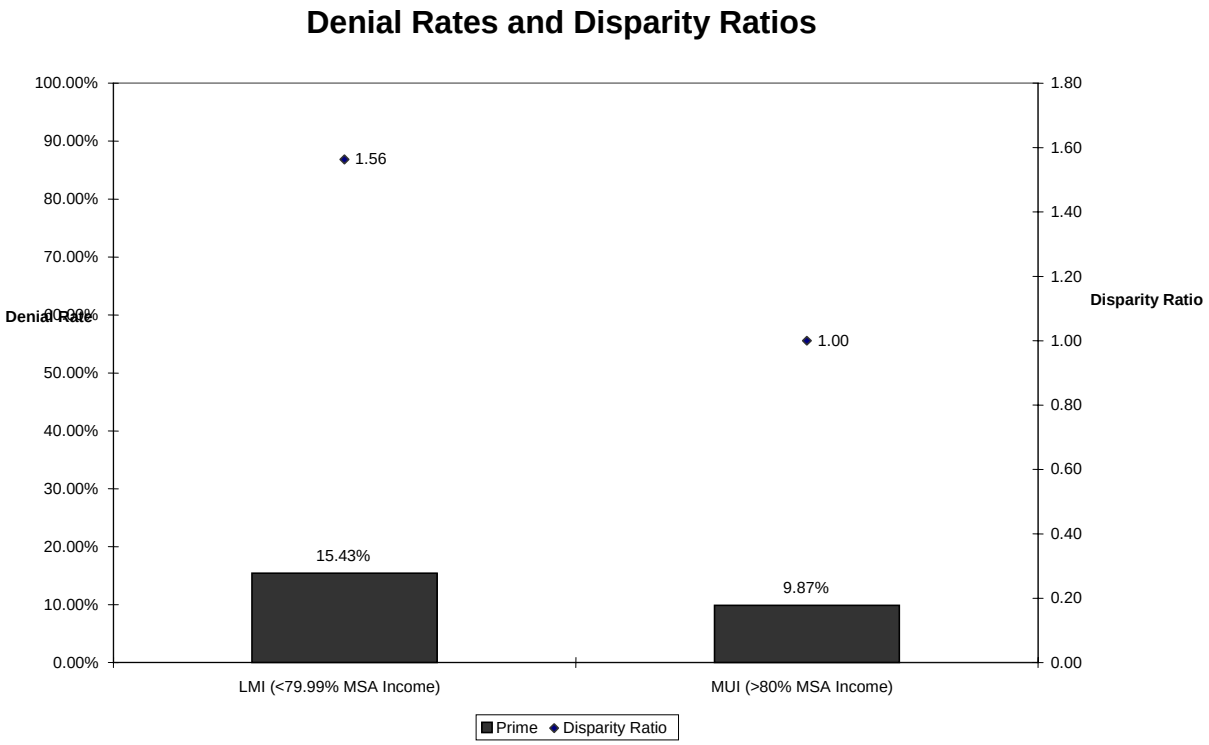


Chart 7: Home Purchase Lending by Income of Borrower, City of Cincinnati



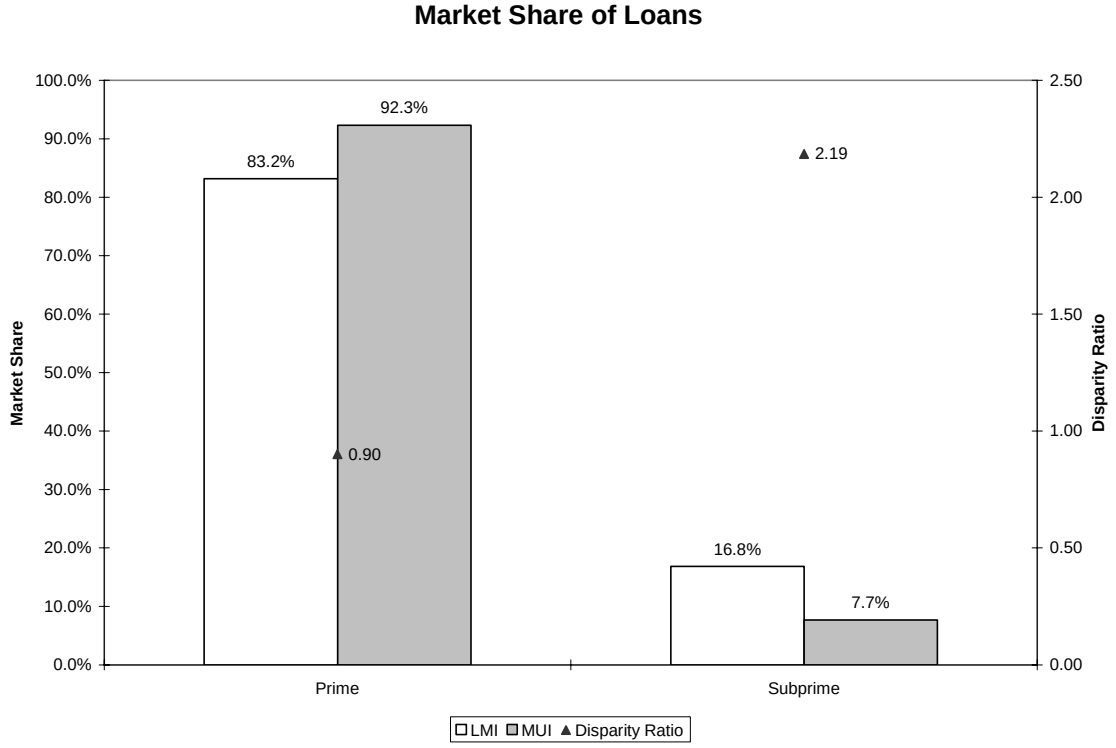


Chart 7: Home Purchase Lending by Income of Borrower, City of Cincinnati, cont.

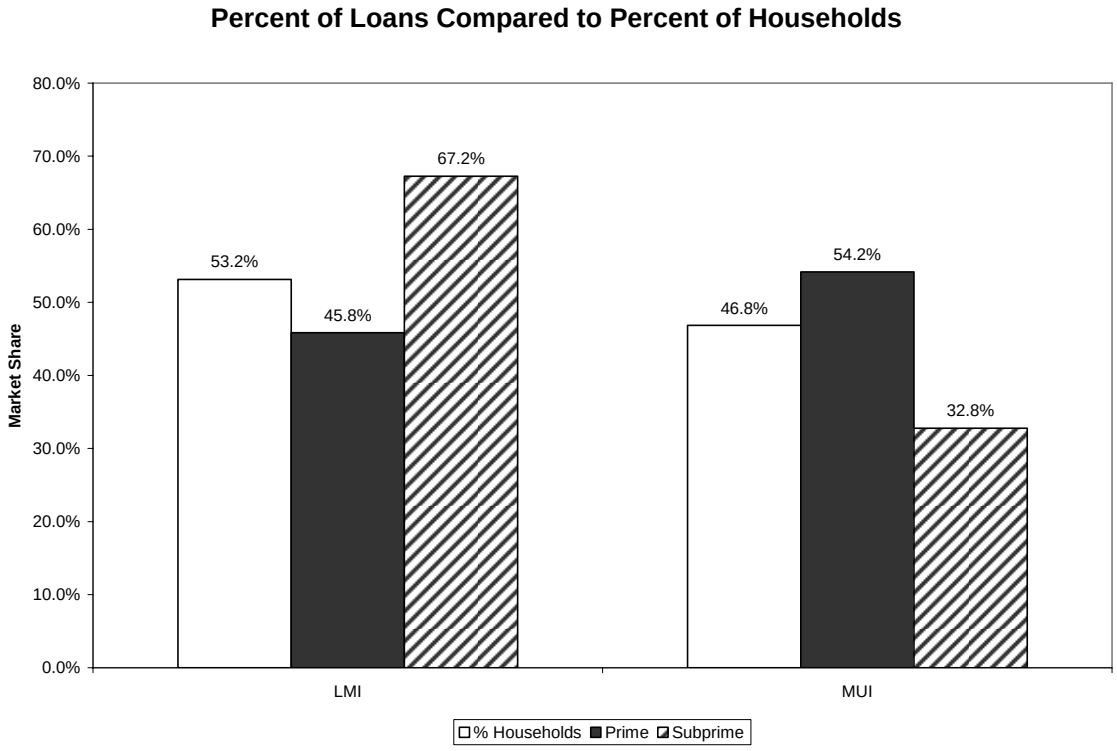
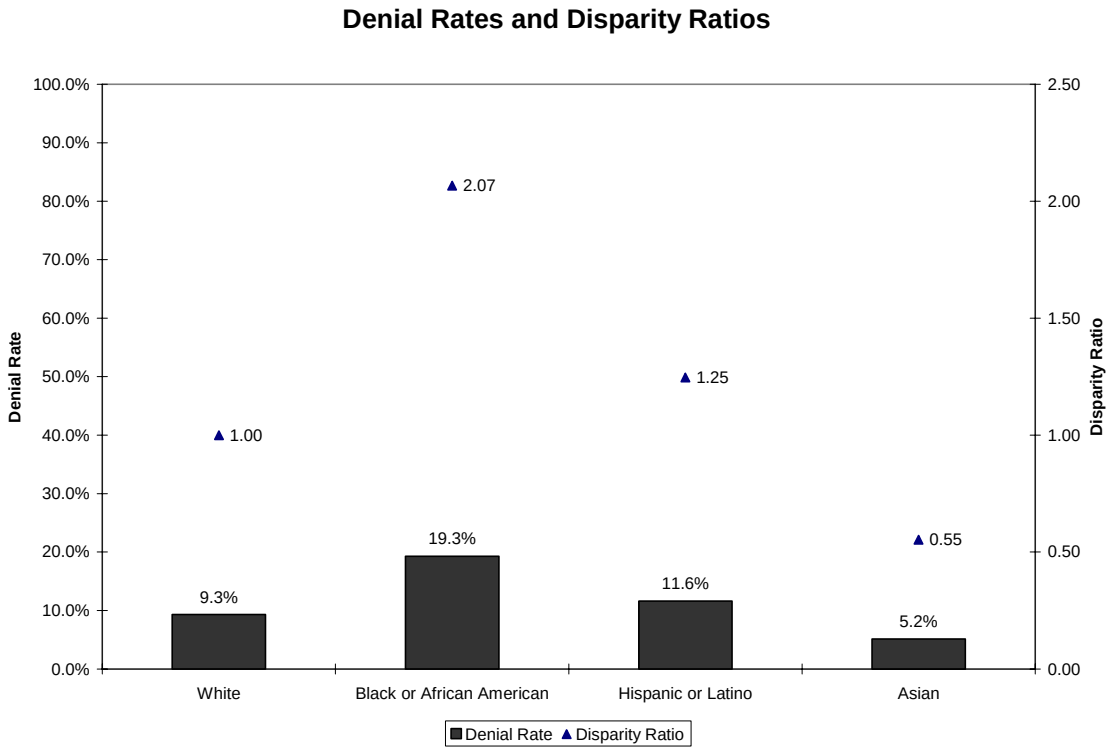


Chart 8: Home Purchase Lending by Race of Borrower, City of Cincinnati



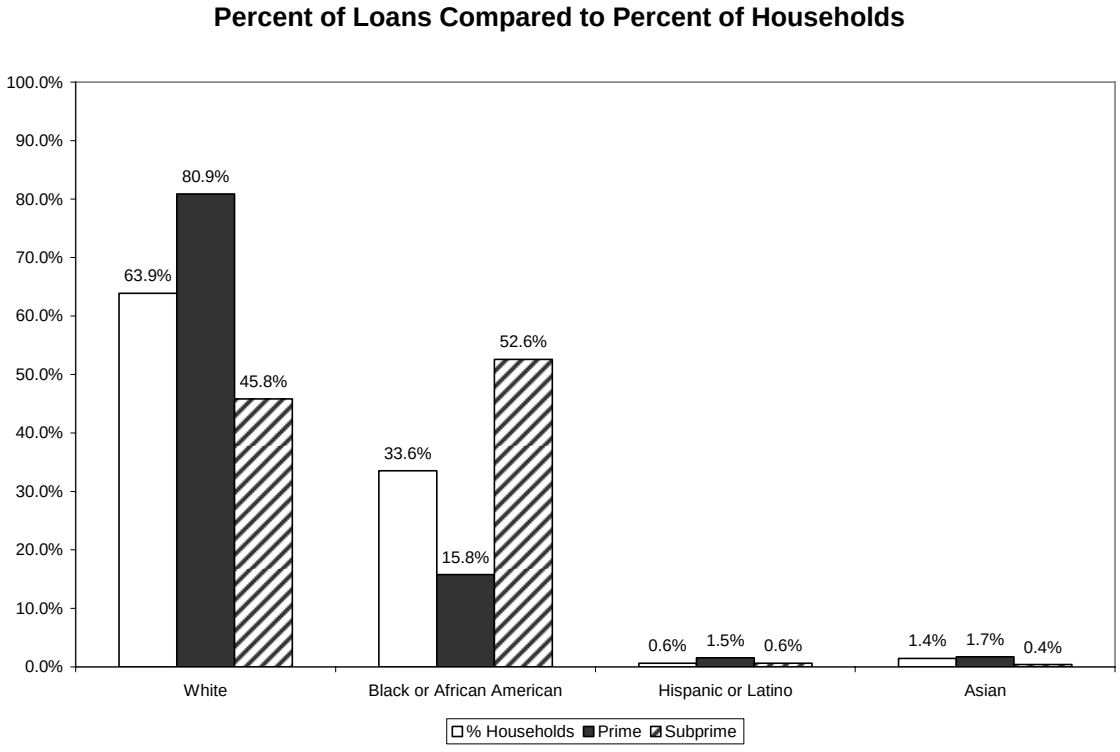


Chart 8: Home Purchase Lending by Race of Borrower, City of Cincinnati, cont.

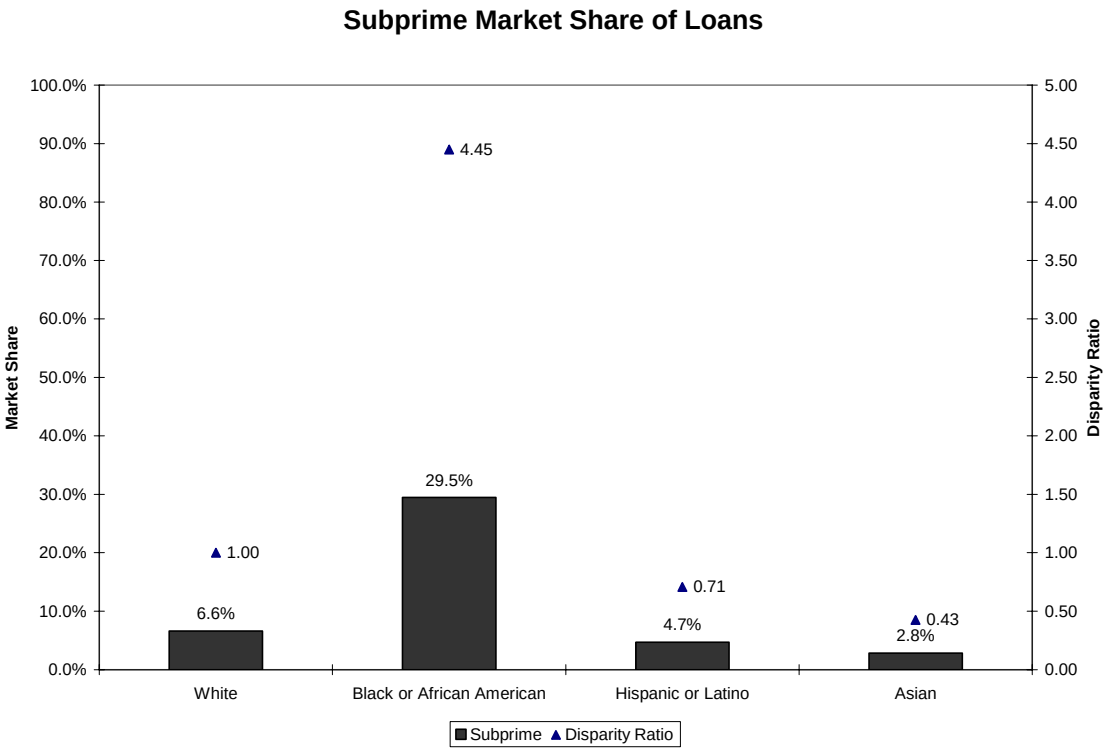
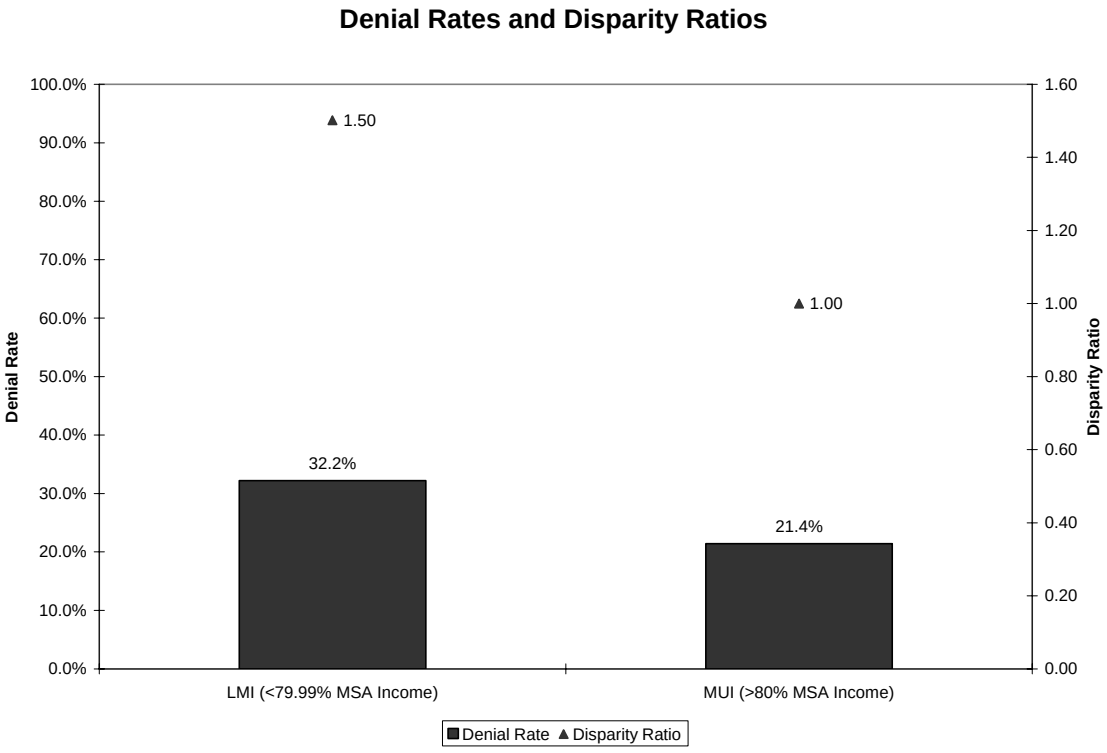


Chart 9: Refinance Lending by Income of Borrower, City of Cincinnati



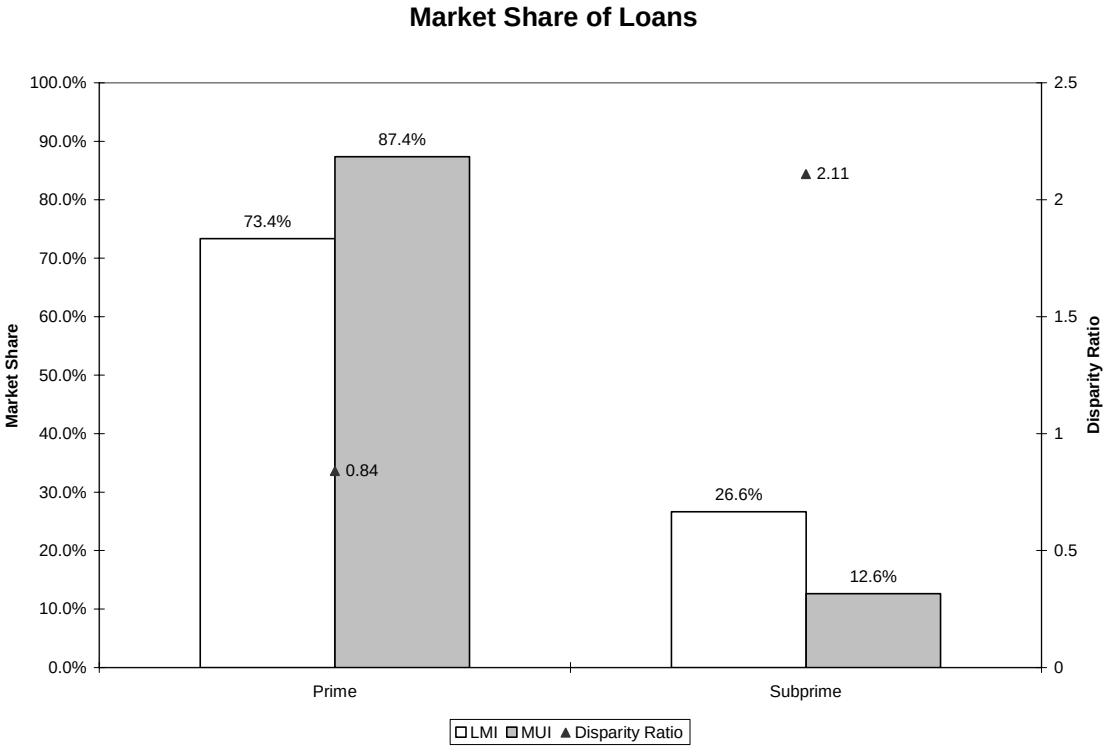


Chart 9: Refinance Lending by Income of Borrower, City of Cincinnati, cont.

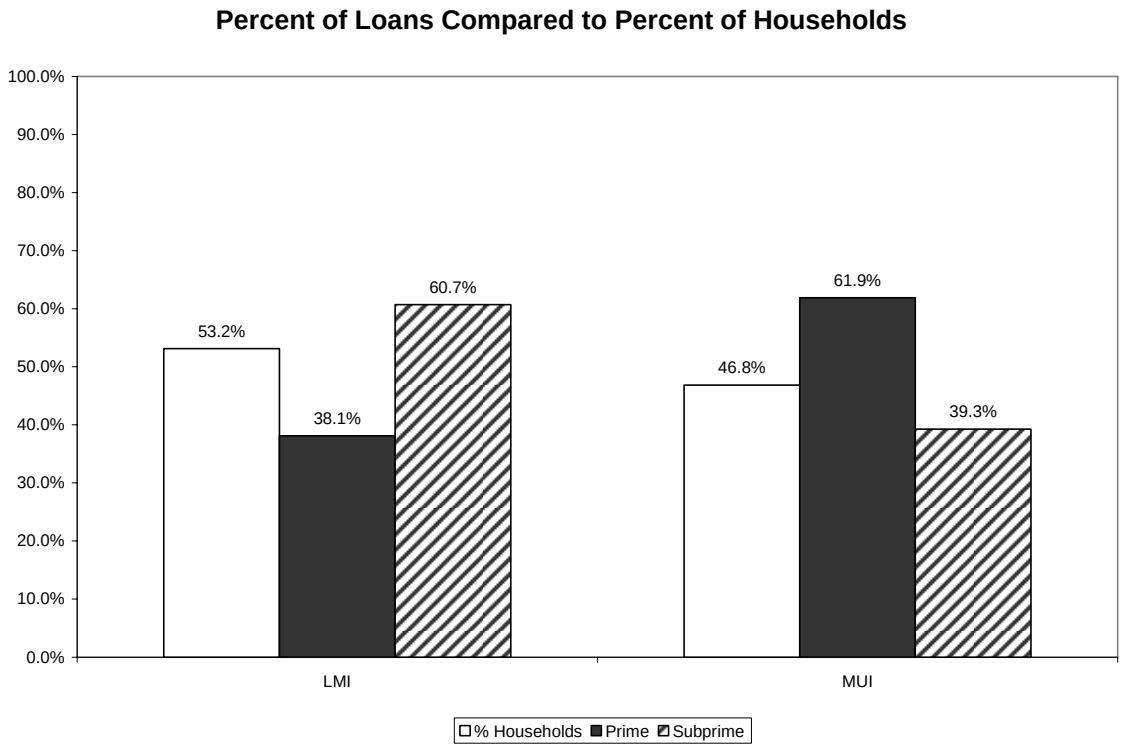
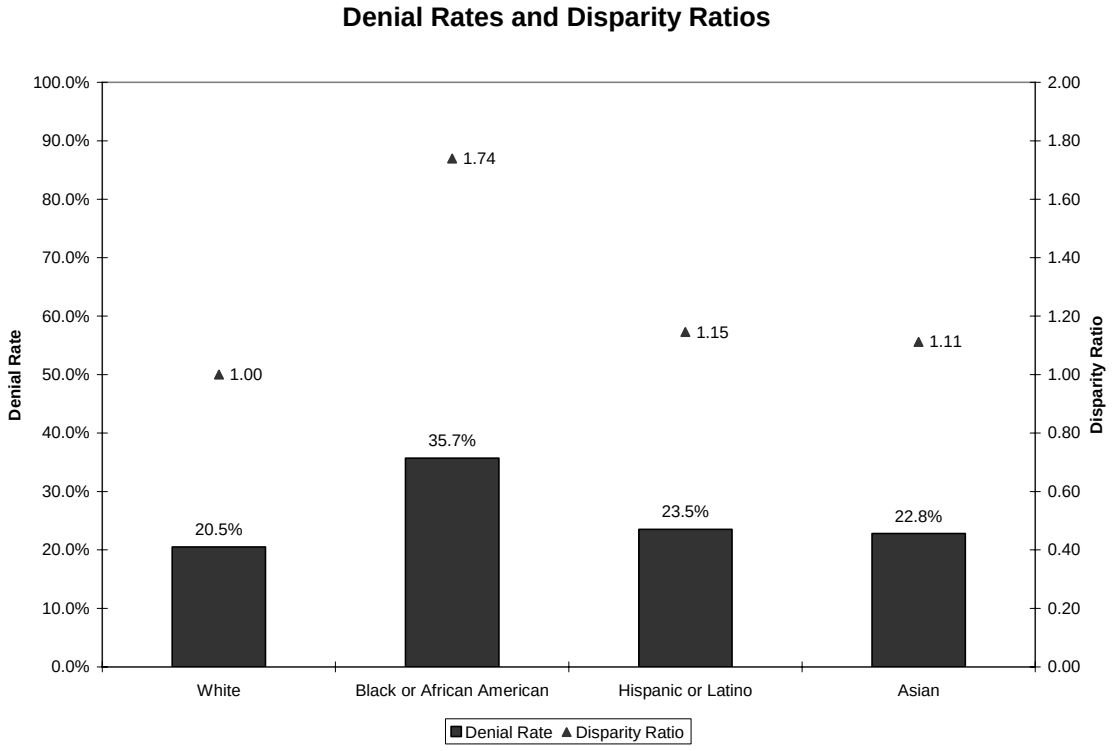


Chart 10: Refinance Lending by Race of Borrower, City of Cincinnati



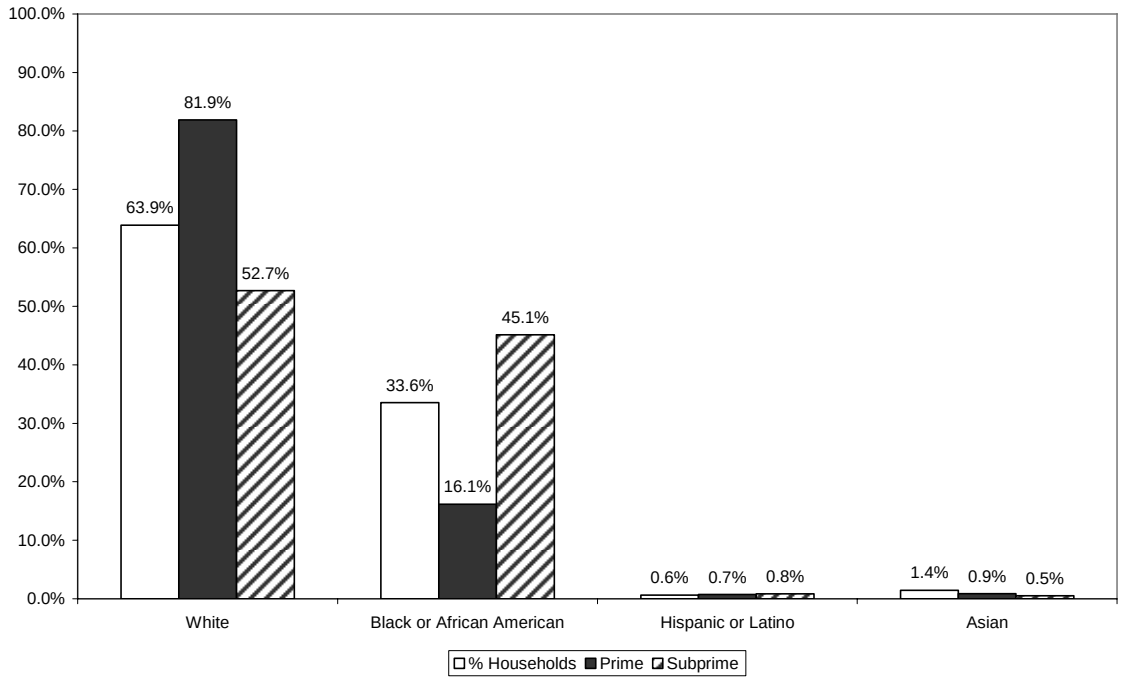


Chart 10: Refinance Lending by Race of Borrower, City of Cincinnati, cont.

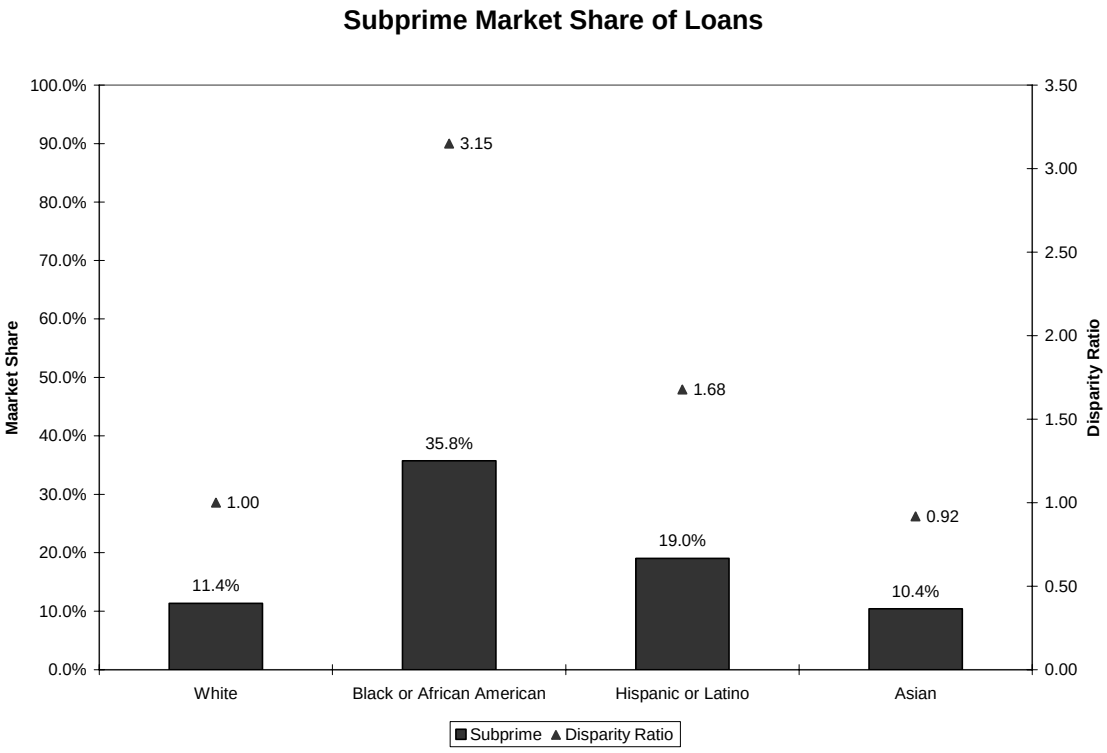
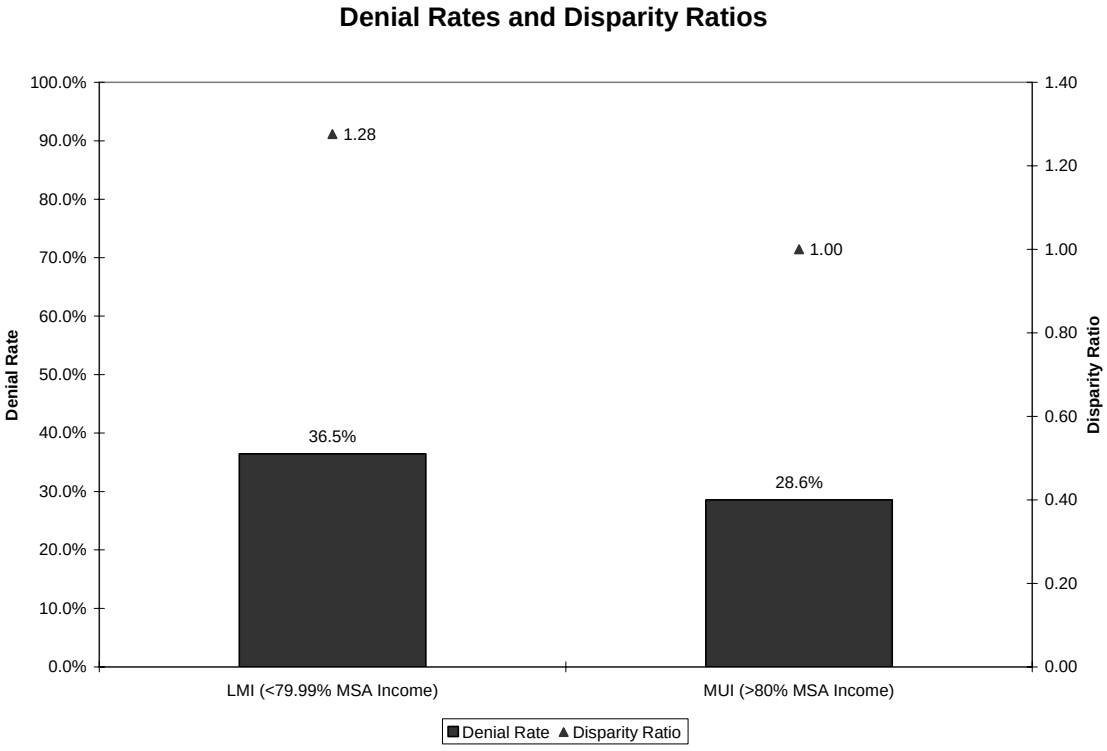


Chart 11: Home Improvement Lending by Income of Borrower, City of Cincinnati



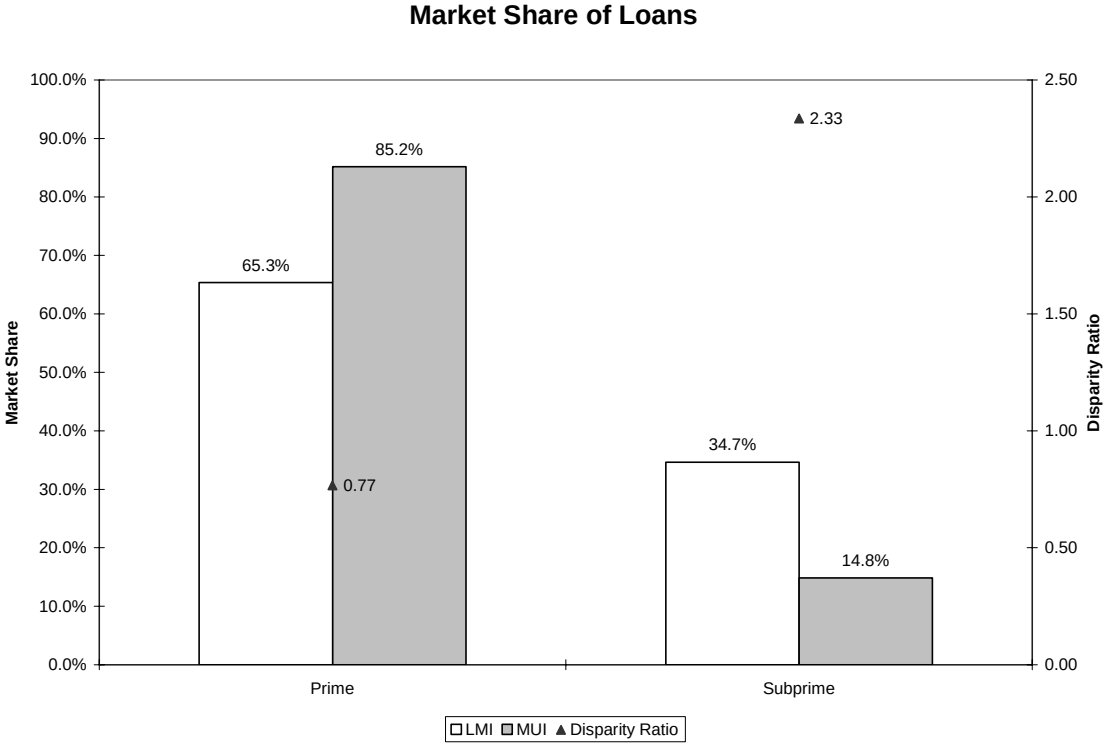


Chart 11: Home Improvement Lending by Income of Borrower, City of Cincinnati, cont.

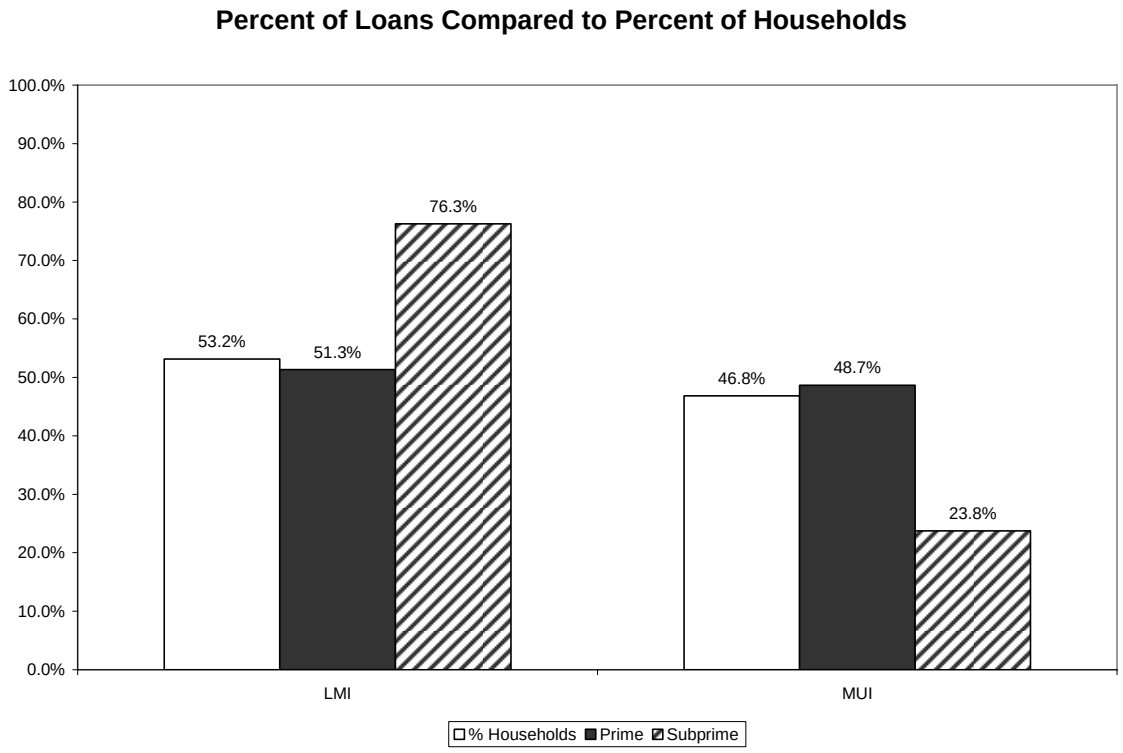
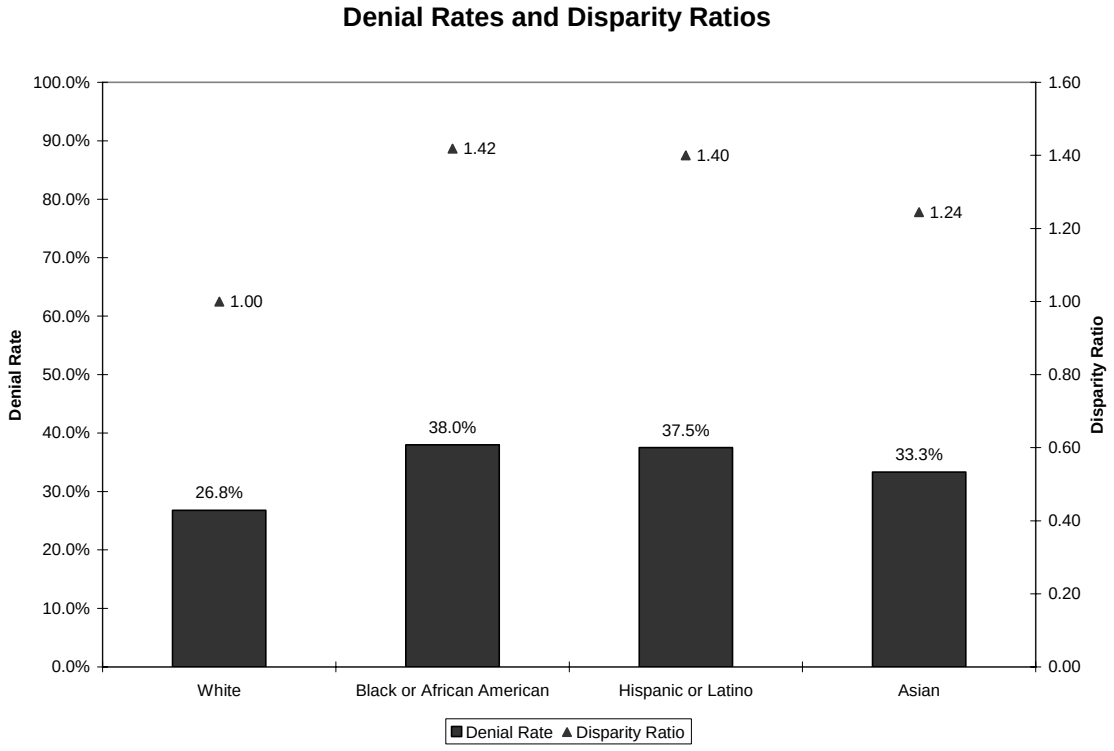


Chart 12: Home Improvement Lending by Race of Borrower, City of Cincinnati



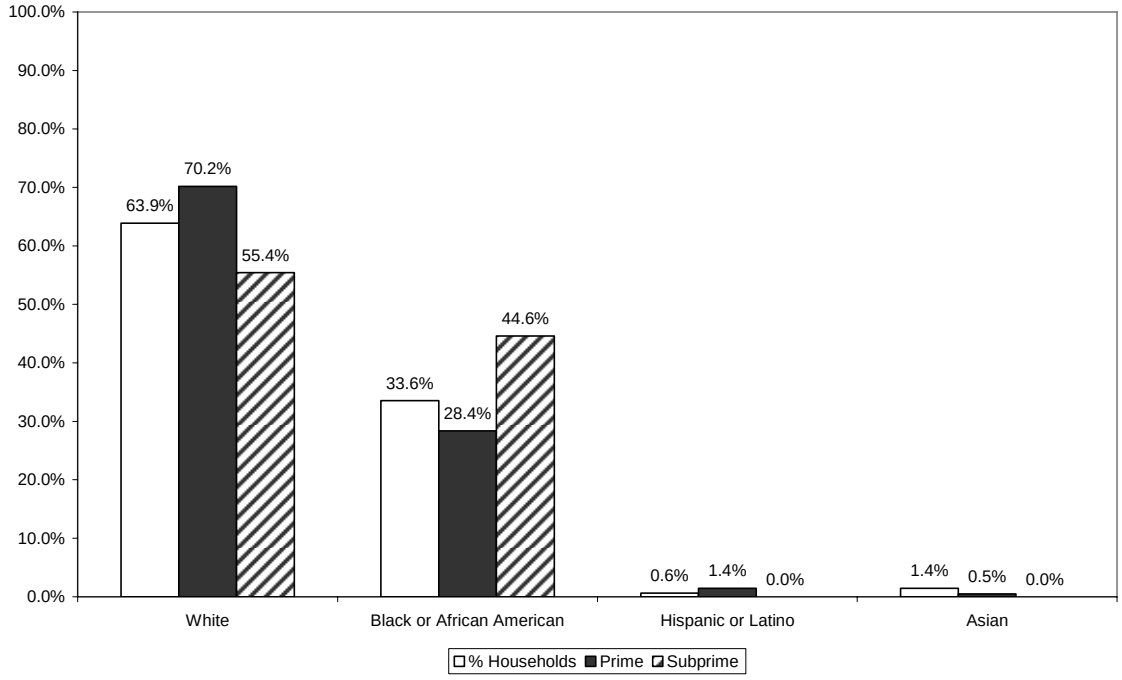


Chart 12: Home Improvement Lending by Race of Borrower, City of Cincinnati, cont.

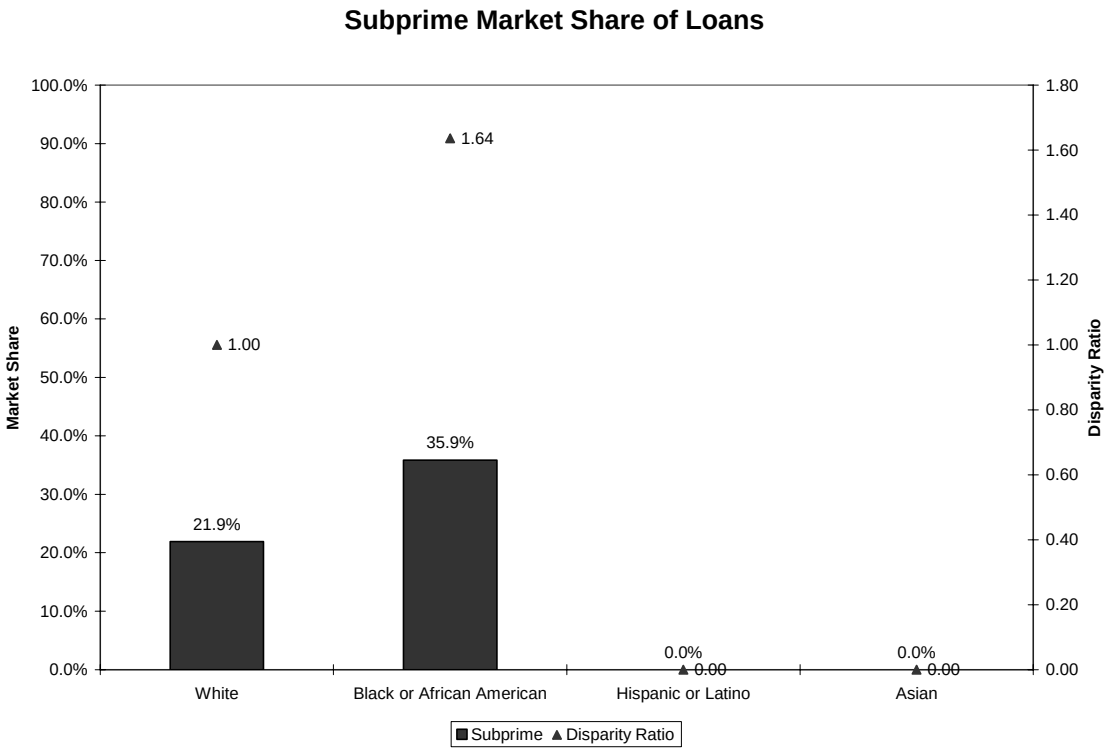
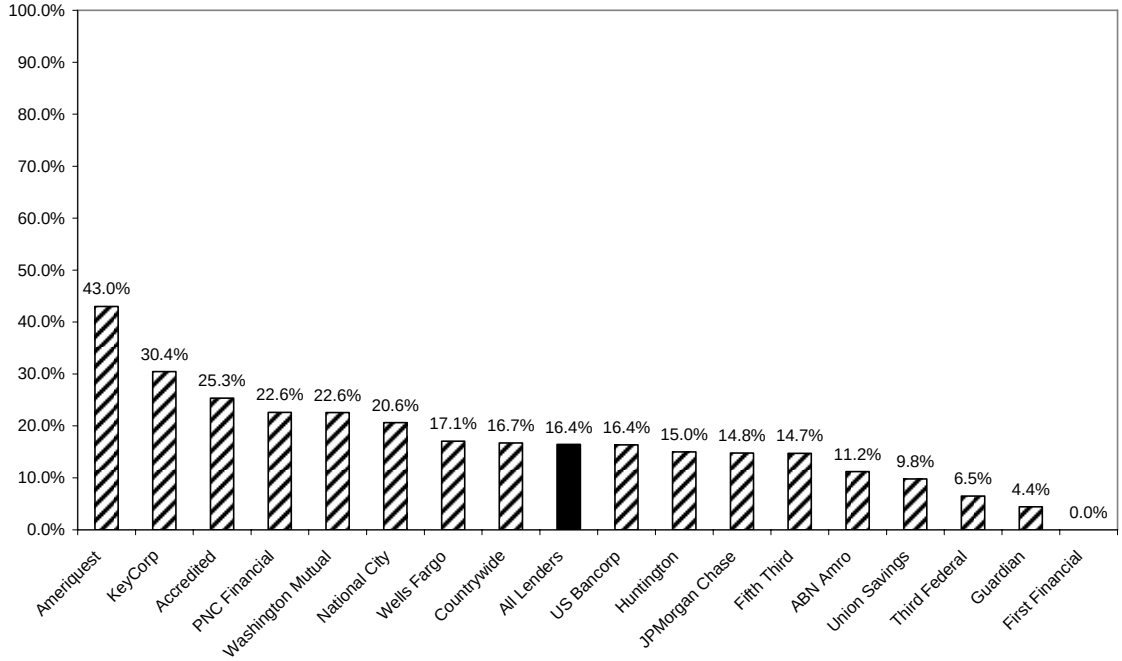
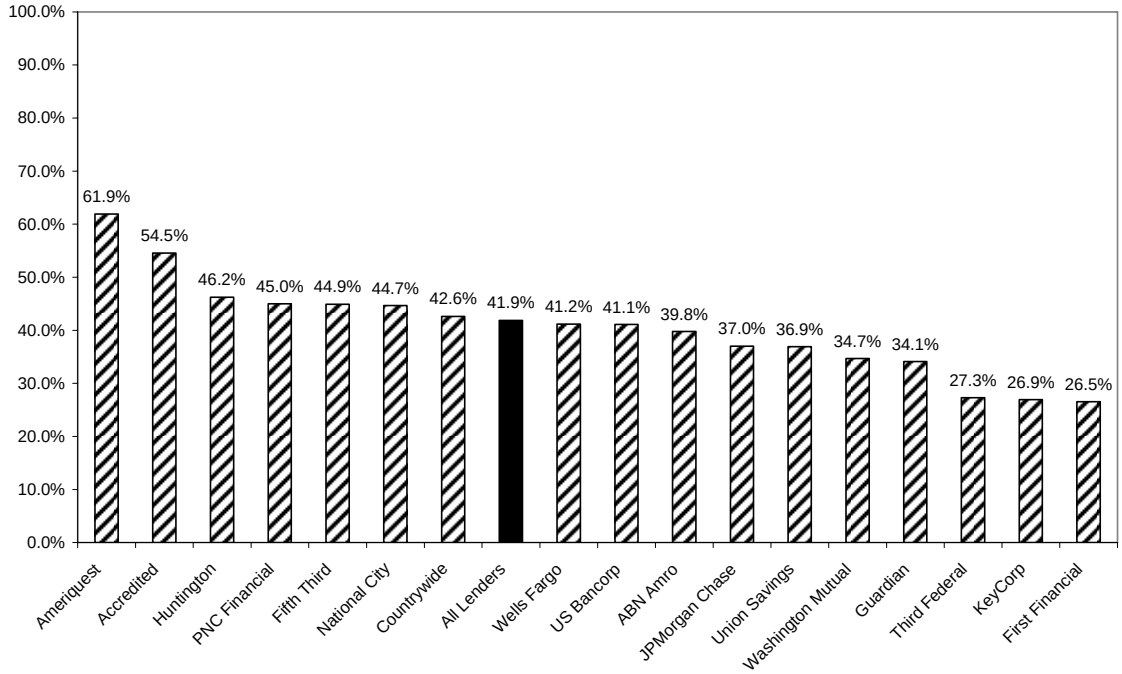


Chart 13: All Single Family Ranking Analysis, City of Cincinnati

Percent of Loans to African-American Borrowers

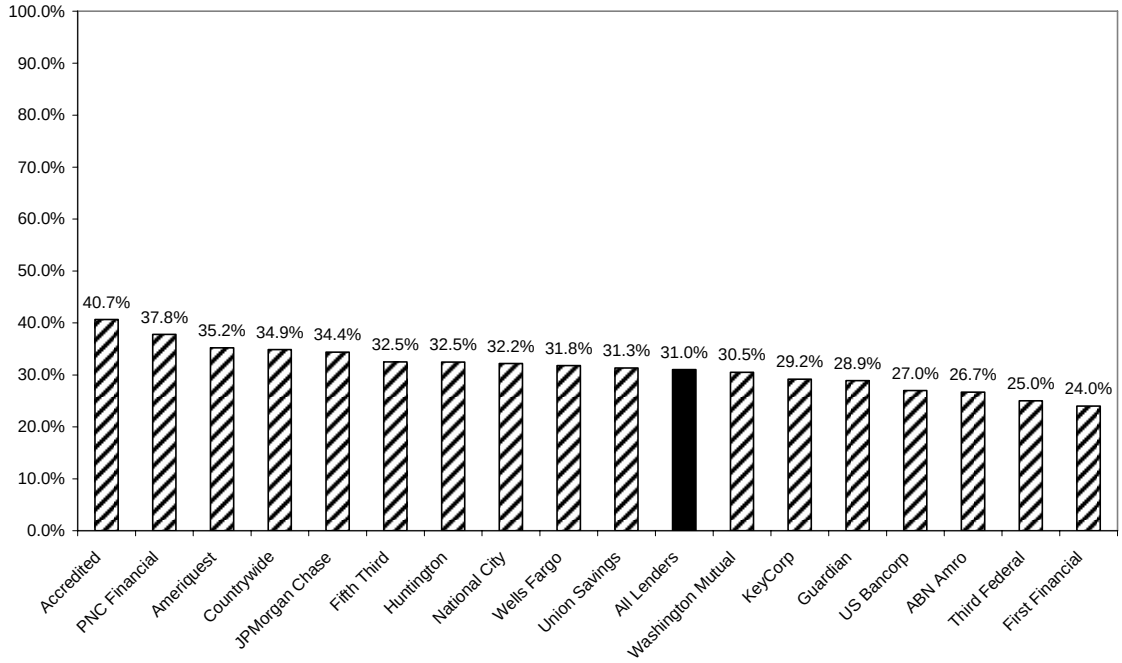


Percent of Loans to LMI Borrowers

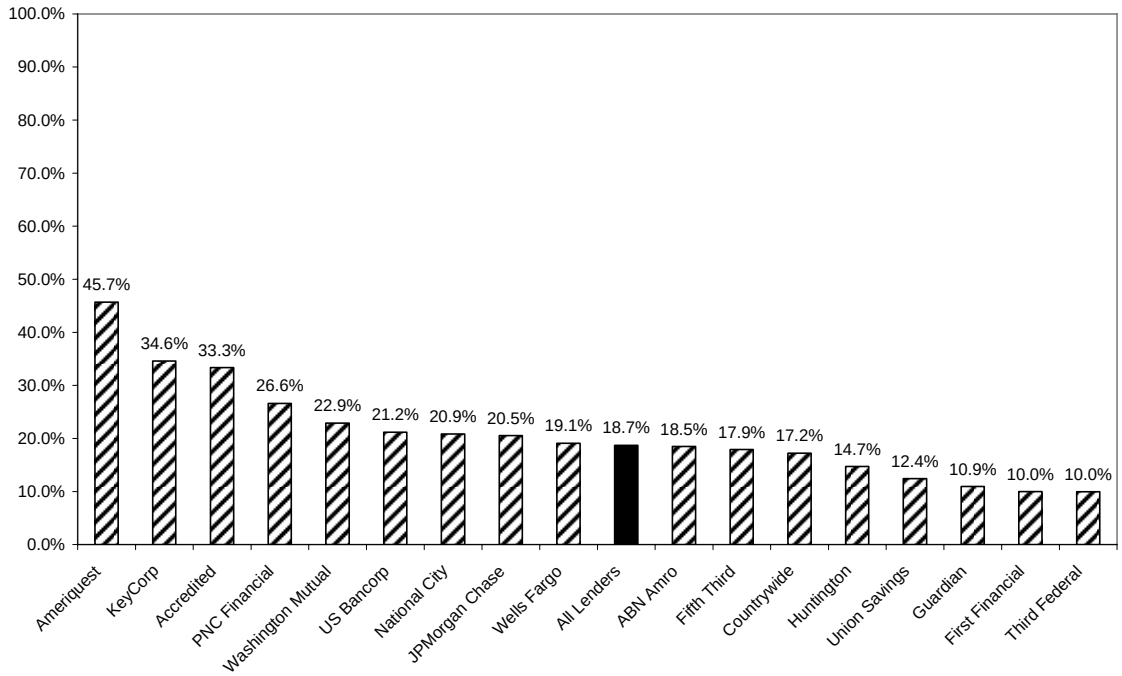


All Single Family Ranking Analysis, City of Cincinnati, cont.

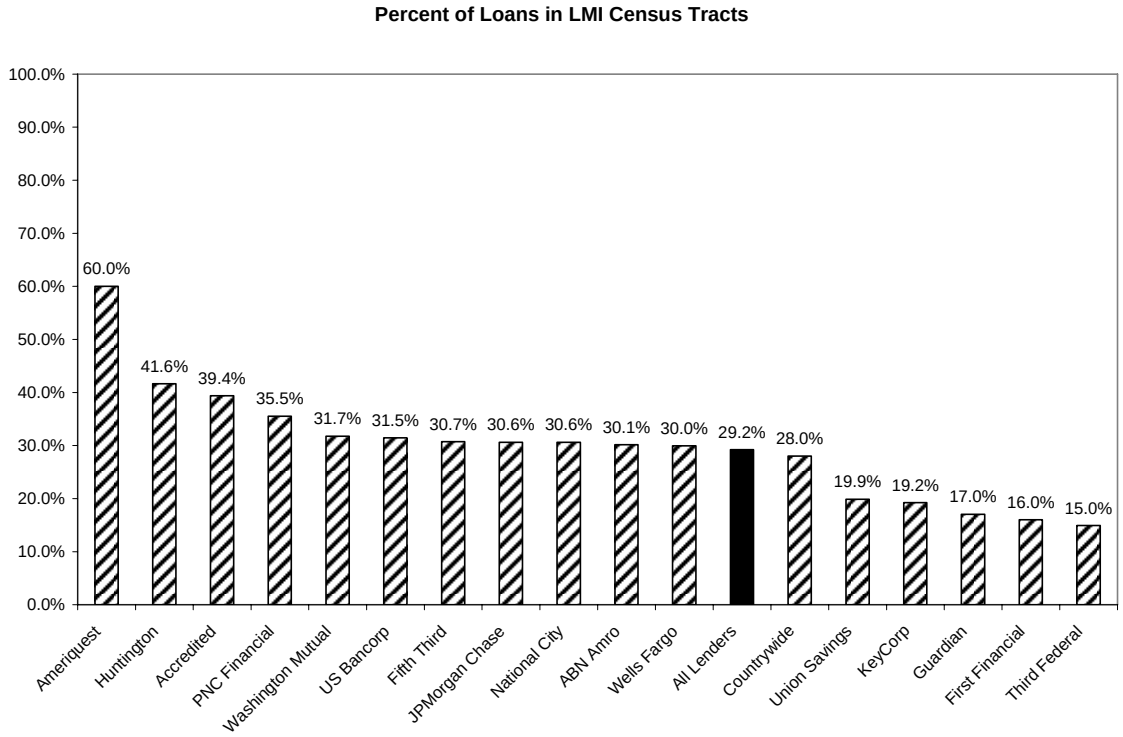
Percent of Loans to Female Borrowers



Percent of Loans in Minority Census Tracts

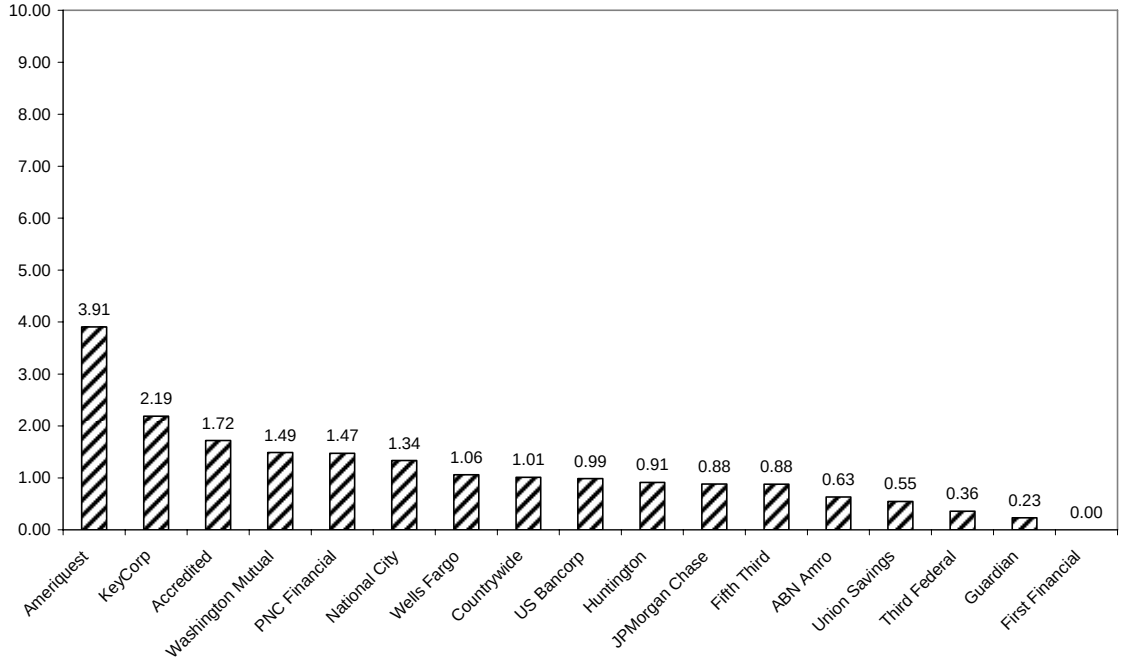


All Single Family Ranking Analysis, City of Cincinnati, cont.

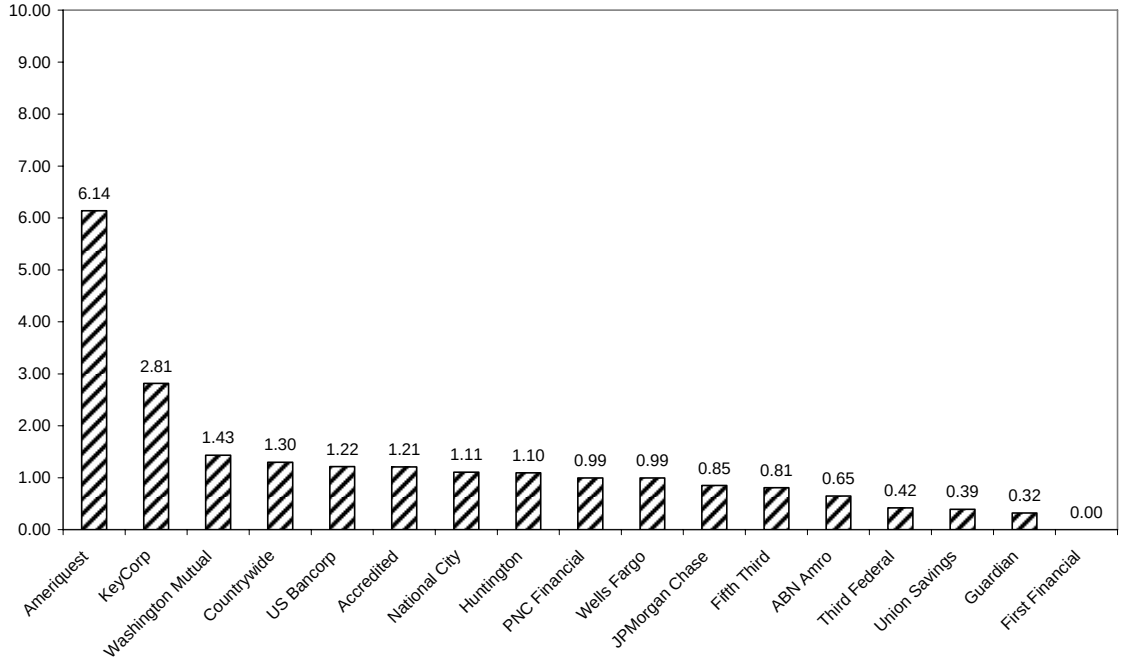


All Single Family Ranking Analysis of Comparisons by Market Share for City of Cincinnati

African-American/White Borrower Market Share

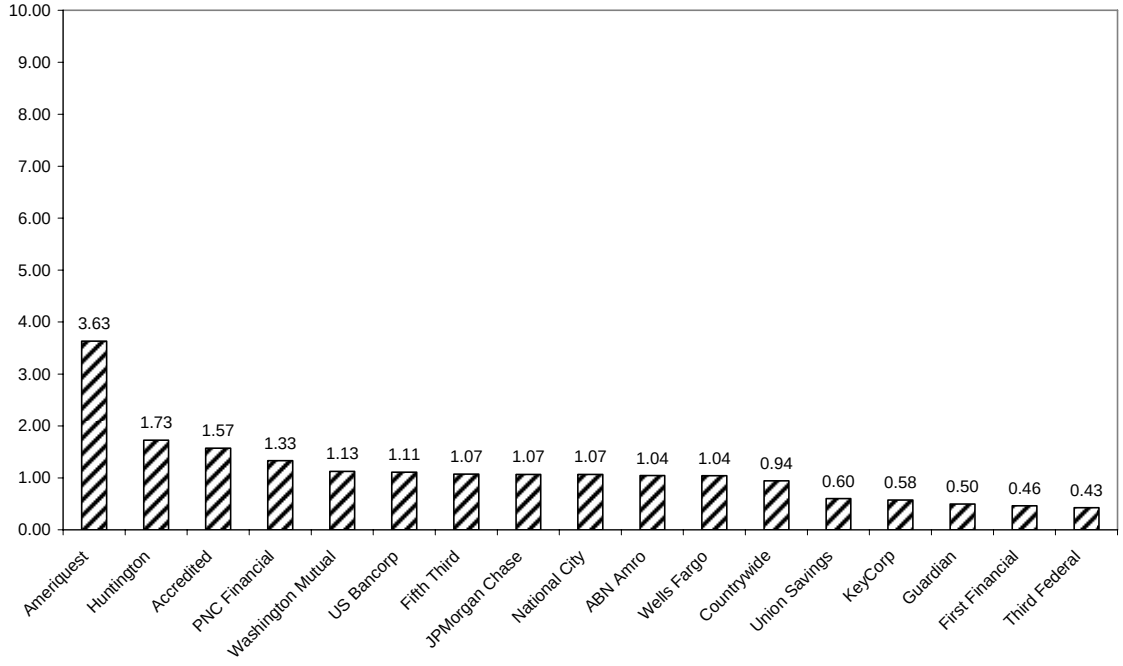


MUI African-American/MUI White Borrower Market Share

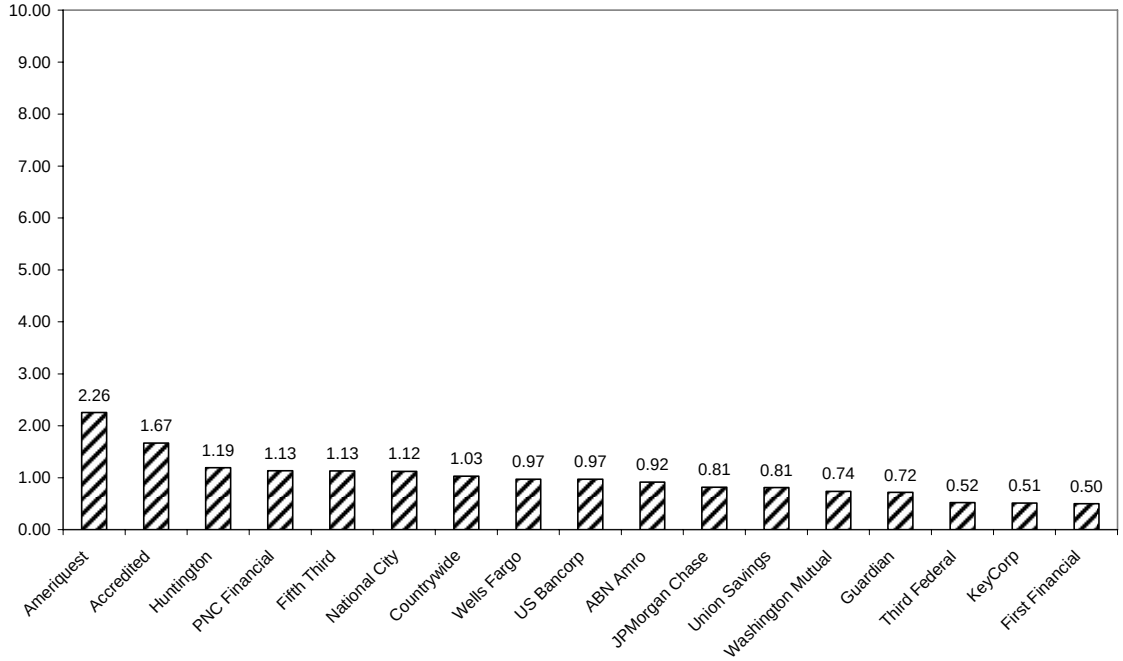


All Single Family Ranking Analysis of Comparisons by Market Share for City of Cincinnati, cont.

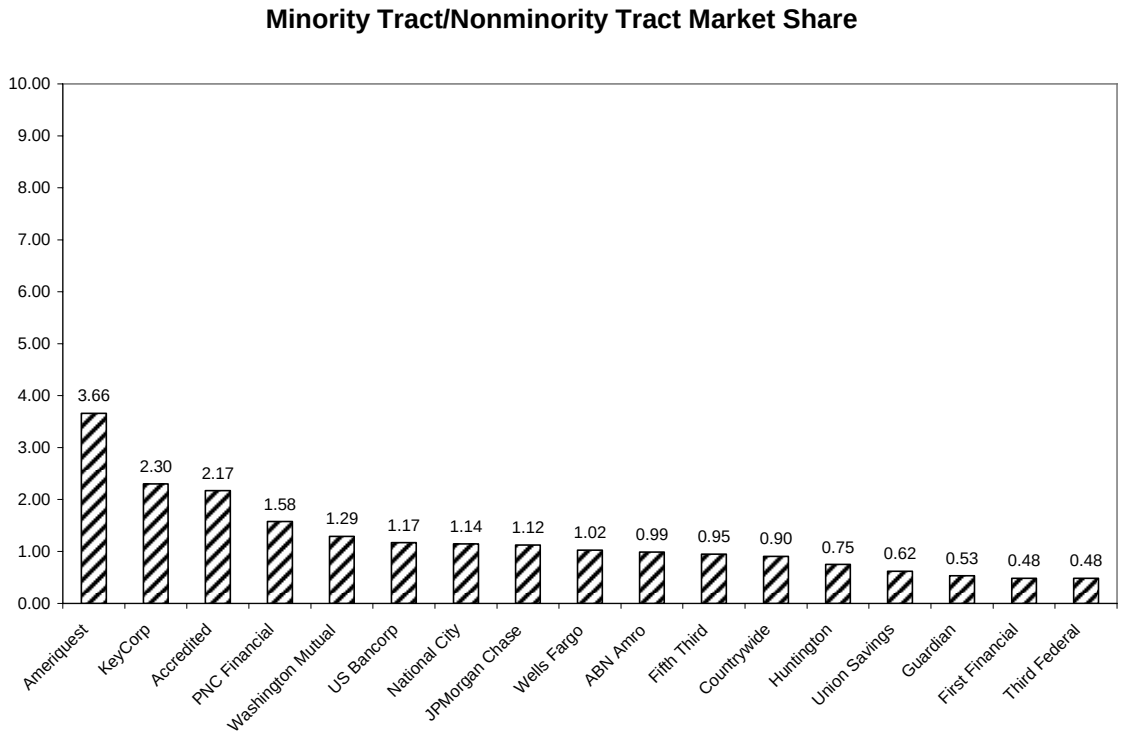
LMI Tract/MUI Tract Market Share



LMI/MUI Borrower Market Share

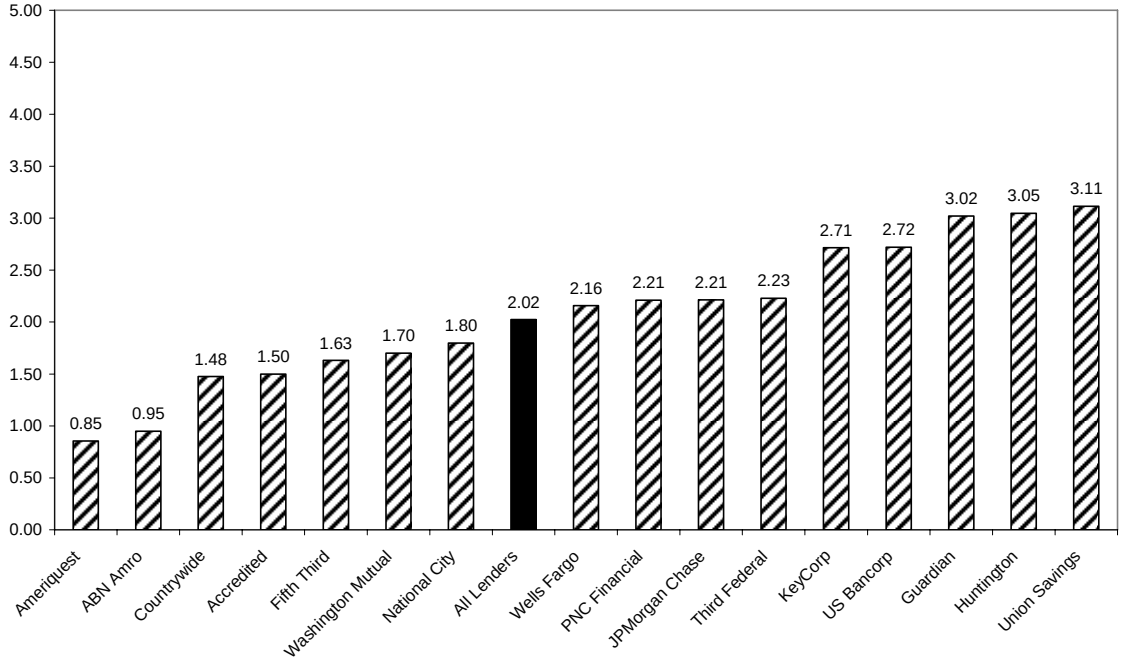


All Single Family Ranking Analysis of Comparisons by Market Share for City of Cincinnati, cont.

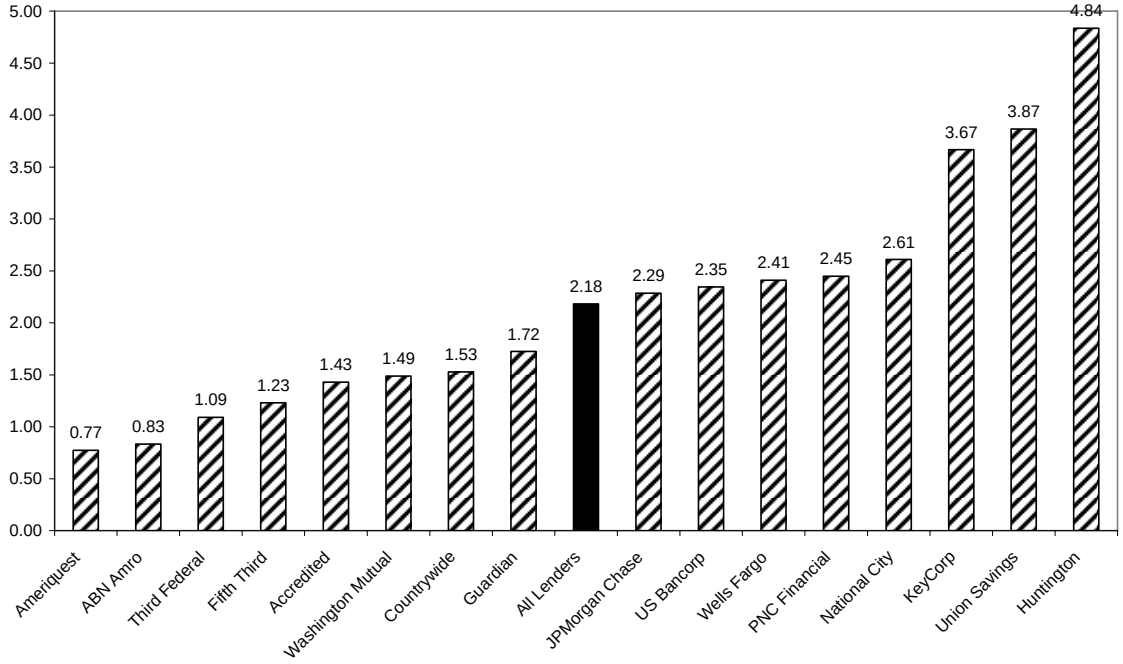


All Single Family Lending Rankings of Denial Disparity Ratios in City of Cincinnati

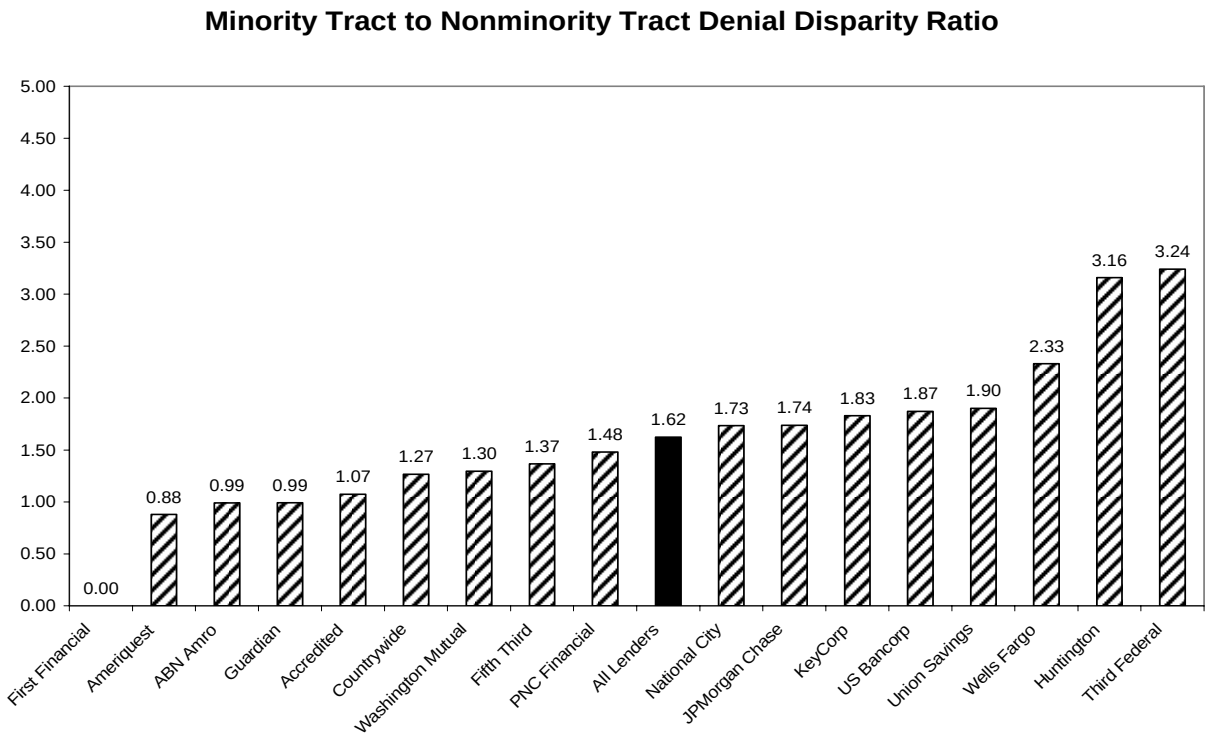
African-American to White Denial Disparity Ratio



MUI African-American to MUI White Denial Disparity Ratio

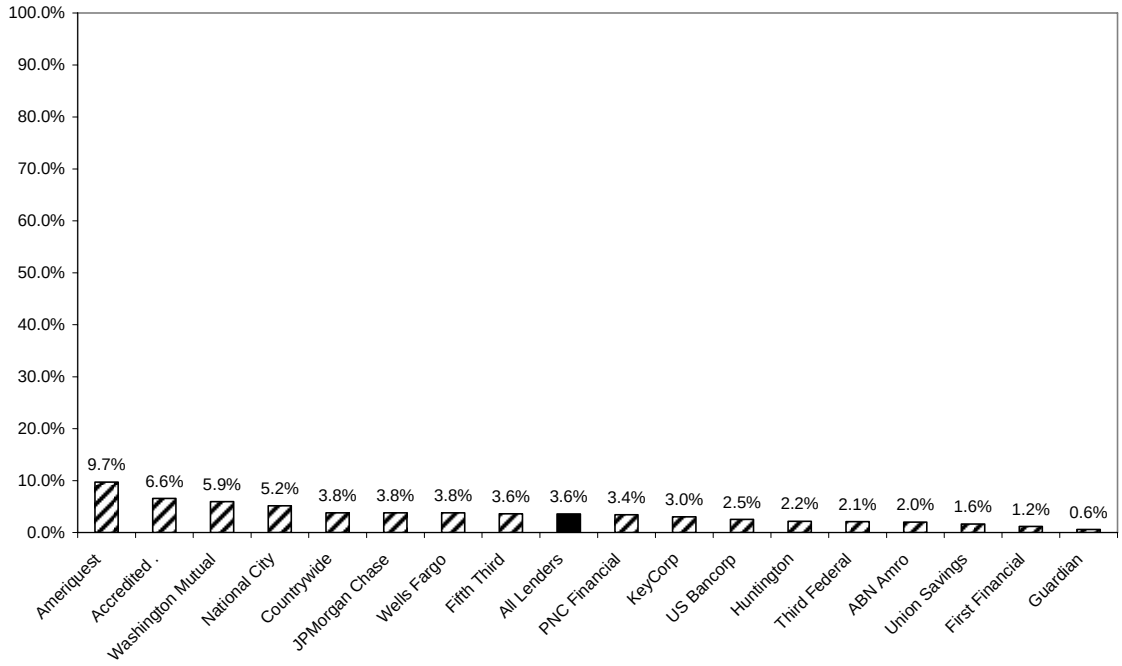


All Single Family Lending Rankings of Denial Disparity Ratios in City of Cincinnati, cont.

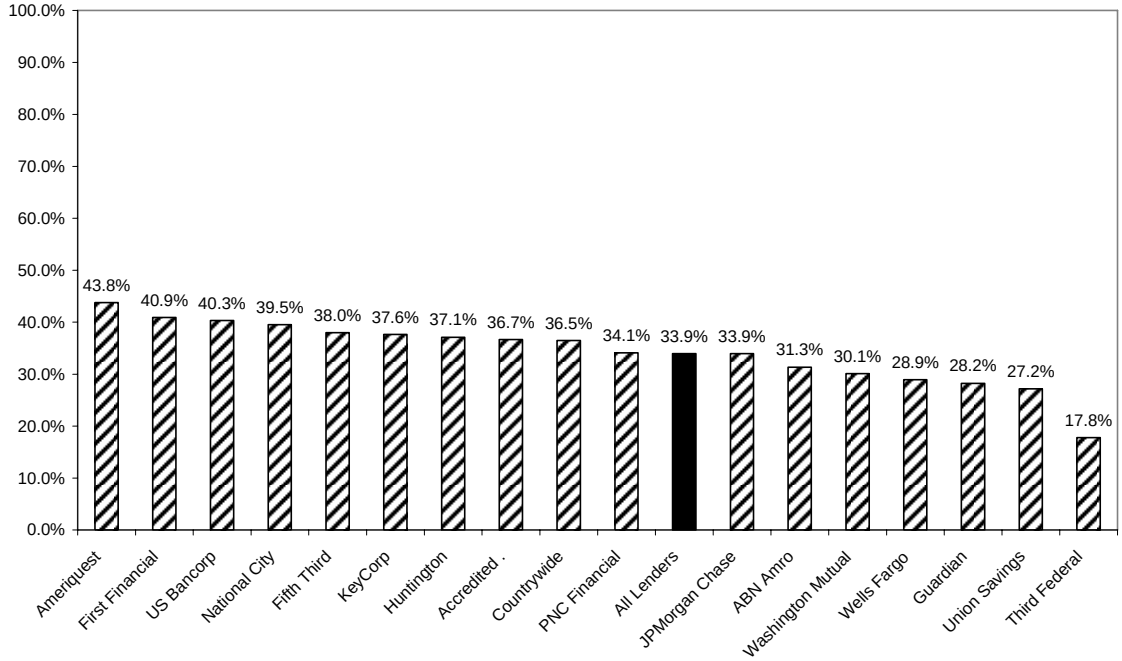


All Single Family Ranking Analysis, Suburban Cincinnati

Percent of Loans to African-American Borrowers

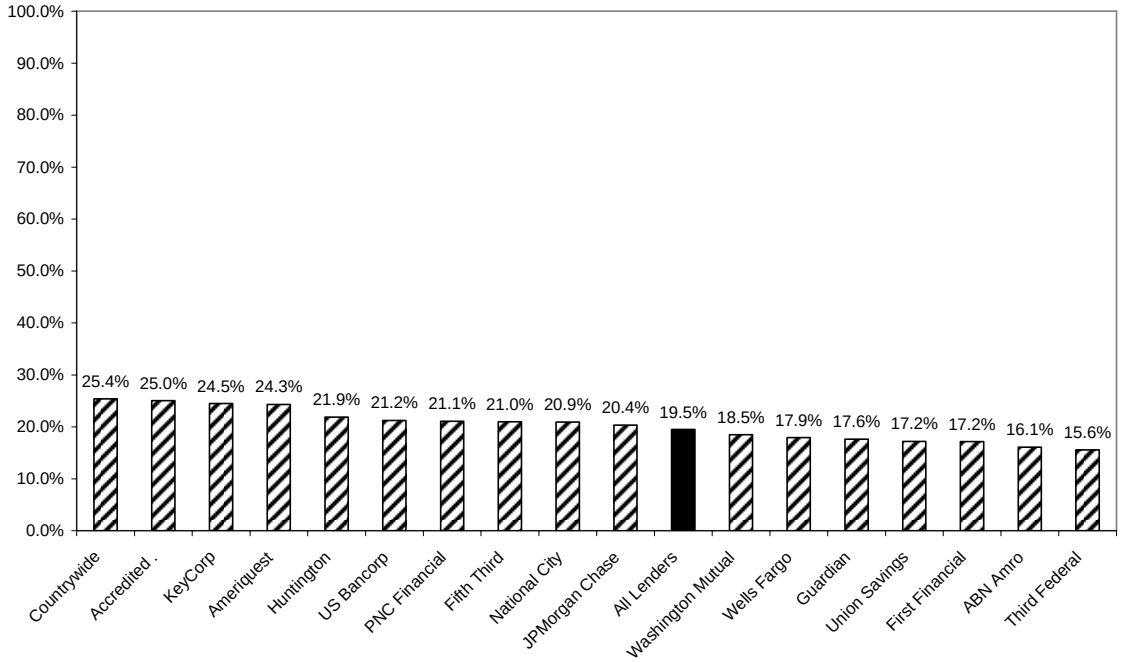


Percent of Loans to LMI Borrowers

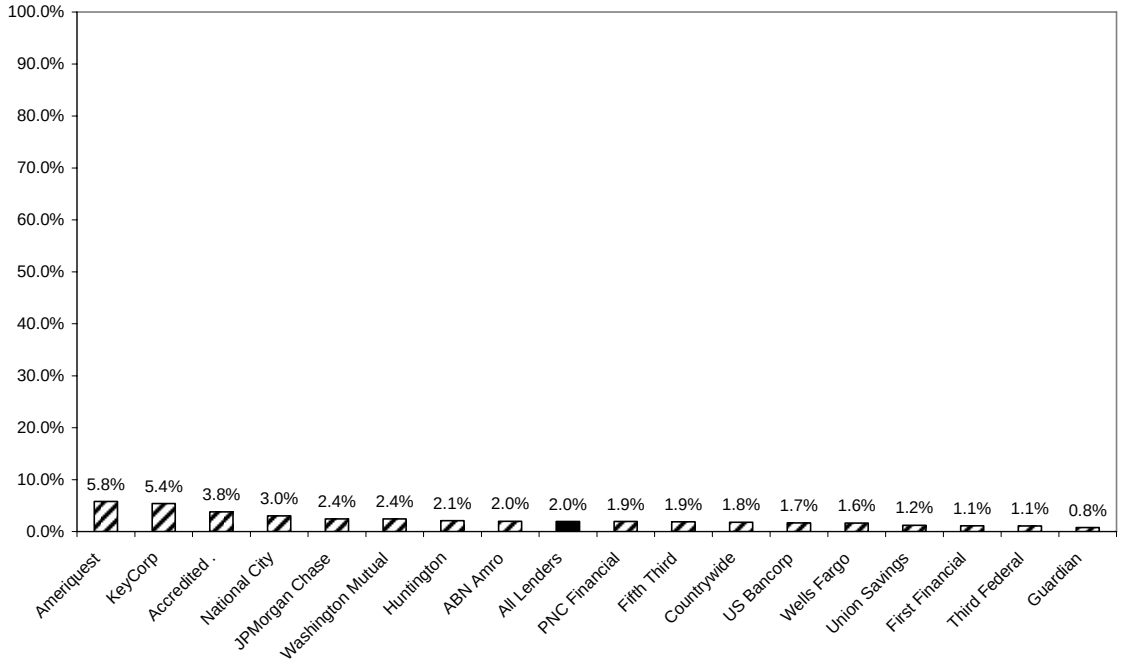


All Single Family Ranking Analysis, Suburban Cincinnati, cont.

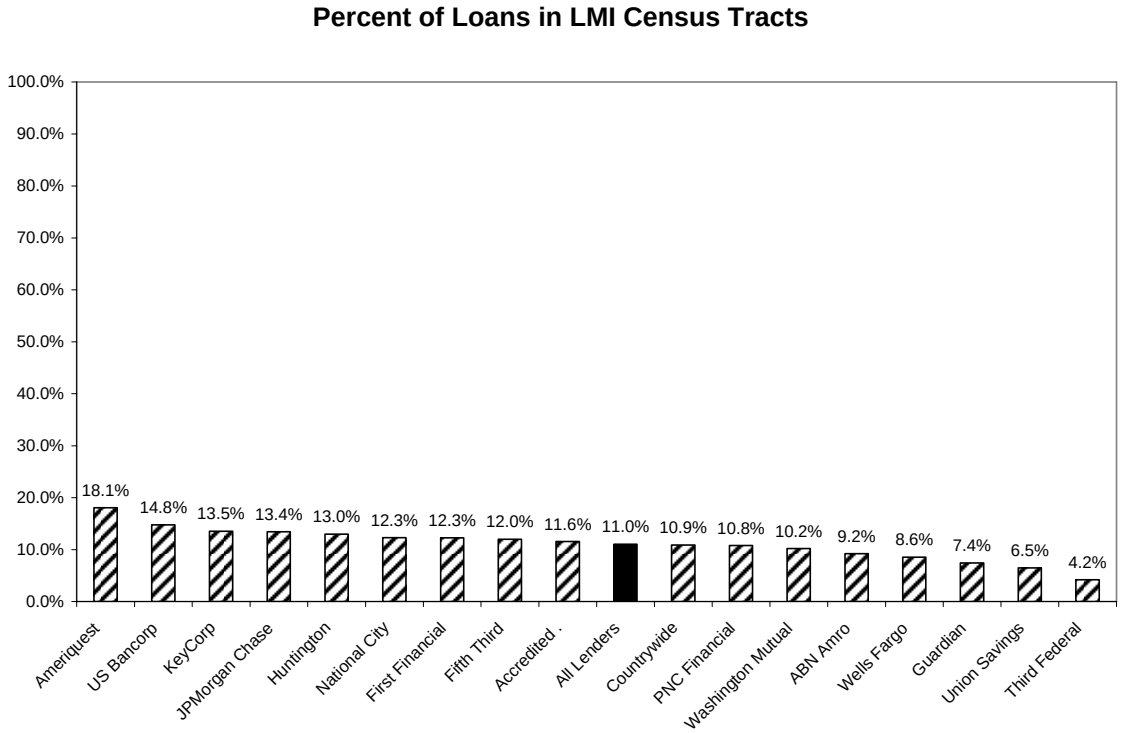
Percent of Loans to Female Borrowers



Percent of Loans in Minority Census Tracts

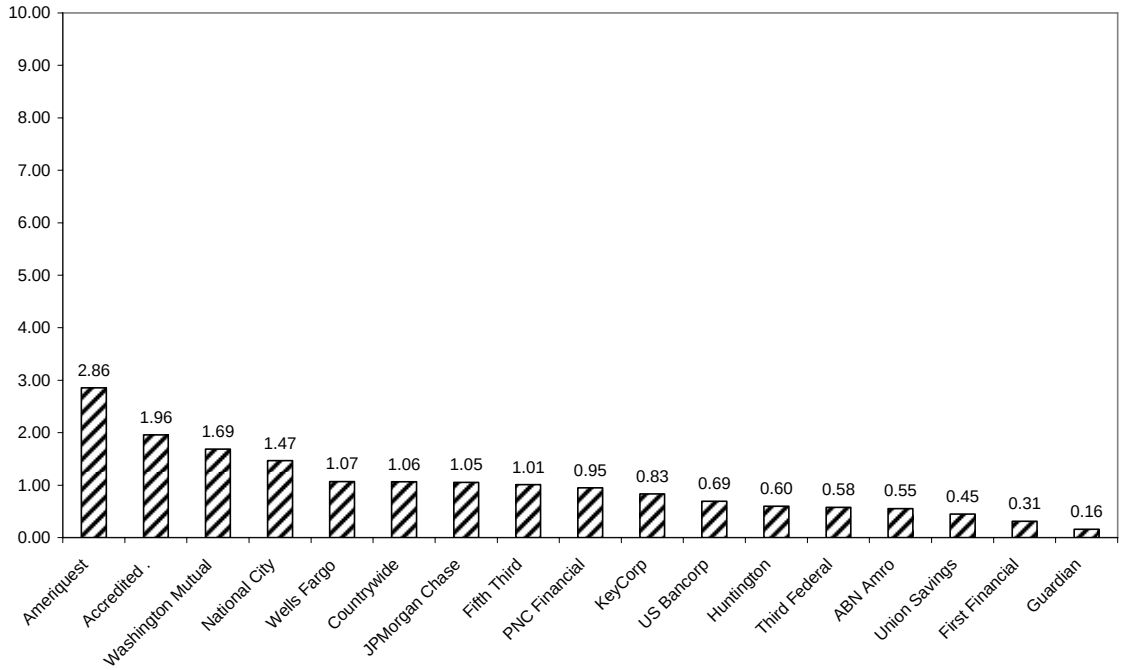


All Single Family Ranking Analysis, Suburban Cincinnati, cont.

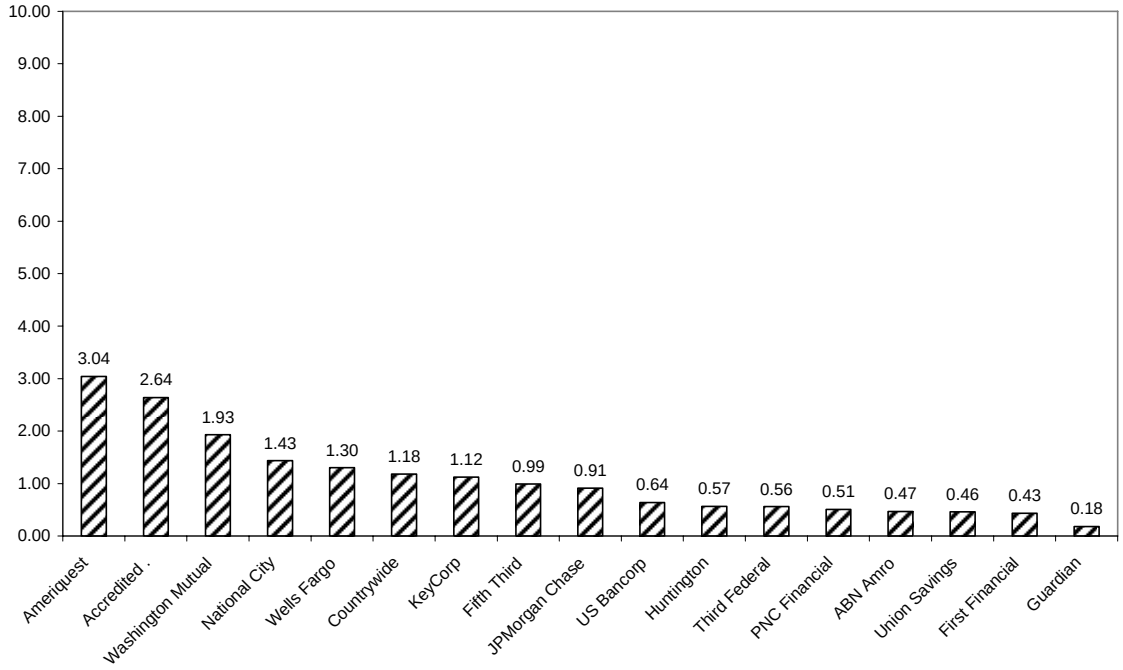


All Single Family Ranking Analysis of Comparisons by Market Share for Suburban Cincinnati

African-American/White Borrower Market Share

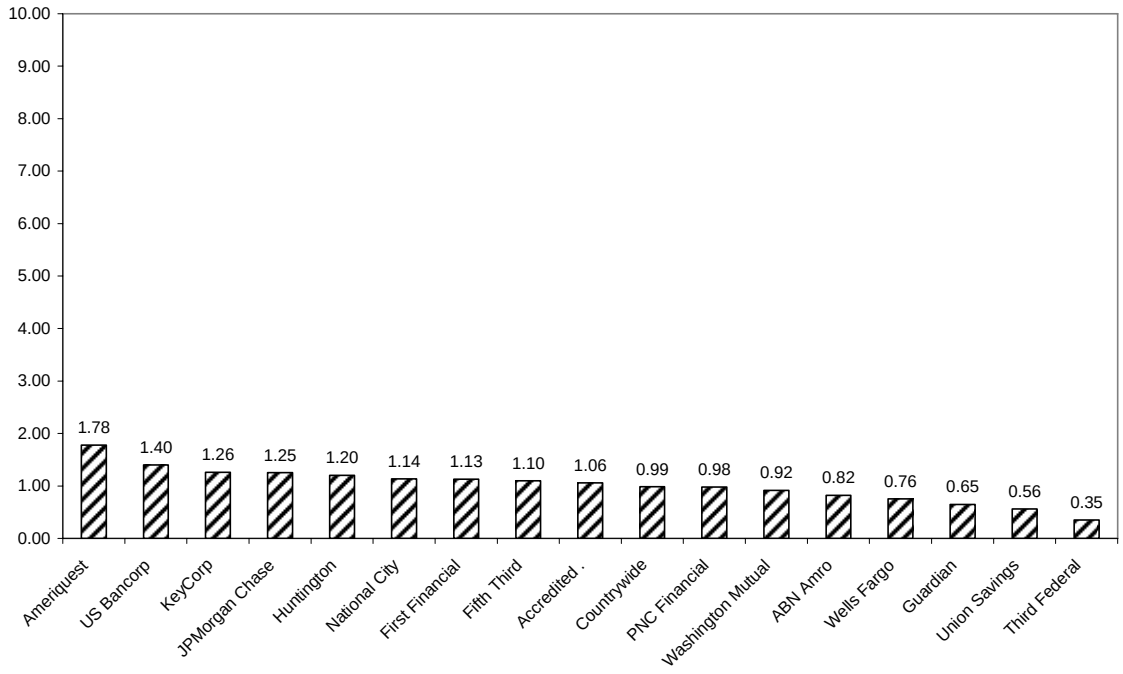


MUI African-American/MUI White Borrower Market Share

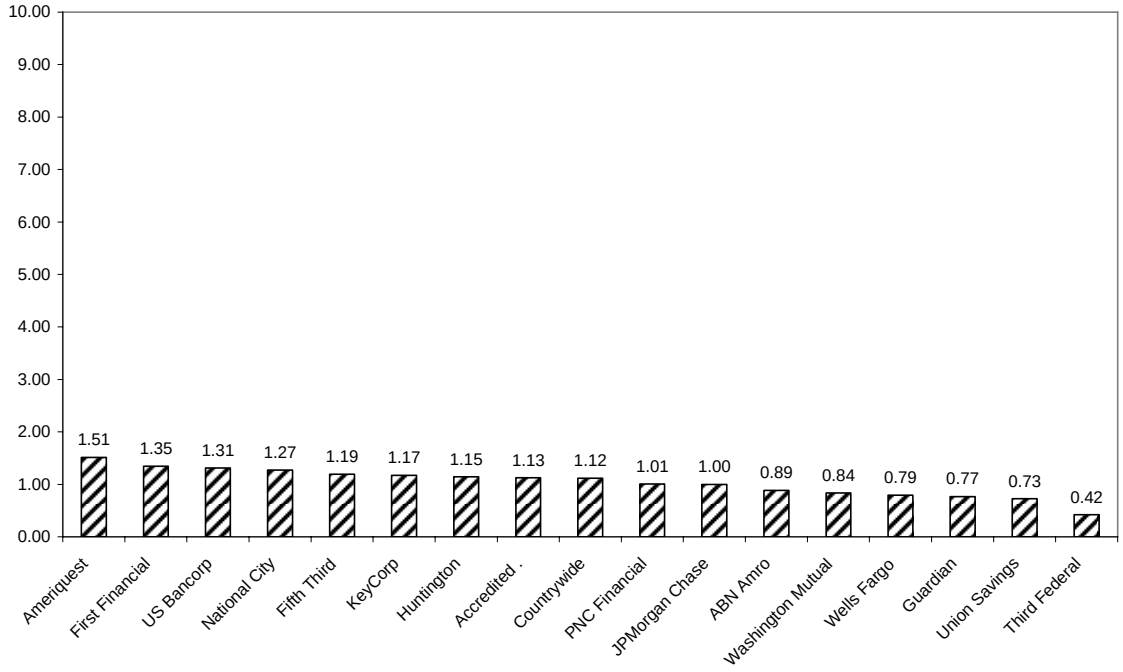


All Single Family Ranking Analysis of Comparisons by Market Share for Suburban Cincinnati, cont.

LMI Tract/MUI Tract Market Share

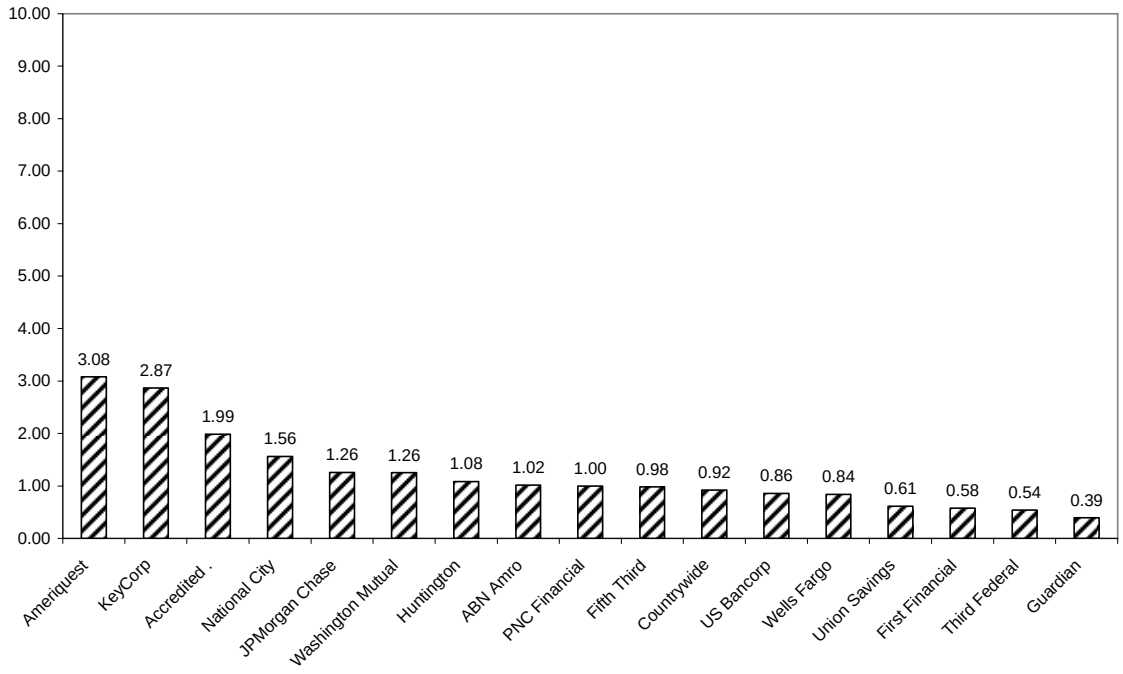


LMI/MUI Borrower Market Share



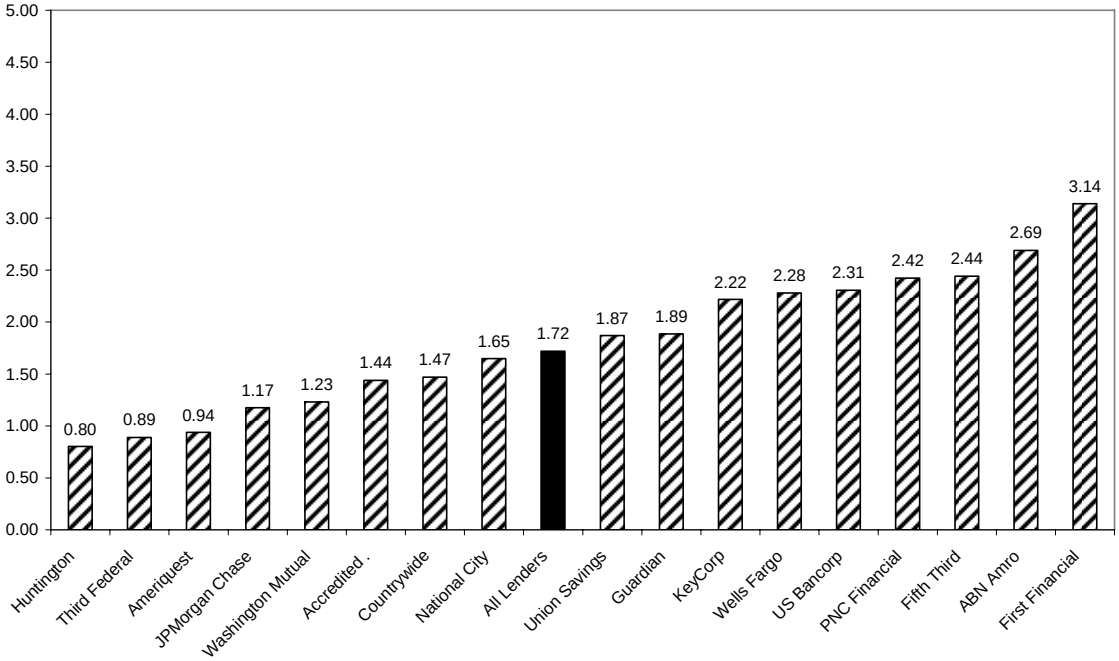
All Single Family Ranking Analysis of Comparisons by Market Share for Suburban Cincinnati, cont.

Minority Tract/Nonminority Tract Market Share

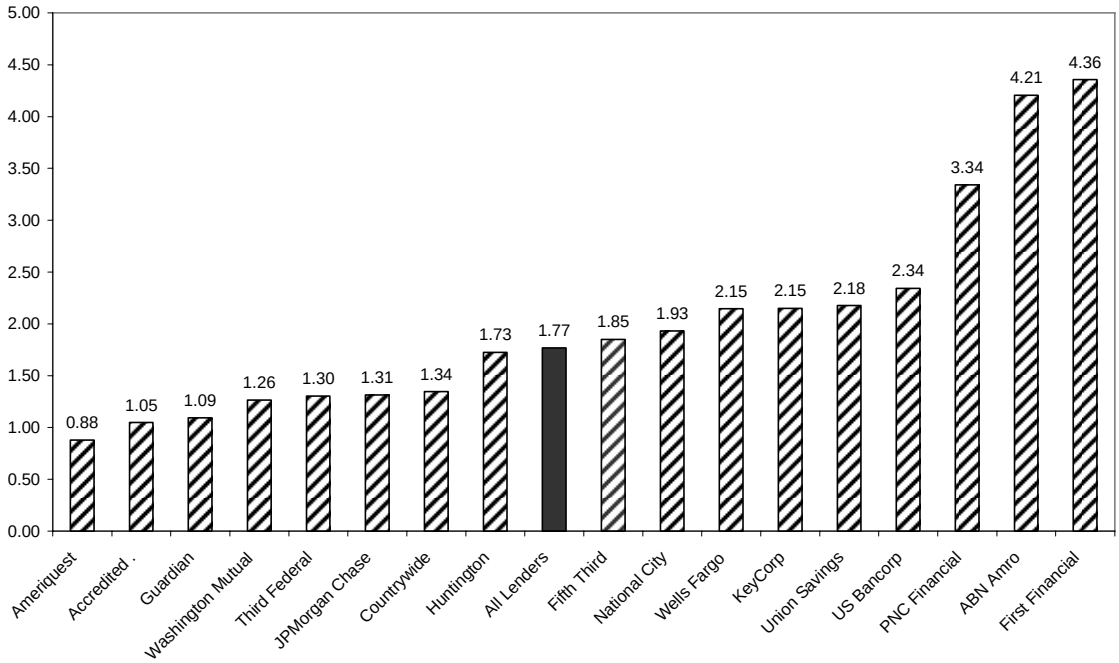


All Single Family Lending Rankings of Denial Disparity Ratios in Suburban Cincinnati

African-American to White Denial Disparity Ratio



MUI African-American to MUI White Denial Disparity Ratio



All Single Family Lending Rankings of Denial Disparity Ratios in Suburban Cincinnati, cont.

Minority Tract to Nonminority Tract Denial Disparity Ratio

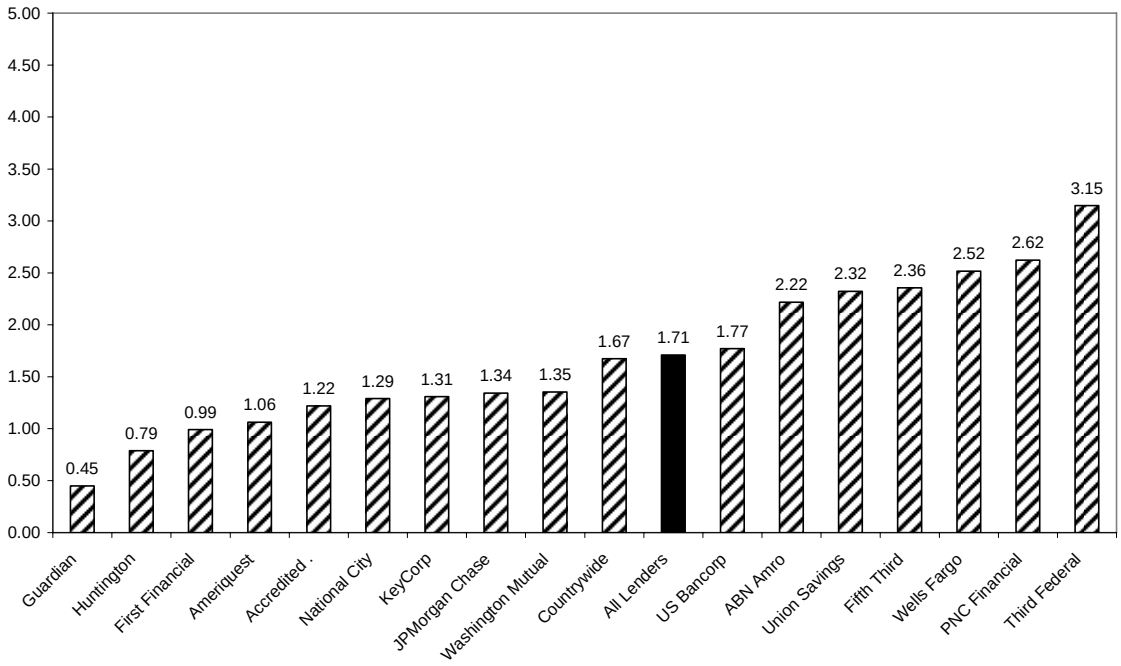
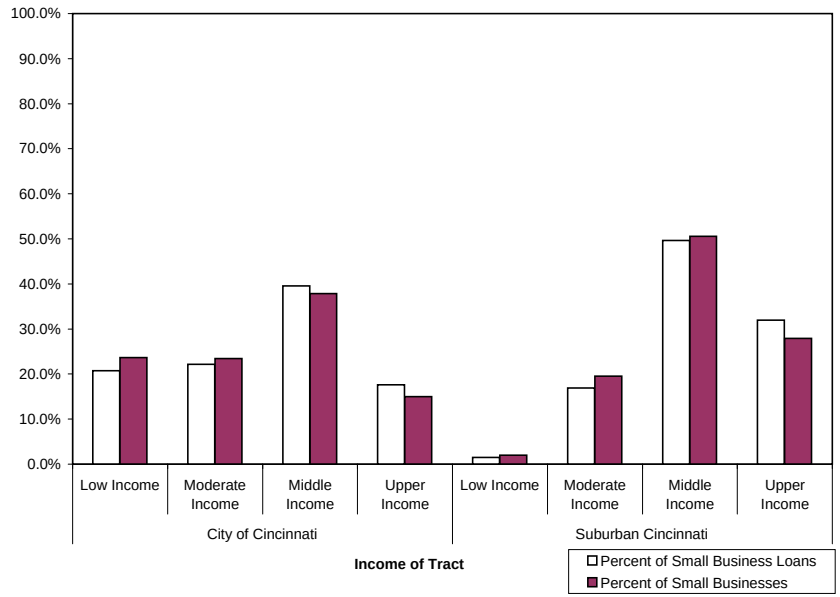
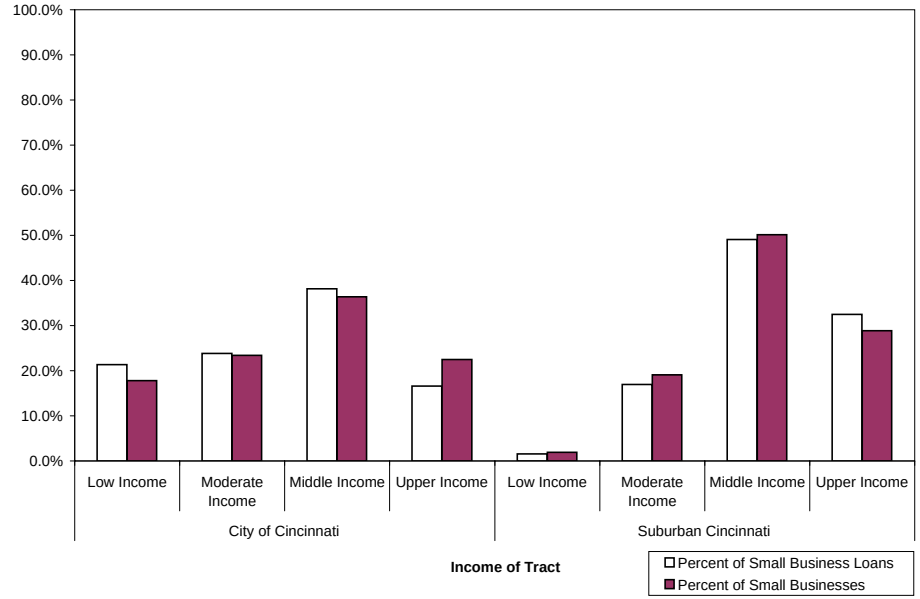


Chart 14. Aggregate Small Business in the City of Cincinnati and Suburban Cincinnati, 2004

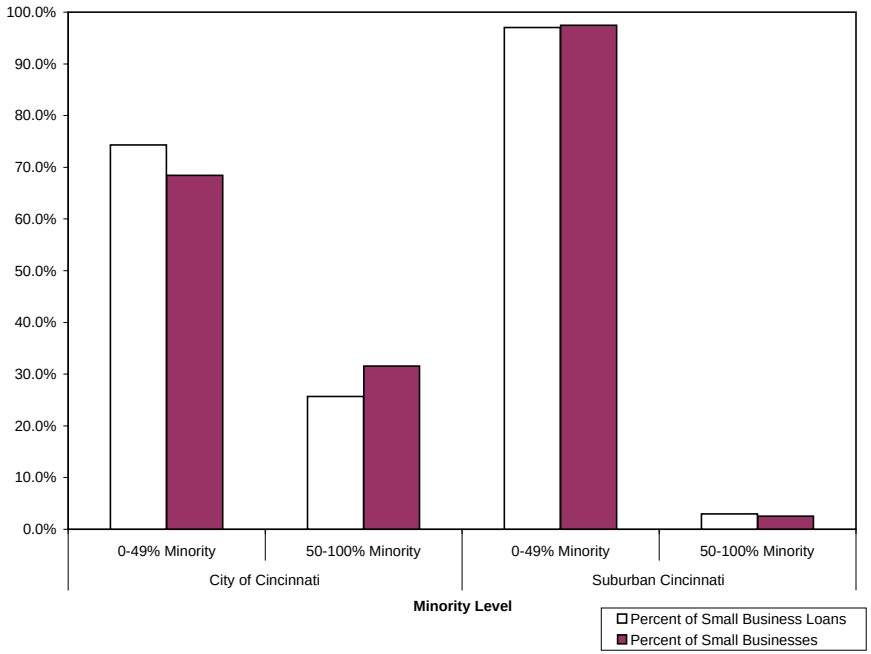
Percent of Small Business Loans
By Income of Census Tract



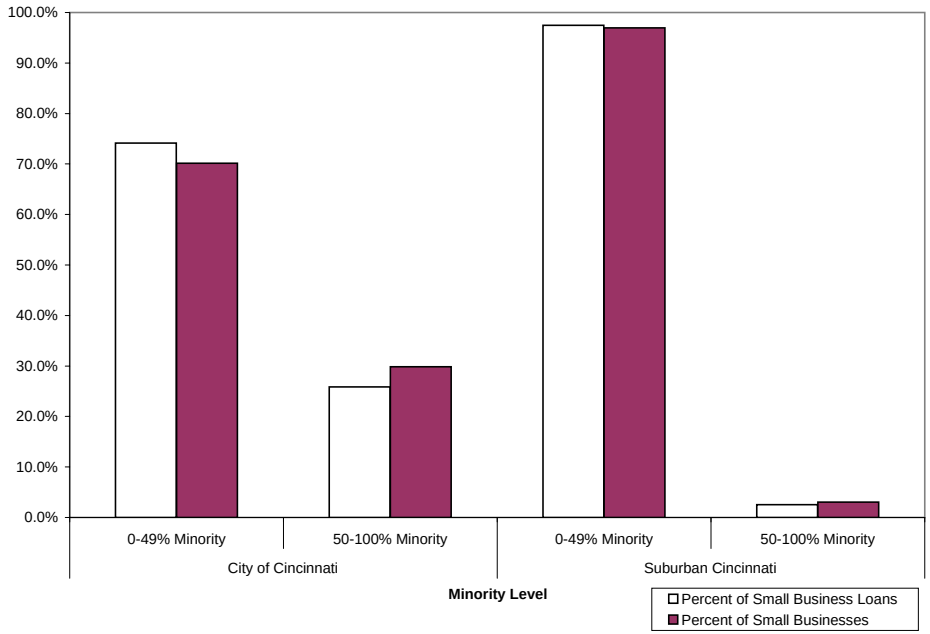
Percent of Small Business Loans to Businesses with
***less than* $1 Mil in Revenue by Income Level of Census Tract**



Percent of Small Business Loans
By Minority Level of Census Tract

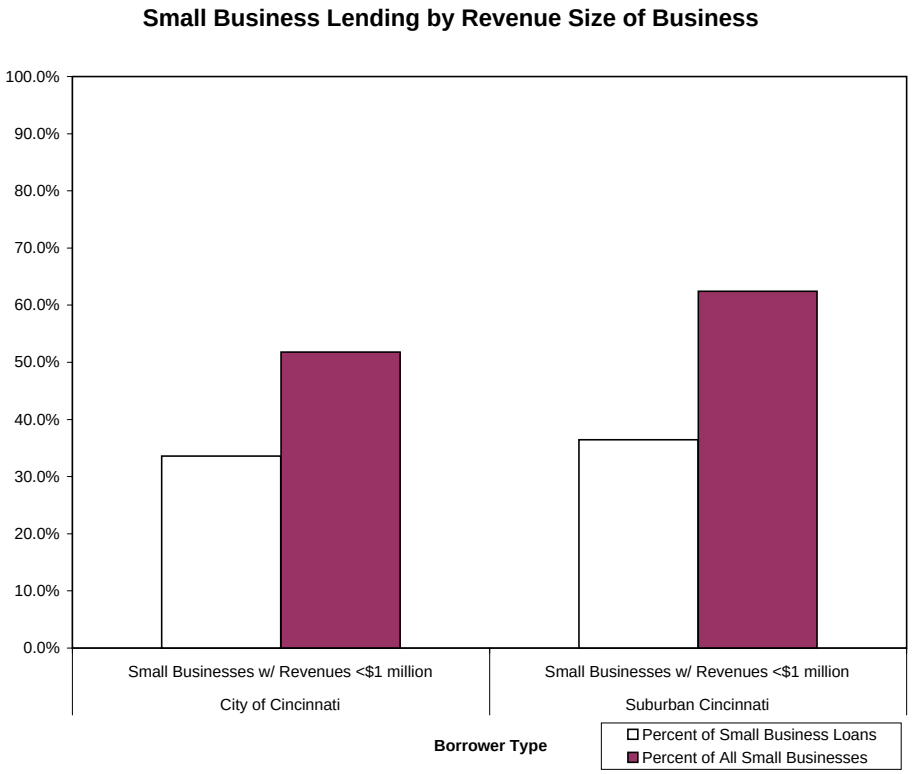


Percent of Small Business Loans to Businesses with
***less than* $1 Mil in Revenue by Minority Level of Census Tract**



* See the methodology section of this report for more details.

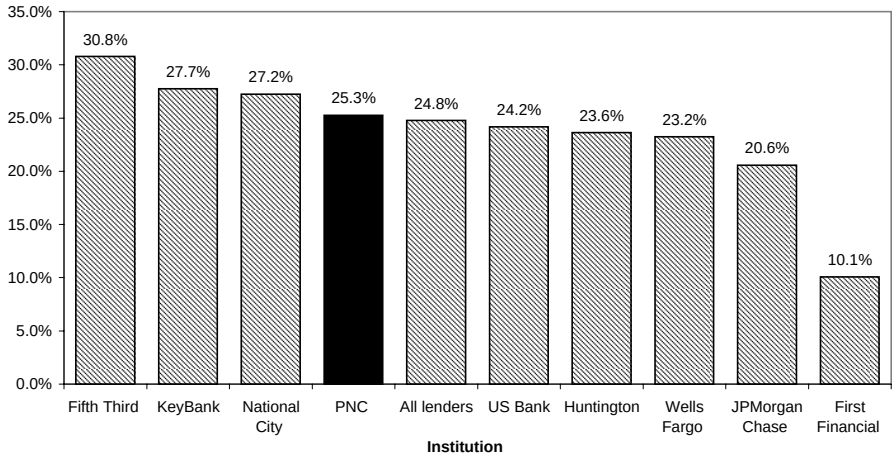
Chart 15: Aggregate Small Business in the City of Cincinnati and Suburban Cincinnati, 2004



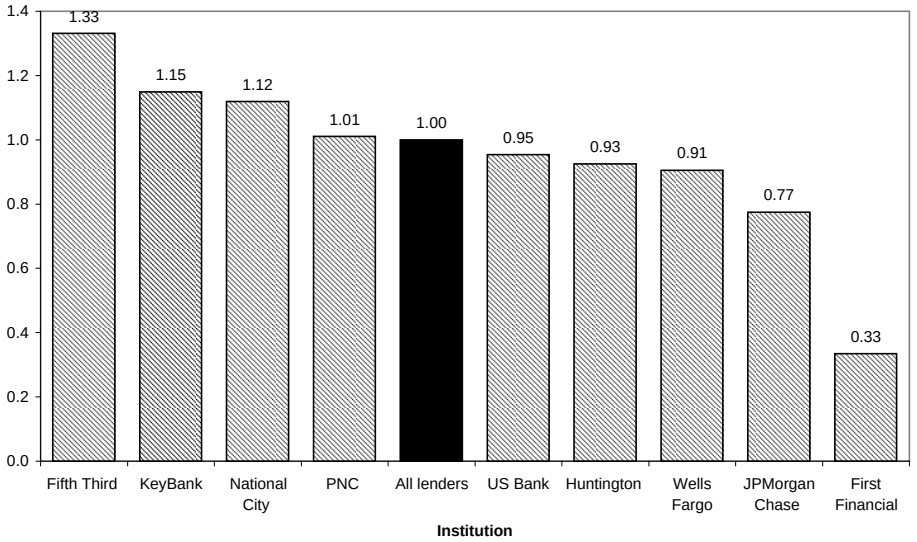
* See the methodology section of this report for more details.

Chart 16: Small Business Lending Ranking in the City of Cincinnati, 2004

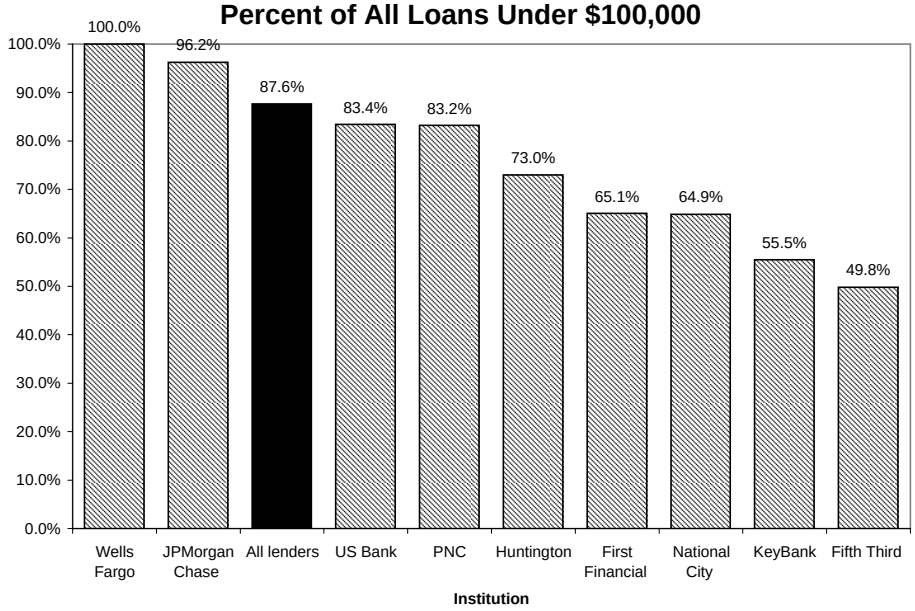
Percent of Loans Made in LMI Census Tracts



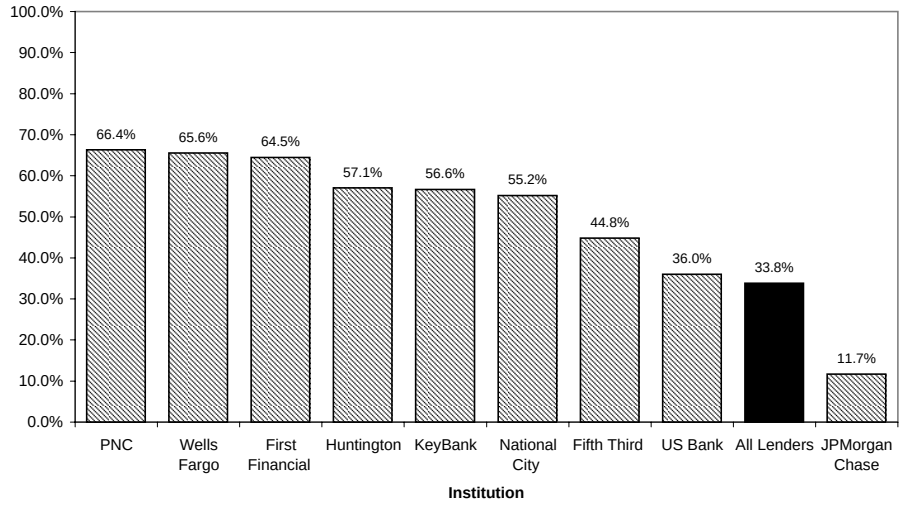
Ratio of LMI/MUI Market Share



Percent of All Loans Under $100,000

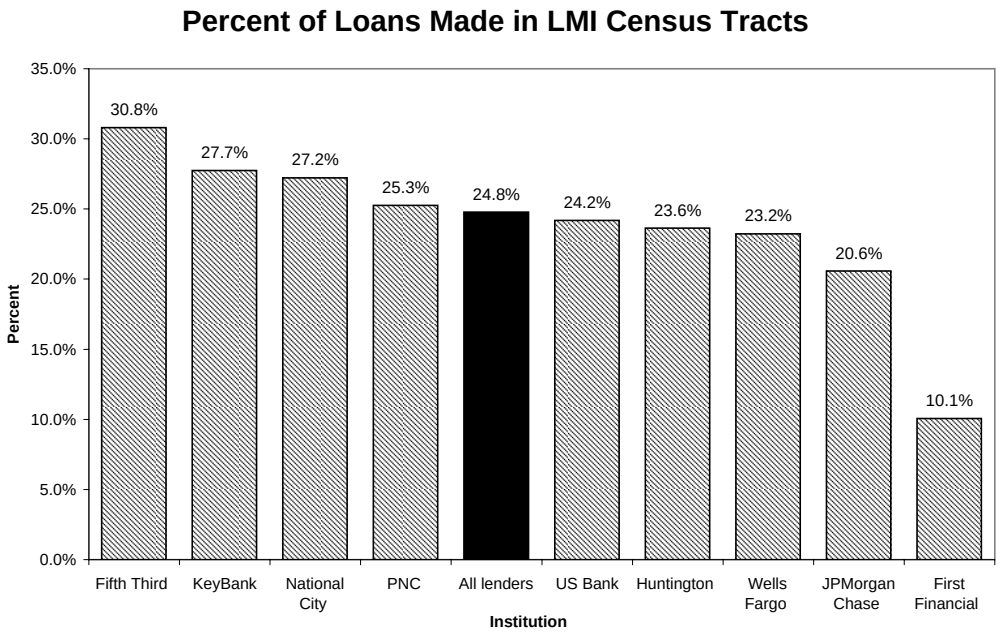


Loans to Businesses with <$1 Million in Revenues



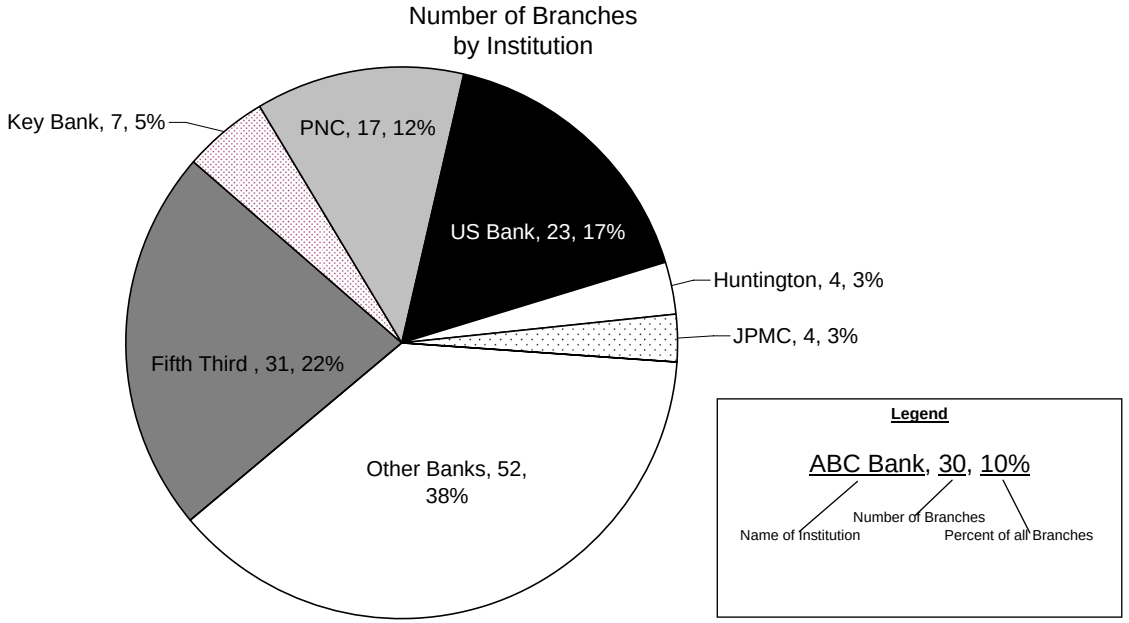
* See the methodology section of this report for more details.

Chart 16 cont: Small Business Lending Ranking in the City of Cincinnati, 2004

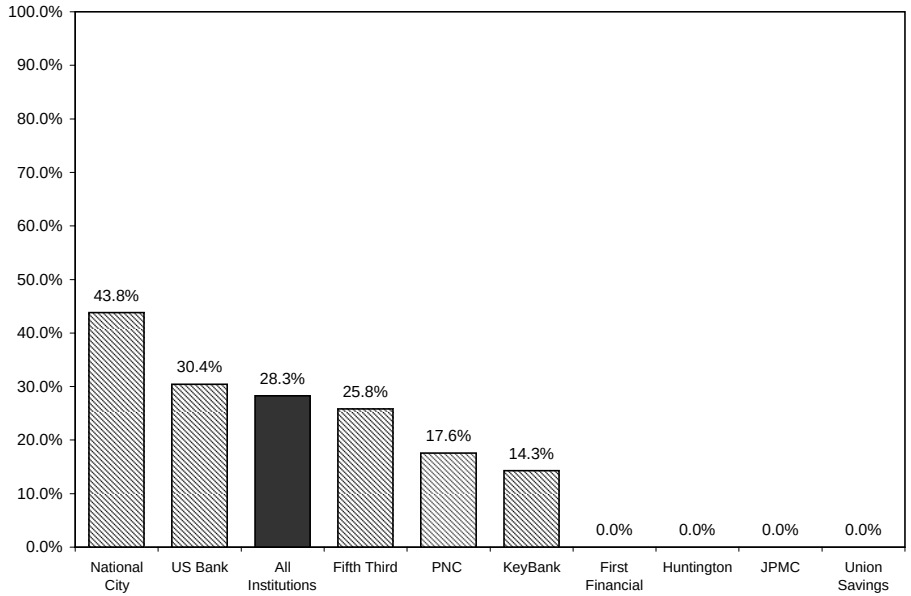


* See the methodology section of this report for more details.

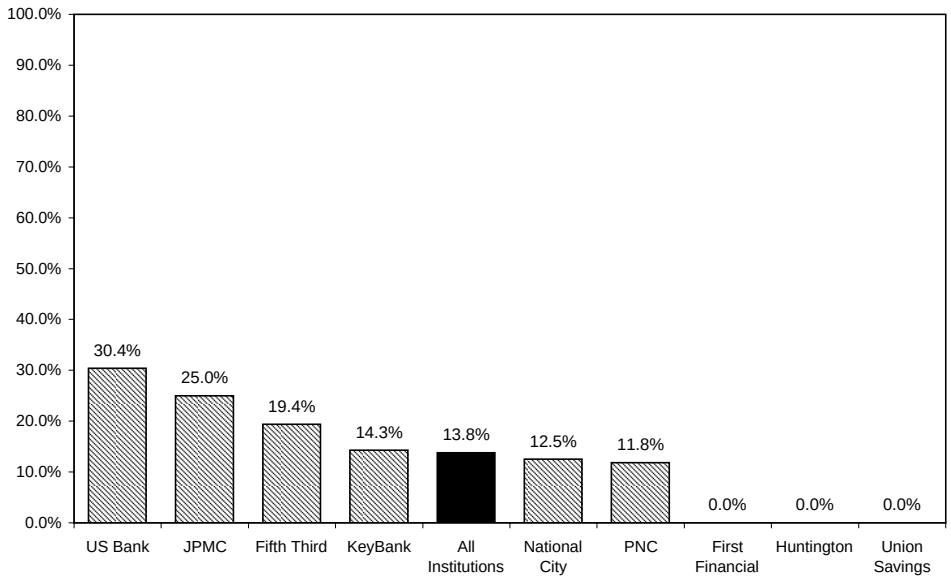
Chart 17: Bank Branch Analysis in the City of Cincinnati



Percent of Branches in LMI Census Tracts in the City of Cincinnati



Percent of Branches in Predominantly Minority Neighborhoods



Appendix C: Tables

Appendix C: Tables

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Table 1. Demographic Information, City of Cincinnati 2000		
Households by Race	**Households**	
	Count	Percent
Race[1]		
White	115,987	63.88%
Black or African American	60,938	33.56%
Hispanic or Latino	1,140	0.62%
Asian	2,606	1.44%
Total[2]	184,134	

Owner-Occupied Housing Units (OOHU) by Minority Level of Census Tract	**OOHU**	
	Count	Percent
Minority Level[3]		
0-49% Minority	64,880	76.91%
0-50% Minority	19,475	23.09%
Total	84,355	

Households by Income Level	**Households**	
	Count	Percent
Income Level		
Low (<50% MSA Income)	62,766	34.09%
Moderate (50-79.99% MSA Income)	35,105	19.06%
Middle (80-119.99% MSA Income)	31,134	16.91%
Upper (120% or More MSA Income)	55,129	29.94%
LMI (<79.99% MSA Income)	97,871	53.15%
MUI (>80% MSA Income)	86,263	46.85%
Total	184,134	

Owner-Occupied Housing Units (OOHU) by Income Level of Census Tract	**OOHU**	
	Count	Percent
Income Level		
Low (<50% MSA Income)	8,518	10.10%
Moderate (50-79.99% MSA Income)	21,053	24.96%
Middle (80-119.99% MSA Income)	38,477	45.61%
Upper (120% or More MSA Income)	16,307	19.33%
LMI (<79.99% MSA Income)	29,571	35.06%
MUI (>80% MSA Income)	54,784	64.94%
Total	84,355	

Gender by Household	**Households**[4]	
	Count	Percent
Borrower Gender		
Male	46,025	25.00%
Female	78,288	42.52%
Joint (Male/Female)	59,821	32.49%
Total[2]	184,134	

1 "White" refers to White Non-Hispanic borrowers; "Black or African American" refers to Black Non-Hispanic borrowers; "Asian" refers to Asian Non-Hispanic borrowers.

2 "Total" refers to total of all races, which includes races in addition to the four included in this analysis. Thus, the number in "total" may not necessarily equal the sum of "White," "Black or African American," "Hispanic or Latino," and "Asian."

3 "Minority" in this instance refers to all persons except White Non-Hispanics.

4 Households in this case refers to whether a given household, as recorded by the Census Bureau 2000, was headed by a male householder or a female householder.

Table 2. Demographic Information, Suburban Cincinnati 2000

Households by Race	Households	
	Count	Percent
Race[1]		
White	550,047	93.32%
Black or African American	29,800	5.06%
Hispanic or Latino	2,909	0.49%
Asian	5,574	0.95%
Total[2]	595,400	

Owner-Occupied Housing Units (OOHU) by Minority Level of Census Tract	OOHU	
	Count	Percent
Minority Level[3]		
0-49% Minority	428,133	97.36%
0-50% Minority	11,596	2.64%
Total	439,729	

Households by Income Level	Households	
	Count	Percent
Income Level		
Low (<50% MSA Income)	114,144	19.17%
Moderate (50-79.99% MSA Income)	95,386	16.02%
Middle (80-119.99% MSA Income)	119,148	20.01%
Upper (120% or More MSA Income)	266,722	44.80%
LMI (<79.99% MSA Income)	209,530	35.19%
MUI (>80% MSA Income)	385,870	64.81%
Total	595,400	

Owner-Occupied Housing Units (OOHU) by Income Level of Census Tract	OOHU	
	Count	Percent
Income Level		
Low (<50% MSA Income)	2,799	0.64%
Moderate (50-79.99% MSA Income)	69,948	15.91%
Middle (80-119.99% MSA Income)	230,880	52.51%
Upper (120% or More MSA Income)	136,102	30.95%
LMI (<79.99% MSA Income)	72,747	16.54%
MUI (>80% MSA Income)	366,982	83.46%
Total	439,729	

Gender by Household	Households[4]	
	Count	Percent
Borrower Gender		
Male	95,006	15.96%
Female	151,145	25.39%
Joint (Male/Female)	349,249	58.66%
Total[2]	595,400	

1 "White" refers to White Non-Hispanic borrowers; "Black or African American" refers to Black Non-Hispanic borrowers; "Asian" refers to Asian Non-Hispanic borrowers.

2 "Total" refers to total of all races, which includes races in addition to the four included in this analysis. Thus, the number in "total" may not necessarily equal the sum of "White," "Black or African American," "Hispanic or Latino," and "Asian."

3 "Minority" in this instance refers to all persons except White Non-Hispanics.

4 Households in this case refers to whether a given household, as recorded by the Census Bureau 2000, was headed by a male householder or a female householder.

Table 3. All Single Family Lending to Owner-Occupants, City of Cincinnati

By Race of Borrower

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to All Races (Portfolio Share)			Households		Ratio of Prime Portfolio Share to Percent of House-holds	Ratio of Subprime Portfolio Share to Percent of House-holds
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Borrower Race[1]										
White	7,418	787	8,205	81.99%	51.00%	77.48%	115,987	63.88%	1.28	0.80
Black or African American	1,485	739	2,224	16.41%	47.89%	21.00%	60,938	33.56%	0.49	1.43
Hispanic or Latino	98	11	109	1.09%	0.73%	1.04%	1,140	0.62%	1.76	1.17
Asian	113	7	120	1.25%	0.45%	1.13%	2,606	1.44%	0.87	0.32
Total[2]	9,996	1,816	11,812				184,134			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Race (Market Share)		Ratio of that Race to White (Market Share Ratio)	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Borrower Race[1]							
White	7,418	787	8,205	90.41%	9.59%	1.00	1.00
Black or African American	1,485	739	2,224	66.77%	33.23%	0.74	3.46
Hispanic or Latino	98	11	109	89.91%	10.09%	0.99	1.05
Asian	113	7	120	94.17%	5.83%	1.04	0.61
Total[2]	9,996	1,816	11,812	84.63%	15.37%	0.94	1.60

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Race to White (Denial Ratio)
	Applications	Denials	Percentage	
Borrower Race[1]				
White	13,106	2,188	16.69%	1.00
Black or African American	5,465	1,698	31.07%	1.86
Hispanic or Latino	179	33	18.44%	1.10
Asian	192	27	14.06%	0.84
Total[2]	23,365	5,061	21.66%	1.30

NOTES

1 "White" refers to White Non-Hispanic borrowers; "Black or African American" refers to Black Non-Hispanic borrowers; "Asian" refers to Asian Non-Hispanic borrowers.

2 "Total" refers to total of all races, which includes races in addition to the four included in this analysis. Thus, the number in "total" may not necessarily equal the sum of "White," "Black or African American," "Hispanic or Latino," and "Asian." This note holds true for both the lending analysis and number of households.

Table 4. All Single Family Lending to Owner-Occupants, City of Cincinnati

By Minority Level of Census Tract

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to Both Minority Levels (Portfolio Share)			Owner-Occupied Housing Units (OOHU)		Ratio of Prime Portfolio Share to Percent of OOHU	Ratio of Subprime Portfolio Share to Percent of OOHU
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Minority Level[1]										
0-49% Minority	8,124	1,095	9,219	81.29%	60.43%	78.09%	64,880	76.91%	1.06	0.79
50-100% Minority	1,870	717	2,587	18.71%	39.57%	21.91%	19,475	23.09%	0.81	1.71
Total[2]	9,996	1,816	11,812				84,355			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Minority Level (Market Share)		Ratio of that Minority Level to 0-49% Minority (Market Share Ratio)	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Minority Level[1]							
0-49% Minority	8,124	1,095	9,219	88.12%	11.88%	1.00	1.00
50-100% Minority	1,870	717	2,587	72.28%	27.72%	0.82	2.33
Total[2]	9,996	1,816	11,812	84.63%	15.37%	0.96	1.29

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Minority Level to 0-49% Minority (Denial Ratio)
	Applications	Denials	Percentage	
Minority Level[1]				
0-49% Minority	16,090	3,106	19.30%	1.00
50-100% Minority	6,424	1,919	29.87%	1.55
Total[2]	22,589	5,061	22.40%	1.16

NOTES

1 "Minority" in this instance refers to all persons except White Non-Hispanics.

2 "Total" refers to total loans to persons in census tracts. In rare cases, census tract information is unknown on an application; thus, "total" may contain a small sum of records in addition to "0-49% minority" and "50-100% minority."

Table 5. All Single Family Lending to Owner-Occupants, City of Cincinnati

By Income Level of Borrower

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to all Income Levels (Portfolio Share)			Households		Ratio of Prime Portfolio Share to Percent of House-holds	Ratio of Subprime Portfolio Share to Percent of House-holds
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Income Level										
Low (<50% MSA Income)	1,257	422	1,679	13.36%	23.51%	14.99%	62,766	34.09%	0.39	0.69
Moderate (50-79.99% MSA Income)	2,683	718	3,401	28.52%	40.00%	30.36%	35,105	19.06%	1.50	2.10
Middle (80-119.99% MSA Income)	2,326	451	2,777	24.72%	25.13%	24.79%	31,134	16.91%	1.46	1.49
Upper (120% or More MSA Income)	3,143	204	3,347	33.40%	11.36%	29.87%	55,129	29.94%	1.12	0.38
LMI (<79.99% MSA Income)	3,940	1,140	5,080	41.87%	63.51%	45.34%	97,871	53.15%	0.79	1.19
MUI (>80% MSA Income)	5,469	655	6,124	58.13%	36.49%	54.66%	86,263	46.85%	1.24	0.78
Total[2]	9,996	1,816	11,812				184,134			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Income Level (Market Share)		Ratio of that Income Level to Upper-Income (Market Share Ratio)[3]	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Income Level							
Low (<50% MSA Income)	1,257	422	1,679	74.87%	25.13%	0.80	4.12
Moderate (50-79.99% MSA Income)	2,683	718	3,401	78.89%	21.11%	0.84	3.46
Middle (80-119.99% MSA Income)	2,326	451	2,777	83.76%	16.24%	0.89	2.66
Upper (120% or More MSA Income)	3,143	204	3,347	93.90%	6.10%	1.00	1.00
LMI (<79.99% MSA Income)	3,940	1,140	5,080	77.56%	22.44%	0.87	2.10
MUI (>80% MSA Income)	5,469	655	6,124	89.30%	10.70%	1.00	1.00
Total[2]	9,996	1,816	11,812	84.63%	15.37%	0.90	2.52

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Income Level to Upper-Income (Denial Ratio)[3]
	Applications	Denials	Percentage	
Income Level				
Low (<50% MSA Income)	4,120	1,386	33.64%	2.19
Moderate (50-79.99% MSA Income)	6,828	1,558	22.82%	1.49
Middle (80-119.99% MSA Income)	5,142	1,053	20.48%	1.33
Upper (120% or More MSA Income)	5,247	806	15.36%	1.00
LMI (<79.99% MSA Income)	10,948	2,944	26.89%	1.50
MUI (>80% MSA Income)	10,389	1,859	17.89%	1.00
Total[2]	22,589	5,061	22.40%	1.46

NOTES

1 "White" refers to White Non-Hispanic borrowers; "Black or African American" refers to Black Non-Hispanic borrowers; "Asian" refers to Asian Non-Hispanic borrowers.

2 "Total" refers to total loans to all persons, including those applications with "income not available" reported. Thus, "total" may be a slightly larger number than the sum of "Low," "Middle," "Moderate," and "Upper." These four categories form a mutually exclusive group; likewise, "LMI" and "MUI" form a mutually exclusive group independent of "Low," "Middle," "Moderate," and Upper."

3 In the case of "Low," "Moderate," "Middle," and "Upper," the index for this ratio (that is, the denominator of the ratio) is "Upper." In the case of "LMI" and "MUI," the index is "MUI."

Table 6. All Single Family Lending to Owner-Occupants, City of Cincinnati

By Income Level of Census Tract

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to all Income Levels (Portfolio Share)			Owner-Occupied Housing Units (OOHU)		Ratio of Prime Portfolio Share to Percent of OOHU[1]	Ratio of Subprime Portfolio Share to Percent of OOHU[1]
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Income Level										
Low (<50% MSA Income)	735	324	1,059	7.91%	18.18%	9.56%	8,518	10.10%	0.78	1.80
Moderate (50-79.99% MSA Income)	2,184	675	2,859	23.50%	37.88%	25.81%	21,053	24.96%	0.94	1.52
Middle (80-119.99% MSA Income)	4,691	726	5,417	50.48%	40.74%	48.91%	38,477	45.61%	1.11	0.89
Upper (120% or More MSA Income)	2,375	86	2,461	25.56%	4.83%	22.22%	16,307	19.33%	1.32	0.25
LMI (<79.99% MSA Income)	2,919	999	3,918	31.41%	56.06%	35.38%	29,571	35.06%	0.90	1.60
MUI (>80% MSA Income)	7,066	812	7,878	76.04%	45.57%	71.13%	54,784	64.94%	1.17	0.70
Total[2]	9,996	1,816	11,812				84,355			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Income Level (Market Share)		Ratio of that Income Level to Upper-Income (Market Share Ratio)[1]	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Income Level							
Low (<50% MSA Income)	735	324	1,059	69.41%	30.59%	0.72	8.76
Moderate (50-79.99% MSA Income)	2,184	675	2,859	76.39%	23.61%	0.79	6.76
Middle (80-119.99% MSA Income)	4,691	726	5,417	86.60%	13.40%	0.90	3.84
Upper (120% or More MSA Income)	2,375	86	2,461	96.51%	3.49%	1.00	1.00
LMI (<79.99% MSA Income)	2,919	999	3,918	74.50%	25.50%	0.83	2.47
MUI (>80% MSA Income)	7,066	812	7,878	89.69%	10.31%	1.00	1.00
Total[2]	9,996	1,816	11,812	84.63%	15.37%	0.88	4.40

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Income Level to Upper-Income (Denial Ratio)[1]
	Applications	Denials	Percentage	
Income Level				
Low (<50% MSA Income)	2,838	911	32.10%	2.79
Moderate (50-79.99% MSA Income)	6,478	1,768	27.29%	2.37
Middle (80-119.99% MSA Income)	9,649	1,932	20.02%	1.74
Upper (120% or More MSA Income)	3,520	405	11.51%	1.00
LMI (<79.99% MSA Income)	9,316	2,679	28.76%	1.62
MUI (>80% MSA Income)	13,169	2,337	17.75%	1.00
Total[2]	22,589	5,061	22.40%	1.95

NOTES

1 In the case of "Low," "Moderate," "Middle," and "Upper," the index for this ratio (that is, the denominator of the ratio) is "Upper." In the case of "LMI" and "MUI," the index is "MUI."

2 "Total" refers to total loans to all persons, including those applications with "income not available" reported. Thus, "total" may be a slightly larger number than the sum of "Low," "Middle," "Moderate," and "Upper" census tracts. These four categories form a mutually exclusive group; likewise, "LMI" and "MUI" form a mutually exclusive group independent of "Low," "Middle," "Moderate," and Upper."

Table 7. All Single Family Lending to Owner-Occupants, City of Cincinnati

By Gender of Borrower

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to Both Genders (Portfolio Share)			Households[3]		Ratio of Prime Portfolio Share to Percent of House-holds	Ratio of Subprime Portfolio Share to Percent of House-holds
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Borrower Gender[1]										
Male	3,041	603	3,644	31.51%	34.68%	31.99%	46,025	25.00%	1.26	1.39
Female	2,995	710	3,705	31.03%	40.83%	32.53%	78,288	42.52%	0.73	0.96
Joint (Male/Female)	3,616	426	4,042	37.46%	24.50%	35.48%	59,821	32.49%	1.15	0.75
Total[2]	9,996	1,816	11,812				184,134			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Gender (Market Share)		Ratio of that Gender to Male (Market Share Ratio)	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Borrower Gender[1]							
Male	3,041	603	3,644	83.45%	16.55%	1.00	1.00
Female	2,995	710	3,705	80.84%	19.16%	0.97	1.16
Joint (Male/Female)	3,616	426	4,042	89.46%	10.54%	1.07	0.64
Total[2]	9,996	1,816	11,812	84.63%	15.37%	1.01	0.93

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Gender to Male (Denial Ratio)
	Applications	Denials	Percentage	
Borrower Gender[1]				
Male	7,062	1,603	22.70%	1.00
Female	7,199	1,672	23.23%	1.02
Joint (Male/Female)	6,789	1,315	19.37%	0.85
Total[2]	22,589	5,061	22.40%	0.99

NOTES

1 Gender refers to whether an application was filed by a male, female, or jointly by both a male and female.

2 "Total" refers to total loans to all genders which includes joint applications and applications in which gender is recorded as "not available." Thus, the number in "total" may not necessarily equal the sum of "male" and "female."

3 "Households" in this case refers to whether a given household, as recorded by the Census Bureau 2000, was headed by a male householder or a female householder.

Table 8. All Single Family Lending to Owner-Occupants, Suburban Cincinnati

By Race of Borrower

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to All Races (Portfolio Share)			Households		Ratio of Prime Portfolio Share to Percent of House-holds	Ratio of Subprime Portfolio Share to Percent of House-holds
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Borrower Race[1]										
White	53,030	5,673	58,703	94.54%	88.27%	93.89%	550,047	93.32%	1.01	0.95
Black or African American	2,014	697	2,711	3.59%	10.84%	4.34%	29,800	5.06%	0.71	2.14
Hispanic or Latino	504	79	583	0.91%	1.25%	0.94%	2,909	0.49%	1.85	2.56
Asian	898	37	935	1.60%	0.58%	1.50%	5,574	0.95%	1.69	0.61
Total[2]	61,079	7,360	68,439				595,400			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Race (Market Share)		Ratio of that Race to White (Market Share Ratio)	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Borrower Race[1]							
White	53,030	5,673	58,703	90.34%	9.66%	1.00	1.00
Black or African American	2,014	697	2,711	74.29%	25.71%	0.82	2.66
Hispanic or Latino	504	79	583	86.45%	13.55%	0.96	1.40
Asian	898	37	935	96.04%	3.96%	1.06	0.41
Total[2]	61,079	7,360	68,439	89.25%	10.75%	0.99	1.11

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Race to White (Denial Ratio)
	Applications	Denials	Percentage	
Borrower Race[1]				
White	95,039	16,988	17.87%	1.00
Black or African American	6,046	1,747	28.90%	1.62
Hispanic or Latino	993	199	20.04%	1.12
Asian	1,341	152	11.33%	0.63
Total[2]	120,611	23,908	19.82%	1.11

NOTES

1 "White" refers to White Non-Hispanic borrowers; "Black or African American" refers to Black Non-Hispanic borrowers; "Asian" refers to Asian Non-Hispanic borrowers.

2 "Total" refers to total of all races, which includes races in addition to the four included in this analysis. Thus, the number in "total" may not necessarily equal the sum of "White," "Black or African American," "Hispanic or Latino," and "Asian." This note holds true for both the lending analysis and number of households.

Table 9. All Single Family Lending to Owner-Occupants, Suburban Cincinnati

By Minority Level of Census Tract

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to Both Minority Levels (Portfolio Share)			Owner-Occupied Housing Units (OOHU)		Ratio of Prime Portfolio Share to Percent of OOHU	Ratio of Subprime Portfolio Share to Percent of OOHU
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Minority Level[1]										
0-49% Minority	59,867	6,925	66,792	98.05%	94.26%	97.64%	428,133	97.36%	1.01	0.97
50-100% Minority	1,193	422	1,615	1.95%	5.74%	2.36%	11,596	2.64%	0.74	2.18
Total[2]	61,079	7,360	68,439				439,729			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Minority Level (Market Share)		Ratio of that Minority Level to 0-49% Minority (Market Share Ratio)	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Minority Level[1]							
0-49% Minority	59,867	6,925	66,792	89.63%	10.37%	1.00	1.00
50-100% Minority	1,193	422	1,615	73.87%	26.13%	0.82	2.52
Total[2]	61,079	7,360	68,439	89.25%	10.75%	1.00	1.04

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Minority Level to 0 49% Minority (Denial Ratio)
	Applications	Denials	Percentage	
Minority Level[1]				
0-49% Minority	116,163	22,471	19.34%	1.00
50-100% Minority	4,168	1,316	31.57%	1.63
Total[2]	120,611	23,908	19.82%	1.02

NOTES

1 "Minority" in this instance refers to all persons except White Non-Hispanics.

2 "Total" refers to total loans to persons in census tracts. In rare cases, census tract information is unknown on an application; thus, "total" may contain a small sum of records in addition to "0-49% minority" and "50-100% minority."

Table 10. All Single Family Lending to Owner-Occupants, Suburban Cincinnati

By Income Level of Borrower

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to all Income Levels (Portfolio Share)			Households		Ratio of Prime Portfolio Share to Percent of House-holds	Ratio of Subprime Portfolio Share to Percent of House-holds
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Income Level										
Low (<50% MSA Income)	5,204	1,212	6,416	9.02%	16.67%	9.88%	114,144	19.17%	0.47	0.87
Moderate (50-79.99% MSA Income)	14,380	2,531	16,911	24.92%	34.82%	26.03%	95,386	16.02%	1.56	2.17
Middle (80-119.99% MSA Income)	16,176	2,136	18,312	28.04%	29.39%	28.19%	119,148	20.01%	1.40	1.47
Upper (120% or More MSA Income)	21,934	1,390	23,324	38.02%	19.12%	35.90%	266,722	44.80%	0.85	0.43
LMI (<79.99% MSA Income)	19,584	3,743	23,327	33.94%	51.49%	35.91%	209,530	35.19%	0.96	1.46
MUI (>80% MSA Income)	38,110	3,526	41,636	66.06%	48.51%	64.09%	385,870	64.81%	1.02	0.75
Total[2]	61,079	7,360	68,439				595,400			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Income Level (Market Share)		Ratio of that Income Level to Upper-Income (Market Share Ratio)[3]	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Income Level							
Low (<50% MSA Income)	5,204	1,212	6,416	81.11%	18.89%	0.86	3.17
Moderate (50-79.99% MSA Income)	14,380	2,531	16,911	85.03%	14.97%	0.90	2.51
Middle (80-119.99% MSA Income)	16,176	2,136	18,312	88.34%	11.66%	0.94	1.96
Upper (120% or More MSA Income)	21,934	1,390	23,324	94.04%	5.96%	1.00	1.00
LMI (<79.99% MSA Income)	19,584	3,743	23,327	83.95%	16.05%	0.92	1.89
MUI (>80% MSA Income)	38,110	3,526	41,636	91.53%	8.47%	1.00	1.00
Total[2]	61,079	7,360	68,439	89.25%	10.75%	0.95	1.80

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Income Level to Upper-Income (Denial Ratio)[3]
	Applications	Denials	Percentage	
Income Level				
Low (<50% MSA Income)	14,443	4,376	30.30%	2.14
Moderate (50-79.99% MSA Income)	31,499	7,057	22.40%	1.58
Middle (80-119.99% MSA Income)	32,582	6,299	19.33%	1.37
Upper (120% or More MSA Income)	36,028	5,099	14.15%	1.00
LMI (<79.99% MSA Income)	45,942	11,433	24.89%	1.50
MUI (>80% MSA Income)	68,610	11,398	16.61%	1.00
Total[2]	120,611	23,908	19.82%	1.40

NOTES

1 "White" refers to White Non-Hispanic borrowers; "Black or African American" refers to Black Non-Hispanic borrowers; "Asian" refers to Asian Non-Hispanic borrowers.

2 "Total" refers to total loans to all persons, including those applications with "income not available" reported. Thus, "total" may be a slightly larger number than the sum of "Low," "Middle," "Moderate," and "Upper." These four categories form a mutually exclusive group; likewise, "LMI" and "MUI" form a mutually exclusive group independent of "Low," "Middle," "Moderate," and Upper."

3 In the case of "Low," "Moderate," "Middle," and "Upper," the index for this ratio (that is, the denominator of the ratio) is "Upper." In the case of "LMI" and "MUI," the index is "MUI."

Table 11. All Single Family Lending to Owner-Occupants, Suburban Cincinnati

By Income Level of Census Tract

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to all Income Levels (Portfolio Share)			Owner-Occupied Housing Units (OOHU)		Ratio of Prime Portfolio Share to Percent of OOHU[1]	Ratio of Subprime Portfolio Share to Percent of OOHU[1]
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Income Level										
Low (<50% MSA Income)	235	116	351	0.38%	1.58%	0.51%	2,799	0.64%	0.60	2.48
Moderate (50-79.99% MSA Income)	6,490	1,559	8,049	10.63%	21.22%	11.77%	69,948	15.91%	0.67	1.33
Middle (80-119.99% MSA Income)	30,342	4,163	34,505	49.70%	56.66%	50.45%	230,880	52.51%	0.95	1.08
Upper (120% or More MSA Income)	23,986	1,509	25,495	39.29%	20.54%	37.27%	136,102	30.95%	1.27	0.66
LMI (<79.99% MSA Income)	6,725	1,675	8,400	11.02%	22.80%	12.28%	72,747	16.54%	0.67	1.38
MUI (>80% MSA Income)	54,328	5,672	60,000	88.98%	77.20%	87.72%	366,982	83.46%	1.07	0.93
Total[2]	61,079	7,360	68,439				439,729			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Income Level (Market Share)		Ratio of that Income Level to Upper-Income (Market Share Ratio)[1]	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Income Level							
Low (<50% MSA Income)	235	116	351	66.95%	33.05%	0.71	5.58
Moderate (50-79.99% MSA Income)	6,490	1,559	8,049	80.63%	19.37%	0.86	3.27
Middle (80-119.99% MSA Income)	30,342	4,163	34,505	87.94%	12.06%	0.93	2.04
Upper (120% or More MSA Income)	23,986	1,509	25,495	94.08%	5.92%	1.00	1.00
LMI (<79.99% MSA Income)	6,725	1,675	8,400	80.06%	19.94%	0.88	2.11
MUI (>80% MSA Income)	54,328	5,672	60,000	90.55%	9.45%	1.00	1.00
Total[2]	61,079	7,360	68,439	89.25%	10.75%	0.95	1.82

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Income Level to Upper-Income (Denial Ratio)[1]
	Applications	Denials	Percentage	
Income Level				
Low (<50% MSA Income)	916	284	31.00%	2.17
Moderate (50-79.99% MSA Income)	17,553	4,736	26.98%	1.89
Middle (80-119.99% MSA Income)	62,844	13,190	20.99%	1.47
Upper (120% or More MSA Income)	38,995	5,570	14.28%	1.00
LMI (<79.99% MSA Income)	18,469	5,020	27.18%	1.48
MUI (>80% MSA Income)	101,839	18,760	18.42%	1.00
Total[2]	120,611	23,908	19.82%	1.39

NOTES

1 In the case of "Low," "Moderate," "Middle," and "Upper," the index for this ratio (that is, the denominator of the ratio) is "Upper." In the case of "LMI" and "MUI," the index is "MUI."

2 "Total" refers to total loans to all persons, including those applications with "income not available" reported. Thus, "total" may be a slightly larger number than the sum of "Low," "Middle," "Moderate," and "Upper" census tracts. These four categories form a mutually exclusive group; likewise, "LMI" and "MUI" form a mutually exclusive group independent of "Low," "Middle," "Moderate," and Upper."

Table 12. All Single Family Lending to Owner-Occupants, Suburban Cincinnati

By Gender of Borrower

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to Both Genders (Portfolio Share)			Households[3]		Ratio of Prime Portfolio Share to Percent of House-holds	Ratio of Subprime Portfolio Share to Percent of House-holds
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Borrower Gender[1]										
Male	15,249	2,371	17,620	25.69%	33.79%	26.55%	95,006	15.96%	1.61	2.12
Female	11,573	1,952	13,525	19.50%	27.82%	20.38%	151,145	25.39%	0.77	1.10
Joint (Male/Female)	32,529	2,694	35,223	54.81%	38.39%	53.07%	349,249	58.66%	0.93	0.65
Total[2]	61,079	7,360	68,439				595,400			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Gender (Market Share)		Ratio of that Gender to Male (Market Share Ratio)	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Borrower Gender[1]							
Male	15,249	2,371	17,620	86.54%	13.46%	1.00	1.00
Female	11,573	1,952	13,525	85.57%	14.43%	0.99	1.07
Joint (Male/Female)	32,529	2,694	35,223	92.35%	7.65%	1.07	0.57
Total[2]	61,079	7,360	68,439	89.25%	10.75%	1.03	0.80

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Gender to Male (Denial Ratio)
	Applications	Denials	Percentage	
Borrower Gender[1]				
Male	33,459	7,415	22.16%	1.00
Female	24,219	5,097	21.05%	0.95
Joint (Male/Female)	55,581	9,415	16.94%	0.76
Total[2]	120,611	23,908	19.82%	0.89

NOTES

1 Gender refers to whether an application was filed by a male, female, or jointly by both a male and female.

2 "Total" refers to total loans to all genders which includes joint applications and applications in which gender is recorded as "not available." Thus, the number in "total" may not necessarily equal the sum of "male" and "female."

3 "Households" in this case refers to whether a given household, as recorded by the Census Bureau 2000, was headed by a male householder or a female householder.

Table 13. Home Purchase Lending to Owner-Occupants, City of Cincinnati

By Race of Borrower

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to All Races (Portfolio Share)			Households		Ratio of Prime Portfolio Share to Percent of House-holds	Ratio of Subprime Portfolio Share to Percent of House-holds
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Borrower Race[1]										
White	3,243	230	3,473	80.87%	45.82%	76.97%	115,997	63.88%	1.27	0.72
Black or African American	632	264	896	15.76%	52.59%	19.86%	60,938	33.56%	0.47	1.57
Hispanic or Latino	61	3	64	1.55%	0.62%	1.01%	1,140	0.62%	2.48	0.99
Asian	69	2	71	1.72%	0.40%	1.57%	2,606	1.44%	1.20	0.28
Total[2]	4,293	587	4,880				184,134			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Race (Market Share)		Ratio of that Race to White (Market Share Ratio)	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Borrower Race[1]							
White	3,243	230	3,473	93.38%	6.62%	1.00	1.00
Black or African American	632	264	896	70.54%	29.46%	0.76	4.45
Hispanic or Latino	61	3	64	95.31%	4.69%	1.02	0.71
Asian	69	2	71	97.18%	2.82%	1.04	0.43
Total[2]	4,293	587	4,880	87.97%	12.03%	0.94	1.82

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Race to White (Denial Ratio)
	Applications	Denials	Percentage	
Borrower Race[1]				
White	4,686	437	9.33%	1.00
Black or African American	1,577	304	19.28%	2.07
Hispanic or Latino	86	10	11.63%	1.25
Asian	97	5	5.15%	0.55
Total[2]	7,325	935	12.76%	1.37

NOTES

1 "White" refers to White Non-Hispanic borrowers; "Black or African American" refers to Black Non-Hispanic borrowers; "Asian" refers to Asian Non-Hispanic borrowers.

2 "Total" refers to total of all races, which includes races in addition to the four included in this analysis. Thus, the number in "total" may not necessarily equal the sum of "White," "Black or African American," "Hispanic or Latino," and "Asian." This note holds true for both the lending analysis and number of households.

Table 14. Home Purchase Lending to Owner-Occupants, City of Cincinnati

By Minority Level of Census Tract

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to Both Minority Levels (Portfolio Share)			Owner-Occupied Housing Units (OOHU)		Ratio of Prime Portfolio Share to Percent of House-holds	Ratio of Subprime Portfolio Share to Percent of House-holds
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Minority Level[1]										
0-49% Minority	3,645	387	4,032	83.49%	65.59%	81.36%	64,880	76.91%	1.09	0.85
50-100% Minority	721	203	924	16.51%	34.41%	18.64%	19,475	23.09%	0.72	1.49
Total[2]	4,366	590	4,956				84,355			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Minority Level (Market Share)		Ratio of that Minority Level to 0-49% Minority (Market Share Ratio)	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Minority Level[1]							
0-49% Minority	3,645	387	4,032	90.40%	9.60%	1.00	1.00
50-100% Minority	721	203	924	78.03%	21.97%	0.86	2.29
Total[2]	4,366	590	4,956	88.10%	11.90%	0.97	1.24

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Minority Level to 0 49% Minority (Denial Ratio)
	Applications	Denials	Percentage	
Minority Level[1]				
0-49% Minority	5,635	602	10.68%	1.00
50-100% Minority	1,680	329	19.58%	1.83
Total[2]	7,325	935	12.76%	1.19

NOTES

1 "Minority" in this instance refers to all persons except White Non-Hispanics.

2 "Total" refers to total loans to persons in census tracts. In rare cases, census tract information is unknown on an application; thus, "total" may contain a small sum of records in addition to "0-49% minority" and "50-100% minority."

Table 15. Home Purchase Lending to Owner-Occupants, City of Cincinnati

By Income Level of Borrower

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to all Income Levels (Portfolio Share)			Households		Ratio of Prime Portfolio Share to Percent of House-holds	Ratio of Subprime Portfolio Share to Percent of House-holds
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Income Level										
Low (<50% MSA Income)	556	136	692	13.23%	23.45%	9.96%	62,766	34.09%	0.39	0.69
Moderate (50-79.99% MSA Income)	1,371	254	1,625	32.61%	43.79%	23.39%	35,105	19.06%	1.71	2.30
Middle (80-119.99% MSA Income)	1,009	137	1,146	24.00%	23.62%	16.50%	31,134	16.91%	1.42	1.40
Upper (120% or More MSA Income)	1,268	53	1,321	30.16%	9.14%	19.02%	55,129	29.94%	1.01	0.31
LMI (<79.99% MSA Income)	1,927	390	2,317	45.84%	67.24%	33.36%	97,871	53.15%	0.86	1.27
MUI (>80% MSA Income)	2,277	190	2,467	54.16%	32.76%	35.52%	86,263	46.85%	1.16	0.70
Total[2]	4,366	590	4,956				184,134			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Income Level (Market Share)		Ratio of that Income Level to Upper-Income (Market Share Ratio)[3]	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Income Level							
Low (<50% MSA Income)	556	136	692	80.35%	19.65%	0.84	4.90
Moderate (50-79.99% MSA Income)	1,371	254	1,625	84.37%	15.63%	0.88	3.90
Middle (80-119.99% MSA Income)	1,009	137	1,146	88.05%	11.95%	0.92	2.98
Upper (120% or More MSA Income)	1,268	53	1,321	95.99%	4.01%	1.00	1.00
LMI (<79.99% MSA Income)	1,927	390	2,317	83.17%	16.83%	0.90	2.19
MUI (>80% MSA Income)	2,277	190	2,467	92.30%	7.70%	1.00	1.00
Total[2]	590	4,366	4,956	11.90%	88.10%	0.12	21.96

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Income Level to Upper-Income (Denial Ratio)[3]
	Applications	Denials	Percentage	
Income Level				
Low (<50% MSA Income)	1,174	257	21.89%	2.46
Moderate (50-79.99% MSA Income)	2,398	294	12.26%	1.38
Middle (80-119.99% MSA Income)	1,601	175	10.93%	1.23
Upper (120% or More MSA Income)	1,773	158	8.91%	1.00
LMI (<79.99% MSA Income)	3,572	551	15.43%	1.56
MUI (>80% MSA Income)	3,374	333	9.87%	1.00
Total[2]	7,325	935	12.76%	1.43

NOTES

1 "White" refers to White Non-Hispanic borrowers; "Black or African American" refers to Black Non-Hispanic borrowers; "Asian" refers to Asian Non-Hispanic borrowers.

2 "Total" refers to total loans to all persons, including those applications with "income not available" reported. Thus, "total" may be a slightly larger number than the sum of "Low," "Middle," "Moderate," and "Upper." These four categories form a mutually exclusive group; likewise, "LMI" and "MUI" form a mutually exclusive group independent of "Low," "Middle," "Moderate," and Upper."

3 In the case of "Low," "Moderate," "Middle," and "Upper," the index for this ratio (that is, the denominator of the ratio) is "Upper." In the case of "LMI" and "MUI," the index is "MUI."

Table 16. Home Purchase Lending to Owner-Occupants, City of Cincinnati

By Income Level of Census Tract

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to all Income Levels (Portfolio Share)			Owner-Occupied Housing Units (OOHU)		Ratio of Prime Portfolio Share to Percent of OOHU	Ratio of Subprime Portfolio Share to Percent of OOHU
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Income Level										
Low (<50% MSA Income)	303	104	407	6.94%	17.63%	8.22%	8,518	10.10%	0.69	1.75
Moderate (50-79.99% MSA Income)	984	214	1,198	22.55%	36.27%	24.18%	21,053	24.96%	0.90	1.45
Middle (80-119.99% MSA Income)	2,101	253	2,354	48.14%	42.88%	47.52%	38,477	45.61%	1.06	0.94
Upper (120% or More MSA Income)	976	19	995	22.36%	3.22%	20.08%	16,307	19.33%	1.16	0.17
LMI (<79.99% MSA Income)	1,287	318	1,605	29.49%	53.90%	32.40%	29,571	35.06%	0.84	1.54
MUI (>80% MSA Income)	3,077	272	3,349	70.51%	46.10%	67.60%	54,784	64.94%	1.09	0.71
Total[2]	4,366	590	4,956				84,355			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Income Level (Market Share)		Ratio of that Income Level to Upper-Income (Market Share Ratio)[1]	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Income Level							
Low (<50% MSA Income)	303	104	407	74.45%	25.55%	0.76	13.38
Moderate (50-79.99% MSA Income)	984	214	1,198	82.14%	17.86%	0.84	9.35
Middle (80-119.99% MSA Income)	2,101	253	2,354	89.25%	10.75%	0.91	5.63
Upper (120% or More MSA Income)	976	19	995	98.09%	1.91%	1.00	1.00
LMI (<79.99% MSA Income)	1,287	318	1,605	80.19%	19.81%	0.87	2.44
MUI (>80% MSA Income)	3,077	272	3,349	91.88%	8.12%	1.00	1.00
Total[2]	4,366	590	4,956	88.10%	11.90%	0.90	6.23

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Income Level to Upper-Income (Denial Ratio)[1]
	Applications	Denials	Percentage	
Income Level				
Low (<50% MSA Income)	775	167	21.55%	3.33
Moderate (50-79.99% MSA Income)	1,974	332	16.82%	2.60
Middle (80-119.99% MSA Income)	3,276	347	10.59%	1.64
Upper (120% or More MSA Income)	1,284	83	6.46%	1.00
LMI (<79.99% MSA Income)	2,749	499	18.15%	1.92
MUI (>80% MSA Income)	4,560	430	9.43%	1.00
Total[2]	7,325	935	12.76%	1.97

NOTES

1 In the case of "Low," "Moderate," "Middle," and "Upper," the index for this ratio (that is, the denominator of the ratio) is "Upper." In the case of "LMI" and "MUI," the index is MUI.

2 "Total" refers to total loans to all persons, including those applications with "income not available" reported. Thus, "total" may be a slightly larger number than the sum of "Low," "Middle," "Moderate," and "Upper" census tracts. These four categories form a mutually exclusive group; likewise, "LMI" and "MUI" form a mutually exclusive group independent of "Low," "Middle," "Moderate," and Upper."

Table 17. Home Purchase Lending to Owner-Occupants, City of Cincinnati

By Gender of Borrower

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to Both Genders (Portfolio Share)			Households[3]		Ratio of Prime Portfolio Share to Percent of House-holds	Ratio of Subprime Portfolio Share to Percent of House-holds
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Borrower Gender[1]										
Male	1,514	238	1,752	35.51%	42.05%	25.06%	46,025	25.00%	1.42	1.68
Female	1,407	239	1,646	33.00%	42.23%	23.55%	78,288	42.52%	0.78	0.99
Joint (Male/Female)	1,342	89	1,431	31.48%	15.72%	20.47%	59,821	32.49%	0.97	0.48
Total[2]	4,366	590	4,956				184,134			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Gender (Market Share)		Ratio of that Gender to Male (Market Share Ratio)	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Borrower Gender[1]							
Male	1,514	238	1,752	86.42%	13.58%	1.00	1.00
Female	1,407	239	1,646	85.48%	14.52%	0.99	1.07
Joint (Male/Female)	1,342	89	1,431	93.78%	6.22%	1.09	0.46
Total[2]	4,366	590	4,956	88.10%	11.90%	1.02	0.88

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Gender to Male (Denial Ratio)
	Applications	Denials	Percentage	
Borrower Gender[1]				
Male	2,641	358	13.56%	1.00
Female	2,471	322	13.03%	0.96
Joint (Male/Female)	1,878	172	9.16%	0.68
Total[2]	7,325	935	12.76%	0.94

NOTES

1 Gender refers to whether an application was filed by a male, female, or jointly by both a male and female.

2 "Total" refers to total loans to all genders which includes joint applications and applications in which gender is recorded as "not available." Thus, the number in "total" may not necessarily equal the sum of "male" and "female."

3 "Households" in this case refers to whether a given household, as recorded by the Census Bureau 2000, was headed by a male householder or a female householder.

Table 18. Home Purchase Lending to Owner-Occupants, Suburban Cincinnati

By Race of Borrower

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to All Races (Portfolio Share)			Households		Ratio of Prime Portfolio Share to Percent of House-holds	Ratio of Subprime Portfolio Share to Percent of House-holds
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Borrower Race[1]										
White	22,254	1,727	23,981	93.78%	86.22%	93.19%	550,047	93.32%	1.00	0.92
Black or African American	883	254	1,137	3.72%	12.68%	4.42%	29,800	5.06%	0.74	2.51
Hispanic or Latino	271	39	310	1.15%	1.99%	1.21%	2,909	0.49%	2.34	4.06
Asian	527	16	543	2.22%	0.80%	2.11%	5,574	0.95%	2.35	0.84
Total[2]	25,650	2,218	27,868				595,400			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Race (Market Share)		Ratio of that Race to White (Market Share Ratio)	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Borrower Race[1]							
White	22,254	1,727	23,981	92.80%	7.20%	1.00	1.00
Black or African American	883	254	1,137	77.66%	22.34%	0.84	3.10
Hispanic or Latino	271	39	310	87.42%	12.58%	0.94	1.75
Asian	527	16	543	97.05%	2.95%	1.05	0.41
Total[2]	25,650	2,218	27,868	92.04%	7.96%	0.99	1.11

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Race to White (Denial Ratio)
	Applications	Denials	Percentage	
Borrower Race[1]				
White	31,297	2,886	9.22%	1.00
Black or African American	1,910	363	19.01%	2.06
Hispanic or Latino	453	62	13.69%	1.48
Asian	719	59	8.21%	0.89
Total[2]	37,783	3,961	10.48%	1.14

NOTES

1 "White" refers to White Non-Hispanic borrowers; "Black or African American" refers to Black Non-Hispanic borrowers; "Asian" refers to Asian Non-Hispanic borrowers.

2 "Total" refers to total of all races, which includes races in addition to the four included in this analysis. Thus, the number in "total" may not necessarily equal the sum of "White," "Black or African American," "Hispanic or Latino," and "Asian." This note holds true for both the lending analysis and number of households.

Table 19. Home Purchase Lending to Owner-Occupants, Suburban Cincinnati

By Minority Level of Census Tract

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to Both Minority Levels (Portfolio Share)			Owner-Occupied Housing Units (OOHU)		Ratio of Prime Portfolio Share to Percent of OOHU	Ratio of Subprime Portfolio Share to Percent of OOHU
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Minority Level[1]										
0-49% Minority	25,245	2,114	27,359	98.44%	95.40%	98.19%	428,133	97.36%	1.01	0.98
50-100% Minority	401	102	503	1.56%	4.60%	1.81%	11,596	2.64%	0.59	1.75
Total[2]	25,650	2,218	27,868				439,729			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Minority Level (Market Share)		Ratio of that Minority Level to 0-49% Minority (Market Share Ratio)	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Minority Level[1]							
0-49% Minority	25,245	2,114	27,359	92.27%	7.73%	1.00	1.00
50-100% Minority	401	102	503	79.72%	20.28%	0.86	2.62
Total[2]	25,650	2,218	27,868	92.04%	7.96%	1.00	1.03

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Minority Level to 0 49% Minority (Denial Ratio)
	Applications	Denials	Percentage	
Minority Level[1]				
0-49% Minority	36,850	3,769	10.23%	1.00
50-100% Minority	912	184	20.18%	1.97
Total[2]	37,783	3,961	10.48%	1.02

NOTES

1 "Minority" in this instance refers to all persons except White Non-Hispanics.

2 "Total" refers to total loans to persons in census tracts. In rare cases, census tract information is unknown on an application; thus, "total" may contain a small sum of records in addition to "0-49% minority" and "50-100% minority."

Table 20. Home Purchase Lending to Owner-Occupants, Suburban Cincinnati

By Income Level of Borrower

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to all Income Levels (Portfolio Share)			Households		Ratio of Prime Portfolio Share to Percent of House-holds	Ratio of Subprime Portfolio Share to Percent of House-holds
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Income Level										
Low (<50% MSA Income)	2,318	356	2,674	9.31%	16.34%	9.88%	114,144	19.17%	0.49	0.85
Moderate (50-79.99% MSA Income)	6,739	827	7,566	27.07%	37.95%	27.95%	95,386	16.02%	1.69	2.37
Middle (80-119.99% MSA Income)	6,868	625	7,493	27.59%	28.68%	27.68%	119,148	20.01%	1.38	1.43
Upper (120% or More MSA Income)	8,969	371	9,340	36.03%	17.03%	34.50%	266,722	44.80%	0.80	0.38
LMI (<79.99% MSA Income)	9,057	1,183	10,240	36.38%	54.29%	37.82%	209,530	35.19%	1.03	1.54
MUI (>80% MSA Income)	15,837	996	16,833	63.62%	45.71%	62.18%	385,870	64.81%	0.98	0.71
Total[2]	25,650	2,218	27,868				595,400			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Income Level (Market Share)		Ratio of that Income Level to Upper-Income (Market Share Ratio)[3]	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Income Level							
Low (<50% MSA Income)	2,318	356	2,674	86.69%	13.31%	0.90	3.35
Moderate (50-79.99% MSA Income)	6,739	827	7,566	89.07%	10.93%	0.93	2.75
Middle (80-119.99% MSA Income)	6,868	625	7,493	91.66%	8.34%	0.95	2.10
Upper (120% or More MSA Income)	8,969	371	9,340	96.03%	3.97%	1.00	1.00
LMI (<79.99% MSA Income)	9,057	1,183	10,240	88.45%	11.55%	0.94	1.95
MUI (>80% MSA Income)	15,837	996	16,833	94.08%	5.92%	1.00	1.00
Total[2]	25,650	2,218	27,868	92.04%	7.96%	0.96	2.00

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Income Level to Upper-Income (Denial Ratio)[3]
	Applications	Denials	Percentage	
Income Level				
Low (<50% MSA Income)	4,238	809	19.09%	2.98
Moderate (50-79.99% MSA Income)	10,623	1,327	12.49%	1.95
Middle (80-119.99% MSA Income)	9,862	902	9.15%	1.43
Upper (120% or More MSA Income)	11,664	746	6.40%	1.00
LMI (<79.99% MSA Income)	14,861	2,136	14.37%	1.88
MUI (>80% MSA Income)	21,526	1,648	7.66%	1.00
Total[2]	37,783	3,961	10.48%	1.64

NOTES

1 "White" refers to White Non-Hispanic borrowers; "Black or African American" refers to Black Non-Hispanic borrowers; "Asian" refers to Asian Non-Hispanic borrowers.

2 "Total" refers to total loans to all persons, including those applications with "income not available" reported. Thus, "total" may be a slightly larger number than the sum of "Low," "Middle," "Moderate," and "Upper." These four categories form a mutually exclusive group; likewise, "LMI" and "MUI" form a mutually exclusive group independent of "Low," "Middle," "Moderate," and Upper."

3 In the case of "Low," "Moderate," "Middle," and "Upper," the index for this ratio (that is, the denominator of the ratio) is "Upper." In the case of "LMI" and "MUI," the index is "MUI."

Table 21. Home Purchase Lending to Owner-Occupants, Suburban Cincinnati

By Income Level of Census Tract

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to all Income Levels (Portfolio Share)			Owner-Occupied Housing Units (OOHU)		Ratio of Prime Portfolio Share to Percent of OOHU[1]	Ratio of Subprime Portfolio Share to Percent of OOHU[1]
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Income Level										
Low (<50% MSA Income)	116	23	139	0.45%	1.04%	0.50%	2,799	0.64%	0.71	1.63
Moderate (50-79.99% MSA Income)	2,659	443	3,102	10.37%	19.99%	11.14%	69,948	15.91%	0.65	1.26
Middle (80-119.99% MSA Income)	12,475	1,264	13,739	48.65%	57.04%	49.32%	230,880	52.51%	0.93	1.09
Upper (120% or More MSA Income)	10,390	486	10,876	40.52%	21.93%	39.04%	136,102	30.95%	1.31	0.71
LMI (<79.99% MSA Income)	2,775	466	3,241	10.82%	21.03%	11.63%	72,747	16.54%	0.65	1.27
MUI (>80% MSA Income)	22,865	1,750	24,615	89.18%	78.97%	88.37%	366,982	83.46%	1.07	0.95
Total[2]	25,650	2,218	27,868				439,729			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Income Level (Market Share)		Ratio of that Income Level to Upper-Income (Market Share Ratio)[1]	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Income Level							
Low (<50% MSA Income)	116	23	139	83.45%	16.55%	0.87	3.70
Moderate (50-79.99% MSA Income)	2,659	443	3,102	85.72%	14.28%	0.90	3.20
Middle (80-119.99% MSA Income)	12,475	1,264	13,739	90.80%	9.20%	0.95	2.06
Upper (120% or More MSA Income)	10,390	486	10,876	95.53%	4.47%	1.00	1.00
LMI (<79.99% MSA Income)	2,775	466	3,241	85.62%	14.38%	0.92	2.02
MUI (>80% MSA Income)	22,865	1,750	24,615	92.89%	7.11%	1.00	1.00
Total[2]	25,650	2,218	27,868	92.04%	7.96%	0.96	1.78

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Income Level to Upper-Income (Denial Ratio)[1]
	Applications	Denials	Percentage	
Income Level				
Low (<50% MSA Income)	254	53	20.87%	2.84
Moderate (50-79.99% MSA Income)	4,769	762	15.98%	2.18
Middle (80-119.99% MSA Income)	18,919	2,123	11.22%	1.53
Upper (120% or More MSA Income)	13,809	1,013	7.34%	1.00
LMI (<79.99% MSA Income)	5,023	815	16.23%	1.69
MUI (>80% MSA Income)	32,728	3,136	9.58%	1.00
Total[2]	37,783	3,961	10.48%	1.43

NOTES

1 In the case of "Low," "Moderate," "Middle," and "Upper," the index for this ratio (that is, the denominator of the ratio) is "Upper." In the case of "LMI" and "MUI," the index is "MUI."
2 "Total" refers to total loans to all persons, including those applications with "income not available" reported. Thus, "total" may be a slightly larger number than the sum of "Low," "Middle," "Moderate," and "Upper" census tracts. These four categories form a mutually exclusive group; likewise, "LMI" and "MUI" form a mutually exclusive group independent of "Low," "Middle," "Moderate," and Upper."

Table 22. Home Purchase Lending to Owner-Occupants, Suburban Cincinnati

By Gender of Borrower

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to Both Genders (Portfolio Share)			Households[3]		Ratio of Prime Portfolio Share to Percent of House-holds	Ratio of Subprime Portfolio Share to Percent of House-holds
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Borrower Gender[1]										
Male	7,233	848	8,081	28.79%	39.24%	29.62%	95,006	15.96%	1.80	2.46
Female	5,256	663	5,919	20.92%	30.68%	21.70%	151,145	25.39%	0.82	1.21
Joint (Male/Female)	12,630	650	13,280	50.28%	30.08%	48.68%	349,249	58.66%	0.86	0.51
Total[2]	25,650	2,218	27,868				595,400			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Gender (Market Share)		Ratio of that Gender to Male (Market Share Ratio)	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Borrower Gender[1]							
Male	7,233	848	8,081	89.51%	10.49%	1.00	1.00
Female	5,256	663	5,919	88.80%	11.20%	0.99	1.07
Joint (Male/Female)	12,630	650	13,280	95.11%	4.89%	1.06	0.47
Total[2]	25,650	2,218	27,868	92.04%	7.96%	1.03	0.76

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Gender to Male (Denial Ratio)
	Applications	Denials	Percentage	
Borrower Gender[1]				
Male	11,361	1,377	12.12%	1.00
Female	8,265	951	11.51%	0.95
Joint (Male/Female)	16,827	1,323	7.86%	0.65
Total[2]	37,783	3,961	10.48%	0.86

NOTES

1 Gender refers to whether an application was filed by a male, female, or jointly by both a male and female.

2 "Total" refers to total loans to all genders which includes joint applications and applications in which gender is recorded as "not available." Thus, the number in "total" may not necessarily equal the sum of "male" and "female."

3 "Households" in this case refers to whether a given household, as recorded by the Census Bureau 2000, was headed by a male householder or a female householder.

Table 23. Refinance Lending to Owner-Occupants, City of Cincinnati

By Race of Borrower

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to All Races (Portfolio Share)			Households		Ratio of Prime Portfolio Share to Percent of House-holds	Ratio of Subprime Portfolio Share to Percent of House-holds
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Borrower Race[1]										
White	4,029	516	4,545	81.87%	52.71%	77.03%	115,997	63.88%	1.28	0.83
Black or African American	794	442	1,236	16.13%	45.15%	20.95%	60,938	33.56%	0.48	1.35
Hispanic or Latino	34	8	42	0.71%	0.84%	0.73%	1,140	0.62%	1.14	1.36
Asian	43	5	48	0.87%	0.51%	0.81%	2,606	1.44%	0.61	0.36
Total[2]	5,402	1,146	6,548				184,134			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Race (Market Share)		Ratio of that Race to White (Market Share Ratio)	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Borrower Race[1]							
White	4,029	516	4,545	88.65%	11.35%	1.00	1.00
Black or African American	794	442	1,236	64.24%	35.76%	0.72	3.15
Hispanic or Latino	34	8	42	80.95%	19.05%	0.91	1.68
Asian	43	5	48	89.58%	10.42%	1.01	0.92
Total[2]	5,402	1,146	6,548	82.50%	17.50%	0.93	1.54

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Race to White (Denial Ratio)
	Applications	Denials	Percentage	
Borrower Race[1]				
White	8,069	1,657	20.54%	1.00
Black or African American	3,659	1,307	35.72%	1.74
Hispanic or Latino	85	20	23.53%	1.15
Asian	92	21	22.83%	1.11
Total[2]	14,562	3,888	26.70%	1.30

NOTES

1 "White" refers to White Non-Hispanic borrowers; "Black or African American" refers to Black Non-Hispanic borrowers; "Asian" refers to Asian Non-Hispanic borrowers.

2 "Total" refers to total of all races, which includes races in addition to the four included in this analysis. Thus, the number in "total" may not necessarily equal the sum of "White," "Black or African American," "Hispanic or Latino," and "Asian." This note holds true for both the lending analysis and number of households.

Table 24. Refinance Lending to Owner-Occupants, City of Cincinnati

By Minority Level of Census Tract

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to Both Minority Levels (Portfolio Share)			Owner-Occupied Housing Units (OOHU)		Ratio of Prime Portfolio Share to Percent of House-holds	Ratio of Subprime Portfolio Share to Percent of House-holds
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Minority Level[1]										
0-49% Minority	4,315	662	4,977	79.91%	57.97%	76.08%	64,880	76.91%	1.04	0.75
50-100% Minority	1,085	480	1,565	20.09%	42.03%	23.92%	19,475	23.09%	0.87	1.82
Total[2]	5,402	1,146	6,548				84,355			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Minority Level (Market Share)		Ratio of that Minority Level to 0-49% Minority (Market Share Ratio)	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Minority Level[1]							
0-49% Minority	4,315	662	4,977	86.70%	13.30%	1.00	1.00
50-100% Minority	1,085	480	1,565	69.33%	30.67%	0.80	2.31
Total[2]	5,402	1,146	6,548	82.50%	17.50%	0.95	1.32

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Minority Level to 0 49% Minority (Denial Ratio)
	Applications	Denials	Percentage	
Minority Level[1]				
0-49% Minority	10,012	2,371	23.68%	1.00
50-100% Minority	4,489	1,489	33.17%	1.40
Total[2]	14,562	3,888	26.70%	1.13

NOTES

1 "Minority" in this instance refers to all persons except White Non-Hispanics.

2 "Total" refers to total loans to persons in census tracts. In rare cases, census tract information is unknown on an application; thus, "total" may contain a small sum of records in addition to "0-49% minority" and "50-100% minority."

Table 25. Refinance Lending to Owner-Occupants, City of Cincinnati

By Income Level of Borrower

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to all Income Levels (Portfolio Share)			Households		Ratio of Prime Portfolio Share to Percent of House-holds	Ratio of Subprime Portfolio Share to Percent of House-holds
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Income Level										
Low (<50% MSA Income)	644	261	905	12.93%	23.00%	14.80%	62,766	34.09%	0.38	0.67
Moderate (50-79.99% MSA Income)	1,254	428	1,682	25.18%	37.71%	27.50%	35,105	19.06%	1.32	1.98
Middle (80-119.99% MSA Income)	1,263	301	1,564	25.36%	26.52%	25.57%	31,134	16.91%	1.50	1.57
Upper (120% or More MSA Income)	1,820	145	1,965	36.54%	12.78%	32.13%	55,129	29.94%	1.22	0.43
LMI (<79.99% MSA Income)	1,898	689	2,587	38.10%	60.70%	42.30%	97,871	53.15%	0.72	1.14
MUI (>80% MSA Income)	3,083	446	3,529	61.90%	39.30%	57.70%	86,263	46.85%	1.32	0.84
Total[2]	5,402	1,146	6,548				184,134			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Income Level (Market Share)		Ratio of that Income Level to Upper-Income (Market Share Ratio)[3]	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Income Level							
Low (<50% MSA Income)	644	261	905	71.16%	28.84%	0.77	3.91
Moderate (50-79.99% MSA Income)	1,254	428	1,682	74.55%	25.45%	0.80	3.45
Middle (80-119.99% MSA Income)	1,263	301	1,564	80.75%	19.25%	0.87	2.61
Upper (120% or More MSA Income)	1,820	145	1,965	92.62%	7.38%	1.00	1.00
LMI (<79.99% MSA Income)	1,898	689	2,587	73.37%	26.63%	0.84	2.11
MUI (>80% MSA Income)	3,083	446	3,529	87.36%	12.64%	1.00	1.00
Total[2]	5,402	1,146	6,548	82.50%	17.50%	0.89	2.37

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Income Level to Upper-Income (Denial Ratio)[3]
	Applications	Denials	Percentage	
Income Level				
Low (<50% MSA Income)	2,764	1,057	38.24%	2.08
Moderate (50-79.99% MSA Income)	4,195	1,184	28.22%	1.53
Middle (80-119.99% MSA Income)	3,376	827	24.50%	1.33
Upper (120% or More MSA Income)	3,376	621	18.39%	1.00
LMI (<79.99% MSA Income)	6,959	2,241	32.20%	1.50
MUI (>80% MSA Income)	6,752	1,448	21.45%	1.00
Total[2]	14,562	3,888	26.70%	1.45

NOTES

1 "White" refers to White Non-Hispanic borrowers; "Black or African American" refers to Black Non-Hispanic borrowers; "Asian" refers to Asian Non-Hispanic borrowers.

2 "Total" refers to total loans to all persons, including those applications with "income not available" reported. Thus, "total" may be a slightly larger number than the sum of "Low," "Middle," "Moderate," and "Upper." These four categories form a mutually exclusive group; likewise, "LMI" and "MUI" form a mutually exclusive group independent of "Low," "Middle," "Moderate," and Upper."

3 In the case of "Low," "Moderate," "Middle," and "Upper," the index for this ratio (that is, the denominator of the ratio) is "Upper." In the case of "LMI" and "MUI," the index is "MUI."

Table 26. Refinance Lending to Owner-Occupants, City of Cincinnati

By Income Level of Census Tract

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to all Income Levels (Portfolio Share)			Owner-Occupied Housing Units (OOHU)		Ratio of Prime Portfolio Share to Percent of OOHU	Ratio of Subprime Portfolio Share to Percent of OOHU
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Income Level										
Low (<50% MSA Income)	405	204	609	7.51%	17.88%	9.32%	8,518	10.10%	0.74	1.77
Moderate (50-79.99% MSA Income)	1,145	430	1,575	21.23%	37.69%	24.10%	21,053	24.96%	0.85	1.51
Middle (80-119.99% MSA Income)	2,487	444	2,931	46.12%	38.91%	44.86%	38,477	45.61%	1.01	0.85
Upper (120% or More MSA Income)	1,356	63	1,419	25.14%	5.52%	21.72%	16,307	19.33%	1.30	0.29
LMI (<79.99% MSA Income)	1,550	634	2,184	28.74%	55.57%	33.43%	29,571	35.06%	0.82	1.59
MUI (>80% MSA Income)	3,843	507	4,350	71.26%	44.43%	66.57%	54,784	64.94%	1.10	0.68
Total[2]	4,366	590	4,956				84,355			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Income Level (Market Share)		Ratio of that Income Level to Upper-Income (Market Share Ratio)[1]	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Income Level							
Low (<50% MSA Income)	405	204	609	66.50%	33.50%	0.70	7.54
Moderate (50-79.99% MSA Income)	1,145	430	1,575	72.70%	27.30%	0.76	6.15
Middle (80-119.99% MSA Income)	2,487	444	2,931	84.85%	15.15%	0.89	3.41
Upper (120% or More MSA Income)	1,356	63	1,419	95.56%	4.44%	1.00	1.00
LMI (<79.99% MSA Income)	1,550	634	2,184	70.97%	29.03%	0.80	2.49
MUI (>80% MSA Income)	3,843	507	4,350	88.34%	11.66%	1.00	1.00
Total[2]	4,366	590	4,956	88.10%	11.90%	0.92	2.68

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Income Level to Upper-Income (Denial Ratio)[1]
	Applications	Denials	Percentage	
Income Level				
Low (<50% MSA Income)	1,931	685	35.47%	2.49
Moderate (50-79.99% MSA Income)	4,282	1,360	31.76%	2.23
Middle (80-119.99% MSA Income)	6,110	1,502	24.58%	1.73
Upper (120% or More MSA Income)	2,156	307	14.24%	1.00
LMI (<79.99% MSA Income)	6,213	2,045	32.91%	1.50
MUI (>80% MSA Income)	8,266	1,809	21.88%	1.00
Total[2]	7,325	935	12.76%	0.90

NOTES

1 In the case of "Low," "Moderate," "Middle," and "Upper," the index for this ratio (that is, the denominator of the ratio) is "Upper." In the case of "LMI" and "MUI," the index is MUI.
2 "Total" refers to total loans to all persons, including those applications with "income not available" reported. Thus, "total" may be a slightly larger number than the sum of "Low," "Middle," "Moderate," and "Upper" census tracts. These four categories form a mutually exclusive group; likewise, "LMI" and "MUI" form a mutually exclusive group independent of "Low," "Middle," "Moderate," and Upper."

Table 27. Refinance Lending to Owner-Occupants, City of Cincinnati

By Gender of Borrower

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to Both Genders (Portfolio Share)			Households[3]		Ratio of Prime Portfolio Share to Percent of House-holds	Ratio of Subprime Portfolio Share to Percent of House-holds
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Borrower Gender[1]										
Male	1,477	347	1,824	28.57%	31.72%	29.12%	46,025	25.00%	1.14	1.27
Female	1,499	428	1,927	28.99%	39.12%	30.76%	78,288	42.52%	0.68	0.92
Joint (Male/Female)	2,194	319	2,513	42.44%	29.16%	40.12%	59,821	32.49%	1.31	0.90
Total[2]	5,402	1,146	6,548				184,134			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Gender (Market Share)		Ratio of that Gender to Male (Market Share Ratio)	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Borrower Gender[1]							
Male	1,477	347	1,824	80.98%	19.02%	1.00	1.00
Female	1,499	428	1,927	77.79%	22.21%	0.96	1.17
Joint (Male/Female)	2,194	319	2,513	87.31%	12.69%	1.08	0.67
Total[2]	5,402	1,146	6,548	82.50%	17.50%	1.02	0.92

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Gender to Male (Denial Ratio)
	Applications	Denials	Percentage	
Borrower Gender[1]				
Male	4,244	1,177	27.73%	1.00
Female	4,465	1,271	28.47%	1.03
Joint (Male/Female)	4,702	1,076	22.88%	0.83
Total[2]	14,562	3,888	26.70%	0.96

NOTES

1 Gender refers to whether an application was filed by a male, female, or jointly by both a male and female.

2 "Total" refers to total loans to all genders which includes joint applications and applications in which gender is recorded as "not available." Thus, the number in "total" may not necessarily equal the sum of "male" and "female."

3 "Households" in this case refers to whether a given household, as recorded by the Census Bureau 2000, was headed by a male householder or a female householder.

Table 28. Refinance Lending to Owner-Occupants, Suburban Cincinnati

By Race of Borrower

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to All Races (Portfolio Share)			Households		Ratio of Prime Portfolio Share to Percent of House-holds	Ratio of Subprime Portfolio Share to Percent of House-holds
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Borrower Race[1]										
White	29,947	3,709	33,656	95.12%	89.27%	94.44%	550,047	93.32%	1.02	0.96
Black or African American	1,083	415	1,498	3.44%	9.99%	4.20%	29,800	5.06%	0.68	1.98
Hispanic or Latino	226	37	263	0.73%	0.91%	0.75%	2,909	0.49%	1.48	1.85
Asian	369	19	388	1.17%	0.46%	1.09%	5,574	0.95%	1.24	0.48
Total[2]	34,460	4,850	39,310				595,400			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Race (Market Share)		Ratio of that Race to White (Market Share Ratio)	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Borrower Race[1]							
White	29,947	3,709	33,656	88.98%	11.02%	1.00	1.00
Black or African American	1,083	415	1,498	72.30%	27.70%	0.81	2.51
Hispanic or Latino	226	37	263	85.93%	14.07%	0.97	1.28
Asian	369	19	388	95.10%	4.90%	1.07	0.44
Total[2]	34,460	4,850	39,310	87.66%	12.34%	0.99	1.12

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Race to White (Denial Ratio)
	Applications	Denials	Percentage	
Borrower Race[1]				
White	61,611	13,433	21.80%	1.00
Black or African American	3,944	1,300	32.96%	1.51
Hispanic or Latino	518	132	25.48%	1.17
Asian	611	90	14.73%	0.68
Total[2]	80,016	18,964	23.70%	1.09

NOTES

1 "White" refers to White Non-Hispanic borrowers; "Black or African American" refers to Black Non-Hispanic borrowers; "Asian" refers to Asian Non-Hispanic borrowers.

2 "Total" refers to total of all races, which includes races in addition to the four included in this analysis. Thus, the number in "total" may not necessarily equal the sum of "White," "Black or African American," "Hispanic or Latino," and "Asian." This note holds true for both the lending analysis and number of households.

Table 29. Refinance Lending to Owner-Occupants, Suburban Cincinnati

By Minority Level of Census Tract

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to Both Minority Levels (Portfolio Share)			Owner-Occupied Housing Units (OOHU)		Ratio of Prime Portfolio Share to Percent of OOHU	Ratio of Subprime Portfolio Share to Percent of OOHU
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Minority Level[1]										
0-49% Minority	33,692	4,540	38,232	97.81%	93.80%	97.32%	428,133	97.36%	1.00	0.96
50-100% Minority	753	300	1,053	2.19%	6.20%	2.68%	11,596	2.64%	0.83	2.35
Total[2]	34,460	4,850	39,310				439,729			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Minority Level (Market Share)		Ratio of that Minority Level to 0-49% Minority (Market Share Ratio)	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Minority Level[1]							
0-49% Minority	33,692	4,540	38,232	88.13%	11.87%	1.00	1.00
50-100% Minority	753	300	1,053	71.51%	28.49%	0.81	2.40
Total[2]	34,460	4,850	39,310	87.66%	12.34%	0.99	1.04

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Minority Level to 0 49% Minority (Denial Ratio)
	Applications	Denials	Percentage	
Minority Level[1]				
0-49% Minority	76,662	17,791	23.21%	1.00
50-100% Minority	3,103	1,065	34.32%	1.48
Total[2]	80,016	18,964	23.70%	1.02

NOTES

1 "Minority" in this instance refers to all persons except White Non-Hispanics.

2 "Total" refers to total loans to persons in census tracts. In rare cases, census tract information is unknown on an application; thus, "total" may contain a small sum of records in addition to "0-49% minority" and "50-100% minority."

Table 30. Refinance Lending to Owner-Occupants, Suburban Cincinnati

By Income Level of Borrower

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to all Income Levels (Portfolio Share)			Households		Ratio of Prime Portfolio Share to Percent of House-holds	Ratio of Subprime Portfolio Share to Percent of House-holds
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Income Level										
Low (<50% MSA Income)	2,718	788	3,506	8.54%	16.41%	9.57%	114,144	19.17%	0.45	0.86
Moderate (50-79.99% MSA Income)	7,395	1,603	8,998	23.22%	33.39%	24.55%	95,386	16.02%	1.45	2.08
Middle (80-119.99% MSA Income)	9,053	1,439	10,492	28.43%	29.97%	28.63%	119,148	20.01%	1.42	1.50
Upper (120% or More MSA Income)	12,679	971	13,650	39.81%	20.22%	37.25%	266,722	44.80%	0.89	0.45
LMI (<79.99% MSA Income)	10,113	2,391	12,504	31.76%	49.80%	34.12%	209,530	35.19%	0.90	1.42
MUI (>80% MSA Income)	21,732	2,410	24,142	68.24%	50.20%	65.88%	385,870	64.81%	1.05	0.77
Total[2]	34,460	4,850	39,310				595,400			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Income Level (Market Share)		Ratio of that Income Level to Upper-Income (Market Share Ratio)[3]	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Income Level							
Low (<50% MSA Income)	2,718	788	3,506	77.52%	22.48%	0.83	3.16
Moderate (50-79.99% MSA Income)	7,395	1,603	8,998	82.18%	17.82%	0.88	2.50
Middle (80-119.99% MSA Income)	9,053	1,439	10,492	86.28%	13.72%	0.93	1.93
Upper (120% or More MSA Income)	12,679	971	13,650	92.89%	7.11%	1.00	1.00
LMI (<79.99% MSA Income)	10,113	2,391	12,504	80.88%	19.12%	0.90	1.92
MUI (>80% MSA Income)	21,732	2,410	24,142	90.02%	9.98%	1.00	1.00
Total[2]	34,460	4,850	39,310	87.66%	12.34%	0.94	1.73

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Income Level to Upper-Income (Denial Ratio)[3]
	Applications	Denials	Percentage	
Income Level				
Low (<50% MSA Income)	9,595	3,306	34.46%	1.96
Moderate (50-79.99% MSA Income)	20,090	5,453	27.14%	1.55
Middle (80-119.99% MSA Income)	22,008	5,166	23.47%	1.34
Upper (120% or More MSA Income)	23,700	4,156	17.54%	1.00
LMI (<79.99% MSA Income)	29,685	8,759	29.51%	1.45
MUI (>80% MSA Income)	45,708	9,322	20.39%	1.00
Total[2]	80,016	18,964	23.70%	1.35

NOTES

1 "White" refers to White Non-Hispanic borrowers; "Black or African American" refers to Black Non-Hispanic borrowers; "Asian" refers to Asian Non-Hispanic borrowers.
2 "Total" refers to total loans to all persons, including those applications with "income not available" reported. Thus, "total" may be a slightly larger number than the sum of "Low," "Middle," "Moderate," and "Upper." These four categories form a mutually exclusive group; likewise, "LMI" and "MUI" form a mutually exclusive group independent of "Low," "Middle," "Moderate," and Upper."

3 In the case of "Low," "Moderate," "Middle," and "Upper," the index for this ratio (that is, the denominator of the ratio) is "Upper." In the case of "LMI" and "MUI," the index is "MUI."

Table 31. Refinance Lending to Owner-Occupants, Suburban Cincinnati

By Income Level of Census Tract

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to all Income Levels (Portfolio Share)			Owner-Occupied Housing Units (OOHU)		Ratio of Prime Portfolio Share to Percent of OOHU[1]	Ratio of Subprime Portfolio Share to Percent of OOHU[1]
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Income Level										
Low (<50% MSA Income)	111	85	196	0.32%	1.76%	0.50%	2,799	0.64%	0.51	2.76
Moderate (50-79.99% MSA Income)	3,661	1,039	4,700	10.63%	21.47%	11.96%	69,948	15.91%	0.67	1.35
Middle (80-119.99% MSA Income)	17,327	2,744	20,071	50.30%	56.69%	51.09%	230,880	52.51%	0.96	1.08
Upper (120% or More MSA Income)	13,345	972	14,317	38.74%	20.08%	36.44%	136,102	30.95%	1.25	0.65
LMI (<79.99% MSA Income)	3,772	1,124	4,896	10.95%	23.22%	12.46%	72,747	16.54%	0.66	1.40
MUI (>80% MSA Income)	30,672	3,716	34,388	89.05%	76.78%	87.54%	366,982	83.46%	1.07	0.92
Total[2]	34,460	4,850	39,310				439,729			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Income Level (Market Share)		Ratio of that Income Level to Upper-Income (Market Share Ratio)[1]	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Income Level							
Low (<50% MSA Income)	111	85	196	56.63%	43.37%	0.61	6.39
Moderate (50-79.99% MSA Income)	3,661	1,039	4,700	77.89%	22.11%	0.84	3.26
Middle (80-119.99% MSA Income)	17,327	2,744	20,071	86.33%	13.67%	0.93	2.01
Upper (120% or More MSA Income)	13,345	972	14,317	93.21%	6.79%	1.00	1.00
LMI (<79.99% MSA Income)	3,772	1,124	4,896	77.04%	22.96%	0.86	2.12
MUI (>80% MSA Income)	30,672	3,716	34,388	89.19%	10.81%	1.00	1.00
Total[2]	34,460	4,850	39,310	87.66%	12.34%	0.94	1.82

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Income Level to Upper-Income (Denial Ratio)[1]
	Applications	Denials	Percentage	
Income Level				
Low (<50% MSA Income)	622	215	34.57%	1.93
Moderate (50-79.99% MSA Income)	12,179	3,738	30.69%	1.72
Middle (80-119.99% MSA Income)	42,394	10,512	24.80%	1.39
Upper (120% or More MSA Income)	24,560	4,388	17.87%	1.00
LMI (<79.99% MSA Income)	12,801	3,953	30.88%	1.39
MUI (>80% MSA Income)	66,954	14,900	22.25%	1.00
Total[2]	80,016	18,964	23.70%	1.33

NOTES

1 In the case of "Low," "Moderate," "Middle," and "Upper," the index for this ratio (that is, the denominator of the ratio) is "Upper." In the case of "LMI" and "MUI," the index is "MUI."

2 "Total" refers to total loans to all persons, including those applications with "income not available" reported. Thus, "total" may be a slightly larger number than the sum of "Low," "Middle," "Moderate," and "Upper" census tracts. These four categories form a mutually exclusive group; likewise, "LMI" and "MUI" form a mutually exclusive group independent of "Low," "Middle," "Moderate," and Upper."

Table 32. Refinance Lending to Owner-Occupants, Suburban Cincinnati

By Gender of Borrower

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to Both Genders (Portfolio Share)			Households[3]		Ratio of Prime Portfolio Share to Percent of House-holds	Ratio of Subprime Portfolio Share to Percent of House-holds
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Borrower Gender[1]										
Male	7,816	1,434	9,250	23.47%	31.36%	24.42%	95,006	15.96%	1.47	1.97
Female	6,108	1,201	7,309	18.34%	26.27%	19.30%	151,145	25.39%	0.72	1.03
Joint (Male/Female)	19,381	1,937	21,318	58.19%	42.37%	56.28%	349,249	58.66%	0.99	0.72
Total[2]	34,460	4,850	39,310				595,400			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Gender (Market Share)		Ratio of that Gender to Male (Market Share Ratio)	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Borrower Gender[1]							
Male	7,816	1,434	9,250	84.50%	15.50%	1.00	1.00
Female	6,108	1,201	7,309	83.57%	16.43%	0.99	1.06
Joint (Male/Female)	19,381	1,937	21,318	90.91%	9.09%	1.08	0.59
Total[2]	34,460	4,850	39,310	87.66%	12.34%	1.04	0.80

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Gender to Male (Denial Ratio)
	Applications	Denials	Percentage	
Borrower Gender[1]				
Male	21,344	5,728	26.84%	1.00
Female	15,294	3,914	25.59%	0.95
Joint (Male/Female)	37,594	7,758	20.64%	0.77
Total[2]	80,016	18,964	23.70%	0.88

NOTES

1 Gender refers to whether an application was filed by a male, female, or jointly by both a male and female.

2 "Total" refers to total loans to all genders which includes joint applications and applications in which gender is recorded as "not available." Thus, the number in "total" may not necessarily equal the sum of "male" and "female."

3 "Households" in this case refers to whether a given household, as recorded by the Census Bureau 2000, was headed by a male householder or a female householder.

Table 33. Home Improvement Lending to Owner-Occupants, City of Cincinnati

By Race of Borrower

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to All Races (Portfolio Share)			Households		Ratio of Prime Portfolio Share to Percent of House-holds	Ratio of Subprime Portfolio Share to Percent of House-holds
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Borrower Race[1]										
White	146	41	187	70.19%	55.41%	66.31%	115,997	63.88%	1.10	0.87
Black or African American	59	33	92	28.37%	44.59%	32.62%	60,938	33.56%	0.85	1.33
Hispanic or Latino	3	0	3	1.45%	0.00%	1.07%	1,140	0.62%	2.33	0.00
Asian	1	0	1	0.48%	0.00%	0.35%	2,606	1.44%	0.34	0.00
Total[2]	228	80	308				184,134			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Race (Market Share)		Ratio of that Race to White (Market Share Ratio)	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Borrower Race[1]							
White	146	41	187	78.07%	21.93%	1.00	1.00
Black or African American	59	33	92	64.13%	35.87%	0.82	1.64
Hispanic or Latino	3	0	3	100.00%	0.00%	1.28	0.00
Asian	1	0	1	100.00%	0.00%	1.28	0.00
Total[2]	228	80	308	74.03%	25.97%	0.95	1.18

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Race to White (Denial Ratio)
	Applications	Denials	Percentage	
Borrower Race[1]				
White	351	94	26.78%	1.00
Black or African American	229	87	37.99%	1.42
Hispanic or Latino	8	3	37.50%	1.40
Asian	3	1	33.33%	1.24
Total[2]	702	238	33.90%	1.27

NOTES

1 "White" refers to White Non-Hispanic borrowers; "Black or African American" refers to Black Non-Hispanic borrowers; "Asian" refers to Asian Non-Hispanic borrowers.

2 "Total" refers to total of all races, which includes races in addition to the four included in this analysis. Thus, the number in "total" may not necessarily equal the sum of "White," "Black or African American," "Hispanic or Latino," and "Asian." This note holds true for both the lending analysis and number of households.

Table 34. Home Improvement Lending to Owner-Occupants, City of Cincinnati

By Minority Level of Census Tract

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to Both Minority Levels (Portfolio Share)			Owner-Occupied Housing Units (OOHU)		Ratio of Prime Portfolio Share to Percent of House-holds	Ratio of Subprime Portfolio Share to Percent of House-holds
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Minority Level[1]										
0-49% Minority	164	46	210	71.93%	57.50%	68.18%	64,880	76.91%	0.94	0.75
50-100% Minority	64	34	98	28.07%	42.50%	31.82%	19,475	23.09%	1.22	1.84
Total[2]	228	80	308				84,355			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Minority Level (Market Share)		Ratio of that Minority Level to 0-49% Minority (Market Share Ratio)	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Minority Level[1]							
0-49% Minority	164	46	210	78.10%	21.90%	1.00	1.00
50-100% Minority	64	34	98	65.31%	34.69%	0.84	1.58
Total[2]	228	80	308	74.03%	25.97%	0.95	1.19

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Minority Level to 0 49% Minority (Denial Ratio)
	Applications	Denials	Percentage	
Minority Level[1]				
0-49% Minority	443	133	30.02%	1.00
50-100% Minority	255	101	39.61%	1.32
Total[2]	702	238	33.90%	1.13

NOTES

1 "Minority" in this instance refers to all persons except White Non-Hispanics.

2 "Total" refers to total loans to persons in census tracts. In rare cases, census tract information is unknown on an application; thus, "total" may contain a small sum of records in addition to "0-49% minority" and "50-100% minority."

Table 35. Home Improvement Lending to Owner-Occupants, City of Cincinnati

By Income Level of Borrower

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to all Income Levels (Portfolio Share)			Households		Ratio of Prime Portfolio Share to Percent of House-holds	Ratio of Subprime Portfolio Share to Percent of House-holds
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Income Level										
Low (<50% MSA Income)	57	25	82	25.45%	31.25%	26.97%	62,766	34.09%	0.75	0.92
Moderate (50-79.99% MSA Income)	58	36	94	25.89%	45.00%	30.92%	35,105	19.06%	1.36	2.36
Middle (80-119.99% MSA Income)	54	13	67	24.11%	16.25%	22.04%	31,134	16.91%	1.43	0.96
Upper (120% or More MSA Income)	55	6	61	24.55%	7.50%	20.07%	55,129	29.94%	0.82	0.25
LMI (<79.99% MSA Income)	115	61	176	51.34%	76.25%	57.89%	97,871	53.15%	0.97	1.43
MUI (>80% MSA Income)	109	19	128	48.66%	23.75%	42.11%	86,263	46.85%	1.04	0.51
Total[2]	228	80	308				184,134			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Income Level (Market Share)		Ratio of that Income Level to Upper-Income (Market Share Ratio)[3]	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Income Level							
Low (<50% MSA Income)	57	25	82	69.51%	30.49%	0.77	3.10
Moderate (50-79.99% MSA Income)	58	36	94	61.70%	38.30%	0.68	3.89
Middle (80-119.99% MSA Income)	54	13	67	80.60%	19.40%	0.89	1.97
Upper (120% or More MSA Income)	55	6	61	90.16%	9.84%	1.00	1.00
LMI (<79.99% MSA Income)	115	61	176	65.34%	34.66%	0.77	2.33
MUI (>80% MSA Income)	109	19	128	85.16%	14.84%	1.00	1.00
Total[2]	228	80	308	74.03%	25.97%	0.82	2.64

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Income Level to Upper-Income (Denial Ratio)[3]
	Applications	Denials	Percentage	
Income Level				
Low (<50% MSA Income)	182	72	39.56%	1.58
Moderate (50-79.99% MSA Income)	235	80	34.04%	1.36
Middle (80-119.99% MSA Income)	165	51	30.91%	1.24
Upper (120% or More MSA Income)	108	27	25.00%	1.00
LMI (<79.99% MSA Income)	417	152	36.45%	1.28
MUI (>80% MSA Income)	273	78	28.57%	1.00
Total[2]	702	238	33.90%	1.36

NOTES

1 "White" refers to White Non-Hispanic borrowers; "Black or African American" refers to Black Non-Hispanic borrowers; "Asian" refers to Asian Non-Hispanic borrowers.

2 "Total" refers to total loans to all persons, including those applications with "income not available" reported. Thus, "total" may be a slightly larger number than the sum of "Low," "Middle," "Moderate," and "Upper." These four categories form a mutually exclusive group; likewise, "LMI" and "MUI" form a mutually exclusive group independent of "Low," "Middle," "Moderate," and Upper."

3 In the case of "Low," "Moderate," "Middle," and "Upper," the index for this ratio (that is, the denominator of the ratio) is "Upper." In the case of "LMI" and "MUI," the index is "MUI."

Table 36. Home Improvement Lending to Owner-Occupants, City of Cincinnati

By Income Level of Census Tract

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to all Income Levels (Portfolio Share)			Owner-Occupied Housing Units (OOHU)		Ratio of Prime Portfolio Share to Percent of House-holds	Ratio of Subprime Portfolio Share to Percent of House-holds
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Income Level										
Low (<50% MSA Income)	27	16	43	11.84%	20.00%	13.96%	8,518	10.10%	1.17	1.98
Moderate (50-79.99% MSA Income)	55	31	86	24.12%	38.75%	27.92%	21,053	24.96%	0.97	1.55
Middle (80-119.99% MSA Income)	103	29	132	45.18%	36.25%	42.86%	38,477	45.61%	0.99	0.79
Upper (120% or More MSA Income)	43	4	47	18.86%	5.00%	15.26%	16,307	19.33%	0.98	0.26
LMI (<79.99% MSA Income)	82	47	129	35.96%	58.75%	41.88%	29,571	35.06%	1.03	1.68
MUI (>80% MSA Income)	146	33	179	64.04%	41.25%	58.12%	54,784	64.94%	0.99	0.64
Total[2]	228	80	308				84,355			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Income Level (Market Share)		Ratio of that Income Level to Upper-Income (Market Share Ratio)[1]	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Income Level							
Low (<50% MSA Income)	27	16	43	62.79%	37.21%	0.69	4.37
Moderate (50-79.99% MSA Income)	55	31	86	63.95%	36.05%	0.70	4.24
Middle (80-119.99% MSA Income)	103	29	132	78.03%	21.97%	0.85	2.58
Upper (120% or More MSA Income)	43	4	47	91.49%	8.51%	1.00	1.00
LMI (<79.99% MSA Income)	82	47	129	63.57%	36.43%	0.78	1.98
MUI (>80% MSA Income)	146	33	179	81.56%	18.44%	1.00	1.00
Total[2]	228	80	308	74.03%	25.97%	0.81	3.05

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Income Level to Upper-Income (Denial Ratio)[1]
	Applications	Denials	Percentage	
Income Level				
Low (<50% MSA Income)	182	72	39.56%	1.58
Moderate (50-79.99% MSA Income)	235	80	34.04%	1.36
Middle (80-119.99% MSA Income)	165	51	30.91%	1.24
Upper (120% or More MSA Income)	108	27	25.00%	1.00
LMI (<79.99% MSA Income)	417	152	36.45%	1.28
MUI (>80% MSA Income)	273	78	28.57%	1.00
Total[2]	702	308	43.87%	1.75

NOTES

1 In the case of "Low," "Moderate," "Middle," and "Upper," the index for this ratio (that is, the denominator of the ratio) is "Upper." In the case of "LMI" and "MUI," the index is MUI.

2 "Total" refers to total loans to all persons, including those applications with "income not available" reported. Thus, "total" may be a slightly larger number than the sum of "Low," "Middle," "Moderate," and "Upper" census tracts. These four categories form a mutually exclusive group; likewise, "LMI" and "MUI" form a mutually exclusive group independent of "Low," "Middle," "Moderate," and Upper."

Table 37. Home Improvement Lending to Owner-Occupants, City of Cincinnati

By Gender of Borrower

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to Both Genders (Portfolio Share)			Households[3]		Ratio of Prime Portfolio Share to Percent of House-holds	Ratio of Subprime Portfolio Share to Percent of House-holds
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Borrower Gender[1]										
Male	50	18	68	22.83%	22.78%	22.82%	46,025	25.00%	0.91	0.91
Female	89	43	132	40.64%	54.43%	44.30%	78,288	42.52%	0.96	1.28
Joint (Male/Female)	80	18	98	36.53%	22.78%	32.89%	59,821	32.49%	1.12	0.70
Total[2]	228	80	308				184,134			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Gender (Market Share)		Ratio of that Gender to Male (Market Share Ratio)	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Borrower Gender[1]							
Male	50	18	68	73.53%	26.47%	1.00	1.00
Female	89	43	132	67.42%	32.58%	0.92	1.23
Joint (Male/Female)	80	18	98	81.63%	18.37%	1.11	0.69
Total[2]	228	80	308	74.03%	25.97%	1.01	0.98

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Gender to Male (Denial Ratio)
	Applications	Denials	Percentage	
Borrower Gender[1]				
Male	177	68	38.42%	1.00
Female	263	79	30.04%	0.78
Joint (Male/Female)	209	67	32.06%	0.83
Total[2]	702	238	33.90%	0.88

NOTES

1 Gender refers to whether an application was filed by a male, female, or jointly by both a male and female.

2 "Total" refers to total loans to all genders which includes joint applications and applications in which gender is recorded as "not available." Thus, the number in "total" may not necessarily equal the sum of "male" and "female."

3 "Households" in this case refers to whether a given household, as recorded by the Census Bureau 2000, was headed by a male householder or a female householder.

Table 38. Home Improvement Lending to Owner-Occupants, Suburban Cincinnati

By Race of Borrower

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to All Races (Portfolio Share)			Households		Ratio of Prime Portfolio Share to Percent of House-holds	Ratio of Subprime Portfolio Share to Percent of House-holds
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Borrower Race[1]										
White	829	237	1,066	94.10%	88.10%	92.70%	550,047	93.32%	1.01	0.94
Black or African American	48	28	76	5.45%	10.41%	6.61%	29,800	5.06%	1.08	2.06
Hispanic or Latino	7	3	10	0.80%	1.12%	0.87%	2,909	0.49%	1.63	2.28
Asian	2	2	4	0.23%	0.74%	0.35%	5,574	0.95%	0.24	0.79
Total[2]	969	292	1,261				595,400			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Race (Market Share)		Ratio of that Race to White (Market Share Ratio)	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Borrower Race[1]							
White	829	237	1,066	77.77%	22.23%	1.00	1.00
Black or African American	48	28	76	63.16%	36.84%	0.81	1.66
Hispanic or Latino	7	3	10	70.00%	30.00%	0.90	1.35
Asian	2	2	4	50.00%	50.00%	0.64	2.25
Total[2]	969	292	1,261	76.84%	23.16%	0.99	1.04

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Race to White (Denial Ratio)
	Applications	Denials	Percentage	
Borrower Race[1]				
White	2,131	669	31.39%	1.00
Black or African American	192	84	43.75%	1.39
Hispanic or Latino	22	5	22.73%	0.72
Asian	11	3	27.27%	0.87
Total[2]	2,812	983	34.96%	1.11

NOTES

1 "White" refers to White Non-Hispanic borrowers; "Black or African American" refers to Black Non-Hispanic borrowers; "Asian" refers to Asian Non-Hispanic borrowers.

2 "Total" refers to total of all races, which includes races in addition to the four included in this analysis. Thus, the number in "total" may not necessarily equal the sum of "White," "Black or African American," "Hispanic or Latino," and "Asian." This note holds true for both the lending analysis and number of households.

Table 39. Home Improvement Lending to Owner-Occupants, Suburban Cincinnati

By Minority Level of Census Tract

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to Both Minority Levels (Portfolio Share)			Owner-Occupied Housing Units (OOHU)		Ratio of Prime Portfolio Share to Percent of OOHU	Ratio of Subprime Portfolio Share to Percent of OOHU
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Minority Level[1]										
0-49% Minority	930	271	1,201	95.98%	93.13%	95.32%	428,133	97.36%	0.99	0.96
50-100% Minority	39	20	59	4.02%	6.87%	4.68%	11,596	2.64%	1.53	2.61
Total[2]	969	292	1,261				439,729			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Minority Level (Market Share)		Ratio of that Minority Level to 0-49% Minority (Market Share Ratio)	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Minority Level[1]							
0-49% Minority	930	271	1,201	77.44%	22.56%	1.00	1.00
50-100% Minority	39	20	59	66.10%	33.90%	0.85	1.50
Total[2]	969	292	1,261	76.84%	23.16%	0.99	1.03

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Minority Level to 0 49% Minority (Denial Ratio)
	Applications	Denials	Percentage	
Minority Level[1]				
0-49% Minority	2,651	911	34.36%	1.00
50-100% Minority	153	67	43.79%	1.27
Total[2]	2,812	983	34.96%	1.02

NOTES

1 "Minority" in this instance refers to all persons except White Non-Hispanics.

2 "Total" refers to total loans to persons in census tracts. In rare cases, census tract information is unknown on an application; thus, "total" may contain a small sum of records in addition to "0-49% minority" and "50-100% minority."

Table 40. Home Improvement Lending to Owner-Occupants, Suburban Cincinnati

By Income Level of Borrower

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to all Income Levels (Portfolio Share)			Households		Ratio of Prime Portfolio Share to Percent of House-holds	Ratio of Subprime Portfolio Share to Percent of House-holds
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Income Level										
Low (<50% MSA Income)	168	68	236	17.59%	23.53%	18.97%	114,144	19.17%	0.92	1.23
Moderate (50-79.99% MSA Income)	246	101	347	25.76%	34.95%	27.89%	95,386	16.02%	1.61	2.18
Middle (80-119.99% MSA Income)	255	72	327	26.70%	24.91%	26.29%	119,148	20.01%	1.33	1.24
Upper (120% or More MSA Income)	286	48	334	29.95%	16.61%	26.85%	266,722	44.80%	0.67	0.37
LMI (<79.99% MSA Income)	414	169	583	43.35%	58.48%	46.86%	209,530	35.19%	1.23	1.66
MUI (>80% MSA Income)	541	120	661	56.65%	41.52%	53.14%	385,870	64.81%	0.87	0.64
Total[2]	969	292	1,261				595,400			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Income Level (Market Share)		Ratio of that Income Level to Upper-Income (Market Share Ratio)[3]	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Income Level							
Low (<50% MSA Income)	168	68	236	71.19%	28.81%	0.83	2.00
Moderate (50-79.99% MSA Income)	246	101	347	70.89%	29.11%	0.83	2.03
Middle (80-119.99% MSA Income)	255	72	327	77.98%	22.02%	0.91	1.53
Upper (120% or More MSA Income)	286	48	334	85.63%	14.37%	1.00	1.00
LMI (<79.99% MSA Income)	414	169	583	71.01%	28.99%	0.87	1.60
MUI (>80% MSA Income)	541	120	661	81.85%	18.15%	1.00	1.00
Total[2]	969	292	1,261	76.84%	23.16%	0.90	1.61

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Income Level to Upper-Income (Denial Ratio)[3]
	Applications	Denials	Percentage	
Income Level				
Low (<50% MSA Income)	610	261	42.79%	1.44
Moderate (50-79.99% MSA Income)	786	277	35.24%	1.19
Middle (80-119.99% MSA Income)	712	231	32.44%	1.09
Upper (120% or More MSA Income)	664	197	29.67%	1.00
LMI (<79.99% MSA Income)	1,396	538	38.54%	1.24
MUI (>80% MSA Income)	1,376	428	31.10%	1.00
Total[2]	2,812	983	34.96%	1.18

NOTES

1 "White" refers to White Non-Hispanic borrowers; "Black or African American" refers to Black Non-Hispanic borrowers; "Asian" refers to Asian Non-Hispanic borrowers.

2 "Total" refers to total loans to all persons, including those applications with "income not available" reported. Thus, "total" may be a slightly larger number than the sum of "Low," "Middle," "Moderate," and "Upper." These four categories form a mutually exclusive group; likewise, "LMI" and "MUI" form a mutually exclusive group independent of "Low," "Middle," "Moderate," and Upper."

3 In the case of "Low," "Moderate," "Middle," and "Upper," the index for this ratio (that is, the denominator of the ratio) is "Upper." In the case of "LMI" and "MUI," the index is "MUI."

Table 41. Home Improvement Lending to Owner-Occupants, Suburban Cincinnati

By Income Level of Census Tract

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to all Income Levels (Portfolio Share)			Owner-Occupied Housing Units (OOHU)		Ratio of Prime Portfolio Share to Percent of OOHU[1]	Ratio of Subprime Portfolio Share to Percent of OOHU[1]
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Income Level										
Low (<50% MSA Income)	8	8	16	0.83%	2.75%	1.27%	2,799	0.64%	1.30	4.32
Moderate (50-79.99% MSA Income)	170	77	247	17.54%	26.46%	19.60%	69,948	15.91%	1.10	1.66
Middle (80-119.99% MSA Income)	540	155	695	55.73%	53.26%	55.16%	230,880	52.51%	1.06	1.01
Upper (120% or More MSA Income)	251	51	302	25.90%	17.53%	23.97%	136,102	30.95%	0.84	0.57
LMI (<79.99% MSA Income)	178	85	263	18.37%	29.21%	20.87%	72,747	16.54%	1.11	1.77
MUI (>80% MSA Income)	791	206	997	81.63%	70.79%	79.13%	366,982	83.46%	0.98	0.85
Total[2]	969	292	1,261				439,729			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Income Level (Market Share)		Ratio of that Income Level to Upper-Income (Market Share Ratio)[1]	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Income Level							
Low (<50% MSA Income)	8	8	16	50.00%	50.00%	0.60	2.96
Moderate (50-79.99% MSA Income)	170	77	247	68.83%	31.17%	0.83	1.85
Middle (80-119.99% MSA Income)	540	155	695	77.70%	22.30%	0.93	1.32
Upper (120% or More MSA Income)	251	51	302	83.11%	16.89%	1.00	1.00
LMI (<79.99% MSA Income)	178	85	263	67.68%	32.32%	0.85	1.56
MUI (>80% MSA Income)	791	206	997	79.34%	20.66%	1.00	1.00
Total[2]	969	292	1,261	76.84%	23.16%	0.92	1.37

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Income Level to Upper-Income (Denial Ratio)[1]
	Applications	Denials	Percentage	
Income Level				
Low (<50% MSA Income)	40	16	40.00%	1.48
Moderate (50-79.99% MSA Income)	605	236	39.01%	1.44
Middle (80-119.99% MSA Income)	1,531	555	36.25%	1.34
Upper (120% or More MSA Income)	626	169	27.00%	1.00
LMI (<79.99% MSA Income)	645	252	39.07%	1.16
MUI (>80% MSA Income)	2,157	724	33.57%	1.00
Total[2]	2,812	983	34.96%	1.29

NOTES

1 In the case of "Low," "Moderate," "Middle," and "Upper," the index for this ratio (that is, the denominator of the ratio) is "Upper." In the case of "LMI" and "MUI," the index is "MUI."

2 "Total" refers to total loans to all persons, including those applications with "income not available" reported. Thus, "total" may be a slightly larger number than the sum of "Low," "Middle," "Moderate," and "Upper" census tracts. These four categories form a mutually exclusive group; likewise, "LMI" and "MUI" form a mutually exclusive group independent of "Low," "Middle," "Moderate," and Upper."

Table 42. Home Improvement Lending to Owner-Occupants, Suburban Cincinnati

By Gender of Borrower

Portfolio Share Analysis	Count of Loans			As a Percent of Loans to Both Genders (Portfolio Share)			Households[3]		Ratio of Prime Portfolio Share to Percent of House-holds	Ratio of Subprime Portfolio Share to Percent of House-holds
	Prime	Subprime	All	Prime	Subprime	All	Count	Percent		
Borrower Gender[1]										
Male	200	89	289	21.57%	31.34%	11.23%	95,006	15.96%	1.35	1.96
Female	209	88	297	22.55%	30.99%	11.54%	151,145	25.39%	0.89	1.22
Joint (Male/Female)	518	107	625	55.88%	37.68%	24.28%	349,249	58.66%	0.95	0.64
Total[2]	969	292	1,261				595,400			

Market Share Analysis	Count of Loans			As a Percent of Loans to that Gender (Market Share)		Ratio of that Gender to Male (Market Share Ratio)	
	Prime	Subprime	All	Prime	Subprime	Prime	Subprime
Borrower Gender[1]							
Male	200	89	289	69.20%	30.80%	1.00	1.00
Female	209	88	297	70.37%	29.63%	1.02	0.96
Joint (Male/Female)	518	107	625	82.88%	17.12%	1.20	0.56
Total[2]	969	292	1,261	76.84%	23.16%	1.11	0.75

Loan Denial Disparity Ratios	Denial Rate			Ratio of that Gender to Male (Denial Ratio)
	Applications	Denials	Percentage	
Borrower Gender[1]				
Male	754	310	41.11%	1.00
Female	660	232	35.15%	0.85
Joint (Male/Female)	1,160	334	28.79%	0.70
Total[2]	2,812	983	34.96%	0.85

NOTES

1 Gender refers to whether an application was filed by a male, female, or jointly by both a male and female.

2 "Total" refers to total loans to all genders which includes joint applications and applications in which gender is recorded as "not available." Thus, the number in "total" may not necessarily equal the sum of "male" and "female."

3 "Households" in this case refers to whether a given household, as recorded by the Census Bureau 2000, was headed by a male householder or a female householder.

Table 43. Home Lending Ranking Analysis: Prime All Single Family Loans, City of Cincinnati

Institution	All Loan Originations	Percent of Loans to African American Borrowers	Rank	Percent of Loans to LMI Borrowers	Rank	Percent of Loans to Female Borrowers	Rank	Percent of Loans in 50-100% Minority Tracts	Rank	Percent of Loans in LMI Tracts	Rank	African-American/White Borrower Market Share	Rank	MUI African American/MUI White Borrower Market Share	Rank
ABN Amro Holding NV	346	11.2%	13	39.8%	10	26.7%	15	18.5%	10	30.1%	10	0.63	13	0.65	13
Accredited Home Lenders Holding Co.	99	25.3%	3	54.5%	2	40.7%	1	33.3%	3	39.4%	3	1.72	3	1.21	6
Ameriquest	105	43.0%	1	61.9%	1	35.2%	3	45.7%	1	60.0%	1	3.91	1	6.14	1
Countrywide Financial Corp	621	16.7%	8	42.6%	7	34.9%	4	17.2%	12	28.0%	12	1.01	8	1.30	4
Fifth Third Bancorp	1,322	14.7%	12	44.9%	5	32.5%	6	17.9%	7	30.7%	7	0.88	12	0.81	12
First Financial Bancorp	50	0.0%	17	26.5%	17	24.0%	17	10.0%	16	16.0%	16	0.00	17	0.00	17
Guardian Savings Bank	393	4.4%	16	34.1%	14	28.9%	13	10.9%	15	17.0%	15	0.23	16	0.32	16
Huntington National Bancshares	197	15.0%	10	46.2%	3	32.5%	7	14.7%	13	41.6%	2	0.91	10	1.10	8
JPMorgan Chase & Co.	307	14.8%	11	37.0%	11	34.4%	5	20.5%	8	30.6%	8	0.88	11	0.85	11
KeyCorp	26	30.4%	2	26.9%	16	29.2%	12	34.6%	2	19.2%	14	2.19	2	2.81	2
National City Corporation	657	20.6%	6	44.7%	6	32.2%	8	20.9%	7	30.6%	9	1.34	6	1.11	7
PNC Financial Services Group Inc.	169	22.6%	4	45.0%	4	37.8%	2	26.6%	4	35.5%	4	1.47	5	0.99	9
Third Federal Savings and Loan	381	6.5%	15	27.3%	15	25.0%	16	10.0%	17	15.0%	17	0.36	15	0.42	14
Union Savings Bank	402	9.8%	14	36.9%	12	31.3%	10	12.4%	14	19.9%	13	0.55	14	0.39	15
US Bancorp	302	16.4%	9	41.1%	9	27.0%	14	21.2%	6	31.5%	6	0.99	9	1.22	5
Washington Mutual	271	22.6%	5	34.7%	13	30.5%	11	22.9%	5	31.7%	5	1.49	4	1.43	3
Wells Fargo & Co.	477	17.1%	7	41.2%	8	31.8%	9	19.1%	9	30.0%	11	1.06	7	0.99	10
All Lenders	9,996	16.4%		41.9%		31.0%		18.7%		29.2%		1.00		1.00	

Institution	All Loan Originations	LMI Tract/MUI Tract Market Share	Rank	LMI/MUI Borrower Market Share	Rank	Minority Tract/Non-Minority Tract Market Share	Rank	African-American to White Denial Disparity Ratio	Rank	MUI African-American to White Denial Disparity Ratio	Rank	Minority Tract to Nonminority Tract Denial Disparity Ratio	Rank	Overall Ranking By Average of Individual Rankings	Rank
ABN Amro Holding NV	346	1.04	10	0.92	10	0.99	10	0.95	2	0.83	2	0.99	3	9.31	11
Accredited Home Lenders Holding Co.	99	1.57	3	1.67	2	2.17	3	1.50	4	1.43	5	1.07	5	3.31	2
Ameriquest	105	3.63	1	2.26	1	3.66	1	0.85	1	0.77	1	0.88	2	1.23	1
Countrywide Financial Corp	621	0.94	12	1.03	7	0.90	12	1.48	3	1.53	7	1.27	6	7.85	7
Fifth Third Bancorp	1,322	1.07	7	1.13	5	0.95	11	1.63	5	1.23	4	1.37	8	7.77	5
First Financial Bancorp (see Note)	50	0.46	16	0.50	17	0.48	16	n/a		n/a		0.00	1	15.18	17
Guardian Savings Bank	393	0.50	15	0.72	14	0.53	15	3.02	14	1.72	8	0.99	4	13.46	14
Huntington National Bancshares	197	1.73	2	1.19	3	0.75	13	3.05	15	4.84	16	3.16	16	9.08	9
JPMorgan Chase & Co.	307	1.07	8	0.81	11	1.12	8	2.21	10	2.29	9	1.74	11	9.38	12
KeyCorp	26	0.58	14	0.51	16	2.30	2	2.71	12	3.67	14	1.83	12	9.23	10
National City Corporation	657	1.07	9	1.12	6	1.14	7	1.80	7	2.61	13	1.73	10	7.77	5
PNC Financial Services Group Inc.	169	1.33	4	1.13	4	1.58	4	2.21	9	2.45	12	1.48	9	5.69	3
Third Federal Savings and Loan	381	0.43	17	0.52	15	0.48	17	2.23	11	1.09	3	3.24	17	14.54	16
Union Savings Bank	402	0.60	13	0.81	12	0.62	14	3.11	16	3.87	15	1.90	14	13.54	15
US Bancorp	302	1.11	6	0.97	9	1.17	6	2.72	13	2.35	10	1.87	13	8.85	8
Washington Mutual	271	1.13	5	0.74	13	1.29	5	1.70	6	1.49	6	1.30	7	6.77	4
Wells Fargo & Co.	477	1.04	11	0.97	8	1.02	9	2.16	8	2.41	11	2.33	15	9.46	13
All Lenders	9,996	1.00		1.00		1.00		2.02		2.18		1.62			

Note: First Financial had zero denials to whites in 2 of the ratios so ratios could not be calculated. They were compared on 11 indicators to get their true rank.

Table 44. Home Lending Ranking Analysis: Subprime All Single Family Loans, City of Cincinnati

Institution	All Loan Originations	Percent of Loans to African American Borrowers	Rank	Percent of Loans to LMI Borrowers	Rank	Percent of Loans to Female Borrowers	Rank	Percent of Loans in 50 100% Minority Tracts	Rank	Percent of Loans in LMI Tracts	Rank	African-American/White Borrower Market Share	Rank	MUI African American/MUI White Borrower Market Share	Rank
Accredited Home Lenders Holding Co.	112	40.4%	5	59.8%	3	46.2%	1	29.5%	5	44.6%	5	0.75	5	0.93	3
Ameriquest	177	44.8%	3	68.2%	2	44.6%	2	44.6%	2	58.8%	2	0.89	3	0.73	5
Countrywide Financial Corp	55	40.5%	4	58.2%	4	29.1%	5	34.5%	4	54.5%	4	0.75	4	0.80	4
National City Corporation	157	58.9%	1	77.4%	1	43.9%	3	39.5%	3	59.2%	1	1.55	1	1.89	1
Wells Fargo & Co.	116	50.0%	2	57.8%	5	39.1%	4	44.8%	1	57.8%	3	1.09	2	1.34	2
All Lenders	1,816	47.9%		63.5%		40.8%		39.5%		55.2%		1.00		1.00	

Institution	All Loan Originations	LMI Tract/MUI Tract Market Share	Rank	LMI/MUI Borrower Market Share	Rank	Minority Tract/Non-Minority Tract Market Share	Rank	Overall Ranking by sum of Individual Rankings	Rank
Accredited Home Lenders Holding Co.	112	0.66	5	0.86	3	0.64	5	40	4
Ameriquest	177	1.16	2	1.23	2	1.23	2	25	2
Countrywide Financial Corp	55	0.98	4	0.80	4	0.81	4	41	5
National City Corporation	157	1.18	1	1.97	1	1.00	3	16	1
Wells Fargo & Co.	116	1.11	3	0.79	5	1.24	1	28	3
All Lenders	1,816	1.00		1.00		1.00			

NOTE: The following lenders were eliminated due to too few observations: ABN Amro Holding NV, Fifth Third Bancorp, First Financial Bancrop, Guardian Savings Bank, Huntington National Bancshares, JPMorgan Chase & Co., KeyCorp, PNC Financial Services Group Inc., Third Federal Savings and Loan, Union Savings Bank, US Bancorp, Washington Mutual, Wells Fargo and Co.

Table 45. Home Lending Ranking Analysis: Prime All Single Family Loans, Suburban Cincinnati

Institution	All Loan Originations	Percent of Loans to African American Borrowers	Rank	Percent of Loans to LMI Borrowers	Rank	Percent of Loans to Female Borrowers	Rank	Percent of Loans in 50 100% Minority Tracts	Rank	Percent of Loans in LMI Tracts	Rank	African-American/White Borrower Market Share	Rank	MUI African American/MUI White Borrower Market Share	Rank
ABN Amro Holding NV	2,364	2.0%	14	31.3%	12	16.1%	16	2.0%	8	9.2%	13	0.55	14	0.47	14
Accredited Home Lenders Holding Co.	578	6.6%	2	36.7%	8	25.0%	2	3.8%	3	11.6%	9	1.96	2	2.64	2
Ameriquest	432	9.7%	1	43.8%	1	24.3%	4	5.8%	1	18.1%	1	2.86	1	3.04	1
Countrywide Financial Corp	4,330	3.8%	5	36.5%	9	25.4%	1	1.8%	11	10.9%	10	1.06	6	1.18	6
Fifth Third Bancorp	5,516	3.6%	8	38.0%	5	21.0%	8	1.9%	10	12.0%	8	1.01	8	0.99	8
First Financial Bancorp	790	1.2%	16	40.9%	2	17.2%	15	1.1%	15	12.3%	7	0.31	16	0.43	16
Guardian Savings Bank	2,563	0.6%	17	28.2%	15	17.6%	13	0.8%	17	7.4%	15	0.16	17	0.18	17
Huntington National Bancshares	1,041	2.2%	12	37.1%	7	21.9%	5	2.1%	7	13.0%	5	0.60	12	0.57	11
JPMorgan Chase & Co.	1,594	3.8%	6	33.9%	11	20.4%	10	2.4%	5	13.4%	4	1.05	7	0.91	9
KeyCorp	111	3.0%	10	37.6%	6	24.5%	3	5.4%	2	13.5%	3	0.83	10	1.12	7
National City Corporation	3,313	5.2%	4	39.5%	4	20.9%	9	3.0%	4	12.3%	6	1.47	4	1.43	4
PNC Financial Services Group Inc.	667	3.4%	9	34.1%	10	21.1%	7	1.9%	9	10.8%	11	0.95	9	0.51	13
Third Federal Savings and Loan	1,866	2.1%	13	17.8%	17	15.6%	17	1.1%	16	4.2%	17	0.58	13	0.56	12
Union Savings Bank	3,472	1.6%	15	27.2%	16	17.2%	14	1.2%	14	6.5%	16	0.45	15	0.46	15
US Bancorp	1,483	2.5%	11	40.3%	3	21.2%	6	1.7%	12	14.8%	2	0.69	11	0.64	10
Washington Mutual	1,147	5.9%	3	30.1%	13	18.5%	11	2.4%	6	10.2%	12	1.69	3	1.93	3
Wells Fargo & Co.	3,530	3.8%	7	28.9%	14	17.9%	12	1.6%	13	8.6%	14	1.07	5	1.30	5
All Lenders	61,079	3.6%		33.9%		19.5%		2.0%		11.0%		1.00		1.00	

Institution	All Loan Originations	LMI Tract/MUI Tract Market Share	Rank	LMI/MUI Borrower Market Share	Rank	Minority Tract/Non-Minority Tract Market Share	Rank	African-American to White Denial Disparity Ratio	Rank	MUI African American to MUI White Denial Disparity Ratio	Rank	Minority Tract to Nonminority Tract Denial Disparity Ratio	Rank	Overall Ranking By Sum of Individual Rankings	Rank
ABN Amro Holding NV	2,364	0.82	13	0.89	12	1.02	8	2.69	16	4.21	16	2.22	12	168	14
Accredited Home Lenders Holding Co.	578	1.06	9	1.13	8	1.99	3	1.44	6	1.05	3	1.22	5	62	2
Ameriquest	432	1.78	1	1.51	1	3.08	1	0.94	3	0.88	2	1.06	4	22	1
Countrywide Financial Corp	4,330	0.99	10	1.12	9	0.92	11	1.47	7	1.34	8	1.67	10	103	8
Fifth Third Bancorp	5,516	1.10	8	1.19	5	0.98	10	2.44	15	1.85	10	2.36	14	117	10
First Financial Bancorp	790	1.13	7	1.35	2	0.58	15	3.14	17	4.36	17	0.99	3	148	12
Guardian Savings Bank	2,563	0.65	15	0.77	15	0.39	17	1.89	10	1.09	4	0.45	1	173	15
Huntington National Bancshares	1,041	1.20	5	1.15	7	1.08	7	0.80	1	1.73	9	0.79	2	90	5
JPMorgan Chase & Co.	1,594	1.25	4	1.00	11	1.26	5	1.17	4	1.31	7	1.34	8	91	6
KeyCorp	111	1.26	3	1.17	6	2.87	2	2.22	11	0.47	1	1.31	7	71	3
National City Corporation	3,313	1.14	6	1.27	4	1.56	4	1.65	8	1.93	11	1.29	6	74	4
PNC Financial Services Group Inc.	667	0.98	11	1.01	10	1.00	9	2.42	14	3.34	15	2.62	16	143	11
Third Federal Savings and Loan	1,866	0.35	17	0.42	17	0.54	16	0.89	2	1.30	6	3.15	17	180	16
Union Savings Bank	3,472	0.56	17	0.73	16	0.61	14	1.87	9	2.18	13	2.32	13	187	17
US Bancorp	1,483	1.40	2	1.31	3	0.86	12	2.31	13	2.34	14	1.77	11	110	9
Washington Mutual	1,147	0.92	12	0.84	13	1.26	6	1.23	5	1.26	5	1.35	9	101	7
Wells Fargo & Co.	3,530	0.76	15	0.79	14	0.84	13	2.28	12	2.15	12	2.52	15	151	13
All Lenders	61,079	1.00		1.00		1.00		1.72		1.77		1.71			

Table 46. Home Lending Ranking Analysis: Subprime All Single Family Loans, Suburban Cincinnati

Institution	All Loan Originations	Percent of Loans to African American Borrowers	Rank	Percent of Loans to LMI Borrowers	Rank	Percent of Loans to Female Borrowers	Rank	Percent of Loans in 50 100% Minority Tracts	Rank	Percent of Loans in LMI Tracts	Rank	African-American/White Borrower Market Share	Rank	MUI African American/MUI White Borrower Market Share	Rank
Accredited Home Lenders Holding Co.	482	8.0%	5	52.3%	4	27.1%	6	4.8%	6	21.2%	5	0.72	6	0.58	6
Ameriquest	679	11.7%	3	50.3%	5	29.3%	4	7.1%	2	20.9%	6	1.09	3	1.18	3
Countrywide Financial Corp	289	12.8%	1	45.6%	7	32.2%	2	4.8%	5	14.2%	9	1.22	1	1.04	4
Fifth Third Bancorp	52	3.9%	9	57.7%	1	30.8%	3	3.8%	8	26.9%	2	0.34	9	0.44	8
Huntington National Bancshares	26	5.0%	8	50.0%	6	12.5%	9	3.8%	8	23.1%	3	0.43	8	0.92	5
JPMorgan Chase & Co.	67	7.9%	6	41.8%	9	21.5%	8	6.0%	3	20.9%	7	0.73	5	0.54	7
National City Corporation	566	11.9%	2	57.0%	2	33.3%	1	4.8%	7	22.6%	4	1.11	2	1.28	1
US Bancorp	69	6.3%	7	55.1%	3	21.9%	7	5.8%	4	27.5%	1	0.56	7	0.00	9
Wells Fargo & Co.	407	10.7%	4	42.7%	8	27.3%	5	7.9%	1	20.4%	8	0.98	4	1.25	2
All Lenders	7,360	10.8%		51.5%		27.8%		5.7%		22.8%		1.00		1.00	

Institution	All Loan Originations	LMI Tract/MUI Tract Market Share	Rank	LMI/MUI Borrower Market Share	Rank	Minority Tract/Non-Minority Tract Market Share	Rank	Overall Ranking By Sum of Individual Rankings	Rank
Accredited Home Lenders Holding Co.	482	0.91	5	1.03	4	0.82	6	53	7
Ameriquest	679	0.90	6	0.95	5	1.25	2	39	2
Countrywide Financial Corp	289	0.56	9	0.79	7	0.84	5	50	5
Fifth Third Bancorp	52	1.25	2	1.28	1	0.66	8	51	6
Huntington National Bancshares	26	1.02	3	0.94	6	0.66	8	64	8
JPMorgan Chase & Co.	67	0.89	7	0.68	9	1.04	3	64	8
National City Corporation	566	0.99	4	1.25	2	0.82	7	32	1
US Bancorp	69	1.29	1	1.15	3	1.01	4	46	3
Wells Fargo & Co.	407	0.87	8	0.70	8	1.40	1	49	4
All Lenders	7,360	1.00		1.00		1.00			

NOTE: The following lenders were eliminated due to too few originations: ABN Amro Holding NV, First Financial Bancorp, Guardian Savings Bank, KeyCorp, PNC Financial Services Group, Inc., Third Federal Savings and Loan, Union Savings Bank, and Washington Mutual.

Table 47. Home Lending Ranking Analysis: Prime Home Purchase Loans, City of Cincinnati

Institution	All Loan Originations	Percent of Loans to African American Borrowers	Rank	Percent of Loans to LMI Borrowers	Rank	Percent of Loans to Female Borrowers	Rank	Percent of Loans in 50 100% Minority Tracts	Rank	Percent of Loans in LMI Tracts	Rank	African-American/White Borrower Market Share	Rank	MUI African American/MUI White Borrower Market Share	Rank
ABN Amro Holding NV	88	6.3%	12	38.6%	11	32.9%	7	6.82%	14	23.9%	12	0.35	12	0.35	12
Accredited Home Lenders Holding Co.	25	47.8%	1	60.0%	1	30.4%	10	24.0%	2	32.0%	4	4.70	1	3.61	1
Countrywide Financial Corp	313	11.6%	9	44.2%	6	35.8%	4	14.4%	10	24.9%	10	0.68	9	0.80	8
Fifth Third Bancorp	713	17.9%	6	56.3%	3	37.8%	2	19.8%	4	34.8%	3	1.15	6	1.08	5
First Financial Bancorp	31	0.0%	14	29.0%	13	25.8%	13	12.9%	12	16.1%	13	0.00	14	0.00	14
Guardian Savings Bank	78	3.9%	13	42.3%	7	35.1%	6	14.1%	11	24.4%	11	0.21	13	0.20	13
Huntington National Bancshares	111	18.1%	5	58.5%	2	38.2%	1	15.3%	8	55.5%	1	1.19	5	1.48	3
JPMorgan Chase & Co.	157	10.4%	10	37.6%	12	32.7%	8	15.9%	6	26.8%	9	0.61	10	0.45	11
National City Corporation	279	21.3%	3	50.9%	4	37.2%	3	20.4%	3	30.1%	6	1.45	3	0.93	6
Third Federal Savings and Loan	219	8.9%	11	26.1%	14	27.8%	12	9.6%	13	14.6%	14	0.52	11	0.63	10
Union Savings Bank	123	18.9%	4	47.2%	5	30.1%	11	17.1%	5	30.9%	5	1.20	4	0.70	9
US Bancorp	117	14.2%	7	39.1%	10	22.3%	14	15.4%	7	29.1%	8	0.86	7	1.13	4
Washington Mutual	78	24.3%	2	40.3%	9	35.5%	5	28.2%	1	39.7%	2	1.68	2	1.64	2
Wells Fargo & Co.	267	13.1%	8	40.7%	8	32.2%	9	14.6%	9	29.6%	7	0.79	8	0.90	7
All Lenders	4,366	16.0%		45.8%		33.0%		16.5%		29.5%		1.00		1.00	

Institution	All Loan Originations	LMI Tract/MUI Tract Market Share	Rank	LMI/MUI Borrower Market Share	Rank	Minority Tract/Non-Minority Tract Market Share	Rank	African-American to White Denial Disparity Ratio	Rank	MUI African American to White Denial Disparity Ratio	Rank	Minority Tract to Nonminority Tract Denial Disparity Ratio	Rank	Overall Rankings By Average of Individual Rankings	Rank
ABN Amro Holding NV	88	0.75	12	0.74	11	0.14	14	0.00	1	0.00	1	0.00	1	9.23	11
Accredited Home Lenders Holding Co.	25	1.13	4	1.77	1	0.60	3	1.26	8	2.00	8	0.98	5	3.77	3
Countrywide Financial Corp	313	0.79	10	0.94	7	0.32	10	2.14	9	2.08	9	1.56	7	8.31	8
Fifth Third Bancorp	713	1.28	3	1.52	3	1.55	1	0.88	3	0.00	1	0.98	4	3.38	1
First Financial Bancorp	31	0.46	13	0.48	13	0.28	12	1.00	5	n/a		n/a		12.36	14
Guardian Savings Bank	78	0.77	11	1.11	5	0.31	11	2.17	10	0.00	1	0.00	1	8.69	9
Huntington National Bancshares	111	2.92	1	1.67	2	0.34	8	1.08	7	0.00	1	2.16	8	4.00	4
JPMorgan Chase & Co.	157	0.87	9	0.71	12	0.36	6	5.00	14	16.80	13	5.47	13	10.23	12
National City Corporation	279	1.03	7	1.23	4	0.49	4	2.44	11	3.84	10	3.44	11	5.77	5
Third Federal Savings and Loan	219	0.41	14	0.42	14	0.20	13	0.97	4	0.00	1	4.33	12	11.00	13
Union Savings Bank	123	1.07	5	1.05	6	0.39	5	2.75	12	4.44	11	2.57	9	7.00	7
US Bancorp	117	0.98	8	0.76	10	0.35	7	3.46	13	4.86	12	2.67	10	9.00	10
Washington Mutual	78	1.58	2	0.80	9	0.75	2	1.03	6	0.00	1	0.65	3	3.54	2
Wells Fargo & Co.	267	1.03	6	0.81	8	0.33	9	0.78	2	0.00	1	1.44	6	6.77	6
All Lenders	4,366	1.00		1.00		1.00		2.36		2.77		3.71			

NOTE: The following lenders were eliminated due to too few originations: Ameriquest, KeyCorp, PNC Financial Services Inc.

Table 48. Home Lending Ranking Analysis: Subprime Home Purchase Loans, City of Cincinnati

Institution	All Loan Originations	Percent of Loans to African American Borrowers		Percent of Loans to LMI Borrowers		Percent of Loans to Female Borrowers		Percent of Loans in 50 100% Minority Tracts		Percent of Loans in LMI Tracts		African-American/White Borrower Market Share		MUI African American/MUI White Borrower Market Share	
			Rank		Rank		Rank		Rank		Rank		Rank		Rank
Accredited Home Lenders Holding Co.	42	37.1%	3	71.4%	3	51.2%	2	19.0%	3	40.5%	3	0.54	2	0.39	3
Ameriquest	38	75.7%	1	78.9%	2	63.2%	1	50.0%	1	65.8%	1	3.05	1	6.36	1
National City Corporation	79	59.3%	2	81.8%	1	40.3%	3	31.6%	2	53.2%	2	0.25	3	1.82	2
All Lenders	590	52.9%		67.2%		42.2%		34.4%		53.9%		1.00		1.00	

Institution	All Applications	LMI Tract/MUI Tract Market Share		LMI/MUI Borrower Market Share		Minority Tract/Non-Minority Tract Market Share		Overall Rankings By Sum of Individual Rankings	
			Rank		Rank		Rank		Rank
Accredited Home Lenders Holding Co.	42	0.58	3	2.14	2	0.45	3	27	3
Ameriquest Mortgage Co.	38	1.64	1	1.83	3	1.91	1	13	1
National City Corporation	79	0.97	2	2.19	1	0.88	2	20	2
All Lenders	590	1.00		1.00		1.00			

NOTE: The following lenders were eliminated due to too few originations: ABN Amro Holding NV, Countrywide Financial Corporation, Fifth Third Bancorp, First Financial Bancorp, Guardian Savings Bank FSB, Huntington National Bancshares, JPMorgan Chase & Co, KeyCorp, PNC Financial Group, Inc., Third Federal Savings and Loan, Union Savings Bank, US Bancorp, Wells Fargo & Co.

Table 49. Home Lending Ranking Analysis: Prime Refinancing Loans, City of Cincinnati

Institution	All Loan Originations	Percent of Loans to African American Borrowers	Rank	Percent of Loans to LMI Borrowers	Rank	Percent of Loans to Female Borrowers	Rank	Percent of Loans in 50 100% Minority Tracts	Rank	Percent of Loans in LMI Tracts	Rank	African-American/White Borrower Market Share	Rank	MUI African American/MUI White Borrower Market Share	Rank
ABN Amro Holding NV	254	12.7%	10	64.0%	1	38.8%	3	22.4%	7	32.4%	6	0.74	10	0.75	10
Accredited Home Lenders Holding Co.	73	16.7%	9	53.4%	3	43.3%	1	35.6%	2	41.1%	2	1.04	9	0.63	12
Ameriquest	82	27.4%	2	63.4%	2	39.0%	2	43.9%	1	59.8%	1	2.03	1	6.60	1
Countrywide Financial Corp	298	21.8%	5	41.2%	5	33.4%	5	20.1%	10	31.2%	7	1.42	4	1.80	2
Fifth Third Bancorp	597	10.9%	12	31.3%	13	26.4%	13	15.7%	11	25.8%	11	0.63	12	0.66	11
Guardian Savings Bank	308	4.7%	14	31.8%	10	27.0%	11	10.4%	15	15.3%	13	0.25	14	0.37	13
Huntington National Bancshares	82	11.1%	11	28.9%	14	25.6%	14	14.6%	12	25.6%	12	0.64	11	0.84	9
JPMorgan Chase & Co.	137	17.8%	7	35.4%	9	35.7%	4	24.8%	4	32.8%	4	1.12	6	1.01	7
National City Corporation	371	19.8%	6	39.9%	7	27.9%	10	20.5%	9	30.7%	9	1.30	5	1.28	4
PNC Financial Services Group Inc.	124	82.2%	1	36.3%	8	32.8%	6	27.4%	3	33.9%	3	1.06	7	0.94	8
Third Federal Savings and Loan	145	3.7%	15	28.8%	15	20.9%	15	11.0%	13	15.2%	15	0.20	15	0.13	15
Union Savings Bank	270	6.0%	13	31.6%	11	31.1%	7	10.7%	14	15.2%	14	0.33	13	0.31	14
US Bancorp	168	17.3%	8	40.0%	6	26.7%	12	24.4%	5	32.7%	5	1.05	8	1.14	6
Washington Mutual	191	22.1%	4	31.5%	12	28.7%	9	20.9%	8	28.8%	10	1.46	3	1.41	3
Wells Fargo & Co.	209	22.3%	3	41.6%	4	30.9%	8	24.4%	6	30.8%	8	1.51	2	1.20	5
All Lenders	5,402	16.3%		38.1%		29.0%		20.1%		28.7%		1.00		1.00	

Institution	All Loan Originations	LMI Tract/MUI Tract Market Share	Rank	LMI/MUI Borrower Market Share	Rank	Minority Tract/Non-Minority Tract Market Share	Rank	African-American to White Denial Disparity Ratio	Rank	MUI African American Denial Disparity Ratio	Rank	Minority Tract to Nonminority Tract Denial Disparity Ratio	Rank	Overall Rankings By Sum of Individual Rankings	Rank
ABN Amro Holding NV	254	1.19	6	1.12	4	1.15	7	1.00	2	0.93	2	1.16	5	73	4
Accredited Home Lenders Holding Co.	73	1.73	2	1.86	2	2.20	2	1.69	6	1.37	4	1.05	3	57	2
Ameriquest	82	3.68	1	2.82	1	3.11	1	0.94	1	0.80	1	0.89	2	17	1
Countrywide Financial Corp	298	1.12	7	1.21	3	1.00	10	1.21	3	1.29	3	1.07	4	68	3
Fifth Third Bancorp	597	0.86	11	0.74	11	0.74	11	2.62	11	2.23	10	1.48	11	148	11
Guardian Savings Bank	308	0.45	13	0.76	9	0.46	15	3.40	9	2.18	9	1.71	13	158	12
Huntington National Bancshares	82	0.85	12	0.66	13	0.68	12	4.35	15	6.13	15	3.03	15	165	14
JPMorgan Chase & Co.	137	1.21	4	0.89	8	1.31	4	1.57	4	1.59	5	1.40	9	75	5
National City Corporation	371	1.10	9	1.08	6	1.02	9	1.64	5	2.08	8	1.36	8	95	9
PNC Financial Services Group Inc.	124	1.27	3	0.93	7	1.50	3	2.20	9	2.43	12	1.34	7	77	6
Third Federal Savings and Loan	145	0.44	15	0.66	14	0.49	13	3.27	12	2.96	13	0.73	1	171	15
Union Savings Bank	270	0.44	14	0.75	10	0.48	14	3.41	14	3.94	14	1.34	6	158	12
US Bancorp	168	1.21	5	1.08	5	1.28	5	2.44	10	2.04	7	1.42	10	92	7
Washington Mutual	191	1.00	10	0.66	15	1.05	8	1.91	8	1.76	6	1.56	12	108	10
Wells Fargo & Co.	209	1.10	8	0.72	12	1.28	6	1.90	7	2.32	11	2.07	14	94	8
All Lenders	5,402	1.00		1.00		1.00		1.85		1.99		1.48			

NOTE: The following lenders were excluded due to their small number of loans: First Financial Bancorp, KeyCorp.

Table 50. Home Lending Ranking Analysis: Subprime Refinancing Loans, City of Cincinnati

Institution	All Loan Originations	Percent of Loans to African American Borrowers	Rank	Percent of Loans to LMI Borrowers	Rank	Percent of Loans to Female Borrowers	Rank	Percent of Loans in 50 100% Minority Tracts	Rank	Percent of Loans in LMI Tracts	Rank	African-American/White Borrower Market Share	Rank	MUI African American/MUI White Borrower Market Share	Rank
Accredited Home Lenders Holding Co.	70	42.4%	3	52.9%	4	43.1%	2	35.7%	5	47.1%	5	0.88	3	0.68	2
Ameriquest	125	32.7%	5	64.5%	2	38.4%	3	41.6%	3	56.0%	2	0.58	5	0.44	3
Countrywide Financial Corp.	34	38.5%	4	55.9%	3	29.4%	5	38.2%	4	50.0%	4	0.73	4	0.32	4
National City Corporation	76	60.3%	1	72.4%	1	49.3%	1	48.7%	1	65.8%	1	1.85	1	0.23	5
Wells Fargo & Co.	101	48.4%	2	52.5%	5	35.0%	4	45.5%	2	55.4%	3	1.12	2	1.51	1
All Lenders	1,146	45.6%		60.7%		39.1%		41.9%		55.3%		1.00		1.00	

Institution	All Loan Originations	LMI Tract/MUI Tract Market Share	Rank	LMI/MUI Borrower Market Share	Rank	Minority Tract/Non-Minority Tract Market Share	Rank	Overall Ranking By Sum of Individual Rankings	Rank
Accredited Home Lenders Holding Co.	70	0.71	5	0.73	4	0.77	5	38	4
Ameriquest	125	1.02	2	1.18	2	0.98	3	30	3
Countrywide Financial Corp.	34	0.80	4	0.82	3	0.85	4	39	5
National City Corporation	76	1.54	1	1.70	1	1.31	1	14	1
Wells Fargo & Co.	101	1.00	3	0.71	5	1.15	2	29	2
All Lenders	1,146	1.00		1.00		1.00			

NOTE: The following lenders were excluded due to too few originations: ABN Amro Holding NV, Fifth Third Bancorp, First Financial Bancorp, Guardian Savings Bank, Huntington National Bancshares, JPMorgan Chase & Co., KeyCorp, PNC Financial Services, Third Federal Savings and Loan, Union Savings Bank, US Bancorp, Washington Mutual.

Table 51. Small Business Lending, City of Cincinnati and Suburban Cincinnati

By Minority Level of Census Tract

City of Cincinnati	All Small Businesses				Small Businesses with Revenues *less than* $1 million			
	Small Business Loans		Small Businesses		Small Business Loans		Small Businesses	
	Count	Percent	Count	Percent	Count	Percent	Count	Percent
Minority Level[1]								
0-49% Minority	7,433	74.33%	15,714	68.41%	10,025	70.14%	2,489	74.12%
50-100% Minority	2,567	25.67%	7,256	31.59%	4,268	29.86%	869	25.88%
Total[2]	10,000	100.00%	22,970	100.00%	14,293	100.00%	3,358	100.00%

Suburban Cincinnati	All Small Businesses				Small Businesses with Revenues *less than* $1 million			
	Small Business Loans		Small Businesses		Small Business Loans		Small Businesses	
	Count	Percent	Count	Percent	Count	Percent	Count	Percent
Minority Level[1]								
0-49% Minority	35,427	97.02%	78,915	96.86%	12,962	97.48%	50,302	96.97%
50-100% Minority	1,090	2.98%	2,562	3.14%	335	2.52%	1,572	3.03%
Total[2]	36,517	100.00%	81,477	100.00%	13,297	100.00%	51,874	100.00%

Table 52. Small Business Lending, City of Cincinnati and Suburban Cincinnati

By Income Level of Census Tract

City of Cincinnati	All Small Businesses				Small Businesses with Revenues *less than* $1 million			
	Small Business Loans		Small Businesses		Small Businesses		Small Business Loans	
	Count	Percent	Count	Percent	Count	Percent	Count	Percent
Income Level[1]								
Low Income	2,074	20.74%	5,437	23.67%	3,054	21.37%	598	17.81%
Moderate Income	2,213	22.13%	5,391	23.47%	3,406	23.83%	785	23.38%
Middle Income	3,955	39.55%	8,704	37.89%	5,458	38.19%	1,221	36.36%
Upper Income	1,758	17.58%	3,438	14.97%	2,375	16.62%	754	22.45%
Total[2]	10,000	100.00%	22,970	100.00%	14,293	100.00%	3,358	100.00%

Suburban Cincinnati	All Small Businesses				Small Businesses with Revenues *less than* $1 million			
	Small Business Loans		Small Businesses		Small Businesses		Small Business Loans	
	Count	Percent	Count	Percent	Count	Percent	Count	Percent
Income Level[1]								
Low Income	552	1.51%	1,643	1.98%	203	1.53%	986	1.90%
Moderate Income	6,173	16.90%	16,207	19.50%	2,253	16.93%	9,906	19.10%
Middle Income	18,116	49.61%	42,048	50.59%	6,529	49.08%	26,025	50.17%
Upper Income	11,676	31.97%	23,222	27.94%	4,319	32.46%	14,957	28.83%
Total[2]	36,517	100.00%	83,120	100.00%	13,304	100.00%	51,874	100.00%

Table 53. Small Business Lending, City of Cincinnati and Suburban Cincinnati

By Revenue Size of Business

	City of Cincinnati		Suburban Cincinnati	
	Count	Percent	Count	Percent
Revenue Size of Business				
All Small Businesses	22,970	100.00%	83,120	100.00%
All Small Business Loans	10,000	100.00%	36,517	100.00%
Small Businesses with Revenues less than $1 million	14,293	51.79%	51,874	62.41%
All Loans to Small Businesses with Revenues less than $1 million	3,358	33.58%	13,304	36.43%

Table 54. Small Business Lending Ranking Analysis, Hamilton County

Note: 1 is best, 9 is worst

Percent of Loans in LMI Census Tracts

Institution	Number of loans to LMI Census Tracts	Number of Total Loans	Percent to LMI	Rank
Fifth Third Bancorp	612	1,987	30.80%	1
First Financial Bancorp	17	169	10.06%	9
Huntington National Bancshares	125	529	23.63%	6
JPMorgan Chase & Co.	195	948	20.57%	8
KeyCorp	48	173	27.75%	2
National City Corporation	110	404	27.23%	3
PNC Financial Services Group Inc.	298	1,180	25.25%	4
US Bancorp	593	2,453	24.17%	5
Wells Fargo & Co.	79	340	23.24%	7
All lenders	**5,276**	**21,284**	**24.79%**	

Ratio of LMI/MUI Market Share[1]

Institution	LMI Marketshare	MUI Marketshare	Ratio: LMI/MUI	Rank
Fifth Third Bancorp	11.60%	8.71%	1.33	1
First Financial Bancorp	0.32%	0.96%	0.33	9
Huntington National Bancshares	2.37%	2.56%	0.93	6
JPMorgan Chase & Co.	3.70%	4.77%	0.77	8
KeyCorp	0.91%	0.79%	1.15	2
National City Corporation	2.08%	1.86%	1.12	3
PNC Financial Services Group Inc.	5.65%	5.59%	1.01	4
US Bancorp	11.24%	11.79%	0.95	5
Wells Fargo & Co.	1.50%	1.65%	0.91	7
All lenders	**100.00%**	**100.00%**	**1.00**	

Percent of Small Business Loans under $100,000

Institution	Number of loans under $100,000	Number of Total Loans	Percent of loans under $100,000	Rank
Fifth Third Bancorp	989	1,987	49.77%	9
First Financial Bancorp	110	169	65.09%	6
Huntington National Bancshares	386	529	72.97%	5
JPMorgan Chase & Co.	912	948	96.20%	2
KeyCorp	96	173	55.49%	8
National City Corporation	262	404	64.85%	7
PNC Financial Services Group Inc.	982	1,180	83.22%	4
US Bancorp	2,046	2,453	83.41%	3
Wells Fargo & Co.	340	340	100.00%	1
All lenders	**18,654**	**21,284**	**87.64%**	

NOTE: Analysis continues on next page.

Table 54 (continued). Small Business Lending Ranking Analysis, Hamilton County

Note: 1 is best, 9 is worst

Percent of Small Business Loans made to Small Businesses with Revenues <$1 Million

Institution	Number of loans to SB w/ Rev < $1 mil	Number of Total Loans	Percent of loans to SB w/ Rev < $1 mil	Rank
Fifth Third Bancorp	890	1,987	44.79%	7
First Financial Bancorp	109	169	64.50%	3
Huntington National Bancshares	302	529	57.09%	4
JPMorgan Chase & Co.	111	948	11.71%	9
KeyCorp	98	173	56.65%	5
National City Corporation	223	404	55.20%	6
PNC Financial Services Group Inc.	783	1,180	66.36%	1
US Bancorp	884	2,453	36.04%	8
Wells Fargo & Co.	223	340	65.59%	2
All lenders	**7,199**	**21,284**	**33.82%**	

Ratio of Loans to All SB/Loans to SB w/ Revenues <$1 Million

Institution	Market Share: No. of loans to SB w/ Rev <$1mil	Market Share: Loans to All Small Business	Ratio	Rank
Fifth Third Bancorp	12.36%	9.34%	1.32	7
First Financial Bancorp	1.51%	0.79%	1.91	3
Huntington National Bancshares	4.20%	2.49%	1.69	4
JPMorgan Chase & Co.	1.54%	4.45%	0.35	9
KeyCorp	1.36%	0.81%	1.67	5
National City Corporation	3.10%	1.90%	1.63	6
PNC Financial Services Group Inc.	10.88%	5.54%	1.96	1
US Bancorp	12.28%	11.53%	1.07	8
Wells Fargo & Co.	3.10%	1.60%	1.94	2
All lenders	**100.00%**	**100.00%**	**1.00**	

Institution	Score	Overall Rank
Fifth Third Bancorp	25	4
First Financial Bancorp	30	8
Huntington National Bancshares	25	4
JPMorgan Chase & Co.	36	9
KeyCorp	22	3
National City Corporation	25	4
PNC Financial Services Group Inc.	14	1
US Bancorp	29	7
Wells Fargo & Co.	19	2

Table 55. Small Business Lending Ranking Analysis, Cincinnati MSA less Hamilton County

Note: 1 is best, 9 is worst

Percent of Loans in LMI Census Tracts

Institution	Number of loans to LMI Census Tracts	Number of Total Loans	Percent to LMI	Rank
Fifth Third Bancorp	415	1,583	26.22%	1
First Financial Bancorp	215	853	25.21%	2
Huntington National Bancshares	154	680	22.65%	5
JPMorgan Chase & Co.	246	1,328	18.52%	7
KeyCorp	17	113	15.04%	8
National City Corporation	74	294	25.17%	3
PNC Financial Services Group Inc.	84	581	14.46%	9
US Bancorp	361	1,622	22.26%	6
Wells Fargo & Co.	91	394	23.10%	4
All lenders	**5,423**	**25,147**	**21.57%**	

Ratio of LMI/MUI Market Share[1]

Institution	LMI Marketshare	MUI Marketshare	Ratio: LMI/MUI	Rank
Fifth Third Bancorp	7.65%	5.92%	1.29	1
First Financial Bancorp	3.96%	3.23%	1.23	2
Huntington National Bancshares	2.84%	2.67%	1.06	5
JPMorgan Chase & Co.	4.54%	5.49%	0.83	7
KeyCorp	0.31%	0.48%	0.65	8
National City Corporation	1.36%	1.12%	1.22	3
PNC Financial Services Group Inc.	1.55%	2.52%	0.61	9
US Bancorp	6.66%	6.39%	1.04	6
Wells Fargo & Co.	1.68%	1.54%	1.09	4
All lenders	**100.00%**	**100.00%**	**1.00**	

Percent of Small Business Loans under $100,000

Institution	Number of loans under $100,000	Number of Total Loans	Percent of loans under $100,000	Rank
Fifth Third Bancorp	793	1,583	50.09%	9
First Financial Bancorp	640	853	75.03%	6
Huntington National Bancshares	541	680	79.56%	5
JPMorgan Chase & Co.	1,273	1,328	95.86%	2
KeyCorp	69	113	61.06%	8
National City Corporation	207	294	70.41%	7
PNC Financial Services Group Inc.	506	581	87.09%	3
US Bancorp	1,399	1,622	86.25%	4
Wells Fargo & Co.	394	394	100.00%	1
All lenders	**22,888**	**25,147**	**91.02%**	

NOTE: Analysis continues on next page.

Table 55 (continued). Small Business Lending Ranking Analysis, Cincinnati MSA less Hamilton County

Note: 1 is best, 9 is worst

Percent of Small Business Loans made to Small Businesses with Revenues <$1 Million

Institution	Number of loans to SB w/ Rev < $1 mil	Number of Total Loans	Percent of loans to SB w/ Rev < $1 mil	Rank
Fifth Third Bancorp	808	1,583	51.04%	7
First Financial Bancorp	625	853	73.27%	3
Huntington National Bancshares	451	680	66.32%	5
JPMorgan Chase & Co.	184	1,328	13.86%	9
KeyCorp	75	113	66.37%	4
National City Corporation	157	294	53.40%	6
PNC Financial Services Group Inc.	442	581	76.08%	1
US Bancorp	763	1,622	47.04%	8
Wells Fargo & Co.	299	394	75.89%	2
All lenders	**9,366**	**25,147**	**37.24%**	

Ratio of Loans to All SB/Loans to SB w/ Revenues <$1 Million

Institution	Market Share: No. of loans to SB w/ Rev <$1mil	Market Share: Loans to All Small Business	Ratio	Rank
Fifth Third Bancorp	8.63%	6.29%	1.37	7
First Financial Bancorp	6.67%	3.39%	1.97	3
Huntington National Bancshares	4.82%	2.70%	1.78	5
JPMorgan Chase & Co.	1.96%	5.28%	0.37	9
KeyCorp	0.80%	0.45%	1.78	4
National City Corporation	1.68%	1.17%	1.43	6
PNC Financial Services Group Inc.	4.72%	2.31%	2.04	1
US Bancorp	8.15%	6.45%	1.26	8
Wells Fargo & Co.	3.19%	1.57%	2.04	2
All lenders	**100.00%**	**100.00%**		

Institution	Score	Overall Rank
Fifth Third Bancorp	25	4
First Financial Bancorp	16	2
Huntington National Bancshares	25	4
JPMorgan Chase & Co.	34	9
KeyCorp	32	7
National City Corporation	25	4
PNC Financial Services Group Inc.	23	3
US Bancorp	32	7
Wells Fargo & Co.	13	1

Table 56. Branch Location by Census Tract, City of Cincinnati

Branch Location by Income Level of Census Tract, City of Cincinnati

	Total	Number in LMI Tracts	Percent In LMI Tracts	Number in MUI Tracts	Percent in MUI Tracts	Difference in % of branches in LMI tracts from % of all branches in LMI tracts	Difference in % of Branches in LMI Tracts from % of Tracts that are LMI
Number of Census Tracts	**133**	**79**	**59.4%**	**54**	**40.6%**		
Fifth Third Bancorp	31	8	25.8%	23	74.2%	-2.5%	-33.6%
First Financial Bancorp	1	0	0.0%	1	100.0%	-28.3%	-59.4%
Huntington National Bancshares	4	0	0.0%	4	100.0%	-28.3%	-59.4%
JPMorgan Chase & Co.[1]	4	0	0.0%	4	100.0%	-28.3%	-59.4%
KeyCorp	7	1	14.3%	6	85.7%	-14.0%	-45.1%
National City Corporation[2]	16	7	43.8%	9	56.3%	15.5%	-15.6%
PNC Financial Services Group Inc.	17	3	17.6%	14	82.4%	-10.6%	-41.8%
Union Savings Bank	2	0	0.0%	2	100.0%	-28.3%	-59.4%
US Bancorp	23	7	30.4%	16	69.6%	2.2%	-29.0%
Total	**138**	**39**	**28.3%**	**99**	**71.7%**	**0.0%**	**-31.1%**

Branch Location by Minority Level of Census Tract, City of Cincinnati

	Total	Number in 50-100% Minority Census Tracts	Percent 50-100% Minority Census Tracts	Number in 0-49% Minority Census Tracts	Percent in 0-49% minority Census Tracts	Difference in % of branches in 50-100% Minority tracts from % of all banks in 50-100% Minority Tracts	Difference in % of Branches in 50-100% Minority Tracts from % of Tracts that are 50-100% Minority
Number of Census Tracts	**133**	**54**	**40.6%**	**79**	**59.4%**		
Fifth Third Bancorp	31	6	19.4%	26	83.9%	5.6%	-21.2%
First Financial Bancorp	1	0	0.0%	1	100.0%	-13.8%	-40.6%
Huntington National Bancshares	4	0	0.0%	4	100.0%	-13.8%	-40.6%
JPMorgan Chase & Co.	4	1	25.0%	3	75.0%	11.2%	-15.6%
KeyCorp	7	1	14.3%	6	85.7%	0.5%	-26.3%
National City Corporation	16	2	12.5%	14	87.5%	-1.3%	-28.1%
PNC Financial Services Group Inc.	17	2	11.8%	15	88.2%	-2.0%	-28.8%
Union Savings Bank	2	0	0.0%	2	100.0%	-13.8%	-40.6%
US Bancorp	23	7	30.4%	17	73.9%	16.7%	-10.2%
Total	**138**	**19**	**13.8%**	**119**	**86.2%**	**0.0%**	**-26.8%**

NOTE: These tables exclude branches in which the income level or minority level of the census tract is not available. Further, some branch addresses did not have a sufficient amount of information for geocoding. Data obtained from FDIC, as of 30 June 2004.

[1] JPMorgan Chase & Co. includes branches operated under the name Bank One; JPMorgan Chase purchased Bank One in July 2004.
[2] National City Corporation includes branches operated under the name The Provident Bank; National City purchased Provident Bank in June 2004.

Table 57. Branch Location by Census Tract, Suburban Cincinnati

Branch Location by Income Level of Census Tract, Suburban Cincinnati

	Total	Number in LMI Tracts	Percent In LMI Tracts	Number in MUI Tracts	Percent in MUI Tracts	Difference in % of branches in LMI tracts from % of all banks in LMI tracts	Difference in % of Branches in LMI Tracts from % of Tracts that are LMI
Number of Census Tracts	**353**	**92**	**26.1%**	**261**	**73.9%**		
Fifth Third Bancorp	107	18	16.8%	89	83.2%	-5.2%	-9.2%
First Financial Bancorp	32	7	21.9%	25	78.1%	-0.1%	-4.2%
Guardian Savings Bank	7	1	14.3%	6	85.7%	-7.7%	-11.8%
Huntington National Bancshares	26	4	15.4%	22	84.6%	-6.6%	-10.7%
JPMorgan Chase & Co.[1]	25	7	28.0%	18	72.0%	6.0%	1.9%
KeyCorp	14	2	14.3%	12	85.7%	-7.7%	-11.8%
National City Corporation[2]	33	7	21.2%	26	78.8%	-0.8%	-4.9%
PNC Financial Services Group Inc.	31	2	6.5%	29	93.5%	-15.6%	-19.6%
Third Federal Savings and Loan	4	1	25.0%	3	75.0%	3.0%	-1.1%
Union Savings Bank	7	0	0.0%	7	100.0%	-22.0%	-26.1%
US Bancorp	88	19	21.6%	69	78.4%	-0.4%	-4.5%
Total	**595**	**131**	**22.0%**	**464**	**78.0%**	**0.0%**	**-4.0%**

Branch Location by Minority Level of Census Tract, Suburban Cincinnati

	Total	Number in 50-100% Minority Census Tracts	Percent 50-100% Minority Census Tracts	Number in 0-49% Minority Census Tracts	Percent in 0-49% minority Census Tracts	Difference in % of branches in 50-100% Minority tracts from % of all banks in 50-100% Minority Tracts	Difference in % of Branches in 50-100% Minority Tracts from % of Tracts that are 50-100% Minority
Number of Census Tracts	**353**	**14**	**4.0%**	**339**	**96.0%**		
Fifth Third Bancorp	107	2	1.9%	105	98.1%	0.0%	-2.1%
First Financial Bancorp	32	0	0.0%	32	100.0%	-1.8%	-4.0%
Guardian Savings Bank	7	0	0.0%	7	100.0%	-1.8%	-4.0%
Huntington National Bancshares	26	1	3.8%	25	96.2%	2.0%	-0.1%
JPMorgan Chase & Co.[1]	25	1	4.0%	24	96.0%	2.2%	0.0%
KeyCorp	14	0	0.0%	14	100.0%	-1.8%	-4.0%
National City Corporation[2]	33	1	3.0%	32	97.0%	1.2%	-0.9%
PNC Financial Services Group Inc.	31	1	3.2%	30	96.8%	1.4%	-0.7%
Third Federal Savings and Loan	4	0	0.0%	4	100.0%	-1.8%	-4.0%
Union Savings Bank	7	0	0.0%	7	100.0%	-1.8%	-4.0%
US Bancorp	88	1	1.1%	87	98.9%	-0.7%	-2.8%
Total	**595**	**11**	**1.8%**	**584**	**98.2%**	**0.0%**	**-2.1%**

Table 58. City of City Census Tract Analysis of Home Lending, 2004

Tracts Sorted in Ascending Order by Median Housing Value

Census Tract	Count of Bank Branches	Count of Prime Loans	Percent of Loans that are Prime	Count of Subprime Loans	Percent of Loans that are Subprime	Total Loans	Percent Minority	Percent African-American	Median Household Income	CRA Income Category	Percent Owner Occupied Housing Units	Median Housing Value
0001.00	3	9	100.00%	0	0.00%	9	76.76	71.92	0	Low	0.00	$0
0002.00	0	0	n/a	0	n/a	0	98.80	96.85	15,938	Low	0.00	$0
0006.00	12	2	100.00%	0	0.00%	2	28.55	20	35,278	Middle	0.00	$0
0062.02	0	0	0.00%	1	100.00%	1	50.93	47.21	0	Low	0.00	$0
0003.01	0	0	0.00%	1	100.00%	1	99.43	98.46	6,748	Low	0.49	$9,999
0091.00	0	5	62.50%	3	37.50%	8	23.07	9.93	12,188	Low	13.83	$29,800
0087.00	0	2	22.22%	7	77.78%	9	50.70	41.08	21,719	Low	26.23	$37,800
0028.00	1	10	71.43%	4	28.57%	14	29.42	24.7	23,352	Low	19.42	$43,500
0009.00	0	2	100.00%	0	0.00%	2	77.68	70.43	6,972	Low	0.41	$47,500
0021.00	0	7	70.00%	3	30.00%	10	94.53	92.84	17,500	Low	22.20	$47,700
0034.00	2	6	66.67%	3	33.33%	9	94.38	91.71	16,750	Low	12.52	$49,300
0103.00	0	27	64.29%	15	35.71%	42	13.81	9.31	31,402	Moderate	41.15	$50,200
0086.01	0	24	75.00%	8	25.00%	32	83.88	80.58	11,413	Low	24.94	$51,700
0077.00	0	18	54.55%	15	45.45%	33	96.53	94	11,120	Low	21.65	$54,500
0085.02	0	2	33.33%	4	66.67%	6	96.82	94.62	10,911	Low	5.21	$55,500
0094.00	1	18	69.23%	8	30.77%	26	31.72	27.29	26,655	Moderate	34.75	$55,700
0093.00	0	38	77.55%	11	22.45%	49	21.08	16.89	25,387	Moderate	29.96	$56,500
0074.00	1	30	66.67%	15	33.33%	45	46.52	43.98	25,932	Low	36.70	$56,600
0015.00	0	9	69.23%	4	30.77%	13	95.53	90.98	7,311	Low	12.83	$57,700
0089.00	0	13	54.17%	11	45.83%	24	53.12	47.48	22,277	Low	26.91	$57,900
0092.00	0	66	73.33%	24	26.67%	90	42.66	36.17	26,012	Low	30.91	$58,900
0098.00	0	34	64.15%	19	35.85%	53	28.53	24.96	31,406	Moderate	36.34	$61,100
0108.00	0	11	64.71%	6	35.29%	17	61.93	56.41	26,895	Moderate	29.72	$62,400
0017.00	0	7	63.64%	4	36.36%	11	84.54	81.3	8,511	Low	4.27	$62,900
0104.00	0	11	68.75%	5	31.25%	16	14.68	11.58	35,417	Moderate	36.48	$62,900
0023.00	0	19	73.08%	7	26.92%	26	83.87	81.17	19,797	Low	16.09	$64,600
0095.00	1	41	69.49%	18	30.51%	59	19.11	13.97	26,964	Moderate	34.55	$64,800
0039.00	0	22	43.14%	29	56.86%	51	96.16	93.62	25,372	Moderate	38.21	$65,600
0047.02	0	17	70.83%	7	29.17%	24	3.36	0.58	24,393	Moderate	47.48	$65,800
0040.00	0	58	74.36%	20	25.64%	78	78.21	74.88	39,554	Middle	67.55	$66,400
0096.00	0	77	77.00%	23	23.00%	100	17.14	12.35	30,625	Moderate	39.57	$66,500
0079.00	0	33	89.19%	4	10.81%	37	48.20	44.61	35,737	Moderate	44.94	$67,400
0073.00	1	58	71.60%	23	28.40%	81	51.48	45.91	31,571	Moderate	50.42	$68,300
0088.00	0	40	63.49%	23	36.51%	63	78.50	72.27	24,354	Low	31.60	$69,600
0038.00	0	23	46.94%	26	53.06%	49	96.57	93.68	17,361	Low	35.72	$70,100
0036.00	0	4	80.00%	1	20.00%	5	98.84	97.44	14,738	Low	9.14	$71,000
0061.00	2	62	75.61%	20	24.39%	82	13.76	9.16	27,364	Moderate	50.08	$71,100
0016.00	0	6	100.00%	0	0.00%	6	88.08	82.89	8,175	Low	1.03	$71,400
0032.00	0	5	71.43%	2	28.57%	7	63.31	53.49	15,208	Low	17.58	$72,300
0232.01	3	65	74.71%	22	25.29%	87	9.54	6.28	34,750	Middle	48.24	$73,400
0069.00	0	43	65.15%	23	34.85%	66	96.75	94.39	20,878	Low	28.51	$73,500
0255.00	1	96	76.19%	30	23.81%	126	7.80	3.63	30,405	Moderate	43.89	$73,900
0055.00	1	68	70.10%	29	29.90%	97	80.96	77.5	28,424	Moderate	38.45	$74,100
0022.00	0	25	46.30%	29	53.70%	54	88.14	84.16	26,111	Moderate	24.53	$74,600
0033.00	2	11	78.57%	3	21.43%	14	54.80	46.59	20,869	Moderate	7.50	$74,600
0035.00	0	6	46.15%	7	53.85%	13	93.88	90.86	19,268	Low	18.57	$75,300
0056.00	0	217	78.91%	58	21.09%	275	46.81	42.51	36,400	Moderate	66.68	$75,400
0078.00	1	52	82.54%	11	17.46%	63	43.56	38.55	28,750	Moderate	39.89	$75,800
0014.00	0	0	n/a	0	n/a	0	88.08	82.35	26,964	Moderate	12.18	$76,100
0037.00	0	11	61.11%	7	38.89%	18	92.47	89.61	11,178	Low	10.96	$76,200
0067.00	0	22	62.86%	13	37.14%	35	97.86	94.97	14,269	Low	16.59	$76,700
0097.00	2	116	77.33%	34	22.67%	150	11.78	7.71	29,318	Moderate	43.48	$77,200
0025.00	0	26	81.25%	6	18.75%	32	30.00	19.59	19,802	Low	17.46	$77,500
0063.00	0	83	66.40%	42	33.60%	125	96.98	93.39	24,163	Low	36.70	$79,900
0044.00	0	42	84.00%	8	16.00%	50	16.80	14.5	33,098	Moderate	42.25	$80,300
0100.02	0	97	71.32%	39	28.68%	136	65.84	61.62	26,561	Moderate	28.91	$82,300
0066.00	0	15	71.43%	6	28.57%	21	81.84	79.09	15,119	Low	16.71	$82,400
0075.00	0	57	86.36%	9	13.64%	66	32.91	28.2	33,625	Moderate	52.34	$84,100
0099.02	0	135	85.99%	22	14.01%	157	5.75	2.48	35,373	Middle	47.05	$84,300
0030.00	0	8	100.00%	0	0.00%	8	39.64	21.9	20,162	Low	9.39	$85,000
0054.00	2	19	90.48%	2	9.52%	21	26.04	18.63	35,660	Moderate	23.32	$85,900
0218.01	6	179	76.17%	56	23.83%	235	26.64	24.13	37,844	Middle	55.46	$85,900
0060.00	2	105	78.36%	29	21.64%	134	26.60	20.48	34,859	Middle	30.61	$86,000
0064.00	0	74	69.16%	33	30.84%	107	94.36	92.22	32,923	Moderate	48.37	$86,700
0109.00	3	57	85.07%	10	14.93%	67	8.94	5.62	35,071	Moderate	47.34	$86,800
0110.00	3	55	69.62%	24	30.38%	79	80.06	76.83	29,622	Moderate	38.47	$87,300
0209.02	4	169	88.95%	21	11.05%	190	3.96	0.91	33,730	Middle	52.82	$87,700
0085.01	0	33	75.00%	11	25.00%	44	74.88	68.59	28,448	Low	15.49	$87,900
0081.00	0	65	78.31%	18	21.69%	83	81.08	77.87	37,237	Middle	56.09	$88,700
0026.00	1	43	81.13%	10	18.87%	53	26.34	18.43	23,153	Low	14.13	$89,500
0106.00	0	52	96.30%	2	3.70%	54	5.15	2.03	44,500	Middle	66.89	$90,100
0209.01	3	153	90.53%	16	9.47%	169	2.87	0.43	38,138	Middle	66.99	$91,100
0082.02	2	60	72.29%	23	27.71%	83	49.81	46.85	27,813	Moderate	36.28	$91,300
0105.00	1	37	78.72%	10	21.28%	47	4.78	2.5	34,943	Middle	51.89	$91,600
0082.01	0	124	83.78%	24	16.22%	148	61.65	58.36	35,833	Middle	62.01	$91,800
0043.00	0	31	100.00%	0	0.00%	31	11.63	8.84	40,982	Moderate	35.22	$92,500
0099.01	0	190	87.96%	26	12.04%	216	4.19	1.12	42,389	Middle	69.66	$93,000
0058.00	0	147	68.69%	67	31.31%	214	79.98	76.39	32,882	Middle	56.91	$93,700
0100.01	2	170	80.95%	40	19.05%	210	41.94	34.82	30,756	Moderate	26.72	$94,100

0027.00	0	39	86.67%	6	13.33%	45	28.37	21.25	30,446	Middle	33.09	$94,600
0102.01	4	212	91.38%	20	8.62%	232	6.32	3.13	34,381	Middle	49.17	$94,900
0107.00	2	73	93.59%	5	6.41%	78	3.22	1.01	42,880	Middle	70.22	$95,700
0080.00	2	14	73.68%	5	26.32%	19	86.85	84.22	12,215	Low	6.03	$95,900
0214.01	4	192	91.00%	19	9.00%	211	2.25	0.41	41,176	Middle	70.44	$96,300
0062.01	2	71	69.61%	31	30.39%	102	79.75	75.71	27,871	Moderate	31.81	$96,600
0253.00	0	77	81.05%	18	18.95%	95	7.02	2.09	30,605	Moderate	45.82	$97,900
0101.00	1	95	82.61%	20	17.39%	115	21.00	16.21	36,974	Middle	33.24	$98,500
0057.02	0	156	85.71%	26	14.29%	182	50.83	46.5	38,794	Moderate	44.25	$99,100
0068.00	0	47	66.20%	24	33.80%	71	93.71	91.52	17,917	Low	19.80	$99,900
0029.00	0	38	86.36%	6	13.64%	44	31.52	15.37	20,254	Moderate	12.23	$100,800
0046.03	0	139	93.29%	10	6.71%	149	3.81	1.49	44,306	Middle	72.01	$102,400
0102.02	1	101	87.83%	14	12.17%	115	11.41	8.41	41,886	Middle	60.64	$103,600
0111.00	0	127	79.87%	32	20.13%	159	41.14	37.64	51,716	Middle	90.28	$106,100
0208.11	2	261	93.55%	18	6.45%	279	14.73	10.76	45,109	Middle	66.32	$110,000
0083.00	0	176	84.21%	33	15.79%	209	31.46	26.47	39,591	Middle	49.77	$110,800
0221.02	4	214	86.29%	34	13.71%	248	19.15	15.5	54,092	Middle	81.77	$110,800
0057.01	3	122	91.73%	11	8.27%	133	32.42	28.44	39,024	Middle	50.58	$113,000
0041.00	1	37	77.08%	11	22.92%	48	59.17	56.23	35,066	Moderate	39.51	$113,800
0222.00	1	178	84.76%	32	15.24%	210	18.80	15.83	54,911	Middle	83.63	$114,300
0046.01	2	222	93.28%	16	6.72%	238	8.84	4.43	37,445	Middle	47.68	$115,500
0018.00	0	57	89.06%	7	10.94%	64	53.70	48.82	34,063	Moderate	33.16	$118,100
0059.00	0	43	82.69%	9	17.31%	52	43.06	37.27	37,716	Middle	46.33	$118,900
0019.00	1	58	87.88%	8	12.12%	66	59.75	53.65	26,967	Moderate	20.50	$120,200
0212.02	1	206	88.41%	27	11.59%	233	2.07	0.45	55,700	Middle	90.53	$122,000
0046.02	4	179	93.23%	13	6.77%	192	6.45	2.9	37,852	Middle	53.88	$124,500
0008.00	0	20	95.24%	1	4.76%	21	71.48	67.46	30,625	Low	23.37	$124,700
0053.00	4	258	93.14%	19	6.86%	277	12.47	8.37	38,458	Middle	41.35	$125,200
0003.02	0	15	93.75%	1	6.25%	16	95.12	93.98	7,969	Low	7.81	$126,800
0084.00	1	37	82.22%	8	17.78%	45	45.76	42.68	26,599	Middle	36.51	$126,900
0065.00	2	121	81.21%	28	18.79%	149	55.36	51.12	39,297	Middle	47.11	$128,500
0052.00	1	158	95.18%	8	4.82%	166	9.63	3.96	42,260	Upper	46.42	$128,700
0042.00	0	63	86.30%	10	13.70%	73	42.98	39.32	36,429	Upper	40.88	$131,600
0020.00	1	30	100.00%	0	0.00%	30	31.60	25.12	36,875	Upper	16.36	$135,200
0250.01	4	261	94.22%	16	5.78%	277	3.68	0.83	66,799	Upper	87.81	$137,100
0010.00	0	19	95.00%	1	5.00%	20	72.14	67.65	14,539	Low	1.52	$137,500
0011.00	1	17	80.95%	4	19.05%	21	85.54	82.21	20,737	Low	9.00	$147,900
0070.00	0	45	83.33%	9	16.67%	54	37.03	28.12	35,927	Middle	36.79	$161,500
0050.00	4	170	97.70%	4	2.30%	174	9.00	4.25	49,937	Upper	42.22	$163,800
0051.00	1	124	99.20%	1	0.80%	125	4.86	1.12	69,327	Upper	63.90	$186,000
0072.00	3	43	95.56%	2	4.44%	45	29.32	14.13	27,074	Middle	18.94	$186,300
0047.01	1	162	95.86%	7	4.14%	169	7.72	5.1	57,672	Upper	60.25	$192,500
0004.00	1	15	100.00%	0	0.00%	15	63.91	58.89	12,260	Low	4.84	$200,000
0248.00	4	133	98.52%	2	1.48%	135	3.63	0.99	56,122	Upper	56.11	$200,000
0242.00	0	109	93.16%	8	6.84%	117	28.67	23.16	50,000	Middle	68.58	$204,300
0013.00	1	47	100.00%	0	0.00%	47	4.98	2.24	49,028	Upper	29.19	$230,900
0071.00	0	99	98.02%	2	1.98%	101	16.40	6.34	34,643	Upper	35.02	$234,100
0049.00	0	261	97.39%	7	2.61%	268	7.56	2.74	59,358	Upper	52.72	$248,500
0226.01	1	234	92.49%	19	7.51%	253	7.01	3.58	102,035	Upper	89.76	$253,600
0048.00	0	191	97.95%	4	2.05%	195	3.49	0.62	84,884	Upper	75.80	$257,500
0012.00	0	22	100.00%	0	0.00%	22	5.47	0.57	50,750	Upper	28.10	$288,900
0045.00	0	36	97.30%	1	2.70%	37	2.66	0.1	104,494	Upper	86.39	$354,700
0007.00	9	21	95.45%	1	4.55%	22	49.07	42.86	17,721	Middle	1.27	$450,000
0244.00	0	385	98.47%	6	1.53%	391	8.10	2.51	125,737	Upper	84.85	$609,300
TOTAL	**137**	**9,386**	**79.39%**	**1,818**	**15.38%**	**11,822**	**27.63**	**23.33**	**44,280**	**Middle**	**55.58**	**$118,701**

NOTES

1 The shaded row above denotes the tract with median housing value among the census tracts in the analysis.

2 "Loans" refers to owner-occupied 1-4 family first lien loans of any purpose.

Table 59. City of City Census Tract Analysis of Home Lending, 2004

Tracts Sorted in Ascending Order by Count of Bank Branches

Census Tract	Count of Bank Branches	Count of Prime Loans	Percent of Loans that are Prime	Count of Subprime Loans	Percent of Loans that are Subprime	Total Loans	Percent Minority	Percent African-American	Median Household Income	CRA Income Category	Percent Owner Occupied Housing Units	Median Housing Value
0006.00	12	2	100.00%	0	0.00%	2	28.55	20	35,278	Middle	0.00	$0
0007.00	9	21	95.45%	1	4.55%	22	49.07	42.86	17,721	Middle	1.27	$450,000
0218.01	6	179	76.17%	56	23.83%	235	26.64	24.13	37,844	Middle	55.46	$85,900
0209.02	4	169	88.95%	21	11.05%	190	3.96	0.91	33,730	Middle	52.82	$87,700
0102.01	4	212	91.38%	20	8.62%	232	6.32	3.13	34,381	Middle	49.17	$94,900
0214.01	4	192	91.00%	19	9.00%	211	2.25	0.41	41,176	Middle	70.44	$96,300
0221.02	4	214	86.29%	34	13.71%	248	19.15	15.5	54,092	Middle	81.77	$110,800
0046.02	4	179	93.23%	13	6.77%	192	6.45	2.9	37,852	Middle	53.88	$124,500
0053.00	4	258	93.14%	19	6.86%	277	12.47	8.37	38,458	Middle	41.35	$125,200
0250.01	4	261	94.22%	16	5.78%	277	3.68	0.83	66,799	Upper	87.81	$137,100
0050.00	4	170	97.70%	4	2.30%	174	9.00	4.25	49,937	Upper	42.22	$163,800
0248.00	4	133	98.52%	2	1.48%	135	3.63	0.99	56,122	Upper	56.11	$200,000
0001.00	3	9	100.00%	0	0.00%	9	76.76	71.92	0	Low	0.00	$0
0232.01	3	65	74.71%	22	25.29%	87	9.54	6.28	34,750	Middle	48.24	$73,400
0109.00	3	57	85.07%	10	14.93%	67	8.94	5.62	35,071	Moderate	47.34	$86,800
0110.00	3	55	69.62%	24	30.38%	79	80.06	76.83	29,622	Moderate	38.47	$87,300
0209.01	3	153	90.53%	16	9.47%	169	2.87	0.43	38,138	Middle	66.99	$91,100
0057.01	3	122	91.73%	11	8.27%	133	32.42	28.44	39,024	Middle	50.58	$113,000
0072.00	3	43	95.56%	2	4.44%	45	29.32	14.13	27,074	Middle	18.94	$186,300
0034.00	2	6	66.67%	3	33.33%	9	94.38	91.71	16,750	Low	12.52	$49,300
0061.00	2	62	75.61%	20	24.39%	82	13.76	9.16	27,364	Moderate	50.08	$71,100
0033.00	2	11	78.57%	3	21.43%	14	54.80	46.59	20,869	Moderate	7.50	$74,600
0097.00	2	116	77.33%	34	22.67%	150	11.78	7.71	29,318	Moderate	43.48	$77,200
0054.00	2	19	90.48%	2	9.52%	21	26.04	18.63	35,660	Moderate	23.32	$85,900
0060.00	2	105	78.36%	29	21.64%	134	26.60	20.48	34,859	Middle	30.61	$86,000
0082.02	2	60	72.29%	23	27.71%	83	49.81	46.85	27,813	Moderate	36.28	$91,300
0100.01	2	170	80.95%	40	19.05%	210	41.94	34.82	30,756	Moderate	26.72	$94,100
0107.00	2	73	93.59%	5	6.41%	78	3.22	1.01	42,880	Middle	70.22	$95,700
0080.00	2	14	73.68%	5	26.32%	19	86.85	84.22	12,215	Low	6.03	$95,900
0062.01	2	71	69.61%	31	30.39%	102	79.75	75.71	27,871	Moderate	31.81	$96,600
0208.11	2	261	93.55%	18	6.45%	279	14.73	10.76	45,109	Middle	66.32	$110,000
0046.01	2	222	93.28%	16	6.72%	238	8.84	4.43	37,445	Middle	47.68	$115,500
0065.00	2	121	81.21%	28	18.79%	149	55.36	51.12	39,297	Middle	47.11	$128,500
0028.00	1	10	71.43%	4	28.57%	14	29.42	24.7	23,352	Low	19.42	$43,500
0094.00	1	18	69.23%	8	30.77%	26	31.72	27.29	26,655	Moderate	34.75	$55,700
0074.00	1	30	66.67%	15	33.33%	45	46.52	43.98	25,932	Low	36.70	$56,600
0095.00	1	41	69.49%	18	30.51%	59	19.11	13.97	26,964	Moderate	34.55	$64,800
0073.00	1	58	71.60%	23	28.40%	81	51.48	45.91	31,571	Moderate	50.42	$68,300
0255.00	1	96	76.19%	30	23.81%	126	7.80	3.63	30,405	Moderate	43.89	$73,900
0055.00	1	68	70.10%	29	29.90%	97	80.96	77.5	28,424	Moderate	38.45	$74,100
0078.00	1	52	82.54%	11	17.46%	63	43.56	38.55	28,750	Moderate	39.89	$75,800
0026.00	1	43	81.13%	10	18.87%	53	26.34	18.43	23,153	Low	14.13	$89,500
0105.00	1	37	78.72%	10	21.28%	47	4.78	2.5	34,943	Middle	51.89	$91,600
0101.00	1	95	82.61%	20	17.39%	115	21.00	16.21	36,974	Middle	33.24	$98,500
0102.02	1	101	87.83%	14	12.17%	115	11.41	8.41	41,886	Middle	60.64	$103,600
0041.00	1	37	77.08%	11	22.92%	48	59.17	56.23	35,066	Moderate	39.51	$113,800
0222.00	1	178	84.76%	32	15.24%	210	18.80	15.83	54,911	Middle	83.63	$114,300
0019.00	1	58	87.88%	8	12.12%	66	59.75	53.65	26,967	Moderate	20.50	$120,200
0212.02	1	206	88.41%	27	11.59%	233	2.07	0.45	55,700	Middle	90.53	$122,000
0084.00	1	37	82.22%	8	17.78%	45	45.76	42.68	26,599	Middle	36.51	$126,900
0052.00	1	158	95.18%	8	4.82%	166	9.63	3.96	42,260	Upper	46.42	$128,700
0020.00	1	30	100.00%	0	0.00%	30	31.60	25.12	36,875	Upper	16.36	$135,200
0011.00	1	17	80.95%	4	19.05%	21	85.54	82.21	20,737	Low	9.00	$147,900
0051.00	1	124	99.20%	1	0.80%	125	4.86	1.12	69,327	Upper	63.90	$186,000
0047.01	1	162	95.86%	7	4.14%	169	7.72	5.1	57,672	Upper	60.25	$192,500
0004.00	1	15	100.00%	0	0.00%	15	63.91	58.89	12,260	Low	4.84	$200,000
0013.00	1	47	100.00%	0	0.00%	47	4.98	2.24	49,028	Upper	29.19	$230,900
0226.01	1	234	92.49%	19	7.51%	253	7.01	3.58	102,035	Upper	89.76	$253,600
0002.00	0	0	n/a	0	n/a	0	98.80	96.85	15,938	Low	0.00	$0
0062.02	0	0	0.00%	1	100.00%	1	50.93	47.21	0	Low	0.00	$0
0003.01	0	0	0.00%	1	100.00%	1	99.43	98.46	6,748	Low	0.49	$9,999
0091.00	0	5	62.50%	3	37.50%	8	23.07	9.93	12,188	Low	13.83	$29,800
0087.00	0	2	22.22%	7	77.78%	9	50.70	41.08	21,719	Low	26.23	$37,800
0009.00	0	2	100.00%	0	0.00%	2	77.68	70.43	6,972	Low	0.41	$47,500
0021.00	0	7	70.00%	3	30.00%	10	94.53	92.84	17,500	Low	22.20	$47,700
0103.00	0	27	64.29%	15	35.71%	42	13.81	9.31	31,402	Moderate	41.15	$50,200
0086.01	0	24	75.00%	8	25.00%	32	83.88	80.58	11,413	Low	24.94	$51,700
0077.00	0	18	54.55%	15	45.45%	33	96.53	94	11,120	Low	21.65	$54,500
0085.02	0	2	33.33%	4	66.67%	6	96.82	94.62	10,911	Low	5.21	$55,500
0093.00	0	38	77.55%	11	22.45%	49	21.08	16.89	25,387	Moderate	29.96	$56,500
0015.00	0	9	69.23%	4	30.77%	13	95.53	90.98	7,311	Low	12.83	$57,700
0089.00	0	13	54.17%	11	45.83%	24	53.12	47.48	22,277	Low	26.91	$57,900
0092.00	0	66	73.33%	24	26.67%	90	42.66	36.17	26,012	Low	30.91	$58,900
0098.00	0	34	64.15%	19	35.85%	53	28.53	24.96	31,406	Moderate	36.34	$61,100
0108.00	0	11	64.71%	6	35.29%	17	61.93	56.41	26,895	Moderate	29.72	$62,400
0017.00	0	7	63.64%	4	36.36%	11	84.54	81.3	8,511	Low	4.27	$62,900
0104.00	0	11	68.75%	5	31.25%	16	14.68	11.58	35,417	Moderate	36.48	$62,900
0023.00	0	19	73.08%	7	26.92%	26	83.87	81.17	19,797	Low	16.09	$64,600
0039.00	0	22	43.14%	29	56.86%	51	96.16	93.62	25,372	Moderate	38.21	$65,600

0047.02	0	17	70.83%	7	29.17%	24	3.36	0.58	24,393	Moderate	47.48	$65,800
0040.00	0	58	74.36%	20	25.64%	78	78.21	74.88	39,554	Middle	67.55	$66,400
0096.00	0	77	77.00%	23	23.00%	100	17.14	12.35	30,625	Moderate	39.57	$66,500
0079.00	0	33	89.19%	4	10.81%	37	48.20	44.61	35,737	Moderate	44.94	$67,400
0088.00	0	40	63.49%	23	36.51%	63	78.50	72.27	24,354	Low	31.60	$69,600
0038.00	0	23	46.94%	26	53.06%	49	96.57	93.68	17,361	Low	35.72	$70,100
0036.00	0	4	80.00%	1	20.00%	5	98.84	97.44	14,738	Low	9.14	$71,000
0016.00	0	6	100.00%	0	0.00%	6	88.08	82.89	8,175	Low	1.03	$71,400
0032.00	0	5	71.43%	2	28.57%	7	63.31	53.49	15,208	Low	17.58	$72,300
0069.00	0	43	65.15%	23	34.85%	66	96.75	94.39	20,878	Low	28.51	$73,500
0022.00	0	25	46.30%	29	53.70%	54	88.14	84.16	26,111	Moderate	24.53	$74,600
0035.00	0	6	46.15%	7	53.85%	13	93.88	90.86	19,268	Low	18.57	$75,300
0056.00	0	217	78.91%	58	21.09%	275	46.81	42.51	36,400	Moderate	66.68	$75,400
0014.00	0	0	n/a	0	n/a	0	88.08	82.35	26,964	Moderate	12.18	$76,100
0037.00	0	11	61.11%	7	38.89%	18	92.47	89.61	11,178	Low	10.96	$76,200
0067.00	0	22	62.86%	13	37.14%	35	97.86	94.97	14,269	Low	16.59	$76,700
0025.00	0	26	81.25%	6	18.75%	32	30.00	19.59	19,802	Low	17.46	$77,500
0063.00	0	83	66.40%	42	33.60%	125	96.98	93.39	24,163	Low	36.70	$79,900
0044.00	0	42	84.00%	8	16.00%	50	16.80	14.5	33,098	Moderate	42.25	$80,300
0100.02	0	97	71.32%	39	28.68%	136	65.84	61.62	26,561	Moderate	28.91	$82,300
0066.00	0	15	71.43%	6	28.57%	21	81.84	79.09	15,119	Low	16.71	$82,400
0075.00	0	57	86.36%	9	13.64%	66	32.91	28.2	33,625	Moderate	52.34	$84,100
0099.02	0	135	85.99%	22	14.01%	157	5.75	2.48	35,373	Middle	47.05	$84,300
0030.00	0	8	100.00%	0	0.00%	8	39.64	21.9	20,162	Low	9.39	$85,000
0064.00	0	74	69.16%	33	30.84%	107	94.36	92.22	32,923	Moderate	48.37	$86,700
0085.01	0	33	75.00%	11	25.00%	44	74.88	68.59	28,448	Low	15.49	$87,900
0081.00	0	65	78.31%	18	21.69%	83	81.08	77.87	37,237	Middle	56.09	$88,700
0106.00	0	52	96.30%	2	3.70%	54	5.15	2.03	44,500	Middle	66.89	$90,100
0082.01	0	124	83.78%	24	16.22%	148	61.65	58.36	35,833	Middle	62.01	$91,800
0043.00	0	31	100.00%	0	0.00%	31	11.63	8.84	40,982	Moderate	35.22	$92,500
0099.01	0	190	87.96%	26	12.04%	216	4.19	1.12	42,389	Middle	69.66	$93,000
0058.00	0	147	68.69%	67	31.31%	214	79.98	76.39	32,882	Middle	56.91	$93,700
0027.00	0	39	86.67%	6	13.33%	45	28.37	21.25	30,446	Middle	33.09	$94,600
0253.00	0	77	81.05%	18	18.95%	95	7.02	2.09	30,605	Moderate	45.82	$97,900
0057.02	0	156	85.71%	26	14.29%	182	50.83	46.5	38,794	Moderate	44.25	$99,100
0068.00	0	47	66.20%	24	33.80%	71	93.71	91.52	17,917	Low	19.80	$99,900
0029.00	0	38	86.36%	6	13.64%	44	31.52	15.37	20,254	Moderate	12.23	$100,800
0046.03	0	139	93.29%	10	6.71%	149	3.81	1.49	44,306	Middle	72.01	$102,400
0111.00	0	127	79.87%	32	20.13%	159	41.14	37.64	51,716	Middle	90.28	$106,100
0083.00	0	176	84.21%	33	15.79%	209	31.46	26.47	39,591	Middle	49.77	$110,800
0018.00	0	57	89.06%	7	10.94%	64	53.70	48.82	34,063	Moderate	33.16	$118,100
0059.00	0	43	82.69%	9	17.31%	52	43.06	37.27	37,716	Middle	46.33	$118,900
0008.00	0	20	95.24%	1	4.76%	21	71.48	67.46	30,625	Low	23.37	$124,700
0003.02	0	15	93.75%	1	6.25%	16	95.12	93.98	7,969	Low	7.81	$126,800
0042.00	0	63	86.30%	10	13.70%	73	42.98	39.32	36,429	Upper	40.88	$131,600
0010.00	0	19	95.00%	1	5.00%	20	72.14	67.65	14,539	Low	1.52	$137,500
0070.00	0	45	83.33%	9	16.67%	54	37.03	28.12	35,927	Middle	36.79	$161,500
0242.00	0	109	93.16%	8	6.84%	117	28.67	23.16	50,000	Middle	68.58	$204,300
0071.00	0	99	98.02%	2	1.98%	101	16.40	6.34	34,643	Upper	35.02	$234,100
0049.00	0	261	97.39%	7	2.61%	268	7.56	2.74	59,358	Upper	52.72	$248,500
0048.00	0	191	97.95%	4	2.05%	195	3.49	0.62	84,884	Upper	75.80	$257,500
0012.00	0	22	100.00%	0	0.00%	22	5.47	0.57	50,750	Upper	28.10	$288,900
0045.00	0	36	97.30%	1	2.70%	37	2.66	0.1	104,494	Upper	86.39	$354,700
0244.00	0	385	98.47%	6	1.53%	391	8.10	2.51	125,737	Upper	84.85	$609,300
TOTAL	**137**	**6,320**	**53.46%**	**1,818**	**15.38%**	**11,822**	**27.63**	**23.33**	**44,280**	**Middle**	**55.58**	**$118,701**

NOTES

1 The shaded row above denotes the tract with median housing value among the census tracts in the analysis.

2 "Loans" refers to owner-occupied 1-4 family first lien loans of any purpose.

Table 60. City of Cincinnati Census Tract Analysis of Small Business Lending, 2004

Tracts Sorted in Ascending Order by Percent African-American

Census Tract	Count of Bank Branches	Count of Small Business Loans	Count of Small Businesses	Percent of Small Businesses Receiving A Loan	Count of Loans to Non-Farm Small Businesses with Revenues <$1 million	Count of Non-Farm Businesses with Revenues <$1 million	Percent of Small Businesses with Revenues <$1 million Receving A Loan	Percent Minority	Percent African-American	Median Household Income	CRA Income Category
0045.00	0	36	79	45.57%	17	57	29.82%	2.66	0.10	$104,494	Upper
0214.01	4	84	193	43.52%	31	131	23.66%	2.25	0.41	$41,176	Middle
0209.01	3	87	177	49.15%	36	109	33.03%	2.87	0.43	$38,138	Middle
0212.02	1	92	166	55.42%	34	110	30.91%	2.07	0.45	$55,700	Middle
0012.00	0	18	57	31.58%	10	36	27.78%	5.47	0.57	$50,750	Upper
0047.02	0	120	219	54.79%	48	133	36.09%	3.36	0.58	$24,393	Moderate
0048.00	0	65	148	43.92%	21	107	19.63%	3.49	0.62	$84,884	Upper
0250.01	4	160	360	44.44%	59	239	24.69%	3.68	0.83	$66,799	Upper
0209.02	4	129	323	39.94%	47	253	18.58%	3.96	0.91	$33,730	Middle
0248.00	4	149	240	62.08%	73	168	43.45%	3.63	0.99	$56,122	Upper
0107.00	2	61	155	39.35%	26	103	25.24%	3.22	1.01	$42,880	Middle
0051.00	1	58	171	33.92%	30	116	25.86%	4.86	1.12	$69,327	Upper
0099.01	0	40	95	42.11%	10	76	13.16%	4.19	1.12	$42,389	Middle
0046.03	0	52	86	60.47%	23	64	35.94%	3.81	1.49	$44,306	Middle
0106.00	0	16	57	28.07%	5	43	11.63%	5.15	2.03	$44,500	Middle
0253.00	0	100	145	68.97%	19	104	18.27%	7.02	2.09	$30,605	Moderate
0013.00	1	72	140	51.43%	32	90	35.56%	4.98	2.24	$49,028	Upper
0099.02	0	37	83	44.58%	13	66	19.70%	5.75	2.48	$35,373	Middle
0105.00	1	34	52	65.38%	17	36	47.22%	4.78	2.50	$34,943	Middle
0244.00	0	268	482	55.60%	105	337	31.16%	8.10	2.51	$125,737	Upper
0049.00	0	196	319	61.44%	89	236	37.71%	7.56	2.74	$59,358	Upper
0046.02	4	71	175	40.57%	31	116	26.72%	6.45	2.90	$37,852	Middle
0102.01	4	127	321	39.56%	50	181	27.62%	6.32	3.13	$34,381	Middle
0226.01	1	103	229	44.98%	45	157	28.66%	7.01	3.58	$102,035	Upper
0255.00	1	81	178	45.51%	30	113	26.55%	7.80	3.63	$30,405	Moderate
0052.00	1	93	183	50.82%	33	123	26.83%	9.63	3.96	$42,260	Upper
0050.00	4	209	393	53.18%	100	273	36.63%	9.00	4.25	$49,937	Upper
0046.01	2	67	156	42.95%	35	100	35.00%	8.84	4.43	$37,445	Middle
0047.01	1	83	118	70.34%	35	75	46.67%	7.72	5.10	$57,672	Upper
0109.00	3	80	252	31.75%	21	150	14.00%	8.94	5.62	$35,071	Moderate
0232.01	3	203	408	49.75%	66	275	24.00%	9.54	6.28	$34,750	Middle
0071.00	0	80	160	50.00%	28	107	26.17%	16.40	6.34	$34,643	Upper
0097.00	2	58	126	46.03%	21	83	25.30%	11.78	7.71	$29,318	Moderate
0053.00	4	187	363	51.52%	78	215	36.28%	12.47	8.37	$38,458	Middle
0102.02	1	26	76	34.21%	13	46	28.26%	11.41	8.41	$41,886	Middle
0043.00	0	24	47	51.06%	7	23	30.43%	11.63	8.84	$40,982	Moderate
0061.00	2	109	213	51.17%	33	124	26.61%	13.76	9.16	$27,364	Moderate
0103.00	0	31	66	46.97%	13	39	33.33%	13.81	9.31	$31,402	Moderate
0091.00	0	60	123	48.78%	19	79	24.05%	23.07	9.93	$12,188	Low
0208.11	2	110	204	53.92%	31	141	21.99%	14.73	10.76	$45,109	Middle
0104.00	0	43	69	62.32%	14	33	42.42%	14.68	11.58	$35,417	Moderate
0096.00	0	36	107	33.64%	17	78	21.79%	17.14	12.35	$30,625	Moderate
0095.00	1	40	94	42.55%	13	64	20.31%	19.11	13.97	$26,964	Moderate
0072.00	3	40	88	45.45%	16	49	32.65%	29.32	14.13	$27,074	Middle
0044.00	0	79	170	46.47%	30	121	24.79%	16.80	14.50	$33,098	Moderate
0029.00	0	54	210	25.71%	19	145	13.10%	31.52	15.37	$20,254	Moderate
0221.02	4	140	328	42.68%	45	223	20.18%	19.15	15.50	$54,092	Middle
0222.00	1	75	170	44.12%	23	115	20.00%	18.80	15.83	$54,911	Middle
0101.00	1	98	194	50.52%	34	146	23.29%	21.00	16.21	$36,974	Middle
0093.00	0	23	74	31.08%	9	50	18.00%	21.08	16.89	$25,387	Moderate
0026.00	1	43	129	33.33%	15	73	20.55%	26.34	18.43	$23,153	Low
0054.00	2	63	104	60.58%	14	48	29.17%	26.04	18.63	$35,660	Moderate
0025.00	0	20	97	20.62%	7	52	13.46%	30.00	19.59	$19,802	Low
0006.00	12	725	1,276	56.82%	140	626	22.36%	28.55	20.00	$35,278	Middle
0060.00	2	53	176	30.11%	24	114	21.05%	26.60	20.48	$34,859	Middle
0027.00	0	18	52	34.62%	7	37	18.92%	28.37	21.25	$30,446	Middle
0030.00	0	211	174	121.26%	11	75	14.67%	39.64	21.90	$20,162	Low
0242.00	0	49	78	62.82%	13	55	23.64%	28.67	23.16	$50,000	Middle
0218.01	6	100	213	46.95%	33	145	22.76%	26.64	24.13	$37,844	Middle
0028.00	1	182	371	49.06%	50	177	28.25%	29.42	24.70	$23,352	Low
0098.00	0	2	35	5.71%	0	26	0.00%	28.53	24.96	$31,406	Moderate
0020.00	1	104	243	42.80%	45	167	26.95%	31.60	25.12	$36,875	Upper
0083.00	0	56	173	32.37%	22	118	18.64%	31.46	26.47	$39,591	Middle
0094.00	1	21	74	28.38%	11	52	21.15%	31.72	27.29	$26,655	Moderate
0070.00	0	45	109	41.28%	13	83	15.66%	37.03	28.12	$35,927	Middle
0075.00	0	24	57	42.11%	12	35	34.29%	32.91	28.20	$33,625	Moderate
0057.01	3	73	179	40.78%	26	127	20.47%	32.42	28.44	$39,024	Middle

0100.01	2	62	201	30.85%	24	133	18.05%	41.94	34.82	$30,756	Moderate
0092.00	0	67	114	58.77%	14	75	18.67%	42.66	36.17	$26,012	Low
0059.00	0	28	52	53.85%	11	39	28.21%	43.06	37.27	$37,716	Middle
0111.00	0	24	89	26.97%	9	72	12.50%	41.14	37.64	$51,716	Middle
0078.00	1	112	243	46.09%	42	160	26.25%	43.56	38.55	$28,750	Moderate
0042.00	0	64	116	55.17%	32	87	36.78%	42.98	39.32	$36,429	Upper
0087.00	0	33	84	39.29%	8	55	14.55%	50.70	41.08	$21,719	Low
0056.00	0	90	215	41.86%	37	152	24.34%	46.81	42.51	$36,400	Moderate
0084.00	1	26	40	65.00%	5	29	17.24%	45.76	42.68	$26,599	Middle
0007.00	9	734	1,683	43.61%	163	938	17.38%	49.07	42.86	$17,721	Middle
0074.00	1	81	154	52.60%	30	106	28.30%	46.52	43.98	$25,932	Low
0079.00	0	11	57	19.30%	6	45	13.33%	48.20	44.61	$35,737	Moderate
0073.00	1	54	146	36.99%	18	67	26.87%	51.48	45.91	$31,571	Moderate
0057.02	0	45	150	30.00%	19	84	22.62%	50.83	46.50	$38,794	Moderate
0033.00	2	72	220	32.73%	24	138	17.39%	54.80	46.59	$20,869	Moderate
0082.02	2	41	168	24.40%	19	121	15.70%	49.81	46.85	$27,813	Moderate
0062.02	0	21	19	110.53%	1	7	14.29%	50.93	47.21	$0	Low
0089.00	0	12	44	27.27%	2	29	6.90%	53.12	47.48	$22,277	Low
0018.00	0	40	83	48.19%	27	51	52.94%	53.70	48.82	$34,063	Moderate
0065.00	2	69	258	26.74%	28	171	16.37%	55.36	51.12	$39,297	Middle
0032.00	0	34	268	12.69%	18	130	13.85%	63.31	53.49	$15,208	Low
0019.00	1	59	145	40.69%	15	106	14.15%	59.75	53.65	$26,967	Moderate
0041.00	1	38	111	34.23%	18	79	22.78%	59.17	56.23	$35,066	Moderate
0108.00	0	40	48	83.33%	17	24	70.83%	61.93	56.41	$26,895	Moderate
0082.01	0	25	127	19.69%	10	85	11.76%	61.65	58.36	$35,833	Middle
0004.00	1	70	198	35.35%	24	74	32.43%	63.91	58.89	$12,260	Low
0100.02	0	41	95	43.16%	20	74	27.03%	65.84	61.62	$26,561	Moderate
0008.00	0	15	50	30.00%	7	28	25.00%	71.48	67.46	$30,625	Low
0010.00	0	67	224	29.91%	23	162	14.20%	72.14	67.65	$14,539	Low
0085.01	0	16	54	29.63%	3	32	9.38%	74.88	68.59	$28,448	Low
0009.00	0	58	130	44.62%	18	80	22.50%	77.68	70.43	$6,972	Low
0001.00	3	206	528	39.02%	53	190	27.89%	76.76	71.92	$0	Low
0088.00	0	17	41	41.46%	5	31	16.13%	78.50	72.27	$24,354	Low
0040.00	0	48	75	64.00%	19	55	34.55%	78.21	74.88	$39,554	Middle
0062.01	2	87	262	33.21%	32	170	18.82%	79.75	75.71	$27,871	Moderate
0058.00	0	58	152	38.16%	23	103	22.33%	79.98	76.39	$32,882	Middle
0110.00	3	127	269	47.21%	41	148	27.70%	80.06	76.83	$29,622	Moderate
0055.00	1	136	296	45.95%	47	180	26.11%	80.96	77.50	$28,424	Moderate
0081.00	0	48	102	47.06%	11	63	17.46%	81.08	77.87	$37,237	Middle
0066.00	0	15	51	29.41%	5	40	12.50%	81.84	79.09	$15,119	Low
0086.01	0	23	95	24.21%	15	62	24.19%	83.88	80.58	$11,413	Low
0023.00	0	69	192	35.94%	20	130	15.38%	83.87	81.17	$19,797	Low
0017.00	0	25	65	38.46%	10	41	24.39%	84.54	81.30	$8,511	Low
0011.00	1	62	326	19.02%	31	181	17.13%	85.54	82.21	$20,737	Low
0014.00	0	12	57	21.05%	7	29	24.14%	88.08	82.35	$26,964	Moderate
0016.00	0	64	170	37.65%	30	116	25.86%	88.08	82.89	$8,175	Low
0022.00	0	36	107	33.64%	6	57	10.53%	88.14	84.16	$26,111	Moderate
0080.00	2	100	118	84.75%	15	58	25.86%	86.85	84.22	$12,215	Low
0037.00	0	58	174	33.33%	15	101	14.85%	92.47	89.61	$11,178	Low
0035.00	0	28	86	32.56%	10	59	16.95%	93.88	90.86	$19,268	Low
0015.00	0	61	158	38.61%	23	92	25.00%	95.53	90.98	$7,311	Low
0068.00	0	35	143	24.48%	14	95	14.74%	93.71	91.52	$17,917	Low
0034.00	2	64	236	27.12%	26	145	17.93%	94.38	91.71	$16,750	Low
0064.00	0	112	215	52.09%	31	125	24.80%	94.36	92.22	$32,923	Moderate
0021.00	0	79	230	34.35%	29	109	26.61%	94.53	92.84	$17,500	Low
0063.00	0	36	134	26.87%	14	90	15.56%	96.98	93.39	$24,163	Low
0039.00	0	10	63	15.87%	4	42	9.52%	96.16	93.62	$25,372	Moderate
0038.00	0	25	95	26.32%	5	68	7.35%	96.57	93.68	$17,361	Low
0003.02	0	9	18	50.00%	1	12	8.33%	95.12	93.98	$7,969	Low
0077.00	0	37	103	35.92%	11	55	20.00%	96.53	94.00	$11,120	Low
0069.00	0	19	73	26.03%	2	45	4.44%	96.75	94.39	$20,878	Low
0085.02	0	3	15	20.00%	0	7	0.00%	96.82	94.62	$10,911	Low
0067.00	0	21	67	31.34%	6	42	14.29%	97.86	94.97	$14,269	Low
0002.00	0	13	31	41.94%	2	18	11.11%	98.80	96.85	$15,938	Low
0036.00	0	14	44	31.82%	6	28	21.43%	98.84	97.44	$14,738	Low
0003.01	0	1	11	9.09%	0	5	0.00%	99.43	98.46	$6,748	Low
TOTAL	**137**	**10,000**	**22,970**	**43.54%**	**3,358**	**14,293**	**23.49%**	**27.63**	**23.33**	**$44,280**	**Middle**

NOTES

1 The shaded row above denotes the tract with median percentage of African American population.

2 "Percent of Small Businesses Receiving A Loan" may exceed one hundred percent, given that a business may receive more than one per year.

Table 61. City of Cincinnati Census Tract Analysis of Small Business Lending, 2004

Tracts Sorted in Ascending Order by Count of Census Tracts

Census Tract	Count of Bank Branches	Count of Small Business Loans	Count of Small Businesses	Percent of Small Businesses Receiving A Loan	Count of Loans to Non-Farm Small Businesses with Revenues <$1 million	Count of Non-Farm Businesses with Revenues <$1 million	Percent of Small Businesses with Revenues <$1 million Receving A Loan	Percent Minority	Percent African-American	Median Household Income	CRA Income Category
0006.00	12	725	1,276	56.82%	140	626	22.36%	28.55	20.00	$35,278	Middle
0007.00	9	734	1,683	43.61%	163	938	17.38%	49.07	42.86	$17,721	Middle
0218.01	6	100	213	46.95%	33	145	22.76%	26.64	24.13	$37,844	Middle
0050.00	4	209	393	53.18%	100	273	36.63%	9.00	4.25	$49,937	Upper
0053.00	4	187	363	51.52%	78	215	36.28%	12.47	8.37	$38,458	Middle
0250.01	4	160	360	44.44%	59	239	24.69%	3.68	0.83	$66,799	Upper
0248.00	4	149	240	62.08%	73	168	43.45%	3.63	0.99	$56,122	Upper
0221.02	4	140	328	42.68%	45	223	20.18%	19.15	15.50	$54,092	Middle
0209.02	4	129	323	39.94%	47	253	18.58%	3.96	0.91	$33,730	Middle
0102.01	4	127	321	39.56%	50	181	27.62%	6.32	3.13	$34,381	Middle
0214.01	4	84	193	43.52%	31	131	23.66%	2.25	0.41	$41,176	Middle
0046.02	4	71	175	40.57%	31	116	26.72%	6.45	2.90	$37,852	Middle
0001.00	3	206	528	39.02%	53	190	27.89%	76.76	71.92	$0	Low
0232.01	3	203	408	49.75%	66	275	24.00%	9.54	6.28	$34,750	Middle
0110.00	3	127	269	47.21%	41	148	27.70%	80.06	76.83	$29,622	Moderate
0209.01	3	87	177	49.15%	36	109	33.03%	2.87	0.43	$38,138	Middle
0109.00	3	80	252	31.75%	21	150	14.00%	8.94	5.62	$35,071	Moderate
0057.01	3	73	179	40.78%	26	127	20.47%	32.42	28.44	$39,024	Middle
0072.00	3	40	88	45.45%	16	49	32.65%	29.32	14.13	$27,074	Middle
0208.11	2	110	204	53.92%	31	141	21.99%	14.73	10.76	$45,109	Middle
0061.00	2	109	213	51.17%	33	124	26.61%	13.76	9.16	$27,364	Moderate
0080.00	2	100	118	84.75%	15	58	25.86%	86.85	84.22	$12,215	Low
0062.01	2	87	262	33.21%	32	170	18.82%	79.75	75.71	$27,871	Moderate
0033.00	2	72	220	32.73%	24	138	17.39%	54.80	46.59	$20,869	Moderate
0065.00	2	69	258	26.74%	28	171	16.37%	55.36	51.12	$39,297	Middle
0046.01	2	67	156	42.95%	35	100	35.00%	8.84	4.43	$37,445	Middle
0034.00	2	64	236	27.12%	26	145	17.93%	94.38	91.71	$16,750	Low
0054.00	2	63	104	60.58%	14	48	29.17%	26.04	18.63	$35,660	Moderate
0100.01	2	62	201	30.85%	24	133	18.05%	41.94	34.82	$30,756	Moderate
0107.00	2	61	155	39.35%	26	103	25.24%	3.22	1.01	$42,880	Middle
0097.00	2	58	126	46.03%	21	83	25.30%	11.78	7.71	$29,318	Moderate
0060.00	2	53	176	30.11%	24	114	21.05%	26.60	20.48	$34,859	Middle
0082.02	2	41	168	24.40%	19	121	15.70%	49.81	46.85	$27,813	Moderate
0028.00	1	182	371	49.06%	50	177	28.25%	29.42	24.70	$23,352	Low
0055.00	1	136	296	45.95%	47	180	26.11%	80.96	77.50	$28,424	Moderate
0078.00	1	112	243	46.09%	42	160	26.25%	43.56	38.55	$28,750	Moderate
0020.00	1	104	243	42.80%	45	167	26.95%	31.60	25.12	$36,875	Upper
0226.01	1	103	229	44.98%	45	157	28.66%	7.01	3.58	$102,035	Upper
0101.00	1	98	194	50.52%	34	146	23.29%	21.00	16.21	$36,974	Middle
0052.00	1	93	183	50.82%	33	123	26.83%	9.63	3.96	$42,260	Upper
0212.02	1	92	166	55.42%	34	110	30.91%	2.07	0.45	$55,700	Middle
0047.01	1	83	118	70.34%	35	75	46.67%	7.72	5.10	$57,672	Upper
0255.00	1	81	178	45.51%	30	113	26.55%	7.80	3.63	$30,405	Moderate
0074.00	1	81	154	52.60%	30	106	28.30%	46.52	43.98	$25,932	Low
0222.00	1	75	170	44.12%	23	115	20.00%	18.80	15.83	$54,911	Middle
0013.00	1	72	140	51.43%	32	90	35.56%	4.98	2.24	$49,028	Upper
0004.00	1	70	198	35.35%	24	74	32.43%	63.91	58.89	$12,260	Low
0011.00	1	62	326	19.02%	31	181	17.13%	85.54	82.21	$20,737	Low
0019.00	1	59	145	40.69%	15	106	14.15%	59.75	53.65	$26,967	Moderate
0051.00	1	58	171	33.92%	30	116	25.86%	4.86	1.12	$69,327	Upper
0073.00	1	54	146	36.99%	18	67	26.87%	51.48	45.91	$31,571	Moderate
0026.00	1	43	129	33.33%	15	73	20.55%	26.34	18.43	$23,153	Low
0095.00	1	40	94	42.55%	13	64	20.31%	19.11	13.97	$26,964	Moderate
0041.00	1	38	111	34.23%	18	79	22.78%	59.17	56.23	$35,066	Moderate
0105.00	1	34	52	65.38%	17	36	47.22%	4.78	2.50	$34,943	Middle
0102.02	1	26	76	34.21%	13	46	28.26%	11.41	8.41	$41,886	Middle
0084.00	1	26	40	65.00%	5	29	17.24%	45.76	42.68	$26,599	Middle
0094.00	1	21	74	28.38%	11	52	21.15%	31.72	27.29	$26,655	Moderate
0244.00	0	268	482	55.60%	105	337	31.16%	8.10	2.51	$125,737	Upper
0030.00	0	211	174	121.26%	11	75	14.67%	39.64	21.90	$20,162	Low
0049.00	0	196	319	61.44%	89	236	37.71%	7.56	2.74	$59,358	Upper
0047.02	0	120	219	54.79%	48	133	36.09%	3.36	0.58	$24,393	Moderate
0064.00	0	112	215	52.09%	31	125	24.80%	94.36	92.22	$32,923	Moderate
0253.00	0	100	145	68.97%	19	104	18.27%	7.02	2.09	$30,605	Moderate
0056.00	0	90	215	41.86%	37	152	24.34%	46.81	42.51	$36,400	Moderate
0071.00	0	80	160	50.00%	28	107	26.17%	16.40	6.34	$34,643	Upper
0044.00	0	79	170	46.47%	30	121	24.79%	16.80	14.50	$33,098	Moderate
0021.00	0	79	230	34.35%	29	109	26.61%	94.53	92.84	$17,500	Low

0023.00	0	69	192	35.94%	20	130	15.38%	83.87	81.17	$19,797	Low
0092.00	0	67	114	58.77%	14	75	18.67%	42.66	36.17	$26,012	Low
0010.00	0	67	224	29.91%	23	162	14.20%	72.14	67.65	$14,539	Low
0048.00	0	65	148	43.92%	21	107	19.63%	3.49	0.62	$84,884	Upper
0042.00	0	64	116	55.17%	32	87	36.78%	42.98	39.32	$36,429	Upper
0016.00	0	64	170	37.65%	30	116	25.86%	88.08	82.89	$8,175	Low
0015.00	0	61	158	38.61%	23	92	25.00%	95.53	90.98	$7,311	Low
0091.00	0	60	123	48.78%	19	79	24.05%	23.07	9.93	$12,188	Low
0009.00	0	58	130	44.62%	18	80	22.50%	77.68	70.43	$6,972	Low
0058.00	0	58	152	38.16%	23	103	22.33%	79.98	76.39	$32,882	Middle
0037.00	0	58	174	33.33%	15	101	14.85%	92.47	89.61	$11,178	Low
0083.00	0	56	173	32.37%	22	118	18.64%	31.46	26.47	$39,591	Middle
0029.00	0	54	210	25.71%	19	145	13.10%	31.52	15.37	$20,254	Moderate
0046.03	0	52	86	60.47%	23	64	35.94%	3.81	1.49	$44,306	Middle
0242.00	0	49	78	62.82%	13	55	23.64%	28.67	23.16	$50,000	Middle
0040.00	0	48	75	64.00%	19	55	34.55%	78.21	74.88	$39,554	Middle
0081.00	0	48	102	47.06%	11	63	17.46%	81.08	77.87	$37,237	Middle
0070.00	0	45	109	41.28%	13	83	15.66%	37.03	28.12	$35,927	Middle
0057.02	0	45	150	30.00%	19	84	22.62%	50.83	46.50	$38,794	Moderate
0104.00	0	43	69	62.32%	14	33	42.42%	14.68	11.58	$35,417	Moderate
0100.02	0	41	95	43.16%	20	74	27.03%	65.84	61.62	$26,561	Moderate
0099.01	0	40	95	42.11%	10	76	13.16%	4.19	1.12	$42,389	Middle
0018.00	0	40	83	48.19%	27	51	52.94%	53.70	48.82	$34,063	Moderate
0108.00	0	40	48	83.33%	17	24	70.83%	61.93	56.41	$26,895	Moderate
0099.02	0	37	83	44.58%	13	66	19.70%	5.75	2.48	$35,373	Middle
0077.00	0	37	103	35.92%	11	55	20.00%	96.53	94.00	$11,120	Low
0045.00	0	36	79	45.57%	17	57	29.82%	2.66	0.10	$104,494	Upper
0096.00	0	36	107	33.64%	17	78	21.79%	17.14	12.35	$30,625	Moderate
0022.00	0	36	107	33.64%	6	57	10.53%	88.14	84.16	$26,111	Moderate
0063.00	0	36	134	26.87%	14	90	15.56%	96.98	93.39	$24,163	Low
0068.00	0	35	143	24.48%	14	95	14.74%	93.71	91.52	$17,917	Low
0032.00	0	34	268	12.69%	18	130	13.85%	63.31	53.49	$15,208	Low
0087.00	0	33	84	39.29%	8	55	14.55%	50.70	41.08	$21,719	Low
0103.00	0	31	66	46.97%	13	39	33.33%	13.81	9.31	$31,402	Moderate
0059.00	0	28	52	53.85%	11	39	28.21%	43.06	37.27	$37,716	Middle
0035.00	0	28	86	32.56%	10	59	16.95%	93.88	90.86	$19,268	Low
0082.01	0	25	127	19.69%	10	85	11.76%	61.65	58.36	$35,833	Middle
0017.00	0	25	65	38.46%	10	41	24.39%	84.54	81.30	$8,511	Low
0038.00	0	25	95	26.32%	5	68	7.35%	96.57	93.68	$17,361	Low
0043.00	0	24	47	51.06%	7	23	30.43%	11.63	8.84	$40,982	Moderate
0075.00	0	24	57	42.11%	12	35	34.29%	32.91	28.20	$33,625	Moderate
0111.00	0	24	89	26.97%	9	72	12.50%	41.14	37.64	$51,716	Middle
0093.00	0	23	74	31.08%	9	50	18.00%	21.08	16.89	$25,387	Moderate
0086.01	0	23	95	24.21%	15	62	24.19%	83.88	80.58	$11,413	Low
0062.02	0	21	19	110.53%	1	7	14.29%	50.93	47.21	$0	Low
0067.00	0	21	67	31.34%	6	42	14.29%	97.86	94.97	$14,269	Low
0025.00	0	20	97	20.62%	7	52	13.46%	30.00	19.59	$19,802	Low
0069.00	0	19	73	26.03%	2	45	4.44%	96.75	94.39	$20,878	Low
0012.00	0	18	57	31.58%	10	36	27.78%	5.47	0.57	$50,750	Upper
0027.00	0	18	52	34.62%	7	37	18.92%	28.37	21.25	$30,446	Middle
0088.00	0	17	41	41.46%	5	31	16.13%	78.50	72.27	$24,354	Low
0106.00	0	16	57	28.07%	5	43	11.63%	5.15	2.03	$44,500	Middle
0085.01	0	16	54	29.63%	3	32	9.38%	74.88	68.59	$28,448	Low
0008.00	0	15	50	30.00%	7	28	25.00%	71.48	67.46	$30,625	Low
0066.00	0	15	51	29.41%	5	40	12.50%	81.84	79.09	$15,119	Low
0036.00	0	14	44	31.82%	6	28	21.43%	98.84	97.44	$14,738	Low
0002.00	0	13	31	41.94%	2	18	11.11%	98.80	96.85	$15,938	Low
0089.00	0	12	44	27.27%	2	29	6.90%	53.12	47.48	$22,277	Low
0014.00	0	12	57	21.05%	7	29	24.14%	88.08	82.35	$26,964	Moderate
0079.00	0	11	57	19.30%	6	45	13.33%	48.20	44.61	$35,737	Moderate
0039.00	0	10	63	15.87%	4	42	9.52%	96.16	93.62	$25,372	Moderate
0003.02	0	9	18	50.00%	1	12	8.33%	95.12	93.98	$7,969	Low
0085.02	0	3	15	20.00%	0	7	0.00%	96.82	94.62	$10,911	Low
0098.00	0	2	35	5.71%	0	26	0.00%	28.53	24.96	$31,406	Moderate
0003.01	0	1	11	9.09%	0	5	0.00%	99.43	98.46	$6,748	Low
TOTAL	**137**	**10,000**	**22,970**	**43.54%**	**3,358**	**14,293**	**23.49%**	**27.63**	**23.33**	**$44,280**	**Middle**

NOTES

1 "Percent of Small Businesses Receiving A Loan" may exceed one hundred percent, given that a business may receive more than one per year.

Table 62. Affiliates Used in Home Lending Ranking Analysis		
1	**Fifth Third Bancorp**	
	Fifth Third Mortgage Company	
	Fifth Third Bank (OH)	
	Home Equity of America	
	Fifth Third Bank (MI)	
2	**National City Corporation**	
	National City Bank, Indiana	
	Provident Bank	
	Naitonal City Bank	
3	**Countrywide Financial Corporation**	
	Countrywide Home Loans	
	Countrywide Mortgage Ventures LLC	
	Treasury Bank NA	
4	**Wells Fargo & Co.**	
	Wells Fargo Bank NA	
	Wells Fargo Financial Ohio 1, Inc.	
	Wells Fargo Funding Inc.	
	Wells Fargo Financial Kentucky, Inc.	
	Wells Fargo Financial Indiana, Inc.	
	Wells Fargo Financial Acceptance America	
5	**The Union Savings Bank**	
	(has no affiliates)	
6	**Guardian Savings Bank, FSB**	
	(has no affiliates)	
7	**Third Federal Savings and Loan Association**	
	(has no affiliates)	
8	**ABN Amro Holding NV**	
	ABN Amro Mortgage Group, Inc.	
9	**Washington Mutual**	
	Washington Mutual Bank FA	
	Long Beach Mortgage Co.	
	Washington Mutual Finance Corporation	
10	**JPMorgan Chase & Co.**	
	Chase Manhattan Mortgage Corporation	
	JPMorgan Chase Bank, NA	
	Chase Manhattan Bank USA, NA	
11	**Ameriquest Mortgage Co.**	
	Ameriquest Mortgage Co.	
	Argent Mortgage Co.	
	Bedford Home Loans, Inc.	
12	**US Bancorp**	
	US Bank, NA	
	US Bank North Dakota	
13	**Accredited Home Lenders Holding Co.**	
	Accredited Home Lenders Inc.	
14	**Huntington National Bancshares**	
	The Huntington National Bank	
15	**PNC Financial Services Group, Inc.**	
	PNC Bank NA	
16	**KeyCorp**	
	KeyBank NA	
17	**First Financial Bancorp**	
	First Financial Bank	
	Heritage Community Bank	

NOTES

1 Company in bold is the top holding company, regardless of whether it does home lending itself.

2 Affilates were chosen based on the amount of loans made in both the City of Cincinnati and the Cincinnati MSA.

Table 63. Affiliates Used in Small Business Ranking Analysis		
1	**Fifth Third Bancorp**	
	Fifth Third Bank (OH)	
	Fifth Third Bank (MI)	
2	**National City Corporation**	
	National City Bank, Indiana	
	Provident Bank	
	Naitonal City Bank	
3	**Wells Fargo & Co.**	
	Wells Fargo Bank NA	
4	**JPMorgan Chase & Co.**	
	JPMorgan Chase Bank, NA	
	Chase Manhattan Bank USA, NA	
5	**US Bancorp**	
	US Bank, NA	
	US Bank North Dakota	
6	**Huntington National Bancshares**	
	The Huntington National Bank	
7	**PNC Financial Services Group, Inc.**	
	PNC Bank NA	

NOTES

1 Company in bold is the top holding company, regardless of whether it does home lending itself.

2 Affilates were chosen based on the amount of loans made in both the City of Cincinnati and the Cincinnati MSA.