

May 5, 2003

Mr. Robert Albanese  
Regional Director  
Office of Thrift Supervision  
10 Exchange Place Centre  
18<sup>th</sup> Floor  
Jersey City, NJ 07302

RE: CRA Exam of Staten Island Bank

Dear Mr. Albanese:

The National Community Reinvestment Coalition (NCRC) and NCRC member organizations and individuals in New York signing this letter believe that OTS must lower Staten Island Bank and Trust's CRA rating on its upcoming exam. The previous rating of Outstanding awarded on July 5, 2000 is an inflated rating. In particular, the thrift's lending performance is at best "low satisfactory," not the "outstanding" rating of the previous exam. NCRC believes that an unjustifiably narrow assessment area contributes significantly to the grade inflation. In order to grade CRA performance adequately, the upcoming CRA exam must adopt a realistic assessment area that captures the majority of the Staten Island Bank and Trust's lending activity.

NCRC and our New York-based members believe that a more rigorous examination of Staten Island Bank and Trust will increase home and small business loans to low- and moderate-income (LMI) borrowers and communities. As the nation's CRA trade association of 600 community organizations and local public agencies, NCRC regularly comments on CRA exams with the intention of increasing access to credit and capital for traditionally underserved communities. Our New York-based members likewise engage in CRA activism including commenting on merger applications with the purpose of holding lending institutions accountable for adhering to their obligation of serving all communities in which they are chartered. In the case of Staten Island Bank and Trust, NCRC and its New York-based members believe that CRA examination procedures must be improved so that the lending institution will become committed to serving all LMI communities in its service area, not just the relatively few LMI communities in Staten Island.

### **Substandard Lending Performance**

#### **Single Family Lending**

Every couple of years, NCRC produces a comprehensive report, *America's Best and Worst Lenders*, which ranks financial institutions on a series of twelve indicators of CRA and fair lending performance in twenty five metropolitan areas. In the New York metropolitan area, Staten Island Bank and Trust is among the bottom of the ranked lending institutions in home purchase and refinance lending for 2000 and 2001. In home

purchase lending, Staten Island Bank and Trust was ranked 24 out of 37 HMDA reporters in 2001 and 28 out of 37 in 2000 (see exhibits 1 and 2). In refinance lending, Staten Island Bank and Trust was ranked even worse: 31 out of 35 in 2001 and dead last out of 35 in 2000 (see exhibits 3 and 4). The bottom tier rankings are not consistent with an Outstanding rating on the lending test of the previous CRA exam.

Comparisons on a few indicators illuminate the poor performance of Staten Island Bank and Trust. When combining the HMDA data of the bank with its mortgage company affiliate, SIB Mortgage Corp. (as the previous CRA exam does), Staten Island's performance improves, but not close to the level of a lender meriting an Outstanding rating on the lending test.

### **Home Purchase Lending in New York MSA**

In home purchase lending during 2001, all prime lenders, in the aggregate, issued 12.4 percent of their home mortgage loans to LMI borrowers in the New York metropolitan statistical area (MSA).<sup>1</sup> Staten Island Bank and Trust issued just 6.2 percent of its loans to LMI borrowers, or half the amount, in percentage terms, of all prime lenders, as a group. When adding SIB Mortgage Corp's loans to Staten Island Bank and Trust's, the institution still only issued 6.5 percent of its loans to LMI borrowers. Staten Island's competitors that issued a similar number of total loans made much higher portions of their loans to LMI borrowers. As Exhibit 5 shows, M& T Mortgage Corporation, Fleet National Bank, and Bank of America made 19.5 percent, 14.4 percent, and 9.6 percent of their home purchase loans to LMI borrowers, in contrast to Staten Island's 6.2 percent. Abacus Federal Savings Bank, a thrift with a similar 2001 loan volume to Staten Island's, issued 18.9 percent of its loans to LMI borrowers.

All prime lenders, as a group, issued 10.7 percent of their home mortgage loans to residents of LMI tracts in the New York MSA during 2001. Staten Island Bank and Trust made just 3.8 percent of its mortgage loans to residents of LMI tracts. After adding SIB Mortgage Corp data, Staten Island Bank and Trust made 10 percent of its loans to residents of LMI tracts, which is just about equal to the all-prime lender benchmark. However, Staten Island's low percentage of loans to LMI borrowers (half as much as the peer aggregate in percentage terms) suggests that Staten Island's lending in LMI tracts disproportionately reached middle- and upper-income (MUI) borrowers and may therefore fuel gentrification.

The possibility that Staten Island Bank and Trust's lending in LMI tracts disproportionately served MUI borrowers is made more likely when considering that the institution trails its peers by a large margin in reaching minority borrowers. All prime lenders, as a group, made 22.3 percent of their mortgage loans during 2001 to African-Americans and Hispanics in the New York metropolitan area. Staten Island Bank and

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<sup>1</sup> The Department of Housing and Urban Development develops a list of subprime and manufactured home loan specialists. NCRC used this list to exclude subprime and manufactured home loan specialists from the group of prime peer lenders. Staten Island Bank and Trust was compared against all prime lenders, as a group.

Trust issued just 5.3 percent of its loans to African-Americans and Hispanics. When including SIB Mortgage Corp., Staten Island's portion of mortgage loans to African-Americans and Hispanics improved to 16.6 percent. But the combined lending of Staten Island Bank and Trust and its affiliated mortgage company was still far behind the all prime lender benchmark. Likewise, all prime lenders, as a group, made 25 percent of their mortgage loans to residents of minority tracts (greater than 50 percent minorities) during 2001. Staten Island Bank and Trust issued just 7 percent of its mortgage loans to residents of minority tracts during 2001. When including SIB Mortgage Corp., the portion of loans in minority tracts improves to 17.9 percent, but this was still considerably below the aggregate peer benchmark.

The poor performance occurred as well during 2000. The previous CRA exam covered the first six months of 2000. Either the OTS did not adequately assess Staten Island's CRA performance or Staten Island Bank and Trust made considerably fewer loans to LMI borrowers and neighborhoods after the pressure of the CRA exam was over. In 2000, Staten Island Bank and Trust issued 4.4 percent of its home purchase loans to LMI borrowers while all prime lenders, as a group made 11.4 percent of their loans to LMI borrowers (see Exhibit 5). After adding SIB Mortgage Corp data, Staten Island's performance barely changed; Staten Island still issued only 4.5 percent of its loans to LMI borrowers. In contrast, Fleet, Bank of America, M&T Mortgage Corp., and Abacus Federal issued 16.8 percent, 9.7 percent, 21.7 percent, and 22.6 percent of their mortgage loans to LMI borrowers during 2000.

All prime lenders, as a group, made 10 percent of their home mortgage loans in LMI census tracts while Staten Island Bank and Trust issued only 3.1 percent of its loans in LMI census tracts during 2000. After adding SIB Mortgage Corp's data, Staten Island still made only 4.6 percent of its purchase loans to residents of LMI tracts. All prime lenders, as a group, made 22.3 percent of their loans to African-Americans and Hispanics. Staten Island Bank and Trust issued only a measly 3.2 percent of its mortgage loans to African-Americans and Hispanics. After adding SIB Mortgage Corp.'s data, Staten Island issued only 6.2 percent of its loans to African-Americans and Hispanics. The record is similar in minority tracts; all prime lenders, as a group, and Staten Island Bank and SIB Mortgage Corp. made 23.1 percent and 7.4 percent of their mortgage loans, respectively, to residents of minority tracts during 2000.

### **Refinance Lending in the New York MSA**

Staten Island Bank and Trust is more successful in reaching LMI borrowers with refinance lending than home purchase lending in the New York MSA. But Staten Island's performance to other categories of borrowers and census tracts is considerably worse than all prime lenders, as a group. In 2001, Staten Island Bank and SIB Mortgage Corp. combined made 10.3 percent of their refinance loans to LMI borrowers while all prime lenders, as a group issued 10.2 percent of their loans to these borrowers. In 2000, Staten Island Bank and SIB Mortgage Corp's portion of loans to LMI borrowers was three percentage points less than the aggregate peer percentage (see Exhibit 5).

In other categories of borrowers and census tracts, Staten Island Bank and Trust was far away from the all prime lender benchmark. In 2001, Staten Island Bank and Trust and SIB Mortgage Corp. made only 10.7 percent of their loans to African-Americans and Hispanics while all prime lenders, as a group, issued 17.2 percent of their refinance loans to African-Americans and Hispanics in the New York MSA. In 2000, all prime lenders, as a group, made 17.8 percent of their refinance loans to African-Americans and Hispanics. In contrast, Staten Island Bank and Trust and its mortgage company issued only 6.4 percent of their loans to these borrowers. The record is also dismal in minority census tracts. In 2001, all prime lenders, as a group, and Staten Island Bank and its mortgage company issued 22.4 percent and 11.3 percent of their loans, respectively, to residents of minority tracts. In 2000, all prime lenders, as a group, and Staten Island Bank and its mortgage company made 26.4 percent and 7.5 percent of their loans, respectively, to residents of minority tracts.

In each year, Exhibit 5 compared Staten Island Bank and SIB Mortgage Company to its prime peers on four measures of performance: lending to LMI borrowers, lending to LMI census tracts, lending to African-American and Hispanic borrowers, and lending to minority tracts. Therefore, in both years, performance is compared on eight indicators. In 2001 and 2000 home purchase lending, Staten Island Bank and SIB Mortgage Corp. trailed all prime lenders, as a group, by more than three percentage points on seven of the eight indicators. Staten Island Bank and Trust and SIB Mortgage Corp. made just half or less the amount of loans (in percentage point terms) as its peers on five of the eight indicators in home purchase lending. On more than half of the indicators in home purchase loans, Staten Island was not only trailing its peers, but was far behind its peers.

In refinance lending, the performance was marginally better. Staten Island Bank and SIB Mortgage Corp. issued a percentage of loans that was at least three percentage points less than all prime lenders, as a group, on six of eight indicators during the two years. Staten Island Bank and SIB Mortgage Corp. made just half the amount of loans (in percentage point terms) as its peers on four of the eight indicators. On half of the indicators in refinance lending, Staten Island was not only trailing its peers, but was far behind its peers.

NCRC and its New York-based members acknowledge that lending to minorities is not explicitly evaluated on CRA exams, though it ought to be. NCRC and its New York-based members added lending to minorities in our CRA evaluation of Staten Island Bank and its mortgage company because a more comprehensive picture of the institution's performance is obtained when doing so. The more comprehensive picture suggests that Staten Island Bank and its mortgage company trail their prime peers by a considerable margin when it comes to serving low- and moderate-income and minority low- and moderate-income communities. This performance is certainly not worthy of the previous rating of Outstanding on the lending test.

## Assessment Area and Single Family Lending

Some observers may assert that the demographics of Staten Island explain the thrift's relatively poor performance in lending to LMI and minority borrowers and communities. Since Staten Island is a relatively affluent borough of New York City, it follows that the thrift would issue a lower portion of loans to LMI borrowers and communities than its peers when considering lending in the New York metropolitan area. Upon closer examination, however, it becomes clear that Staten Island Bank and Trust's poor CRA performance is the result of inadequate CRA examination procedures. The thrift makes a sizable number of loans outside of Staten Island that CRA examiners chose not to evaluate because the lending activity fell outside of the thrift's assessment area.

In the previous CRA exam, Staten Island Bank and Trust's CRA assessment area was Richmond County (Staten Island), the Bay Ridge section of Kings County (Brooklyn), and the New Jersey counties of Monmouth and Ocean. Between the time period of 1998 through June of 2000, the previous CRA exam documents that only 42 percent of Staten Island Bank and Trust's loans were in the assessment area. During 2000, only 922 of 2,147 loans or 42.9 percent of Staten Island Bank and Trust's loans were in the assessment area (see Exhibit 6).<sup>2</sup> When including purchases, only 30 percent of Staten Island Bank and Trust's HMDA reportable loans and purchases in 2000 were in its assessment area. Finally, when including SIB Mortgage Corp.'s loans and purchases, a measly 15.8 percent of the institution's loans and purchases were in the assessment area in 2000 (see Exhibit 7).

The portion of Staten Island's Bank and Trust's loans and purchases in the assessment area increased in 2001 to 61 percent. Since almost 40 percent of the thrift's loans and purchases were still outside of Staten Island's assessment area, the thrift's current assessment area does a poor job of capturing a significant amount of the thrift's lending activity. Although the current CRA regulation does not count affiliate lending when considering the portion of lending in the assessment area, it is instructive to note that when combining Staten Island Bank's and SIB Mortgage's lending and purchasing activity, a mere 7.2 percent of the institution's purchases and loans were in the assessment area during 2001 (see Exhibit 7).

When assessment areas exclude significant amounts of lending activity, a lending institution can then neglect its obligation to serve LMI borrowers and census tracts outside of its self-declared assessment. This is indeed the case with Staten Island Bank and Trust's single family lending performance in Manhattan. During 2000, Staten Island Bank and Trust made 668 single-family home loans (home purchase, refinance, and home improvement) in Manhattan. This was 31 percent of the thrift's total loans, yet Manhattan was outside of the assessment area included on the CRA exam. In 2001, the

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<sup>2</sup> NCRC uses an assessment area definition that favors the thrift when it comes to calculating the portion of loans in the assessment area. Since we do not know which census tracts comprise the Bay Ridge section of Brooklyn, NCRC included all of Brooklyn or Kings County in the assessment area. Despite the favorable definition of the assessment area, Staten Island Bank and Trust still made a significant number of loans outside of the assessment area.

thrift made 302 loans, or 16 percent of its single-family loans, in Manhattan. Over the two-year time period, the thrift made 970 of its 4,027 single-family loans, or nearly one quarter of its loans, in Manhattan (see Exhibit 8).

Staten Island Bank and Trust and SIB Mortgage Corp. made almost none of their 993 loans to LMI borrowers or to African-Americans in Manhattan during 2000 and 2001. In 2000, the thrift and its mortgage company issued one of their 672 loans in Manhattan to a LMI borrower. In 2001, the institution made one of its 321 loans to an LMI borrower (see Exhibits 9, 10, and 11). Likewise, Staten Island Bank and SIB Mortgage Corp. issued only 7 and 13 of its 993 loans in Manhattan to African-American and Hispanic borrowers, respectively, during the two-year time period.

The inexcusable lending performance in Manhattan and the inexcusable regulatory decision to allow the thrift to exclude Manhattan from the assessment area is magnified when considering how many more loans could have been made to LMI and minority borrowers if Manhattan had been part of the assessment area. If Manhattan had been part of the assessment area, Staten Island Bank and Trust may have been goaded into performing at least as well as all prime lenders, as a group. In other words, all prime lenders, as a group, made 5.7 percent of their single-family loans to LMI borrowers in 2000. If Staten Island Bank and Trust and SIB Mortgage Corp. had issued 5.7 percent of their single-family loans to LMI borrowers, the institution would have issued 38 loans instead of 1 loan to LMI borrowers during 2000 (see Exhibit 11). Over the two-year time period, hitting the prime all lender benchmark percentage would have translated into 50 loans for LMI borrowers. Likewise, Staten Island Bank and Trust and SIB Mortgage Corp. would have issued 55 loans instead of 20 loans to African-Americans and Hispanics if the institution had equaled the all prime lender benchmark to African-Americans and Hispanics during the two-year time period.

It may not automatically follow that a particular lender would have performed as well as its peers if a geographical area became an assessment area. However, it is plausible and realistic to assume that inclusion of Manhattan as an assessment area would have resulted in considerably more of Staten Island Bank and Trust's loans being issued to LMI and minority borrowers. After all, it is inconceivable that Staten Island Bank and Trust still would have made only 2 loans out of nearly 1,000 loans to LMI borrowers if Manhattan had been an assessment area.

Staten Island Bank and Trust does not have a branch in Manhattan and has 20 branches in Staten Island. Yet, Staten Island Bank and Trust has figured out a method for making a significant number of loans to borrowers in Manhattan. It would not take too much more of an effort for the thrift and its mortgage company to make a reasonable number of loans to LMI and minority borrowers and communities. Staten Island Bank and SIB Mortgage Corp. could establish relationships with employers in Manhattan who employ a diverse group of workers, including LMI and minority workers. The thrift could also establish relationships with churches, community development corporations, and nonprofit homeownership counseling agencies working in Manhattan. By not including Manhattan as an assessment area, the OTS is basically allowing a depository institution to fail on its

CRA obligation to serve all segments of the community, including LMI borrowers, when reasonable efforts by the thrift could improve upon abysmal CRA and fair lending performance. Moreover, the CRA regulations state that an assessment area of a bank or thrift includes geographical areas containing branches and geographical areas surrounding branches in which an institution ‘has originated or purchased a substantial portion of its loans.’ Manhattan is a geographical area receiving a significant number of the thrift’s loans and is also contiguous to the county containing the thrift’s branches. Excluding Manhattan from the thrift’s assessment area would be an unjustifiably narrow reading of the CRA regulation.

NCRC and New York-based NCRC members also believe that the OTS must include the entire New York metropolitan area as an assessment area. While lending activity outside of the thrift’s self-designated assessment area has been the greatest in Manhattan, Staten Island Bank and Trust and SIB Mortgage Corp. has increased lending significantly in Queens from 41 loans in 2000 to 105 loans in 2001.

### **The CRA Exam Must Also Examine Nationwide Lending**

SIB Mortgage Corp. has become a nationwide lender, dramatically increasing its lending from 5,075 loans in 2000 to 25,671 loans in 2001. SIB Mortgage Corporation has offices in 42 states and makes loans in more than 100 metropolitan areas. Since Staten Island Bank and Trust and its affiliate SIB Mortgage Corp. are nationwide lenders, the OTS must follow its own precedent for considering lending outside of the official assessment area. In 1998, an OTS exam of Travelers Bank and Trust examined lending beyond Traveler’s assessment area of Wilmington, Delaware because Travelers made a very small portion of its loans in Wilmington. The OTS stated that it could not restrict its evaluation of lending to the Traveler’s “official” assessment area because then Traveler’s performance would be “seriously deficient for a retail lending institution of its size.” Likewise, Staten Island Bank and SIB Mortgage Corp. made only 9 percent of its single-family loans in the Richmond-Kings assessment area during 2000 and 2001. Restricting the CRA evaluation to the Richmond-Kings assessment area would also result in seriously deficient performance.

More recently, the OTS stated in its evaluation of State Farm Bank, FSB, that State Farm’s “overall volume of lending would be marginal” if the exam only considered the official CRA assessment area of Bloomington-Normal, Illinois. Accordingly, for this non-traditional and nationwide lender, the OTS examined State Farm’s lending across the entire country. Like State Farm Bank FSB relying on its affiliated insurance agents and other non-branch networks to make loans, Staten Island Bank and Trust relies on the non-branch network of its affiliated mortgage company to make loans across the country. Also, SIB Mortgage Corp. made more than five times the number of single family loans as State Farm, FSB (25,671 loans in 2001 for SIB Mortgage versus 5,446 loans in 2000 through 2002 for State Farm).

Since SIB Mortgage Corp. is a larger nationwide home lender than State Farm Bank, FSB, the OTS must conduct a nationwide evaluation for the Staten Island Bank and Trust CRA exam just as the OTS did in the State Farm exam.

A nationwide evaluation would reinforce the conclusion that Staten Island Bank and Trust does not deserve an Outstanding rating on the lending test. As exhibit 12 shows, SIB Mortgage's lending performance across the country declined noticeably from 2000 to 2001. In both years, SIB Mortgage Corp. made a percentage of single-family loans (home mortgage, refinance, and home improvement) to residents of LMI census tracts that was comparable to the portion of loans that all lenders, as a group, made in LMI tracts. However, SIB Mortgage Corp.'s portion of loans to LMI borrowers declined dramatically from 41.7 percent of its loans in 2000 to 16.1 percent of its loans in 2001 (see Exhibit 12). In contrast, all lenders, as a group, made 24.7 percent of their single-family loans to LMI borrowers during 2001. In other words, as SIB Mortgage Corp. was accelerating its lending capacity, it seriously overlooked its programs and infrastructure to make loans to LMI borrowers. A rating of Low Satisfactory on the lending test would encourage Staten Island Bank and Trust to refocus its energies and efforts to making loans to LMI borrowers across the country.

### **Small Business Lending Also Subpar**

Staten Island Bank and Trust's small business lending is significantly worse than its peers in reaching small businesses in LMI tracts and to the smallest businesses with revenues under \$1 million. In 2001 and 2000, Staten Island Bank and Trust made 8.8 percent and 10.8 percent of its loans, respectively, to small businesses in LMI tracts in Richmond and Kings County. All lenders, as a group, made 29.6 percent and 28.3 percent of their loans, respectively, during 2001 and 2000 to small business in LMI tracts. In both years, Staten Island Bank and Trust made less than half the amount, in percentage point terms, as all lenders, as a group, in LMI tracts. Similarly, Staten Island Bank and Trust made less than half the amount of loans, in percentage point terms, to small businesses with revenues under \$1 million in Richmond and Kings Counties (see Exhibit 13).

Even if the analysis is confined to Richmond County (Staten Island), Staten Island Bank and Trust performs poorly. Its portion of loans to business in LMI tracts is similar to the percentage of loans in LMI tracts made by all lenders, as a group. Staten Island, however, has a paucity of LMI tracts, meaning that measures of lender performance by census tract category tends to be compressed, not dispersed. On other measures that exhibit dispersion, Staten Island Bank and Trust indeed diverges from the aggregate peer, performing significantly worse than all lenders as a group. In 2001, Staten Island Bank and Trust issued 22.6 percent of its loans to businesses with revenues under \$1 million, considerably less than the 38.4 percent issued by all lenders, as a group. In 2000, performance is even worse; Staten Island Bank and Trust issued 17.9 percent of its loans to businesses with revenues under \$1 million while all lenders, as a group, made 44.4 percent of their loans to these businesses (see Exhibit 14).



Similarly, Staten Island Bank and Trust performs poorly when considering loans in amounts of \$100,000 or less, which are typically needed by the smallest businesses. In 2001, Staten Island Bank and Trust made 62.7 percent of its loans in amounts of \$100,000 or less but all lenders, as a group, made 96.3 percent of their loans in these amounts. The percentage point difference was of a similar large magnitude during 2001 and 2000 when considering lending in Richmond and Kings Counties or just in Richmond County.

## **Conclusion**

CRA imposes an obligation upon depository institutions to serve the credit needs of all the communities in which they are chartered to do business. Staten Island Bank and Trust is a federally chartered thrift with an affiliated mortgage company making loans across the country. It must therefore have an assessment area that encompasses all of the New York MSA. In addition, the CRA exam must evaluate lending across the country.

A narrow assessment area in New York state comprised mostly of Staten Island is unjustified. The narrow assessment area is responsible for the abject failure of the thrift to serve the credit needs of low- and moderate-income borrowers and communities in Manhattan. The unjustified assessment area is all the more galling when considering that Staten Island has the resources of a nationwide mortgage company to make loans to LMI and minority borrowers in Manhattan, not to mention numerous partnering opportunities with NCRC New York member community organizations for reaching LMI and minority borrowers. Within its assessment area, Staten Island Bank and Trust performs poorly in reaching the smallest of the small businesses. In addition, SIB Mortgage Corp.'s lending to LMI borrowers across the country plummeted from 2000 to 2001.

In sum, a rating of Low Satisfactory or below on the lending test would provide a strong incentive to Staten Island Bank and Trust to meet the credit needs of all the communities in which it is chartered. Staten Island Bank and Trust needs the spur of a below average rating to motivate it to improve upon its lackluster performance within its assessment area, its deteriorating performance across the country, and its failure to serve LMI borrowers and communities in Manhattan.

Please describe specifically in the CRA exam how you considered this comment letter and also provide us with a copy of the CRA exam. Communications concerning this comment letter should go to John Taylor or Josh Silver of the National Community Reinvestment Coalition at (202) 628-8866; the mailing address is 733 15<sup>th</sup> St. NW, Suite 540, Washington DC 20005. Thank you for your consideration in this important matter.

Sincerely,

John Taylor, National Community Reinvestment Coalition  
Irene Baldwin, Association for Neighborhood & Housing Development, NY, NY  
Matthew Lee, Inner City Press/Community on the Move, Bronx, NY  
Richard D. Marsico, Professor of Law, New York Law School

**Exhibits for CRA Comment Letter on  
Staten Island Bank and Trust**

**Exhibit 1: 2001 New York Prime Home Purchase Lenders**

Overall Rank	All Apps	All Loans	Minority Loans	Minority Denial Disparity Ratio	Minority Denial Disparity Ratio	Minority Denial Disparity Ratio	LMI Loans	LMI Market Share Minus MUI Market Share	MUI Minority Denial Disparity Ratio	Female Loans	Minority Tract Loans	Minority Tract Denial Disparity Ratio	Minority Tract Denial Disparity Ratio	LMI Tract Loans	LMI Tract Market Share Minus MUI Tract Market Share												
1ST REPUBLIC MORTGAGE BAKERS	1	904	656	54.33%	4	2.23	22	0.78	7	31.55%	1	2.31%	3	1.50	7	38.96%	5	73.63%	2	1.07	3	0.70	3	25.61%	1	2.37%	3
CONSUMER HOME MORTGAGE INC	2	1,318	666	78.94%	1	0.81	2	0.70	5	7.96%	23	-0.37%	22	0.81	3	32.18%	18	59.16%	3	1.07	4	1.07	12	22.67%	3	1.96%	4
PROFESSIONAL MORTGAGE BANKER'S	3	580	371	71.43%	2	2.29	23	0.87	8	6.74%	32	-0.48%	25	1.85	12	35.68%	12	80.05%	1	0.51	1	0.68	2	20.22%	4	0.88%	6
FLEET NATIONAL BANK	4	1,388	941	26.30%	11	1.55	10	0.74	6	14.35%	10	0.13%	10	1.57	8	32.16%	19	24.87%	12	1.24	8	0.92	9	10.10%	15	0.02%	15
CHASE MANHATTAN BANK	5	10,583	7,906	24.02%	13	1.37	6	1.40	26	16.87%	7	5.25%	2	1.43	6	36.77%	9	21.87%	18	1.42	12	1.31	24	12.78%	12	5.10%	1
M&T MORTGAGE CORPORATION	5	1,397	916	24.45%	12	1.65	12	1.03	14	19.54%	3	0.96%	6	1.69	11	34.91%	14	24.02%	14	2.03	22	0.75	5	12.66%	13	0.57%	10
ALLIANCE MORTGAGE BANKING CORP	7	307	233	68.51%	3	n/a	n/a	2.48	35	7.73%	25	-0.19%	18	n/a	n/a	40.84%	1	57.94%	4	n/a	n/a	1.15	14	24.46%	2	0.78%	9
BNY MORTGAGE COMPANY LLC	8	3,305	2,601	16.91%	24	1.91	15	0.97	10	24.41%	2	5.26%	1	2.30	20	38.40%	6	21.91%	17	1.63	16	1.16	15	10.92%	14	0.56%	11
ABACUS FEDERAL SAVINGS BANK	9	503	434	0.47%	37	n/a	n/a	-	n/a	18.89%	4	0.39%	9	n/a	n/a	28.94%	27	35.25%	7	2.13	24	1.09	13	18.89%	5	0.89%	5
HOMESIDE LENDING, INC.	10	1,052	722	33.00%	8	1.57	11	1.26	20	8.45%	21	-0.70%	29	1.63	10	31.07%	20	38.50%	5	1.45	14	1.23	22	14.96%	8	0.84%	7
INDYMAC BANK	10	3,673	2,566	39.90%	6	0.96	4	1.63	29	5.61%	37	-1.44%	34	0.95	4	37.19%	8	36.71%	6	1.20	7	1.42	29	14.77%	9	2.84%	2
CHASE MANHATTAN MORTGAGE CORP	12	1,062	662	20.44%	17	1.44	8	2.28	34	17.37%	5	0.42%	8	1.41	5	34.72%	16	22.81%	15	1.24	9	3.25	37	13.44%	10	0.53%	12
WALL STREET MTG. BANKERS LTD.	13	536	414	43.67%	5	2.14	21	1.38	25	11.84%	13	0.05%	12	2.53	22	40.44%	2	25.60%	11	1.13	6	1.38	28	9.66%	17	-0.03%	17
BANK OF AMERICA, N.A.	14	899	510	15.58%	26	1.39	7	0.56	1	9.61%	19	-0.40%	24	1.62	9	30.86%	22	20.78%	20	1.43	13	0.88	7	9.41%	20	-0.07%	18
MID-ISLAND MORTGAGE CORP.	15	128	83	27.85%	9	0.92	3	1.71	30	7.23%	27	-0.08%	14	5.00	33	34.94%	13	24.10%	13	0.92	2	1.33	26	15.66%	6	0.11%	14
EAB MORTGAGE COMPANY	16	864	684	19.02%	19	4.44	34	1.07	15	10.67%	17	-0.40%	23	7.99	34	37.90%	7	28.65%	9	1.55	15	0.79	6	15.20%	7	0.82%	8
DIME SAVINGS BANK OF NY, FSB	17	2,939	1,712	21.84%	16	2.13	20	0.98	11	16.06%	8	0.84%	7	2.33	21	39.63%	3	21.61%	19	2.22	26	0.97	10	7.71%	25	-0.91%	30
HSBC MORTGAGE CORPORATION	18	6,479	4,846	16.54%	25	2.01	18	1.03	13	15.31%	9	1.47%	4	1.92	15	29.99%	24	20.53%	21	1.99	20	1.21	18	9.49%	19	-0.40%	23
NATIONAL CITY MORTGAGE COMPANY	19	385	288	26.34%	10	2.32	24	1.10	16	6.60%	33	-0.36%	20	2.27	19	27.23%	30	31.60%	8	2.33	27	1.04	11	13.19%	11	0.21%	13
EMIGRANT MORTGAGE COMPANY	20	715	434	13.25%	29	1.01	5	1.50	28	7.14%	30	0.05%	13	0.56	1	32.55%	17	19.82%	22	1.32	11	1.19	16	5.76%	30	-0.42%	24
COUNTRYWIDE HOME LOANS	21	2,081	1,345	34.54%	7	2.05	19	1.29	23	9.07%	20	-0.79%	32	2.65	23	34.87%	15	28.48%	10	2.42	30	1.20	17	9.52%	18	-0.15%	19
CITIBANK, NA	22	3,128	2,151	23.91%	14	2.52	26	1.24	19	17.15%	6	1.32%	5	2.79	25	35.75%	10	17.62%	26	2.51	32	1.22	20	6.14%	27	-1.90%	34
ASTORIA FEDERAL SAVINGS	23	1,224	870	8.87%	34	1.97	17	0.89	9	11.72%	14	-0.35%	19	2.08	18	29.55%	25	12.87%	32	1.79	19	0.55	1	5.98%	29	-0.81%	29
SI BANK & TRUST	24	862	662	5.28%	36	0.67	1	1.00	12	6.19%	34	-0.70%	30	1.58	2	25.95%	35	6.95%	35	1.31	10	0.91	8	3.78%	35	-0.95%	31
WELLS FARGO HOME MORTGAGE	25	5,351	3,980	23.22%	15	1.91	16	1.16	18	9.72%	18	-3.04%	36	1.95	16	30.99%	21	19.62%	23	2.03	21	1.35	27	7.71%	24	-2.11%	35
CENDANT MORTGAGE	26	1,917	1,255	13.64%	28	1.44	9	0.67	3	13.47%	12	-0.11%	15	1.85	13	26.36%	33	9.24%	34	2.76	33	1.22	21	2.23%	36	-2.26%	36
FIRST UNION MORTGAGE CORP.	27	587	405	18.23%	21	1.86	13	1.27	21	5.68%	35	-0.52%	26	1.88	14	27.46%	29	19.01%	25	2.49	31	1.31	25	7.90%	22	-0.20%	20
NORTH FORK BANK	28	608	435	12.50%	30	4.18	33	0.66	2	11.72%	14	-0.17%	17	3.83	29	27.13%	31	11.95%	33	2.84	34	0.74	4	4.83%	33	-0.52%	25
FLAGSTAR BANK, FSB	29	894	568	19.53%	18	2.52	25	1.44	27	7.22%	28	-0.67%	28	2.91	26	26.23%	34	22.01%	16	2.40	28	1.52	31	9.86%	16	-0.02%	16
MERRILL LYNCH CREDIT CORP.	30	417	267	9.09%	33	-	n/a	0.69	4	5.62%	36	-0.37%	21	-	n/a	23.86%	36	6.74%	36	1.12	5	1.29	23	5.24%	32	-0.29%	22
CITIMORTGAGE INC.	31	3,052	1,946	11.85%	31	3.62	30	1.74	31	14.08%	11	0.05%	11	3.43	28	35.71%	11	13.31%	31	2.03	23	1.63	32	6.01%	28	-1.78%	33
WASHINGTON MUTUAL BANK, FA	32	3,705	2,557	11.36%	32	1.88	14	1.15	17	7.12%	31	-3.19%	37	1.96	17	30.10%	23	14.67%	29	1.71	17	1.21	19	5.63%	31	-2.58%	37
THE NEW YORK MORTGAGE COMPANY,	33	1,014	781	15.28%	27	2.74	27	1.76	32	7.17%	29	-0.72%	31	3.09	27	39.57%	4	16.90%	27	2.42	29	1.86	34	8.83%	21	-0.21%	21
ABN AMRO	34	1,268	1,091	18.53%	20	2.93	28	1.36	-	7.88%	24	-1.22%	33	2.73	24	27.06%	32	19.34%	24	1.75	18	2.34	35	7.79%	23	-0.56%	26
AMERICAN HOME MORTGAGE CORP	35	2,127	1,333	17.76%	23	3.47	29	1.36	24	7.65%	26	-1.52%	35	3.99	31	29.33%	26	15.08%	28	3.39	35	1.45	30	6.75%	26	-1.01%	32
GMAC MORTGAGE	35	695	524	18.23%	22	3.75	31	2.08	33	8.02%	22	-0.56%	27	4.03	32	28.80%	28	13.36%	30	2.20	25	1.77	33	4.39%	34	-0.68%	28
RICHMOND CTY SVGS BK	37	350	303	6.64%	35	4.03	32	1.27	22	10.89%	16	-0.14%	16	3.98	30	16.94%	37	6.27%	37	-	n/a	3.04	36	1.32%	37	-0.61%	27

Overall Rank - combined rank for all categories

All Apps - all loan applications

All Loans - all loans originated

Minority Loans - loans to minorities as a percent of all loans with race information

Minority Denial Disparity Ratio - ratio of minority denial rate to white denial rate

Minority Denial Ratio - ratio of minority denial rate to white denial rate

LMI Loans - loans to LMI borrowers as a percent of all loans

LMI Market Share Minus MUI Market Share - LMI borrower market share minus MUI borrower market share

MUI Minority Denial Disparity - ratio of MUI minority denial rate to MUI white denial rate

Female Loans - loans to female borrowers as a percent of all loans with gender information

Minority Tract Loans - loans to minority tracts as a percent of all loans

Minority Tract Denial Disparity Ratio - ratio of minority tract denial rate to white tract denial rate

Minority Tract Denial Ratio - ratio of minority tract denial rate to white tract denial rate

LMI Tract Loans - loans to LMI tracts as a percent of all loans

LMI Tract Market Share Minus MUI Tract Market Share - LMI tract market share minus MUI tract market share

Each column contains an indicator and the lender's rank for the indicator. For example, "Minority Loans" shows the percent of loans to minorities and the lender's rank on this indicator.

For more information about the indicators, see methodology section.

**Exhibit 2: 2000 New York Prime Home Purchase Lenders**

	<b>Overall Rank</b>	<b>All Apps</b>	<b>All Loans</b>	<b>Minority Loans</b>	<b>Minority Denial Disparity Ratio</b>	<b>Minority Fallout Disparity Ratio</b>	<b>LMI Loans</b>	<b>LMI Market Share Minus MUI Market Share</b>	<b>MUI Minority Denial Disparity Ratio</b>	<b>Female Loans</b>	<b>Minority Tract Loans</b>	<b>Minority Tract Denial Disparity Ratio</b>	<b>Minority Tract Fallout Disparity Ratio</b>	<b>LMI Tract Loans</b>	<b>LMI Tract Market Share Minus MUI Tract Market Share</b>												
1ST REPUBLIC MORTGAGE BAKERS	1	794	427	54.90%	4	2.03	22	0.80	6	29.27%	1	1.63%	6	2.66	27	44.71%	1	68.85%	2	1.02	2	0.87	8	24.82%	1	1.75%	5
INDYMAC BANK	2	3,812	1,360	41.66%	7	1.23	6	0.60	2	6.47%	32	-0.65%	25	1.14	6	39.12%	5	39.49%	6	1.18	7	0.74	3	18.01%	6	3.09%	2
M&T MORTGAGE CORPORATION	3	1,560	1,019	27.19%	12	1.58	15	0.70	3	21.69%	4	1.86%	5	2.00	19	39.04%	6	23.65%	14	1.28	11	0.74	4	12.17%	11	0.71%	10
PROFESSIONAL MORTGAGE BANKER'S	4	554	359	73.09%	2	1.63	17	n/a	n/a	3.90%	37	-0.68%	26	1.35	10	36.13%	12	79.39%	1	0.81	1	0.76	5	23.40%	2	1.34%	6
CONSUMER HOME MORTGAGE INC	5	867	570	81.74%	1	1.12	5	1.53	28	7.54%	26	-0.57%	23	0.80	2	32.23%	17	50.00%	4	1.20	9	1.10	20	17.37%	7	1.19%	9
MID-ISLAND MORTGAGE CORP.	6	369	328	48.60%	5	0.61	1	1.10	17	9.15%	19	-0.19%	13	0.81	3	33.23%	15	23.17%	15	0.00	n/a	1.11	22	10.98%	14	0.14%	15
EMIGRANT MORTGAGE COMPANY	7	790	490	19.34%	23	0.70	2	0.79	4	11.02%	14	0.33%	10	0.69	1	33.26%	14	16.94%	27	1.32	13	0.93	10	8.16%	19	-0.19%	17
CHASE MANHATTAN BANK	8	9,471	6,889	21.55%	19	1.41	11	1.58	30	14.68%	9	3.29%	2	1.45	12	36.80%	9	21.03%	17	1.38	14	1.56	31	13.06%	8	6.42%	1
EAB MORTGAGE COMPANY	8	1,291	1,071	17.34%	26	0.96	3	1.35	26	12.14%	12	-0.22%	14	0.91	5	38.29%	7	18.86%	22	1.47	16	0.80	6	10.74%	15	0.32%	11
NATIONAL CITY MORTGAGE COMPANY	10	480	328	38.74%	8	1.28	8	1.14	18	5.18%	35	-0.54%	21	1.19	7	31.46%	18	43.90%	5	1.21	10	1.04	16	12.20%	10	0.23%	12
ABACUS FEDERAL SAVINGS BANK	11	498	438	0.46%	37	0.00	n/a	4.00	36	22.60%	3	0.89%	8	n/a	n/a	30.66%	20	36.76%	7	1.02	3	1.07	18	20.09%	5	1.24%	7
HOMESIDE LENDING, INC.	12	862	355	28.18%	11	1.33	9	1.02	13	8.17%	22	-0.38%	17	1.43	11	29.26%	27	30.14%	8	1.31	12	1.09	19	11.55%	12	0.18%	14
ALLIANCE MORTGAGE BANKING CORP	13	986	649	64.32%	3	1.85	20	1.28	24	6.47%	31	-0.80%	29	2.01	20	36.28%	11	52.39%	3	1.07	5	1.39	29	22.80%	3	2.32%	4
WALL STREET MTG. BANKERS LTD.	13	616	421	48.09%	6	1.38	10	1.55	29	8.08%	23	-0.28%	15	1.21	8	42.24%	3	26.60%	11	1.64	19	1.72	32	11.40%	13	0.20%	13
CHASE MANHATTAN MORTGAGE CORP	15	1,425	868	21.84%	18	1.25	7	2.35	34	9.79%	16	-0.63%	24	1.25	9	30.06%	24	27.53%	10	1.06	4	1.88	35	21.31%	4	2.74%	3
DIME SAVINGS BANK OF NY, FSB	16	2,638	1,599	24.83%	16	2.28	27	0.79	5	21.20%	5	2.85%	3	2.50	25	37.87%	8	20.83%	18	1.97	24	0.91	9	7.38%	21	-0.96%	29
BNY MORTGAGE COMPANY LLC	17	1,781	1,394	25.85%	14	1.92	21	1.32	25	25.90%	2	3.97%	1	2.66	26	44.27%	2	17.79%	23	1.20	8	1.19	24	7.17%	22	-0.91%	28
HSBC MORTGAGE CORPORATION	18	4,767	3,521	18.36%	24	2.03	23	0.96	10	16.47%	7	2.71%	4	2.12	22	30.20%	23	20.65%	19	1.51	17	0.98	11	8.66%	18	-0.69%	24
FLEET NATIONAL BANK	19	1,664	1,039	25.61%	15	1.65	18	1.22	21	16.75%	6	0.86%	9	1.75	18	30.21%	22	21.37%	16	1.53	18	1.73	34	8.95%	17	-0.18%	16
COUNTRYWIDE HOME LOANS	20	1,925	1,203	32.34%	9	2.21	25	1.10	16	11.55%	13	-0.42%	20	2.15	23	28.83%	30	26.10%	12	1.89	23	1.13	23	8.98%	16	-0.21%	18
BANK OF AMERICA, N.A.	21	2,553	1,781	20.43%	21	1.59	16	0.57	1	9.66%	17	-1.32%	32	1.61	13	28.93%	29	17.74%	25	1.64	20	0.99	13	7.80%	20	-0.87%	27
FLAGSTAR BANK, FSB	22	859	483	23.74%	17	2.19	24	0.81	7	6.21%	33	-0.72%	27	2.10	21	27.54%	32	27.74%	9	2.37	28	0.87	7	6.83%	23	-0.36%	20
AMERICAN HOME MORTGAGE CORP	23	2,474	1,735	31.95%	10	3.60	33	0.94	9	7.03%	27	-2.29%	35	3.81	33	30.26%	21	24.09%	13	3.62	36	1.02	15	12.22%	9	1.22%	8
CITIBANK, NA	24	3,682	2,604	20.95%	20	3.97	35	0.96	11	14.17%	10	1.24%	7	4.04	35	35.01%	13	19.24%	20	3.25	35	1.01	14	5.84%	26	-2.63%	34
NORTH FORK BANK	25	597	425	12.08%	29	2.32	28	0.88	8	15.76%	8	0.25%	12	3.02	30	26.00%	35	12.00%	31	2.01	26	0.99	12	6.82%	24	-0.32%	19
FIRST UNION MORTGAGE CORP.	26	535	366	27.14%	13	1.79	19	1.15	19	9.29%	18	-0.29%	16	1.75	17	29.06%	28	17.76%	24	1.77	21	1.94	36	4.64%	31	-0.49%	21
CITIMORTGAGE INC.	27	2,417	1,532	18.20%	25	3.76	34	1.26	22	13.97%	11	0.27%	11	3.91	34	39.41%	4	19.06%	21	3.00	33	1.06	17	6.79%	25	-1.16%	31
SI BANK & TRUST	28	1,616	1,340	3.21%	36	1.00	4	1.00	12	4.40%	36	-2.24%	34	0.90	4	24.14%	36	5.45%	36	1.10	6	0.65	2	3.06%	34	-2.37%	33
WELLS FARGO HOME MORTGAGE	29	4,475	3,179	20.30%	22	1.57	14	1.07	14	6.64%	30	-4.46%	37	1.63	14	32.87%	16	13.84%	28	1.99	25	1.29	25	5.73%	27	-3.33%	37
ASTORIA FEDERAL SAVINGS	30	1,508	1,151	7.92%	33	1.52	13	1.09	15	7.82%	24	-1.32%	33	1.63	15	27.88%	31	8.69%	34	2.09	27	1.10	21	2.78%	35	-2.12%	32
CENDANT MORTGAGE	31	2,098	1,551	8.09%	32	1.47	12	2.27	33	10.83%	15	-0.78%	28	1.72	16	29.43%	26	8.96%	33	2.41	29	1.49	30	3.29%	33	-2.66%	35
WASHINGTON MUTUAL BANK, FA	32	3,268	2,516	9.77%	30	2.32	29	1.28	23	8.51%	21	-2.52%	36	2.44	24	30.96%	19	12.56%	29	1.81	22	1.35	27	5.45%	29	-2.82%	36
RICHMOND CTY SVGS BK	33	615	555	4.87%	34	2.21	26	1.18	20	7.75%	25	-0.56%	22	2.74	28	23.10%	37	8.29%	35	2.89	32	0.24	1	2.34%	36	-1.09%	30
THE NEW YORK MORTGAGE COMPANY,	34	964	773	9.43%	31	2.56	30	1.67	31	6.99%	28	-0.91%	31	2.92	29	36.35%	10	12.55%	30	2.79	31	1.31	26	5.56%	28	-0.84%	26
MERRILL LYNCH CREDIT CORP.	35	501	303	4.49%	35	0.00	n/a	1.41	27	5.61%	34	-0.38%	18	0.00	n/a	29.81%	25	4.62%	37	1.43	15	1.37	28	1.98%	37	-0.62%	22
GMAC MORTGAGE	36	665	474	14.12%	28	3.42	32	1.89	32	9.07%	20	-0.39%	19	3.31	31	27.05%	33	11.18%	32	3.06	34	1.73	33	4.43%	32	-0.67%	23
ABNAMRO.MTG. GROUP INC.	37	1,000	794	16.69%	27	3.09	31	2.36	35	6.93%	29	-0.86%	30	3.46	32	27.03%	34	17.00%	26	2.46	30	2.33	30	5.29%	30	-0.79%	25

Overall Rank - combined rank for all categories

All Apps - all loan applications

All Loans - all loans originated

Minority Loans - loans to minorities as a percent of all loans with race information

Minority Denial Disparity Ratio - ratio of minority denial rate to white denial rate

Minority Fallout Ratio - ratio of minority fallout rate to white fallout rate

LMI Loans - loans to LMI borrowers as a percent of all loans

LMI Market Share Minus MUI Market Share - LMI borrower market share minus MUI borrower market share

MUI Minority Denial Disparity - ratio of MUI minority denial rate to MUI white denial rate

Female Loans - loans to female borrowers as a percent of all loans with gender information

Minority Tract Loans - loans to minority tracts as a percent of all loans

Minority Tract Denial Disparity Ratio - ratio of minority tract denial rate to white tract denial rate

Minority Tract Fallout Ratio - ratio of minority tract fallout rate to white tract fallout rate

LMI Tract Loans - loans to LMI tracts as a percent of all loans

LMI Tract Market Share Minus MUI Tract Market Share - LMI tract market share minus MUI tract market share

Each column contains an indicator and the lender's rank for the indicator. For example, "Minority Loans" shows the percent of loans to minorities and the lender's rank on this indicator.

For more information about the indicators, see methodology section.

**Exhibit 3: 2001 New York Prime Refinance Lenders**

	Overall Rank	All Apps	All Loans	Minority Loans	Minority Denial Disparity Ratio	Minority Denial Disparity Ratio	Minority Denial Disparity Ratio	LMI Loans	LMI Market Share Minus MUI Market Share	MUI Minority Denial Disparity Ratio	Female Loans	Minority Tract Loans	Minority Tract Denial Disparity Ratio	Minority Tract Fallout Disparity Ratio	LMI Tract Loans	LMI Tract Market Share Minus MUI Tract Market Share											
AMERICAN DREAM MORTGAGE BANKER	1	309	298	86.82%	1	n/a	n/a	n/a	n/a	26.85%	1	1.18%	6	n/a	n/a	43.29%	1	67.45%	1	n/a	n/a	1.12	15	21.48%	1	1.32%	5
INTERSTATE HOME LOAN CTR, INC	2	954	96	40.51%	3	0.69	1	0.66	3	14.58%	5	0.10%	11	0.58	2	34.74%	7	30.21%	7	2.70	31	0.81	8	10.42%	9	0.08%	13
INDYMAC BANK	3	3,342	2,120	41.33%	2	1.02	4	1.27	18	6.46%	32	-0.04%	18	1.07	3	39.85%	3	35.94%	3	1.21	4	0.98	11	13.87%	2	4.00%	1
HOMESIDE LENDING, INC.	4	2,577	1,660	32.56%	7	1.41	9	1.34	23	15.06%	4	2.24%	2	1.52	9	31.84%	13	36.93%	2	1.41	8	1.18	18	11.39%	6	1.85%	3
BANK ONE, NA	5	1,796	296	33.49%	6	1.41	10	0.70	4	10.14%	16	-0.09%	22	1.35	5	40.67%	2	30.41%	6	1.53	11	0.68	2	8.78%	14	0.09%	12
CHASE MANHATTAN MORTGAGE CORP	6	592	294	18.98%	15	1.11	7	1.52	29	18.03%	2	0.51%	9	1.21	4	28.77%	20	24.49%	11	1.14	3	0.76	6	13.61%	3	0.53%	9
BNY MORTGAGE COMPANY LLC	7	1,397	972	15.68%	24	1.06	5	1.18	13	10.70%	14	0.04%	15	1.38	6	32.61%	10	22.33%	13	1.57	14	1.18	19	12.96%	4	1.56%	4
FLEET NATIONAL BANK	8	6,050	3,305	20.08%	14	1.79	19	0.97	6	9.95%	18	1.72%	3	1.96	17	27.61%	23	24.72%	10	1.27	7	1.14	16	9.92%	10	2.17%	2
EMIGRANT MORTGAGE COMPANY	9	538	317	17.87%	20	0.81	2	1.22	16	6.31%	33	0.05%	13	0.53	1	34.19%	8	16.40%	25	1.25	6	0.73	5	6.94%	20	-0.09%	17
COUNTRYWIDE HOME LOANS	10	4,525	2,931	39.94%	4	1.55	13	1.37	24	9.01%	20	1.31%	5	1.96	18	31.81%	14	33.03%	4	2.06	24	1.26	23	9.01%	12	1.10%	6
ABN AMRO	11	2,924	2,213	30.85%	8	1.71	15	2.04	32	13.65%	6	1.55%	4	1.67	12	26.00%	26	28.60%	9	1.60	16	1.43	28	8.81%	13	0.69%	7
FLAGSTAR BANK, FSB	12	1,256	817	23.60%	11	1.64	14	1.19	14	11.63%	11	0.09%	12	1.65	10	28.52%	21	20.32%	16	1.50	9	1.31	26	7.34%	16	-0.12%	19
EAB MORTGAGE COMPANY	13	544	423	23.53%	12	1.77	18	1.38	25	7.80%	28	-0.37%	28	1.94	16	31.64%	15	28.61%	8	1.63	18	0.69	3	12.29%	5	0.59%	8
M.L.MOSKOWITZ AND CO., INC.	14	116	111	26.09%	9	4.29	33	n/a	n/a	10.81%	13	0.04%	14	3.09	30	28.44%	22	31.53%	5	1.11	2	-	n/a	9.01%	11	0.05%	15
BANK OF AMERICA, N.A.	15	787	475	17.88%	19	1.52	12	1.03	8	8.63%	25	-0.26%	26	1.47	8	30.14%	17	20.00%	17	1.80	22	0.71	4	8.21%	15	0.06%	14
PNC BANK NA	16	222	71	8.33%	33	1.31	8	1.31	20	12.68%	8	0.02%	16	1.67	11	25.00%	31	22.54%	12	1.61	17	0.56	1	4.23%	32	-0.08%	16
WELLS FARGO BANK WEST, NA	17	859	324	18.00%	18	1.11	6	1.02	7	7.41%	29	-0.32%	27	1.39	7	22.22%	34	19.44%	18	1.56	13	0.92	10	6.17%	23	-0.17%	20
GMAC MORTGAGE	18	7,240	2,268	21.36%	13	2.81	30	1.81	31	16.40%	3	3.22%	1	2.48	26	26.91%	25	22.00%	14	1.64	19	0.91	9	6.92%	21	-0.63%	26
FIRST UNION NATIONAL BANK	19	473	211	13.77%	29	1.84	20	1.15	12	9.95%	19	-0.07%	20	1.79	14	32.37%	12	16.11%	27	1.50	10	0.80	7	5.21%	29	-0.17%	21
CHASE MANHATTAN BANK	20	15,180	3,942	17.26%	22	1.74	17	1.39	26	10.12%	17	-0.20%	25	1.71	13	34.92%	5	16.36%	26	1.55	12	1.10	14	7.13%	19	-0.84%	30
DIME SAVINGS BANK OF NY, FSB	21	2,506	1,535	18.09%	17	2.32	27	1.29	19	12.18%	9	0.56%	8	2.44	25	32.46%	11	17.20%	23	1.94	23	1.27	24	6.84%	22	-0.45%	24
M&T MORTGAGE CORPORATION	22	804	532	15.08%	26	2.56	29	1.12	11	11.84%	10	0.13%	10	2.39	24	29.42%	19	15.60%	29	2.11	27	1.06	12	7.14%	18	-0.11%	18
MID-ISLAND MORTGAGE CORP.	23	432	375	38.24%	5	1.46	11	1.33	22	8.53%	26	-0.05%	19	2.03	20	25.07%	30	17.60%	21	4.14	34	1.66	32	10.93%	7	0.38%	10
CITIBANK, NA	24	3,567	1,836	18.27%	16	4.52	34	1.20	15	12.85%	7	0.90%	7	4.85	33	35.35%	4	18.46%	19	2.82	32	1.09	13	5.66%	27	-1.21%	32
THE NEW YORK MORTGAGE COMPANY,	25	492	390	16.28%	23	2.02	22	1.72	30	4.87%	34	-0.50%	30	2.57	28	33.52%	9	15.90%	28	0.77	1	1.64	31	10.51%	8	0.33%	11
WELLS FARGO HOME MORTGAGE	26	6,071	4,470	24.86%	10	2.15	23	1.09	10	7.25%	30	-2.33%	34	2.31	22	26.98%	24	21.43%	15	2.08	26	1.18	20	7.23%	17	-0.80%	28
CITIMORTGAGE INC.	27	2,423	1,173	15.58%	25	3.50	32	1.49	28	11.25%	12	0.01%	17	3.43	31	34.90%	6	16.62%	24	2.45	29	1.30	25	5.88%	26	-0.69%	27
CENDANT MORTGAGE	28	921	693	7.82%	34	0.82	3	1.48	27	8.95%	21	-0.41%	29	-	n/a	30.73%	16	12.55%	32	1.24	5	1.77	33	3.90%	33	-0.84%	29
ASTORIA FEDERAL SAVINGS	29	919	662	11.11%	31	2.19	25	0.85	5	6.65%	31	-0.78%	32	2.19	21	25.97%	28	11.93%	33	2.08	25	1.15	17	4.83%	31	-0.62%	25
NORTH AMERICAN MORTGAGE CO.	30	624	471	13.92%	28	2.23	26	2.20	33	10.19%	15	-0.10%	23	2.48	27	25.97%	27	18.05%	20	2.53	30	1.45	30	5.94%	25	-0.27%	22
HSBC MORTGAGE CORPORATION	31	5,422	3,970	14.34%	27	2.48	28	1.07	9	8.84%	24	-2.17%	33	2.37	23	24.68%	32	15.52%	30	1.76	21	1.25	22	5.97%	24	-2.21%	34
SI BANK & TRUST	31	926	698	4.53%	35	1.97	21	0.61	1	8.88%	23	-0.13%	24	1.97	19	24.39%	33	3.01%	35	2.21	28	1.25	21	1.43%	34	-1.39%	33
AMERICAN HOME MORTGAGE CORP	33	2,072	1,221	17.56%	21	2.16	24	1.32	21	8.93%	22	-0.58%	31	2.97	29	29.44%	18	17.20%	22	2.90	33	1.45	29	5.57%	28	-0.86%	31
MIDWAY MORTGAGE COMPANY, INC.	34	169	140	9.92%	32	2.81	31	0.65	2	7.86%	27	-0.07%	21	4.48	32	20.45%	35	6.43%	34	1.59	15	-	n/a	1.43%	35	-0.28%	23
WASHINGTON MUTUAL BANK, FA	35	4,639	3,305	11.53%	30	1.73	16	1.23	17	4.75%	35	-5.19%	35	1.85	15	25.86%	29	13.22%	31	1.69	20	1.43	27	4.90%	30	-2.99%	35

Overall Rank - combined rank for all categories

All Apps - all loan applications

All Loans - all loans originated

Minority Loans - loans to minorities as a percent of all loans with race information

Minority Denial Disparity Ratio - ratio of minority denial rate to white denial rate

Minority Fallout Ratio - ratio of minority fallout rate to white fallout rate

LMI Loans - loans to LMI borrowers as a percent of all loans

LMI Market Share Minus MUI Market Share - LMI borrower market share minus MUI borrower market share

MUI Minority Denial Disparity - ratio of MUI minority denial rate to MUI white denial rate

Female Loans - loans to female borrowers as a percent of all loans with gender information

Minority Tract Loans - loans to minority tracts as a percent of all loans

Minority Tract Denial Disparity Ratio - ratio of minority tract denial rate to white tract denial rate

Minority Tract Fallout Ratio - ratio of minority tract fallout rate to white tract fallout rate

LMI Tract Loans - loans to LMI tracts as a percent of all loans

LMI Tract Market Share Minus MUI Tract Market Share - LMI tract market share minus MUI tract market share

Each column contains an indicator and the lender's rank for the indicator. For example, "Minority Loans" shows the percent of loans to minorities and the lender's rank on this indicator.

For more information about the indicators, see methodology section.

**Exhibit 4: 2000 New York Prime Refinance Lenders**

	Overall Rank	All Apps	All Loans	Minority Loans	Minority Denial Disparity Ratio	Minority Denial Disparity Ratio	LMI Loans	LMI Market Share Minus MUI Market Share	MUI Minority Denial Disparity Ratio	Female Loans	Minority Tract Loans	Minority Tract Denial Disparity Ratio	Minority Tract Denial Disparity Ratio	LMI Tract Loans	LMI Tract Market Share Minus MUI Tract Market Share												
AMERICAN DREAM MORTGAGE BANKER	1	174	160	84.25%	1	n/a	n/a	28.75%	1	2.14%	4	n/a	n/a	32.50%	22	68.13%	1	0.24	1	1.27	25	21.25%	1	1.90%	3		
COUNTRYWIDE HOME LOANS	2	953	517	40.38%	3	1.34	9	1.25	15	15.47%	9	2.37%	3	1.64	11	37.98%	6	40.04%	5	1.25	11	1.26	24	13.15%	7	1.80%	4
INDYMAC BANK	3	1,454	508	39.60%	4	1.03	5	2.39	27	5.91%	33	-1.20%	32	0.99	3	41.41%	4	38.19%	6	1.07	6	0.57	1	18.31%	3	4.47%	1
CITIMORTGAGE INC.	4	1,531	278	38.26%	5	1.65	21	0.86	7	12.95%	16	-0.16%	19	1.69	13	37.92%	7	37.41%	7	1.34	14	0.84	9	13.67%	5	1.12%	5
CHASE MANHATTAN BANK	5	1,659	1,003	22.32%	19	1.38	11	1.54	22	16.15%	7	2.80%	2	1.42	6	34.66%	14	25.32%	16	1.51	17	0.82	8	13.56%	6	3.90%	2
ABNAMRO MTG. GROUP INC.	6	550	371	34.01%	7	1.13	6	1.86	25	22.10%	2	2.83%	1	1.23	4	32.96%	20	43.13%	3	1.30	13	1.32	26	10.24%	14	0.19%	13
CHASE MANHATTAN MORTGAGE CORP	7	232	114	25.93%	14	0.99	3	1.26	16	14.04%	13	0.04%	15	0.99	2	35.40%	11	28.07%	14	1.19	9	1.73	30	19.30%	2	1.12%	6
INTERSTATE HOME LOAN CTR, INC	8	1,752	115	36.84%	6	1.45	15	0.81	5	15.65%	8	0.20%	12	1.48	9	32.46%	23	43.48%	2	2.02	28	0.81	7	12.17%	11	0.28%	11
FLAGSTAR BANK, FSB	9	339	153	27.34%	11	1.54	17	0.63	3	17.65%	6	0.55%	8	1.84	18	30.72%	26	33.99%	8	1.29	12	0.94	13	13.07%	8	0.53%	8
HOMESIDE LENDING, INC.	10	361	113	28.57%	10	1.37	10	1.53	21	18.58%	4	0.51%	9	1.47	8	30.09%	27	41.59%	4	1.07	5	1.08	19	8.85%	23	-0.11%	20
BANK ONE, NA	11	1,749	523	30.61%	8	1.40	13	0.91	8	8.03%	26	-2.60%	34	1.44	7	32.73%	21	32.50%	9	1.51	18	0.76	4	11.28%	12	0.81%	7
WELLS FARGO HOME MORTGAGE	12	715	416	30.09%	9	1.41	14	0.66	4	8.89%	23	-1.18%	31	1.49	10	34.84%	13	28.13%	13	1.20	10	0.88	11	9.13%	18	-0.26%	23
MID-ISLAND MORTGAGE CORP.	13	119	81	25.64%	15	0.84	1	2.89	29	11.11%	19	-0.15%	18	0.97	1	30.86%	25	20.99%	24	0.00	n/a	2.36	32	14.81%	4	0.42%	9
FLEET NATIONAL BANK	14	3,861	1,562	26.02%	12	1.61	18	0.60	2	8.58%	24	2.04%	5	1.72	14	28.11%	30	25.16%	17	1.43	15	0.86	10	8.96%	22	-1.24%	31
BANK OF AMERICA, N.A.	15	286	175	18.52%	23	1.96	24	1.28	18	12.57%	17	-0.12%	17	2.00	20	36.75%	9	21.71%	22	1.11	8	0.98	15	9.14%	17	-0.10%	19
HSBC MORTGAGE CORPORATION	16	606	373	21.52%	20	1.40	12	0.83	6	18.23%	5	1.63%	6	2.04	21	29.97%	28	18.77%	25	1.46	16	1.16	22	8.58%	24	-0.46%	26
M&T MORTGAGE CORPORATION	16	303	182	26.00%	13	4.03	28	1.08	10	15.38%	10	0.34%	10	4.29	27	33.33%	17	29.67%	11	2.25	30	1.12	21	9.34%	16	-0.08%	18
AMERICAN HOME MORTGAGE CORP	18	487	310	22.43%	18	1.73	22	1.13	11	13.55%	14	-0.03%	16	2.08	22	24.84%	35	29.68%	10	1.91	26	0.78	6	9.03%	20	-0.24%	21
GMAC MORTGAGE	19	419	186	18.18%	24	0.00	n/a	3.57	31	13.44%	15	0.20%	13	0.00	n/a	26.83%	32	28.49%	12	1.08	7	1.37	27	10.75%	13	0.19%	14
WELLS FARGO BANK WEST, NA	20	608	248	54.55%	2	1.00	4	0.00	n/a	4.44%	34	-2.03%	33	1.75	16	42.86%	3	21.77%	21	1.60	20	0.92	12	4.84%	30	-1.26%	32
M.L.MOSKOWITZ AND CO., INC.	21	120	118	25.00%	16	0.00	n/a	n/a	n/a	8.47%	25	-0.43%	25	0.00	n/a	27.59%	31	24.58%	18	0.00	n/a	n/a	n/a	12.71%	9	0.36%	10
PNC BANK NA	22	268	108	11.11%	30	1.63	20	1.63	23	11.11%	19	-0.24%	21	2.00	19	44.44%	1	18.52%	26	1.59	19	0.67	3	7.41%	28	-0.26%	22
CENDANT MORTGAGE	23	140	100	12.50%	28	1.25	8	1.67	24	11.00%	21	-0.22%	20	0.00	n/a	33.33%	17	24.00%	19	1.60	21	1.06	18	9.00%	21	-0.08%	17
NORTH AMERICAN MORTGAGE CO.	24	282	182	18.12%	25	2.73	26	1.17	12	14.84%	11	0.25%	11	3.11	25	37.68%	8	22.53%	20	1.97	27	1.20	23	8.24%	26	-0.29%	24
CITIBANK, NA	25	2,443	1,034	20.87%	21	1.62	19	1.19	13	12.48%	18	-0.30%	22	1.84	17	35.40%	12	21.28%	23	1.81	25	0.96	14	5.32%	29	-4.70%	35
BNY MORTGAGE COMPANY LLC	26	149	88	15.63%	27	2.73	27	1.23	14	21.59%	3	0.67%	7	4.10	26	43.08%	2	12.50%	32	1.68	22	2.44	33	3.41%	34	-0.58%	27
ASTORIA FEDERAL SAVINGS	27	276	197	12.17%	29	1.48	16	1.05	9	7.11%	28	-1.13%	30	1.66	12	35.98%	10	16.24%	28	2.44	31	0.78	5	4.06%	31	-1.16%	29
DIME SAVINGS BANK OF NY, FSB	27	527	305	19.92%	22	1.93	23	1.27	17	14.10%	12	0.16%	14	1.73	15	29.75%	29	17.05%	27	2.15	29	1.11	20	8.52%	25	-0.38%	25
WASHINGTON MUTUAL BANK, FA	29	942	571	10.78%	31	1.17	7	1.46	20	6.13%	31	-3.81%	35	1.29	5	33.46%	16	13.66%	30	0.77	2	1.42	28	8.06%	27	-1.01%	28
EAB MORTGAGE COMPANY	30	116	90	23.19%	17	11.00	31	2.93	30	6.67%	30	-0.53%	27	n/a	n/a	38.03%	5	26.67%	15	2.96	33	1.62	29	12.22%	10	0.23%	12
MIDWAY MORTGAGE COMPANY, INC.	31	101	82	15.79%	26	6.84	30	0.51	1	6.10%	32	-0.42%	24	5.27	28	25.00%	34	13.41%	31	2.87	32	1.04	17	9.76%	15	0.00%	15
EMIGRANT MORTGAGE COMPANY	32	310	188	5.88%	34	0.97	2	2.34	26	3.72%	35	-0.30%	23	2.45	23	34.05%	15	6.38%	34	1.05	4	2.27	31	3.72%	32	-1.17%	30
THE NEW YORK MORTGAGE COMPANY,	33	139	99	9.30%	33	4.38	29	2.82	28	7.07%	29	-0.47%	26	9.88	29	32.97%	19	14.14%	29	1.00	3	3.27	34	9.09%	19	-0.07%	16
FIRST UNION NATIONAL BANK	34	459	262	9.47%	32	2.12	25	1.44	19	10.69%	22	-0.68%	28	2.63	24	25.26%	33	11.83%	33	1.72	23	0.98	16	3.44%	33	-1.71%	33
SI BANK & TRUST	35	308	234	3.11%	35	0.00	n/a	0.00	n/a	7.26%	27	-0.76%	29	0.00	n/a	32.33%	24	3.85%	35	1.76	24	0.57	2	0.85%	35	-2.15%	34

Overall Rank - combined rank for all categories

All Apps - all loan applications

All Loans - all loans originated

Minority Loans - loans to minorities as a percent of all loans with race information

Minority Denial Disparity Ratio - ratio of minority denial rate to white denial rate

Minority Fallout Ratio - ratio of minority fallout rate to white fallout rate

LMI Loans - loans to LMI borrowers as a percent of all loans

LMI Market Share Minus MUI Market Share - LMI borrower market share minus MUI borrower market share

MUI Minority Denial Disparity - ratio of MUI minority denial rate to MUI white denial rate

Female Loans - loans to female borrowers as a percent of all loans with gender information

Minority Tract Loans - loans to minority tracts as a percent of all loans

Minority Tract Denial Disparity Ratio - ratio of minority tract denial rate to white tract denial rate

Minority Tract Fallout Ratio - ratio of minority tract fallout rate to white tract fallout rate

LMI Tract Loans - loans to LMI tracts as a percent of all loans

LMI Tract Market Share Minus MUI Tract Market Share - LMI tract market share minus MUI tract market share

Each column contains an indicator and the lender's rank for the indicator. For example, "Minority Loans" shows the percent of loans to minorities and the lender's rank on this indicator.

For more information about the indicators, see methodology section.

**Exhibit 5: SI Bank Lending in New York MSA Versus Prime Peers**

2001 Home Purchase	Fleet	Bank of Amer	M&T Mort.	Abacus Fed	SI Bank	SI Bank & SIB Mortgage	Aggregate Prime	Ratio of SI to Aggregate
Total number loans	941	510	916	434	662	936	60,946	
LMI borrowers	14.4%	9.6%	19.5%	18.9%	6.2%	6.5%	12.4%	0.53
Afr-Am & Hispanics	26.3%	15.6%	24.5%	0.5%	5.3%	16.6%	22.3%	0.74
LMI tracts	10.1%	9.4%	12.7%	18.9%	3.8%	10.0%	10.7%	0.94
Minority tracts	24.9%	20.8%	24.0%	35.3%	7.0%	17.9%	25.0%	0.72
2000 Home Purchase	Fleet	Bank of Amer	M&T Mort	Abacus Fe	SI Bank	SI Bank & SIB Mortgage	Aggregate Prime	Ratio of SI to Aggregate
Total number loans	1,039	1,781	1,019	438	1,340	1,445	60,655	
LMI borrowers	16.8%	9.7%	21.7%	22.6%	4.4%	4.5%	11.4%	0.39
Afr-Am & Hispanics	25.6%	20.4%	27.2%	0.5%	3.2%	6.2%	22.3%	0.28
LMI tracts	9.0%	7.8%	12.2%	20.1%	3.1%	4.6%	10.0%	0.46
Minority tracts	21.4%	17.7%	23.7%	36.8%	5.5%	7.4%	23.1%	0.32
2001 Refinance	Fleet	Bank of Amer	M&T Mort	Flagstar FSB	SI Bank	SI Bank & SIB Mortgage	Aggregate Prime	Ratio of SI to Aggregate
Total number loans	3305	475	532	817	698	949	59,341	
LMI borrowers	10.0%	8.6%	11.8%	11.6%	8.9%	10.3%	10.2%	1.01
Afr-Am & Hispanics	20.1%	17.9%	15.1%	23.6%	4.5%	10.7%	17.2%	0.62
LMI tracts	9.9%	8.2%	7.1%	7.3%	1.4%	4.6%	7.9%	0.59
Minority tracts	24.7%	20.0%	15.6%	20.3%	3.0%	11.3%	22.4%	0.50
2000 Refinance	Fleet	Bank of Amer	M&T Mort	Flagstar FSB	SI Bank	SI Bank & SIB Mortgage	Aggregate Prime	Ratio of SI to Aggregate
Total number loans	1562	175	182	153	234	268	15,015	
LMI borrowers	8.6%	12.6%	15.4%	17.7%	7.3%	9.0%	11.9%	0.75
Afr-Am & Hispanics	26.0%	18.5%	26.0%	27.3%	3.1%	6.4%	17.8%	0.36
LMI tracts	9.0%	9.1%	9.3%	13.1%	0.9%	2.6%	10.1%	0.26
Minority tracts	25.2%	21.7%	29.7%	34.0%	3.9%	7.5%	26.4%	0.28

**Exhibit 6: Portion of Loans in Assessment Area  
SI Bank and Trust**

<i>Year</i>	<i>Total Single Family Loans</i>	<i>Total Purchases</i>	<i>Assessment Area (AA) Loans</i>	<i>Purchases in AA</i>	<i>Portion of Loans in AA</i>	<i>Portion of Purchases in AA</i>	<i>Portion of Loans &amp; Purchases in AA</i>
2000	2,147	903	922	3	42.9%	0.3%	30.3%
2001	1,880	132	1,230	3	65.4%	2.3%	61.3%
<i>Two Yr Total</i>	<i>4,027</i>	<i>1,035</i>	<i>2,152</i>	<i>6</i>	<i>53.4%</i>	<i>0.6%</i>	<i>42.6%</i>

**Exhibit 7: Portion of Loans in Assessment Area  
SI Bank and Trust and SIB Mortgage Corp. Combined**

<i>Year</i>	<i>Total Single Family Loans</i>	<i>Total Purchass</i>	<i>Assessment Area (AA) Loans</i>	<i>Purchases in AA</i>	<i>Portion of Loans in AA</i>	<i>Portion of Purchases in AA</i>	<i>Portion of Loans &amp; Purchases in AA</i>
2000	7,222	1,060	1,297	9	18.0%	0.8%	15.8%
2001	27,551	820	2,033	11	7.4%	1.3%	7.2%
<i>Two Yr Total</i>	<i>34,773</i>	<i>1,880</i>	<i>3,330</i>	<i>20</i>	<i>9.6%</i>	<i>1.1%</i>	<i>9.1%</i>

**Exhibit 8: Portion of SI Bank and Trust's Single Family Lending in Manhattan**

<i>Year</i>	<i>Total Single Family Loans</i>	<i>Loans in Manhattan</i>	<i>Percent in Manhattan</i>
2000	2,147	668	31.1%
2001	1,880	302	16.1%
<i>Two Yr Total</i>	<i>4,027</i>	<i>970</i>	<i>24.1%</i>



**Exhibit 9: Portion of SI Bank and Trust's & SIB Mortgage Single Family Lending in Manhattan**

Year	Total Single Family Loans	Loans in Manhattan	Percent in Manhattan
2000	7,222	672	9.3%
2001	27,551	321	1.2%
Two Yr Total	34,773	993	2.9%

**Exhibit 10: SI Bank Lending in Manhattan by Groups of Borrowers**

Borrowers	Number of Loans, 2000	Percent of Loans, 2000	Number of Loans, 2001	Percent of Loans, 2001	If SI had met Peer Aggregate Percentage		
					#Loans, 2000	#Loans, 2001	Both yrs
Low/Mod	1	0.1%	0	0.0%	38	11	49
Black	1	0.1%	1	0.3%	17	7	24
Hispanic	10	1.5%	2	0.7%	23	7	30

Peer Prime Aggregate Percentage was 3.5% to Low/Mod & 2.3% of loans to Blacks & Hispanics in 2001

Peer Prime Aggregate Percentage was 5.7% to Low/Mod, 3.5% to Hispanics & 2.5% to Blacks in 2000

**Exhibit 11: SI Bank & SIB Mortgage Lending in Manhattan By Groups of Borrowers**

Borrowers	Number of Loans, 2000	Percent of Loans, 2000	Number of Loans, 2001	Percent of Loans, 2001	If SI had met Peer Aggregate Percentage		
					#Loans, 2000	#Loans, 2001	Both yrs
Low/Mod	1	0.1%	1	0.3%	38	11	50
Black	2	0.3%	5	1.6%	17	7	24
Hispanic	10	1.5%	3	0.9%	24	7	31

**Exhibit 12: SIB Mortgage Company Single Family Lending Nationwide**

	<i>SIB Mortgage</i>	<i>Aggregate Peer</i>
<i>Lending in 2000</i>		
Total Number of Loans	5,075	6,866,671
Percent to LMI borrower	41.7%	29.5%
Percent to LMI tracts	14.4%	15.0%
<i>Lending in 2001</i>		
Total Number of Loans	25,671	11,791,246
Percent to LMI borrower	16.1%	24.7%
Percent to LMI Tracts	12.5%	12.1%

**Exhibit 13: SI Bank and Trust Small Business Lending in Richmond and Kings Counties**

	<i>Number of loan in LMI tracts</i>	<i>Percent of Loans in LMI tr</i>	<i>Number loans to Bus &lt;\$1 mi</i>	<i>Percent of Loans &lt;\$1 mi to Bus &lt;\$100 K</i>	<i>Number loans &lt; \$100 K</i>	<i>Percent loans &lt; 100 K</i>
<i>2001</i>						
<i>SI Bank and Trust</i>	43	8.8%	106	21.8%	302	62.0%
<i>All Lenders</i>	39,645	29.6%	17,182	43.3%	38,401	96.9%
<i>2000</i>						
<i>SI Bank and Trust</i>	59	10.8%	90	16.5%	406	74.4%
<i>All Lenders</i>	9,052	28.3%	15,540	48.7%	30,812	96.5%

**Exhibit 14: SI Bank and Trust Small Business Lending in Richmond County**

<i>2001</i>						
<i>SI Bank and Trust</i>	13	3.3%	89	22.6%	247	62.7%
<i>All Lenders</i>	199	2.9%	2,627	38.4%	6,590	96.3%
<i>2000</i>						
<i>SI Bank and Trust</i>	12	2.9%	75	17.9%	302	71.9%
<i>All Lenders</i>	182	3.2%	2,566	44.4%	5,547	96.1%