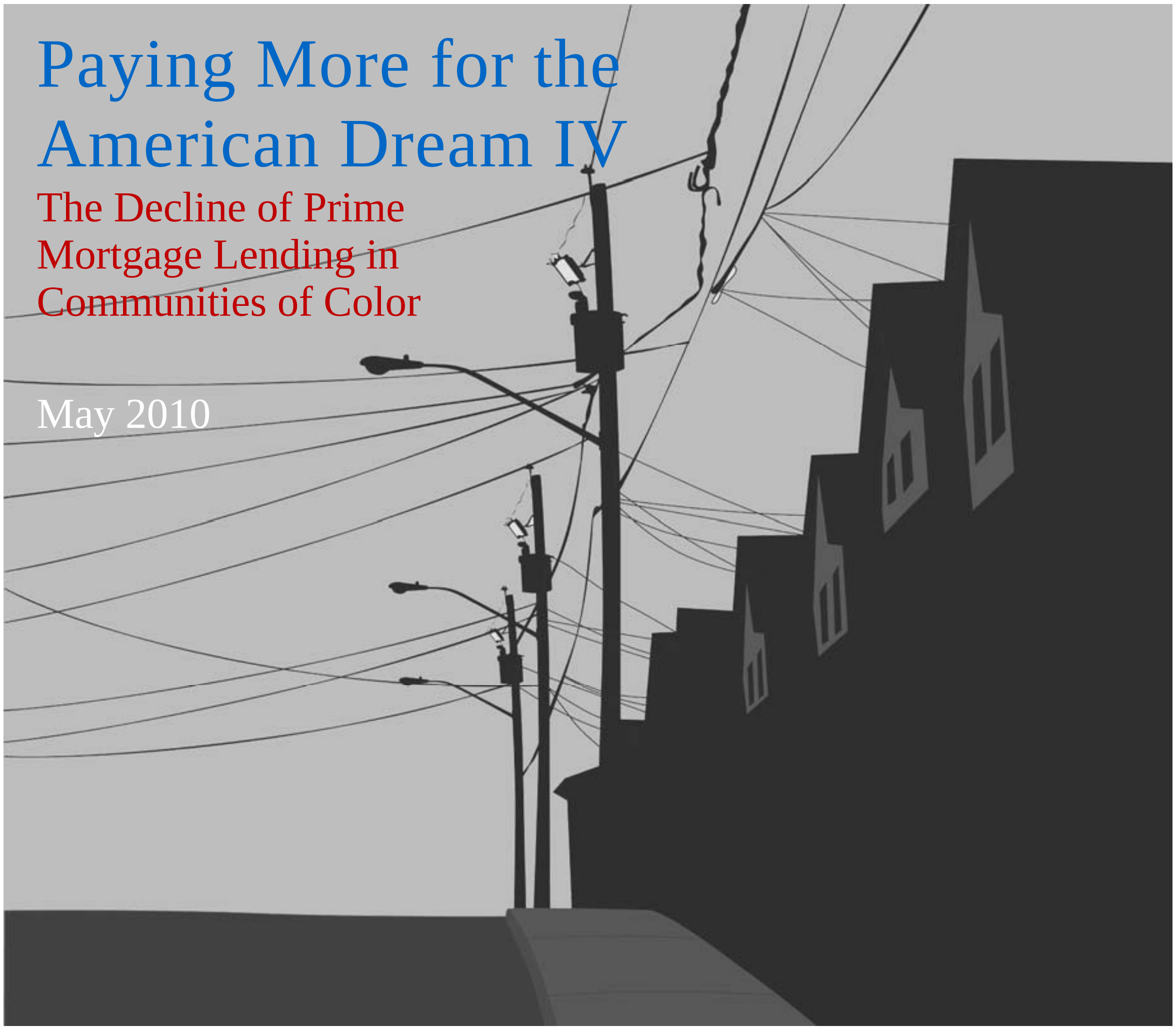
Paying More for the American Dream IV

The Decline of Prime Mortgage Lending in Communities of Color

May 2010



A Joint Report By:

California Reinvestment Coalition

Community Reinvestment Association of North Carolina

Empire Justice Center

Massachusetts Affordable Housing Alliance

Neighborhood Economic Development Advocacy Project

Ohio Fair Lending Coalition

Woodstock Institute

California Reinvestment Coalition advocates for the right of low-income communities and communities of color to have fair and equal access to banking and other financial services. CRC has a membership of more than 240 nonprofit organizations and public agencies across the State.

Community Reinvestment Association of North Carolina is a nonprofit, nonpartisan research and advocacy organization whose mission is to promote and protect community wealth. We advocate for change in the lending practices of financial institutions to promote wealth building for underserved communities and to end predatory lending practices that strip wealth.

Empire Justice Center is a statewide non-profit law firm that works to protect and strengthen the legal rights of people in New York State who are poor, disabled or disenfranchised through: systems change advocacy, training and support to other advocates and organizations, and high quality direct civil legal representation.

Massachusetts Affordable Housing Alliance's mission is to organize for increases in public and private sector investment in affordable housing and to break down the barriers facing minority and low to moderate income first time homebuyers as they seek affordable and sustainable homeownership opportunities. Our campaigns have resulted in more than $3.3 billion of public and private sector investment in affordable housing in Massachusetts since 1985. Our grassroots Homebuyers Union organizing, in both urban and suburban communities, has been effective in engaging banks, insurance companies, and elected officials around the issues of affordable homeownership and responsible mortgage lending.

Formerly NEDAP

Neighborhood Economic Development Advocacy Project (NEDAP) is a resource and advocacy center for community groups in New York City. Our mission is to promote community economic justice and to eliminate discriminatory economic practices that harm communities and perpetuate inequality and poverty.

Ohio Fair Lending Coalition is composed of The Toledo Fair Housing Center, Empowering & Strengthening Ohio's People, formerly known as East Side Organizing Project, SEIU Local 3 and fair lending advocates, Paul Bellamy and Charles Bromley. The Coalition challenged the merger of Sky and Huntington Banks in 2007 and it continues to be Ohio's Fair Lending Organization.

Woodstock Institute is a leading nonprofit research and policy organization in the areas of fair lending, wealth creation, and financial systems reform. Woodstock Institute works locally and nationally to create a financial system in which lower-wealth persons and communities of color can safely borrow, save, and build wealth so that they can achieve economic security and community prosperity. Our key tools include: applied research; policy development; coalition building; and technical assistance.

Preface

The *Paying More for the American Dream* series is a collaborative effort of the California Reinvestment Coalition, Community Reinvestment Association of North Carolina, Empire Justice Center, Massachusetts Affordable Housing Alliance, Neighborhood Economic Development Advocacy Project, Ohio Fair Lending Coalition, and Woodstock Institute. This is the collaboration's fourth annual report examining systematic inequalities in the housing finance system and their impact on lower-income neighborhoods and communities of color. The first report, released in March 2007, examined disparities in mortgage pricing by several of the country's largest mortgage lenders that offered both prime and subprime loans. The second report, released in March 2008, looked at the geographic lending patterns of a set of defunct subprime lenders whose loans largely fueled the foreclosure wave that is currently devastating communities across the country and found that these loans were highly concentrated in minority and lower-income communities. The third report, released in April 2009, analyzed and compared the lending patterns of lenders that were covered by the Community Reinvestment Act with lenders that were not covered by the CRA. The current report examines the dramatic changes in prime mortgage lending seen in communities of color in the wake of the foreclosure crisis.

The authors hope these reports inform the debate around fair lending policy and access to responsible mortgage credit for lower-income families and neighborhoods and people and communities of color.

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The authors would also like to thank Beverly Berryhill, Katie Buitrago, and Patricia Woods-Hessing of Woodstock Institute for their work in the editing and production of this report.

Executive Summary

The financial crisis has led to significantly reduced access to mortgage credit for all borrowers and communities. In neighborhoods of color, however, where the foreclosure crisis has taken an especially severe toll, access to prime, conventional mortgage loans has declined precipitously – to a much greater degree than in predominantly white neighborhoods. Families living in neighborhoods of color disproportionately lack access to affordable loans needed to purchase or improve their homes or to refinance their mortgage to secure a lower monthly payment. As this lack of access and the ongoing foreclosure crisis wreak havoc on communities of color, neighborhood rehabilitation efforts, including sustainable loan modifications, are desperately needed to help families avert foreclosure and stay in their homes, and to prevent further destabilization of neighborhoods.

This report focuses on changes in lending patterns in seven key metropolitan areas: Boston, MA; Charlotte, NC; Chicago, IL; Cleveland, OH; Los Angeles, CA; New York, NY; and Rochester, NY. It examines changes in the levels of prime, conventional home purchase and refinance mortgage lending in predominantly white communities and communities of color between 2006, the beginning of the foreclosure crisis, and 2008, the most recent year for which national mortgage lending data are available. The report also examines lending patterns for the four largest bank holding companies: Bank of America, Citigroup, JPMorgan Chase, and Wells Fargo. Finally, the report includes recommendations for federal policy reforms that would require financial institutions to issue credit responsibly and protect all communities, particularly communities of color, from abusive lending practices.

<u>Key Findings:</u>

The report finds that, between 2006 and 2008, access to prime mortgage credit for both home purchase and refinance lending declined substantially in communities of color – more than twice as much as it did in predominantly white communities. Prime refinance lending dropped even more dramatically in communities of color – almost five times more than in predominantly white neighborhoods. The four largest bank holding companies also significantly reduced their prime refinance lending in communities of color, even though they increased their prime refinance lending in predominantly white communities, and notwithstanding their receipt of TARP funds.

Analysis of changes in prime, conventional mortgage lending between 2006 and 2008 in the seven cities reveals the following:

- Prime lending in communities of color decreased by 60.3 percent, compared to 28.4 percent in predominantly white neighborhoods.

- Prime refinance lending declined by 66.4 percent in neighborhoods of color, and by 13.9 percent in predominantly white areas.

- The overall share of prime refinance loans made to communities of color shrank by 35 percent, whereas the share made to predominantly white communities increased by 11 percent.

- Prime refinance lending by the country's four largest banks – Bank of America, Citigroup, JPMorgan Chase, and Wells Fargo – to predominantly white communities collectively increased by 32 percent, whereas prime refinance lending to communities of color declined by 33 percent.

Recommendations:

This report raises serious questions about how the economic crisis has reduced access to prime mortgage credit in communities of color and underscores the need to develop and enforce effective and strong fair lending and public policy that ensures that all communities have access to affordable, high-quality mortgage credit. To address the key findings and related issues raised by this report, the authors recommend the following:

- Create a strong, independent Consumer Financial Protection Agency.
- Expand the Community Reinvestment Act to promote responsible lending and investment.
- Expand Home Mortgage Disclosure Act data to shed light on discriminatory practices.
- Prioritize fair lending enforcement.
- Stop preventable foreclosures.
- Require banks to fund revitalization of damaged neighborhoods.

Introduction

Borrowers in communities of color were disproportionately targeted for higher-cost and unaffordable subprime loans, and these communities have suffered immense damage as many long-time homeowners have lost their homes to foreclosure. As earlier reports in this series documented, African American and Latino borrowers in six large metropolitan areas were nearly four times more likely than white borrowers to receive higher-cost home purchase loans in 2005.[1] In 2006, borrowers living in neighborhoods of color in the study cities received more than four times as many high-risk loans made by subprime lenders that later went out of business than borrowers living in predominantly white communities.[2] As the subprime market collapsed and foreclosures began to increase, communities of color experienced disproportionately high levels of foreclosures. For example, the density of foreclosure filing activity in the Chicago area in 2006 was five times greater in communities of color (areas with 80 percent or more residents of color) than in predominantly white communities (areas with 90 percent or more white residents).[3]

The collapse of the subprime mortgage market in 2006 and 2007 led to a major restructuring of the mortgage finance industry. Many of the country's largest mortgage lenders went out of business, or were acquired by other institutions. Between 2006 and 2008, the number of mortgage lenders reporting data under the Home Mortgage Disclosure Act (HMDA) declined from 8,886 to 8,388.[4] Some of the largest mortgage lending banks and thrifts in the country, including Washington Mutual, Wachovia, Countrywide, Merrill Lynch/First Franklin, and National City Bank, collapsed in 2008 as their portfolios of subprime, Alt-A loans, option adjustable rate mortgages (ARMs), and hybrid ARMSs deteriorated. Ultimately, JPMorgan Chase acquired Washington Mutual, Wells Fargo acquired Wachovia, Bank of America acquired Countrywide and Merrill Lynch/First Franklin, and PNC acquired National City.

Large financial institutions critical to the mortgage finance system, including Citigroup, Bank of America, JPMorgan Chase, and Wells Fargo, were experiencing deep financial problems and were bailed out by the federal government's Troubled Asset Relief Program (TARP). Fannie Mae and Freddie Mac, government-sponsored enterprises (GSEs) that facilitate access to mortgage capital for conventional lenders, also found themselves on the verge of insolvency and effectively had to be nationalized by the federal government.

With the collapse of the private mortgage-backed securities industry that supplied much of the capital for the subprime lending boom, Fannie Mae and Freddie Mac are now among the only funding sources for conventional mortgages. The GSEs have responded to the economic crisis by tightening underwriting criteria for mortgages they purchase. In addition, the FHA's overall market share has increased

[1] *Paying More for the American Dream: A Multi-State Analysis of Higher-Cost Home Purchase Lending*. March 2007. Available: http://www.woodstockinst.org/publications/download/paying-more-for-the-american-dream%3a--a-multi%11state-analysis-of-higher%11cost-home-purchase-lending/

[2] *Paying More for the American Dream II: The Subprime Shakeout and Its Impact on Low-Income and Minority Communities,* March 2008. Available: http://www.woodstockinst.org/publications/download/paying-more-for-the-american-dream-%11-the-subprime-shakeout-and-its-impact-on-lower%11income-and-minority-communities/

[3] Woodstock Institute. "*2006 Chicago Area Community Lending Fact Book*." Woodstock Institute March 2008.

[4] Avery, Robert B. et al. "The 2008 HMDA Data: The Mortgage Market During a Turbulent Year." *Federal Reserve Bulletin* September 23, 2009.

significantly, from less than 2 percent in 2005 to 24 percent in 2008,[5] although this expansion has not necessarily served borrowers well, since abusive practices by FHA lenders appear rampant.[6]

The turmoil in the mortgage finance industry has reduced access to credit for all communities. People who live in communities of color, however, where the foreclosure crisis hit first and hardest, face both historical and new barriers to access to prime, conventional mortgages. At the community level, the accumulation of large numbers of foreclosed properties, as well as potential blight tied to vacant and abandoned properties, causes further declines in neighborhood real estate markets that have already experienced significant reductions in local property values, trapping homeowners who owe more on their mortgages than their properties are worth. Additionally, high levels of unemployment in communities of color will likely cause a lag in any economic recovery in these neighborhoods. The foreclosure crisis has led to lost equity and damaged credit records for millions of homeowners, not only restricting their access to future mortgages and other forms of credit, but also harming their future job prospects, as employers increasingly consider credit reports in the hiring process.[7]

While many individuals may need to repair or rebuild credit to qualify for a loan, borrowers who are good credit risks may also be unable to access mortgage credit. Communities of color, which have been the hardest hit by the mortgage crisis, will face even greater challenges to accessing new, affordable mortgage credit. The following analysis is an examination of how recent trends in the mortgage lending industry have led to reduced access to prime, conventional mortgage loans in communities of color.

Methodology

This report examines lending in seven metropolitan areas: Boston, MA; Charlotte, NC; Chicago, IL; Cleveland, OH; Los Angeles, CA; New York, NY; and Rochester, NY.[8] The authors of this report selected these areas because they represent organizations in each city. These cities represent both larger (New York, Chicago, Los Angeles, Boston) and smaller (Cleveland, Charlotte, Rochester) urban areas in a number of different geographic regions of the country.

In each metropolitan area, prime lending levels at the height of the mortgage lending boom in 2006 were compared to lending in 2008, the most recent year for which nationwide HMDA data are available. The analysis included:

- Changes both in total prime lending (home purchase and refinance loans combined) and in prime refinance lending alone.

- Changes in lending in communities of color (areas where 80 percent or more of the residents are people of color) relative to changes in lending in predominantly white communities (areas where less than 10 percent of residents are people of color).

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[5]US Department of Housing and Urban Development. "FHA-Insured Single Family Mortgage Originations and Market Share Report 2009-Q2" 2009.

[6]Dina ElBoghdady and Dan Keating " The Next Hit: Quick Defaults More FHA-Backed Mortgages Go Bad Without a Single Payment" *Washington Post*, 3/8/2009. Available: http://www.washingtonpost.com/wp-dyn/content/article/2009/03/07/AR2009030702257.html

[7]Unite Here. "Employment Credit Checks: A Catch-22 for American Workers" 2010. Available: http://www.creditcatch22.org/CreditCatch-22Report.pdf.

[8]Whereas most of the study areas are metropolitan statistical areas, "Los Angeles, CA" refers to Los Angeles County and "New York, NY" refers to the five boroughs of New York City. See individual tables in the Appendix for a description of each study area.

- Changes in prime refinance loan originations by the top four bank holding companies in the nation: Bank of America, Citigroup, JPMorgan Chase and Wells Fargo.

The primary data source for this analysis is the Home Mortgage Disclosure Act Loan Application Register data (HMDA LAR data) as collected, processed, and released each year by the federal government. The report considers direct originations of prime, conventional, first-lien home purchase, or refinance mortgages on owner-occupied, one-to-four unit, site-built properties. "Prime" loans on a first-lien mortgage are those for which the APR is less than three percentage points above the interest rate on a U.S. Treasury security of comparable maturity. (See Appendix I for more information on the data and methodology.)

Findings

<u>Decline in Prime Lending</u>

Prime mortgage lending declined between 2006 and 2008 in all seven metropolitan areas examined, but declines were much steeper in communities of color. Conventional prime lending (for home purchase and refinance loans combined) declined dramatically, by an average of 37 percent, in each of the seven study cities between 2006 and 2008.[9] In each of the seven cities, however, the decline in lending was much more pronounced in communities of color than in predominantly white communities. As Chart I shows, there was a 60.3 percent decrease in prime loans made in communities of color compared to a 28.4 percent decline in predominantly white communities. The lending decline in neighborhoods of color was thus two times greater than it was in predominantly white neighborhoods.

Chart I. Percentage Change in Prime Home Purchase and Refinance Lending in Neighborhoods of Color and in Predominantly White Neighborhoods, 2006 to 2008

[9] For readability's sake, the report often refers to study areas as the "study cities."

As Chart I shows, in the cities examined:

- Neighborhoods of color in Charlotte, Cleveland, and Los Angeles experienced the largest declines in prime lending between 2006 and 2008, all over 64 percent.

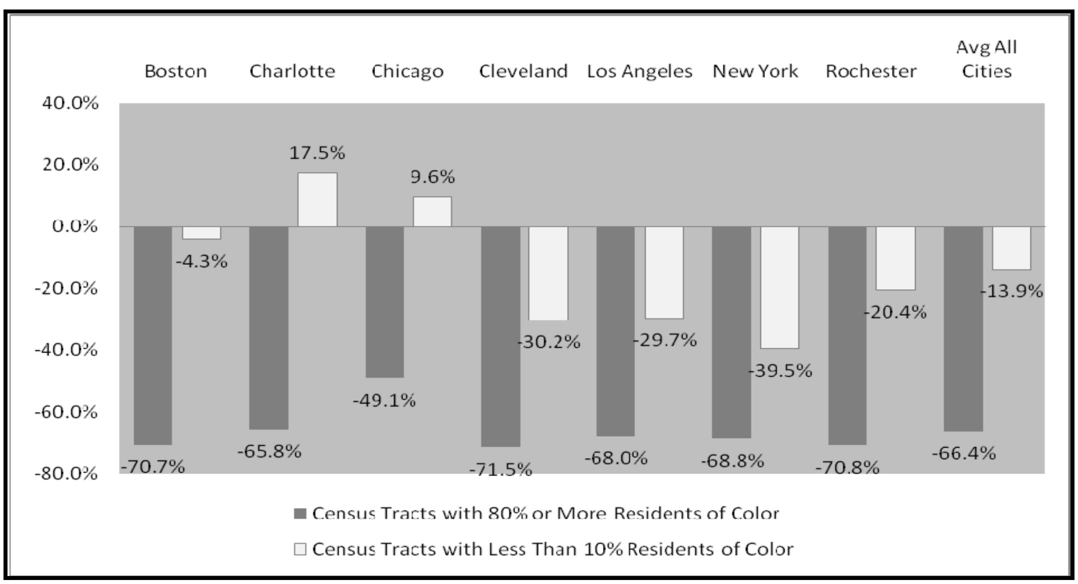
- Boston had the greatest disparity across neighborhoods. The decline in prime lending in Boston's communities of color was 3.4 times greater than it was in predominantly white communities (55.8 percent compared to 16.3 percent).

- In four of the cities examined – Boston, Charlotte, Chicago, and Rochester – the decline in prime lending in neighborhoods of color was at least twice the decline in predominantly white neighborhoods.

Changes in Refinance Lending

Access to prime refinance lending in communities of color decreased substantially between 2006 and 2008. Communities of color have been among those hardest hit by abusive lending and foreclosures. Families that already own homes in these neighborhoods need access to responsible refinance lending to take advantage of low interest rates and reduce monthly mortgage payments. The number of prime refinance loans in communities of color, however, decreased dramatically. Chart II shows that prime refinance lending decreased by 66.4 percent in neighborhoods of color – a decline 4.8 times larger than the decline in prime refinance lending in predominantly white communities.

Chart II. Percentage Change in Prime Refinance Lending in Neighborhoods of Color and in Predominantly White Neighborhoods, 2006 to 2008



As Chart II shows, in the cities examined:

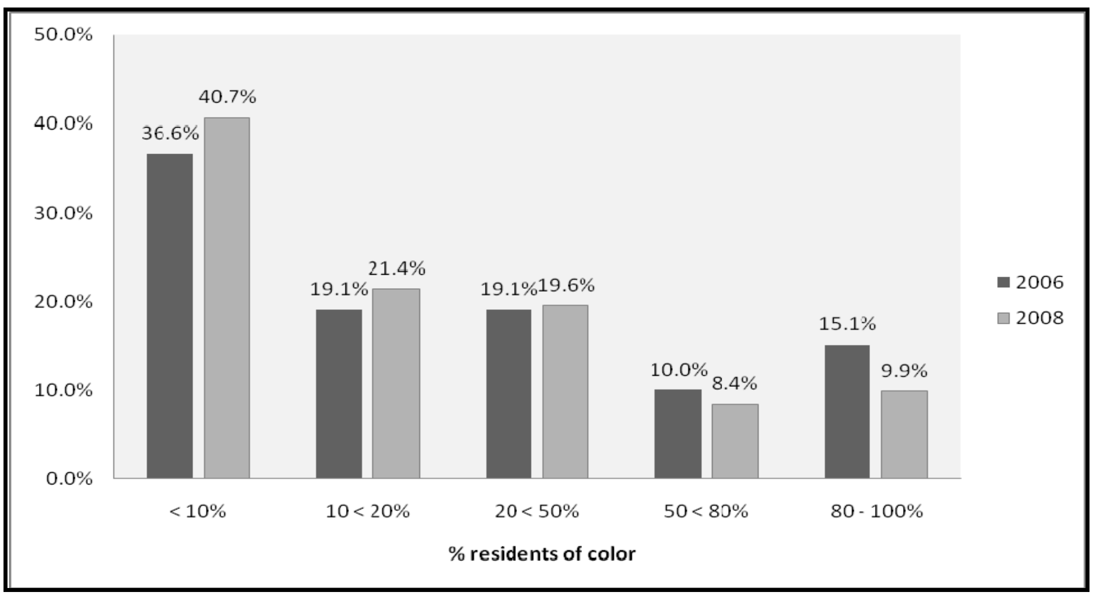
- In all but one city, refinance lending in communities of color declined by more than 65 percent between 2006 and 2008.

- Communities of color in Charlotte experienced the most dramatic disparity in prime refinance lending. In Charlotte's neighborhoods of color lending declined by 65.8 percent, while it increased by 17.5 percent in predominantly white neighborhoods.

- Prime refinance lending also increased in the predominantly white communities in Chicago and Charlotte, and declined only slightly in Boston's predominantly white communities.

The share of prime refinance loans made in communities of color shrank dramatically between 2006 and 2008. As Chart III shows, majority white neighborhoods (areas with less than 50 percent residents of color) received larger proportions of prime refinance loans in both 2006 and 2008 than neighborhoods with 50 percent or more residents of color.

Chart III. Distribution of Prime Refinance Loans by Neighborhood Racial/Ethnic Composition in the Seven Study Cities, 2006 and 2008



Additional findings show:

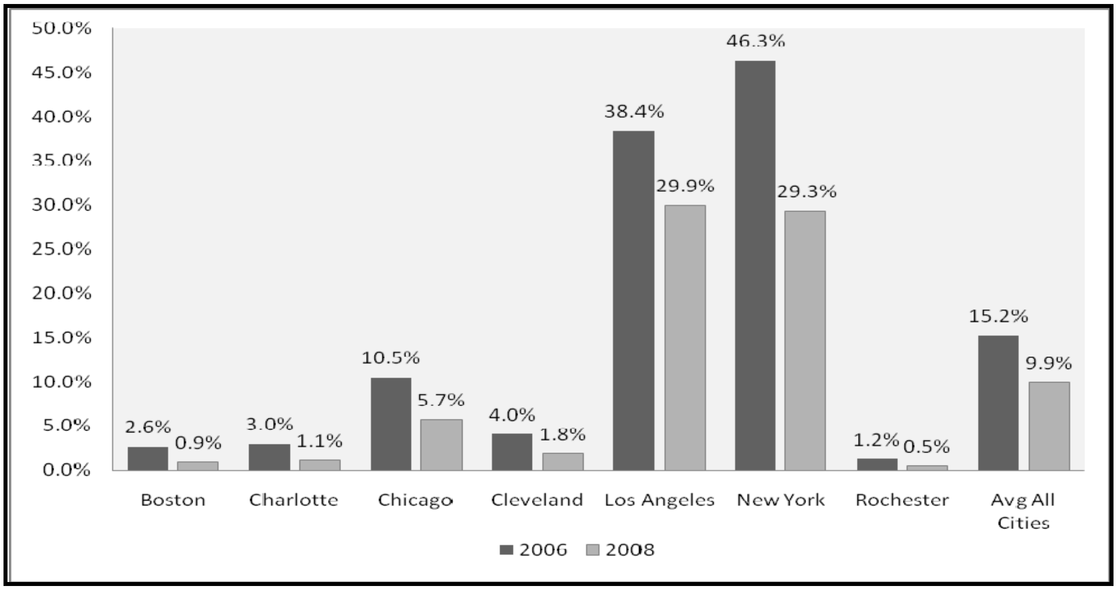
- The share of prime conventional refinance loans made in neighborhoods of color declined 35 percent between 2006 and 2008, whereas the share going to predominantly white communities increased by 11 percent over the same time period.

- In 2006, the share of refinance loans made in predominantly white communities was 2.4 times greater than in neighborhoods of color.

- By 2008, the share of refinance loans made in predominantly white communities was 4.1 times greater than in neighborhoods of color.

The share of prime refinance loans made in communities of color declined in all seven cities. Chart IV illustrates this decline. In four of the cities – Boston, Charlotte, Cleveland and Rochester – the decline was greater than 50 percent.

Chart IV. Share of Prime Refinance Loans Going to Neighborhoods of Color, 2006 and 2008



Prime Lending by the Top Four Bank Holding Companies

This report examines the change in prime refinance mortgage lending by the nation's largest banks – Bank of America, Citigroup, JPMorgan Chase, and Wells Fargo – all of which are TARP recipients and were active mortgage lenders in the seven cities.[10] The recent consolidation of the banking industry highlights the need for large bank holding companies to make low-cost, affordable loans in communities of color. This leadership role is vital to both the financial well-being of communities and to the success of the banks, and was one of the justifications for these banks' receipt of TARP money.

<u>Comparing Changes in Refinance Lending</u>

The top four bank holding companies shifted their mortgage lending focus to predominantly white communities and away from communities of color. Although the top four bank holding companies were able to maintain their levels of refinance lending between 2006 and 2008, Chart V suggests that they targeted predominantly white communities for new loans while making fewer loans in communities of color. On average, the top four bank holding companies increased prime refinance lending in predominantly white communities by 32 percent and decreased such lending by 33 percent in communities of color.

[\] See Appendix I for the methodology on how affiliates were chosen.

Among the top four bank holding companies:

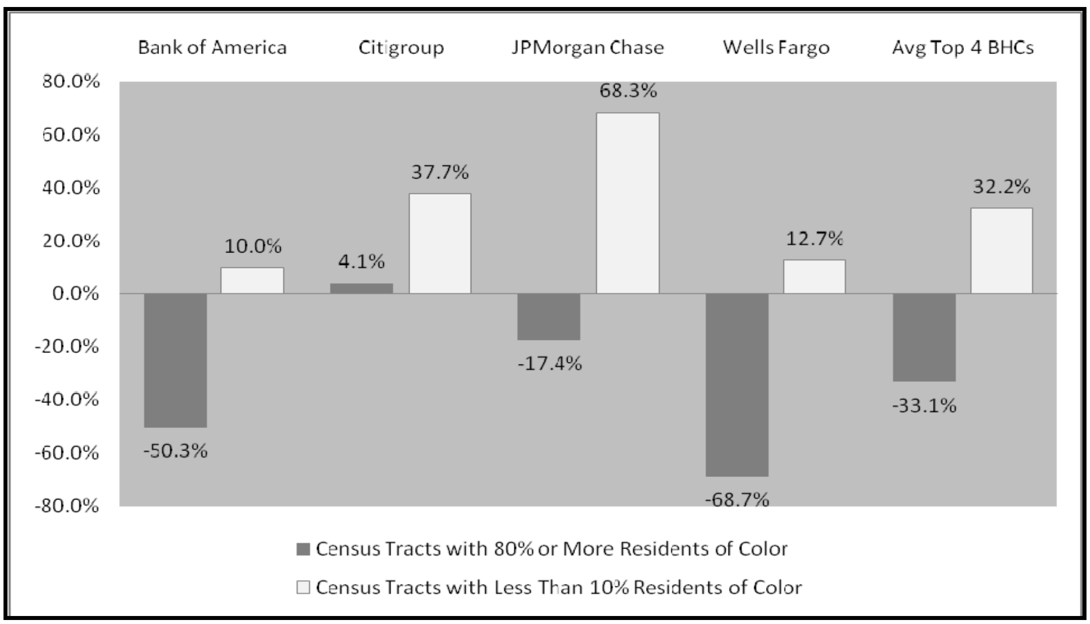
- All four increased their levels of prime refinance lending in predominantly white communities, while three reduced prime refinance lending in neighborhoods of color.

- Wells Fargo showed the largest decline in prime refinance lending in communities of color (68.7 percent).

- JPMorgan Chase showed the largest disparity between change in lending in predominantly white communities and in communities of color.

- Citigroup's prime refinance lending increased in both communities of color and predominantly white communities, but the increase was substantially smaller in communities of color.

Chart V. Percentage Change in Prime Refinance Lending by the Top Four Bank Holding Companies in Neighborhoods of Color and in Predominantly White Neighborhoods, 2006 to 2008



Conclusion and Recommendations

The findings set forth in this report suggest that redlining persists, as mainstream financial institutions continue disproportionately to deny credit to people living in communities of color. The explosion of unaffordable, destabilizing credit in more recent times and the ensuing foreclosure crisis have served to magnify existing obstacles to fair credit access for millions of homeowners who now find their credit ruined. Systemic change is needed to address the major discrepancies that pervade the prime, conventional mortgage market, and to ensure that families and communities can recover from the foreclosure crisis and have equal access going forward.

This report raises serious questions about how the economic crisis has affected access to prime mortgage credit in communities of color and underscores a need for the development and enforcement of effective and strong fair lending and public policy that ensures that all communities have access to affordable, high-quality mortgage credit. To address the key findings and related issues raised by this report, the authors recommend the following:

- **Create a strong, independent Consumer Financial Protection Agency (CFPA).** Consumers and communities need an independent federal agency whose sole mission is to protect the public from unfair, deceptive, and predatory financial products and services. Without meaningful regulation and oversight of industry practices, we can be assured of another financial crisis that wreaks havoc on consumers and their neighborhoods. The CFPA must include rule-making authority; broad enforcement powers; jurisdiction over all abusive financial products and practices (without any special interest exemptions); oversight of the CRA; and flexibility to allow states to enforce federal and state consumer protection and fair housing laws.

- **Expand the Community Reinvestment Act (CRA) to promote responsible lending and investment.** The CRA has been effective in encouraging banks to provide good loans, investments and services in low- and moderate-income communities, consistent with safety and soundness. Changes in the financial services landscape, however, have limited the CRA's scope and effectiveness. The CRA must be modernized to keep pace with industry practices by:

    - Extending the CRA to mortgage companies, insurance companies, Wall Street investment houses, and credit unions.

    - Extending banks' CRA assessment areas beyond brick and mortar branches to all areas in which financial institutions are profiting and conducting financial business.

    - Explicitly considering the race and ethnicity of borrowers and neighborhoods, not just income, when determining whether institutions are meeting community credit needs under the CRA.

    - Requiring that public input plays a meaningful role in decisions over mergers and other financial expansion activities.

- **Expand Home Mortgage Disclosure Act (HMDA) data to shed light on discriminatory practices.** Congress passed the HMDA to provide data to help identify discrimination in mortgage lending. Industry practices, however, have outpaced the data, and the HMDA should be modernized to include all fields necessary to achieve its stated goals. At a minimum, HMDA data should be expanded to include data relating to loan fees and APRs charged, loan-to-value ratios, debt-to-income ratios, credit scores, borrowers' primary languages, and age of borrowers. The data should also include information on risky loan features, such as reduced documentation and stated income underwriting, option ARM loans, prepayment penalties, and yield spread premiums. An expanded HMDA should also be connected to data on loan performance to better measure where loans are becoming delinquent, going into foreclosure, or receiving some type of loan modification.

- **Prioritize fair lending enforcement.** To ensure a level playing field, the Department of Justice (DOJ), banking regulators, and Treasury officials must vigorously investigate and enforce fair lending violations in lending and loan modification programs. Recent DOJ initiatives to investigate reverse redlining practices are positive, to be encouraged, and consistent with the authors' prior analyses. At the same time, enforcement agencies should also investigate more timely concerns relating to borrower challenges in accessing new loans and loan modifications so that historically redlined neighborhoods are not subjected to continued redlining practices.

- **Prevent foreclosures.** Congress should enact bankruptcy reform to allow bankruptcy judges to modify mortgages and reduce principal on homeowners' primary residences. Financial institutions must offer long-term, sustainable loan modifications with principal reduction on a broad scale to stop all preventable foreclosures.

- **Require banks to keep people in their homes and fund neighborhood revitalization.** The impact of years of abusive lending and foreclosures on communities of color has been severe. Financial institutions, whose practices triggered the foreclosure crisis, should now help rebuild neighborhoods by working to keep families in their homes, mitigating the harmful effects of foreclosure, and significantly increasing loans and investments in neighborhoods so that residents, small businesses and community institutions can thrive. Financial institutions must:

  - Prevent vacancy, blight and community destabilization by allowing homeowners whose homes have gone into foreclosure, as well as tenants living in foreclosed properties, to stay in their homes.

    - Allow homeowners the option to repurchase their homes at fair market value after a long-term tenancy.

    - Tenants who have been paying rent in homes that have gone into foreclosure should be offered long-term leases, building off of the current policies of the government-sponsored enterprises Fannie Mae and Freddie Mac.

  - Invest in hard-hit neighborhoods. Financial institutions that facilitated the current crisis in their roles as loan brokers, originators, funders, securitizers, trustees and servicers of abusive loans must now help rehabilitate neighborhoods hardest hit by foreclosure. Loans and investments are needed to help families rebuild credit histories, promote financial literacy, improve the housing stock, transfer foreclosed properties to local nonprofit groups and first-time homebuyers, finance quality affordable housing, infuse equity into community institutions that sustain neighborhoods, and spur small business development and job creation.

  - Reverse a decline in access to credit by developing safe and sound, yet creative methods of underwriting new loans. Borrowers in neighborhoods that have been targeted by predatory lending should not be denied credit for failing to satisfy traditional underwriting criteria or because they are deemed to live in "declining markets," provided that they can demonstrate a clear ability to repay a new loan. Sound, affordable loans are needed to help borrowers improve their homes, start new businesses, finance children's education, and build or rebuild wealth.

Appendix I: Notes on Data and Definitions

HMDA Data: The primary data source for this report is the Home Mortgage Disclosure Act Loan Application Register data (HMDA data), as collected, processed, and released each year by the federal government. (For more information, visit: www.ffiec.gov/hmda). Among the HMDA data provided for each loan are: the identity of the lending institution; whether the loan is government-backed (by the VA or FHA) or "conventional" (not government-backed); whether or not the home is owner-occupied; whether the home is a site-built home or a manufactured home; the census tract, county, and metropolitan area in which the property is located; the race and ethnicity of the borrower; the purpose of the loan (home-purchase, refinancing of existing mortgage, or home improvement); the lien status of the loan (first lien or junior lien); and pricing information for loans with annual percentage rates above threshold levels (see below). The FFIEC makes raw HMDA Loan Application Register data available on CD-ROM; the data may also be downloaded from www.ffiec.gov.

Loans Included: This report examines only a particular portion of all loans included in HMDA data – those that are: 1) for a home purchase or refinance; 2) prime (rather than higher cost as in the previous reports); 3) conventional (rather than government-backed); 4) first-lien; 5) for a home that will be occupied by the borrower; and 6) for a site-built one- to four-family home. "Prime" first-lien mortgages are those for which the APR is less than three percentage points above the interest rate on a U.S. Treasury security of comparable maturity.

Neighborhood Composition: HMDA data makes it possible to classify loans by neighborhoods along racial/ethnic and income categories. For this report, census tracts are divided into those where people of color comprise 80-100 percent; 50-79 percent; 20-49 percent; 10-19 percent; or less than 10 percent of the total number of residents in the tract. In this report, census tracts where people of color comprise 80-100 percent of the residents are called "communities of color" or "neighborhoods of color," and census tracts where people of color comprise less than 10 percent of the residents are called "predominantly white" neighborhoods, communities or areas.

Selection of Top Four Bank Holding Company Lending Affiliates in 2006 and 2008: This report analyzes the mortgage lending of the top four bank holding companies (BHCs) and their lending affiliates. To determine the affiliates of these companies, we used the HMDA Lender File created by Robert Avery of the Board of Governors of the Federal Reserve System for the Federal Reserve's 2008 and 2006 HMDA reports, as well as the file in the annual HMDA data listing all of the reporting institutions. We first determined all of the affiliates of each BHC for 2008, and included affiliates of recently acquired institutions—Wachovia acquired by Wells Fargo and Countrywide and Merrill Lynch acquired by Bank of America. (JPMorgan Chase did not report the mortgage lending of its recent acquisition, Washington Mutual.) We then examined the 2006 HMDA reporters and included all of the affiliates using a variable in the Federal Reserve HMDA Lender File that categorizes lenders into their larger organizations (ORG06). We also included the recent acquisitions of these BHCs, even though they did not own them in 2006, to see how lending for the organization as whole changed between 2006 and 2008.

Cities: Metropolitan areas can be, and are, defined in many different ways for many different purposes. Each of the seven groups that participated in preparing this report defined its own metropolitan area in the way that it has found to be most useful for its own work. The notes to the individual metropolitan area tables in Appendix II provide information on the precise definitions of each city or metropolitan area included in this report.

Appendix II

Boston - All Lenders

Table 1) Change in loan origination volume for conventional, prime first lien loans on 1-4 family owner-occupied site built units, 2006 and 2008

Census Tract % Residents of Color	Home Purchase 2006	Home Purchase 2008	Home Purchase Change 2006 to 2008	Refinance 2006	Refinance 2008	Refinance Change 2006 to 2008
Less Than 10%	21,072	14,280	-32.2%	27,704	26,526	-4.3%
10% - 19.9%	9,073	6,360	-29.9%	9,492	8,698	-8.4%
20% - 49.9%	6,991	4,701	-32.8%	7,277	4,844	-33.4%
50% - 79.9%	1,816	1,328	-26.9%	2,255	1,038	-54.0%
80% or greater	572	442	-22.7%	1,267	371	-70.7%
Total	39,524	27,111	-31.4%	47,995	41,477	-13.6%

Table 2) Change in market composition for conventional, prime first lien loans on 1-4 family owner-occupied site built units, 2006 and 2008

Census Tract % Residents of Color	Home Purchase 2006	Home Purchase 2008	Refinance 2006	Refinance 2008
Less Than 10%	53.3%	52.7%	57.7%	64.0%
10% - 19.9%	23.0%	23.5%	19.8%	21.0%
20% - 49.9%	17.7%	17.3%	15.2%	11.7%
50% - 79.9%	4.6%	4.9%	4.7%	2.5%
80% or greater	1.4%	1.6%	2.6%	0.9%
Total	100%	100%	100%	100%

Note: there were only 10 loans in 2006 and 14 loans in 2008 for which no info on % Minority thus, "NA" row is omitted from these two tables.

Note: "Boston" is the Boston metropolitan area as defined by the federal government in 2003. This area consists of Essex, Middlesex, Norfolk, Plymouth, and Suffolk Counties.

Charlotte - All Lenders

Table 1) Change in loan origination volume for conventional, prime first lien loans on 1-4 family owner-occupied site built units, 2006 and 2008

Census Tract % Residents of Color	Home Purchase 2006	Home Purchase 2008	Home Purchase Change 2006 to 2008	Refinance 2006	Refinance 2008	Refinance Change 2006 to 2008
Less Than 10%	9,429	4,167	-55.8%	5,165	6,067	17.5%
10% - 19.9%	14,514	5,719	-60.6%	6,830	7,254	6.2%
20% - 49.9%	10,692	3,487	-67.4%	5,085	3,863	-24.0%
50% - 79.9%	2,675	861	-67.8%	1,627	843	-48.2%
80% or greater	793	201	-74.7%	576	197	-65.8%
NA	-	1	n/a	-	-	0.0%
Total	38,103	14,436	-62.1%	19,283	18,224	-5.5%

Table 2) Change in market composition for conventional, prime first lien loans on 1-4 family owner-occupied site built units, 2006 and 2008

Census Tract % Residents of Color	Home Purchase 2006	Home Purchase 2008	Refinance 2006	Refinance 2008
Less Than 10%	24.7%	28.9%	26.8%	33.3%
10% - 19.9%	38.1%	39.6%	35.4%	39.8%
20% - 49.9%	28.1%	24.2%	26.4%	21.2%
50% - 79.9%	7.0%	6.0%	8.4%	4.6%
80% or greater	2.1%	1.4%	3.0%	1.1%
NA	0.0%	0.0%	0.0%	0.0%
Total	100.0%	100%	100%	100.0%

Note: "Charlotte" is the Charlotte-Gastonia-Concord N.C.-S.C. Metropolitan Statistical Area as defined by the federal government in 2003. This area consists of five counties in N.C. (Anson, Cabarrus, Gaston, Mecklenburg, & Union plus York County in S.C.

Appendix II (cont'd)

Chicago - All Lenders

Table 1) Change in loan origination volume for conventional, prime first lien loans on 1-4 family owner-occupied site built units, 2006 and 2008

Census Tract % Residents of Color	Home Purchase 2006	Home Purchase 2008	Home Purchase Change 2006 to 2008	Refinance 2006	Refinance 2008	Refinance Change 2006 to 2008
Less Than 10%	23,079	11,142	-51.7%	24,234	26,553	9.6%
10% - 19.9%	25,865	11,698	-54.8%	26,567	27,796	4.6%
20% - 49.9%	29,189	12,892	-55.8%	29,706	27,843	-6.3%
50% - 79.9%	12,009	5,731	-52.3%	12,562	10,034	-20.1%
80% or greater	7,205	2,831	-60.7%	10,879	5,542	-49.1%
NA	1	1	0.0%	1	1	0.0%
Total	97,348	44,295	-54.5%	103,949	97,769	-5.9%

Table 2) Change in market composition for conventional, prime first lien loans on 1-4 family owner-occupied site built units, 2006 and 2008

Census Tract % Residents of Color	Home Purchase 2006	Home Purchase 2008	Refinance 2006	Refinance 2008
Less Than 10%	23.7%	25.2%	23.3%	27.2%
10% - 19.9%	26.6%	26.4%	25.6%	28.4%
20% - 49.9%	30.0%	29.1%	28.6%	28.5%
50% - 79.9%	12.3%	12.9%	12.1%	10.3%
80% or greater	7.4%	6.4%	10.5%	5.7%
Total	100.0%	100.0%	100%	100%

Note: "Chicago" consistes of Cook, DuPage, Lake, Kane, McHenry, and Will Counties

Cleveland - All Lenders

Table 1) Change in loan origination volume for conventional, prime first lien loans on 1-4 family owner-occupied site built units, 2006 and 2008

Census Tract % Residents of Color	Home Purchase 2006	Home Purchase 2008	Home Purchase Change 2006 to 2008	Refinance 2006	Refinance 2008	Refinance Change 2006 to 2008
Less Than 10%	13959	6698	-52.0%	10349	7220	-30.2%
10% - 19.9%	2673	1268	-52.6%	1882	1183	-37.1%
20% - 49.9%	1581	718	-54.6%	1238	612	-50.6%
50% - 79.9%	609	261	-57.1%	598	230	-61.5%
80% or greater	402	144	-64.2%	592	169	-71.5%
NA	2	2	n/a	3	1	0.0%
Total	19226	9091	-52.7%	14662	9415	-35.8%

Table 2) Change in market composition for conventional, prime first lien loans on 1-4 family owner-occupied site built units, 2006 and 2008

Census Tract % Residents of Color	Home Purchase 2006	Home Purchase 2008	Refinance 2006	Refinance 2008
Less Than 10%	72.6%	73.7%	70.6%	76.7%
10% - 19.9%	13.9%	13.9%	12.8%	12.6%
20% - 49.9%	8.2%	7.9%	8.4%	6.5%
50% - 79.9%	3.2%	2.9%	4.1%	2.4%
80% or greater	2.1%	1.6%	4.0%	1.8%
NA	0.0%	0.0%	0.0%	0.0%
Total	100.0%	100%	100%	100.0%

Note: "Cleveland" is the Cleveland Metropolitan Statistical Area, which consists of five counties: Cuyahoga, Geauga, Lake, Loraine, and Medina

Appendix II (cont'd)

Los Angeles - All Lenders

Table 1) Change in loan origination volume for conventional, prime first lien loans on 1-4 family owner-occupied site built units, 2006 and 2008

Census Tract % Residents of Color	Home Purchase 2006	Home Purchase 2008	Home Purchase Change 2006 to 2008	Refinance 2006	Refinance 2008	Refinance Change 2006 to 2008
Less Than 10%	261	161	-38.3%	414	291	-29.7%
10% - 19.9%	6,281	3,342	-46.8%	10,196	6,106	-40.1%
20% - 49.9%	22,357	12,275	-45.1%	37,652	18,876	-49.9%
50% - 79.9%	15,784	8,706	-44.8%	35,716	13,960	-60.9%
80% or greater	14,897	7,117	-52.2%	52,351	16,748	-68.0%
NA	80	134	67.5%	158	53	-66.5%
Total	59,660	31,735	-46.8%	136,487	56,034	-58.9%

Table 2) Change in market composition for conventional, prime first lien loans on 1-4 family owner-occupied site built units, 2006 and 2008

Census Tract % Residents of Color	Home Purchase 2006	Home Purchase 2008	Refinance 2006	Refinance 2008
Less Than 10%	0.4%	0.5%	0.3%	0.5%
10% - 19.9%	10.5%	10.5%	7.5%	10.9%
20% - 49.9%	37.5%	38.7%	27.6%	33.7%
50% - 79.9%	26.5%	27.4%	26.2%	24.9%
80% or greater	25.0%	22.4%	38.4%	29.9%
NA	0.1%	0.4%	0.1%	0.1%
Total	100.0%	100.0%	100%	100%

Note: "Los Angeles" is defined as the metro area consisting of Los Angeles County

New York - All Lenders

Table 1) Change in loan origination volume for conventional, prime first lien loans on 1-4 family owner-occupied site built units, 2006 and 2008

Census Tract % Residents of Color	Home Purchase 2006	Home Purchase 2008	Home Purchase Change 2006 to 2008	Refinance 2006	Refinance 2008	Refinance Change 2006 to 2008
Less Than 10%	2,255	1,717	-23.9%	2,001	1,211	-39.5%
10% - 19.9%	6,611	4,726	-28.5%	3,548	2,748	-22.5%
20% - 49.9%	14,677	11,925	-18.8%	6,885	4,726	-31.4%
50% - 79.9%	6,579	4,686	-28.8%	3,990	1,986	-50.2%
80% or greater	11,977	7,081	-40.9%	14,178	4,430	-68.8%
NA	3	5	66.7%	2		0.0%
Total	42,102	30,140	-28.4%	30,604	15,101	-50.7%

Table 2) Change in market composition for conventional, prime first lien loans on 1-4 family owner-occupied site built units, 2006 and 2008

Census Tract % Residents of Color	Home Purchase 2006	Home Purchase 2008	Refinance 2006	Refinance 2008
Less Than 10%	5.4%	5.7%	6.5%	8.0%
10% - 19.9%	15.7%	15.7%	11.6%	18.2%
20% - 49.9%	34.9%	39.6%	22.5%	31.3%
50% - 79.9%	15.6%	15.5%	13.0%	13.2%
80% or greater	28.4%	23.5%	46.3%	29.3%
NA	0.0%	0.0%	0.0%	0.0%
Total	100.0%	100%	100%	100.0%

Note: "New York City" consists of the following counties: Bronx, Kings (Brooklyn), New York (Manhattan), Queens and Richmond (Staten Island).

Appendix II (cont'd)

Rochester - All Lenders

Table 1) Change in loan origination volume for conventional, prime first lien loans on 1-4 family owner-occupied site built units, 2006 and 2008

Census Tract	Home Purchase			Refinance		
% Residents of Color	2006	2008	Change 2006 to 2008	2006	2008	Change 2006 to 2008
Less Than 10%	5453	3937	-27.8%	2820	2244	-20.4%
10% - 19.9%	1845	1336	-27.6%	829	575	-30.6%
20% - 49.9%	502	347	-30.9%	194	121	-37.6%
50% - 79.9%	220	152	-30.9%	69	35	-49.3%
80% or greater	53	34	-35.8%	48	14	-70.8%
NA	0	0	n/a	0	0	n/a
Total	8073	5806	-28.1%	3960	2989	-24.5%

Table 2) Change in market composition for conventional, prime first lien loans on 1-4 family owner-occupied site built units, 2006 and 2008

Census Tract	Home Purchase		Refinance	
% Residents of Color	2006	2008	2006	2008
Less Than 10%	67.5%	67.8%	71.2%	75.1%
10% - 19.9%	22.9%	23.0%	20.9%	19.2%
20% - 49.9%	6.2%	6.0%	4.9%	4.0%
50% - 79.9%	2.7%	2.6%	1.7%	1.2%
80% or greater	0.7%	0.6%	1.2%	0.5%
NA	0.0%	0.0%	0.0%	0.0%
Total	100.0%	100.0%	100%	100%

Note: "Rochester" is the Rochester NY Metropolitan Statistical Area as defined by the federal government in 2003. The area consists of five counties: Livingston, Monroe, Ontario, Orleans and Wayne.

Appendix III

Boston - Top Four Bank Holding Companies

Table 1) Change in loan origination volume for conventional, prime first lien loans on 1-4 family owner-occupied site built units, 2006 and 2008

Top Four Total	Home Purchase			Refinance		
% Residents of Color	2006	2008	Change 2006 to 2008	2006	2008	Change 2006 to 2008
Less Than 10%	5,366	3,339	-37.8%	5,909	6,433	8.9%
10% - 19.9%	2,638	1,808	-31.5%	2,222	2,417	8.8%
20% - 49.9%	2,275	1,511	-33.6%	1,937	1,568	-19.1%
50% - 79.9%	618	514	-16.8%	650	382	-41.2%
80% or greater	187	154	-17.6%	388	143	-63.1%
Total	11,084	7,326	-33.9%	11,106	10,943	-1.5%

Citigroup	Home Purchase			Refinance		
Census Tract % Residents of Color	2006	2008	Change 2006 to 2008	2006	2008	Change 2006 to 2008
Less Than 10%	556	238	-57.2%	748	595	-20.5%
10% - 19.9%	246	137	-44.3%	237	234	-1.3%
20% - 49.9%	190	95	-50.0%	174	155	-10.9%
50% - 79.9%	32	27	-15.6%	39	36	-7.7%
80% or greater	6	4	-33.3%	15	10	-33.3%
Total	1,030	501	-51.4%	1,213	1,030	-15.1%

Wells Fargo	Home Purchase			Refinance		
Census Tract % Residents of Color	2006	2008	Change 2006 to 2008	2006	2008	Change 2006 to 2008
Less Than 10%	1,880	959	-49.0%	1,470	1,278	-13.1%
10% - 19.9%	938	508	-45.8%	582	495	-14.9%
20% - 49.9%	655	368	-43.8%	479	296	-38.2%
50% - 79.9%	146	116	-20.5%	183	68	-62.8%
80% or greater	31	19	-38.7%	94	28	-70.2%
Total	3,650	1,970	-46.0%	2,808	2,165	-22.9%

Bank of America	Home Purchase			Refinance		
Census Tract % Residents of Color	2006	2008	Change 2006 to 2008	2006	2008	Change 2006 to 2008
Less Than 10%	2,599	1,715	-34.0%	3,151	3,408	8.2%
10% - 19.9%	1,277	965	-24.4%	1,233	1,295	5.0%
20% - 49.9%	1,299	883	-32.0%	1,150	877	-23.7%
50% - 79.9%	414	325	-21.5%	386	220	-43.0%
80% or greater	147	128	-12.9%	258	89	-65.5%
Total	5,736	4,016	-30.0%	6,178	5,889	-4.7%

JPMorgan Chase	Home Purchase			Refinance		
Census Tract % Residents of Color	2006	2008	Change 2006 to 2008	2006	2008	Change 2006 to 2008
Less Than 10%	331	427	29.0%	540	1,152	113.3%
10% - 19.9%	177	198	11.9%	170	393	131.2%
20% - 49.9%	131	165	26.0%	134	240	79.1%
50% - 79.9%	26	46	76.9%	42	58	38.1%
80% or greater	3	3	0.0%	21	16	-23.8%
Total	668	839	25.6%	907	1,859	105.0%

Note: Bank of America here includes Countrywide and Merrill Lynch lenders in both years.
Wells Fargo here includes Wachovia lenders in both years.

Charlotte - Top Four Bank Holding Companies

Table 1) Change in loan origination volume for conventional, prime first lien loans on 1-4 family owner-occupied site built units, 2006 and 2008

Top Four - Total	Home Purchase			Refinance		
% Residents of Color	2006	2008	Change 2006 to 2008	2006	2008	Change 2006 to 2008
Less Than 10%	3,468	1,751	-49.5%	1,624	2,916	79.6%
10% - 19.9%	4,879	2,388	-51.1%	2,054	3,667	78.5%
20% - 49.9%	3,482	1,661	-52.3%	1,504	2,030	35.0%
50% - 79.9%	820	404	-50.7%	473	468	-1.1%
80% or greater	274	106	-61.3%	123	108	-12.2%
NA	0	0	n/a	0	0	n/a
Total	12,923	6,310	-51.2%	5,778	9,189	59.0%

Citigroup	Home Purchase			Refinance		
% Residents of Color	2006	2008	Change 2006 to 2008	2006	2008	Change 2006 to 2008
Less Than 10%	68	22	-67.6%	43	85	97.7%
10% - 19.9%	101	66	-34.7%	58	94	62.1%
20% - 49.9%	67	38	-43.3%	39	50	28.2%
50% - 79.9%	23	18	-21.7%	12	12	0.0%
80% or greater	3	1	-66.7%	6	4	-33.3%
NA	0	0	n/a	0	0	n/a
Total	262	145	-44.7%	158	245	55.1%

Wells Fargo	Home Purchase			Refinance		
% Residents of Color	2006	2008	Change 2006 to 2008	2006	2008	Change 2006 to 2008
Less Than 10%	1,751	867	-50.5%	883	1,376	55.8%
10% - 19.9%	2,211	1,145	-48.2%	1,083	1,678	54.9%
20% - 49.9%	1,133	656	-42.1%	788	929	17.9%
50% - 79.9%	215	133	-38.1%	238	187	-21.4%
80% or greater	86	36	-58.1%	72	56	-22.2%
NA	0	0	n/a	0	0	n/a
Total	5,396	2,837	-47.4%	3,064	4,226	37.9%

Bank of America	Home Purchase			Refinance		
% Residents of Color	2006	2008	Change 2006 to 2008	2006	2008	Change 2006 to 2008
Less Than 10%	1,422	690	-51.5%	532	1,113	109.2%
10% - 19.9%	2,261	964	-57.4%	727	1,474	102.8%
20% - 49.9%	2,085	834	-60.0%	551	836	51.7%
50% - 79.9%	537	228	-57.5%	189	218	15.3%
80% or greater	173	60	-65.3%	40	42	5.0%
NA	0	0	n/a	0	0	n/a
Total	6,478	2,776	-57.1%	2,039	3,683	80.6%

JPMorgan Chase	Home Purchase			Refinance		
% Residents of Color	2006	2008	Change 2006 to 2008	2006	2008	Change 2006 to 2008
Less Than 10%	227	172	-24.2%	166	342	106.0%
10% - 19.9%	306	213	-30.4%	186	421	126.3%
20% - 49.9%	197	133	-32.5%	126	215	70.6%
50% - 79.9%	45	25	-44.4%	34	51	50.0%
80% or greater	12	9	-25.0%	5	6	20.0%
NA	0	0	n/a	0	0	n/a
Total	787	552	-29.9%	517	1,035	100.2%

Appendix III (cont'd)

Chicago - Top Four Bank Holding Companies

Table 1) Change in loan origination volume for conventional, prime first lien loans on 1-4 family owner-occupied site built units, 2006 and 2008

Top Four Total	Home Purchase			Refinance		
% Residents of Color	2006	2008	Change 2006 to 2008	2006	2008	Change 2006 to 2008
Less Than 10%	6,831	3,577	-47.6%	6,202	10,049	62.0%
10% - 19.9%	8,457	4,293	-49.2%	7,216	11,560	60.2%
20% - 49.9%	9,832	4,983	-49.3%	8,464	12,116	43.1%
50% - 79.9%	4,443	2,540	-42.8%	3,912	4,665	19.2%
80% or greater	2,534	1,267	-50.0%	3,593	2,728	-24.1%
NA	0	1	n/a	0	0	n/a
Total	32,097	16,661	-48.1%	29,387	41,118	39.9%

Citigroup	Home Purchase			Refinance		
Census Tract % Residents of Color	2006	2008	Change 2006 to 2008	2006	2008	Change 2006 to 2008
Less Than 10%	615	413	-32.8%	734	1,521	107.2%
10% - 19.9%	876	570	-34.9%	887	1,950	119.8%
20% - 49.9%	1,055	718	-31.9%	1,022	2,212	116.4%
50% - 79.9%	698	513	-26.5%	550	1,105	100.9%
80% or greater	510	314	-38.4%	461	592	28.4%
NA	0	0	n/a	0	0	n/a
Total	3,754	2,528	-32.7%	3,654	7,380	102.0%

Wells Fargo	Home Purchase			Refinance		
Census Tract % Residents of Color	2006	2008	Change 2006 to 2008	2006	2008	Change 2006 to 2008
Less Than 10%	2,460	1,103	-55.2%	1,565	2,124	35.7%
10% - 19.9%	2,866	1,213	-57.7%	1,827	2,426	32.8%
20% - 49.9%	2,971	1,253	-57.8%	2,265	2,257	-0.4%
50% - 79.9%	1,066	471	-55.8%	964	811	-15.9%
80% or greater	415	230	-44.6%	888	477	-46.3%
NA	0	0	n/a	0	0	n/a
Total	9,778	4,270	-56.3%	7,509	8,095	7.8%

Bank of America	Home Purchase			Refinance		
Census Tract % Residents of Color	2006	2008	Change 2006 to 2008	2006	2008	Change 2006 to 2008
Less Than 10%	2,668	1,102	-58.7%	2,421	3,447	42.4%
10% - 19.9%	3,564	1,465	-58.9%	2,895	4,182	44.5%
20% - 49.9%	4,520	1,719	-62.0%	3,373	4,543	34.7%
50% - 79.9%	1,956	822	-58.0%	1,414	1,524	7.8%
80% or greater	1,193	410	-65.6%	1,204	941	-21.8%
NA	0	0	n/a	0	0	n/a
Total	13,901	5,518	-60.3%	11,307	14,637	29.5%

JPMorgan Chase	Home Purchase			Refinance		
Census Tract % Residents of Color	2006	2008	Change 2006 to 2008	2006	2008	Change 2006 to 2008
Less Than 10%	1,088	959	-11.9%	1,482	2,957	99.5%
10% - 19.9%	1,151	1,045	-9.2%	1,607	3,002	86.8%
20% - 49.9%	1,286	1,293	0.5%	1,804	3,104	72.1%
50% - 79.9%	723	734	1.5%	984	1,225	24.5%
80% or greater	416	313	-24.8%	1,040	718	-31.0%
NA	0	1	n/a	0	0	n/a
Total	4,664	4,345	-6.8%	6,917	11,006	59.1%

Cleveland- Top Four Bank Holding Companies

Table 1) Change in loan origination volume for conventional, prime first lien loans on 1-4 family owner-occupied site built units, 2006 and 2008

Top Four - Total	Home Purchase			Refinance		
% Residents of Color	2006	2008	Change 2006 to 2008	2006	2008	Change 2006 to 2008
Less Than 10%	2,554	997	-61.0%	2,076	1,360	-34.5%
10% - 19.9%	448	164	-63.4%	387	227	-41.3%
20% - 49.9%	254	66	-74.0%	231	131	-43.3%
50% - 79.9%	84	28	-66.7%	160	55	-65.6%
80% or greater	44	7	-84.1%	133	44	-66.9%
NA	0	1	n/a	1	1	0.0%
Total	3,384	1,263	-62.7%	2,988	1,818	-39.2%

Citigroup	Home Purchase			Refinance		
% Residents of Color	2006	2008	Change 2006 to 2008	2006	2008	Change 2006 to 2008
Less Than 10%	69	46	-33.3%	95	155	63.2%
10% - 19.9%	8	11	37.5%	21	35	66.7%
20% - 49.9%	8	4	-50.0%	13	17	30.8%
50% - 79.9%	2	1	-50.0%	9	12	33.3%
80% or greater	0	0	n/a	4	6	50.0%
NA	0	0	n/a	0	0	n/a
Total	87	62	-28.7%	142	225	58.5%

Wells Fargo	Home Purchase			Refinance		
% Residents of Color	2006	2008	Change 2006 to 2008	2006	2008	Change 2006 to 2008
Less Than 10%	832	423	-49.2%	325	299	-8.0%
10% - 19.9%	147	76	-48.3%	54	35	-35.2%
20% - 49.9%	73	17	-76.7%	27	24	-11.1%
50% - 79.9%	23	3	-87.0%	28	14	-50.0%
80% or greater	10	4	-60.0%	20	5	-75.0%
NA	0	0	n/a	0	0	n/a
Total	1085	523	-51.8%	454	377	-17.0%

Bank of America	Home Purchase			Refinance		
% Residents of Color	2006	2008	Change 2006 to 2008	2006	2008	Change 2006 to 2008
Less Than 10%	1190	303	-74.5%	1059	456	-56.9%
10% - 19.9%	225	46	-79.6%	215	68	-68.4%
20% - 49.9%	113	31	-72.6%	133	53	-60.2%
50% - 79.9%	47	22	-53.2%	83	16	-80.7%
80% or greater	26	3	-88.5%	62	15	-75.8%
NA	0	0	n/a	0	0	n/a
Total	1601	405	-74.7%	1552	608	-60.8%

JPMorgan Chase	Home Purchase			Refinance		
% Residents of Color	2006	2008	Change 2006 to 2008	2006	2008	Change 2006 to 2008
Less Than 10%	463	225	-51.4%	597	450	-24.6%
10% - 19.9%	68	31	-54.4%	97	89	-8.2%
20% - 49.9%	60	14	-76.7%	58	37	-36.2%
50% - 79.9%	12	2	-83.3%	40	13	-67.5%
80% or greater	8	0	-100.0%	47	18	-61.7%
NA	0	1	n/a	1	1	0.0%
Total	611	273	-55.3%	840	608	-27.6%

Appendix III (cont'd)

Los Angeles - Top Four Bank Holding Companies

Table 1) Change in loan origination volume for conventional, prime first lien loans on 1-4 family owner-occupied site built units, 2006 and 2008

Top Four Total	Home Purchase			Refinance		
			Change			Change
% Residents of Color	2006	2008	2006 to 2008	2006	2008	2006 to 2008
Less Than 10%	129	78	-39.5%	144	162	12.5%
10% - 19.9%	3,097	1,791	-42.2%	3,513	3,399	-3.2%
20% - 49.9%	9,930	6,647	-33.1%	12,442	9,482	-23.8%
50% - 79.9%	6,529	4,916	-24.7%	11,933	7,045	-41.0%
80% or greater	5,858	4,218	-28.0%	17,855	8,832	-50.5%
NA	34	42	23.5%	65	28	-56.9%
Total	25,577	17,692	-30.8%	45,952	28,948	-37.0%

Citigroup	Home Purchase			Refinance		
Census Tract			Change			Change
% Residents of Color	2006	2008	2006 to 2008	2006	2008	2006 to 2008
Less Than 10%	8	7	-12.5%	19	25	31.6%
10% - 19.9%	278	146	-47.5%	284	471	65.8%
20% - 49.9%	661	590	-10.7%	908	1,290	42.1%
50% - 79.9%	546	648	18.7%	849	1,080	27.2%
80% or greater	599	663	10.7%	1,324	1,376	3.9%
NA	1	3	200.0%	4	5	25.0%
Total	2,093	2,057	-1.7%	3,388	4,247	25.4%

Wells Fargo	Home Purchase			Refinance		
Census Tract			Change			Change
% Residents of Color	2006	2008	2006 to 2008	2006	2008	2006 to 2008
Less Than 10%	37	25	-32.4%	54	45	-16.7%
10% - 19.9%	1,044	583	-44.2%	1,273	834	-34.5%
20% - 49.9%	3,114	1,819	-41.6%	4,544	2,335	-48.6%
50% - 79.9%	1,613	1,176	-27.1%	4,449	1,617	-63.7%
80% or greater	1,181	892	-24.5%	6,988	2,075	-70.3%
NA	18	16	-11.1%	28	8	-71.4%
Total	7,007	4,511	-35.6%	17,336	6,914	-60.1%

Bank of America	Home Purchase			Refinance		
Census Tract			Change			Change
% Residents of Color	2006	2008	2006 to 2008	2006	2008	2006 to 2008
Less Than 10%	65	41	-36.9%	53	71	34.0%
10% - 19.9%	1,487	823	-44.7%	1,652	1,584	-4.1%
20% - 49.9%	5,212	3,524	-32.4%	6,137	4,623	-24.7%
50% - 79.9%	3,649	2,596	-28.9%	5,883	3,495	-40.6%
80% or greater	3,372	2,239	-33.6%	8,659	4,442	-48.7%
NA	14	18	28.6%	29	12	-58.6%
Total	13,799	9,241	-33.0%	22,413	14,227	-36.5%

JPMorgan Chase	Home Purchase			Refinance		
Census Tract			Change			Change
% Residents of Color	2006	2008	2006 to 2008	2006	2008	2006 to 2008
Less Than 10%	19	5	-73.7%	18	21	16.7%
10% - 19.9%	288	239	-17.0%	304	510	67.8%
20% - 49.9%	943	714	-24.3%	853	1,234	44.7%
50% - 79.9%	721	496	-31.2%	752	853	13.4%
80% or greater	706	424	-39.9%	884	939	6.2%
NA	1	5	400.0%	4	3	-25.0%
Total	2,678	1,883	-29.7%	2,815	3,560	26.5%

New York - Top Four Bank Holding Companies

Table 1) Change in loan origination volume for conventional, prime first lien loans on 1-4 family owner-occupied site built units, 2006-2008

Top Four - Total	Home Purchase			Refinance		
			Change			Change
% Residents of Color	2006	2008	2006 to 2008	2006	2008	2006 to 2008
Less Than 10%	1,506	1,046	-30.5%	1,253	593	-52.7%
10% - 19.9%	4,675	3,042	-34.9%	2,623	1,599	-39.0%
20% - 49.9%	9,847	7,893	-19.8%	4,181	2,767	-33.8%
50% - 79.9%	3,699	2,802	-24.2%	1,952	1,079	-44.7%
80% or greater	5,840	4,497	-23.0%	5,871	2,248	-61.7%
NA	2	3	50.0%	0	0	n/a
Total	25,569	19,283	-24.6%	15,880	8,286	-47.8%

Citigroup	Home Purchase			Refinance		
			Change			Change
% Residents of Color	2006	2008	2006 to 2008	2006	2008	2006 to 2008
Less Than 10%	215	172	-20.0%	129	79	-38.8%
10% - 19.9%	1,083	542	-50.0%	330	319	-3.3%
20% - 49.9%	2,106	1,326	-37.0%	492	505	2.6%
50% - 79.9%	774	505	-34.8%	179	193	7.8%
80% or greater	1,379	960	-30.4%	397	311	-21.7%
NA	2	0	-100.0%	0	0	n/a
Total	5,559	3,505	-36.9%	1527	1407	-7.9%

Wells Fargo	Home Purchase			Refinance		
			Change			Change
% Residents of Color	2006	2008	2006 to 2008	2006	2008	2006 to 2008
Less Than 10%	512	374	-27.0%	478	219	-54.2%
10% - 19.9%	1,268	962	-24.1%	716	420	-41.3%
20% - 49.9%	2,545	2,463	-3.2%	1217	781	-35.8%
50% - 79.9%	1,013	830	-18.1%	803	324	-59.7%
80% or greater	1,417	1,158	-18.3%	2673	721	-73.0%
NA	0	1	n/a	0	0	n/a
Total	6,755	5,788	-14.3%	5887	2465	-58.1%

Bank of America	Home Purchase			Refinance		
			Change			Change
% Residents of Color	2006	2008	2006 to 2008	2006	2008	2006 to 2008
Less Than 10%	416	129	-69.0%	480	87	-81.9%
10% - 19.9%	1,153	320	-72.2%	1151	134	-88.4%
20% - 49.9%	2,604	979	-62.4%	1597	312	-80.5%
50% - 79.9%	859	369	-57.0%	575	178	-69.0%
80% or greater	1,690	818	-51.6%	1847	474	-74.3%
NA	0	0	n/a	0	0	n/a
Total	6,722	2,615	-61.1%	5650	1185	-79.0%

JPMorgan Chase	Home Purchase			Refinance		
			Change			Change
% Residents of Color	2006	2008	2006 to 2008	2006	2008	2006 to 2008
Less Than 10%	363	371	2.2%	166	208	25.3%
10% - 19.9%	1,171	1,218	4.0%	426	726	70.4%
20% - 49.9%	2,592	3,125	20.6%	875	1169	33.6%
50% - 79.9%	1,053	1,098	4.3%	395	384	-2.8%
80% or greater	1,354	1,561	15.3%	954	742	-22.2%
NA	0	2	n/a	0	0	n/a
Total	6,533	7,375	12.9%	2816	3229	14.7%

Appendix III (cont'd)

Rochester - Top Four Bank Holding Companies

Table 1) Change in loan origination volume for conventional, prime first lien loans on 1-4 family owner-occupied site built units, 2006 and 2008

Top Four Total	Home Purchase			Refinance		
% Residents of Color	2006	2008	Change 2006 to 2008	2006	2008	Change 2006 to 2008
Less Than 10%	1,226	987	-19.5%	561	477	-15.0%
10% - 19.9%	444	349	-21.4%	177	121	-31.6%
20% - 49.9%	120	96	-20.0%	38	30	-21.1%
50% - 79.9%	50	48	-4.0%	11	8	-27.3%
80% or greater	10	11	10.0%	9	1	-88.9%
NA	0	0	n/a	0	0	n/a
Total	1,850	1,491	-19.4%	796	637	-20.0%

Citigroup

Census Tract	Home Purchase			Refinance		
% Residents of Color	2006	2008	Change 2006 to 2008	2006	2008	Change 2006 to 2008
Less Than 10%	62	54	-12.9%	37	26	-29.7%
10% - 19.9%	30	12	-60.0%	9	8	-11.1%
20% - 49.9%	14	2	-85.7%	5	3	-40.0%
50% - 79.9%	6	2	-66.7%	1	0	-100.0%
80% or greater	3	0	-100.0%	1	0	-100.0%
NA	0	0	n/a	0	0	n/a
Total	115	70	-39.1%	53	37	-30.2%

Wells Fargo

Census Tract	Home Purchase			Refinance		
% Residents of Color	2006	2008	Change 2006 to 2008	2006	2008	Change 2006 to 2008
Less Than 10%	419	445	6.2%	116	172	48.3%
10% - 19.9%	127	161	26.8%	35	45	28.6%
20% - 49.9%	27	25	-7.4%	6	11	83.3%
50% - 79.9%	11	9	-18.2%	1	5	400.0%
80% or greater	1	1	0.0%	1	1	0.0%
NA	0	0	n/a	0	0	n/a
Total	585	641	9.6%	159	234	47.2%

Bank of America

Census Tract	Home Purchase			Refinance		
% Residents of Color	2006	2008	Change 2006 to 2008	2006	2008	Change 2006 to 2008
Less Than 10%	614	395	-35.7%	270	181	-33.0%
10% - 19.9%	236	160	-32.2%	68	40	-41.2%
20% - 49.9%	65	60	-7.7%	17	11	-35.3%
50% - 79.9%	24	29	20.8%	7	3	-57.1%
80% or greater	5	7	40.0%	4	0	-100.0%
NA	0	0	n/a	0	0	n/a
Total	944	651	-31.0%	366	235	-35.8%

JPMorgan Chase

Census Tract	Home Purchase			Refinance		
% Residents of Color	2006	2008	Change 2006 to 2008	2006	2008	Change 2006 to 2008
Less Than 10%	131	93	-29.0%	138	98	-29.0%
10% - 19.9%	51	16	-68.6%	65	28	-56.9%
20% - 49.9%	14	9	-35.7%	10	5	-50.0%
50% - 79.9%	9	8	-11.1%	2	0	-100.0%
80% or greater	1	3	200.0%	3	0	-100.0%
NA	0	0	n/a	0	0	n/a
Total	206	129	-37.4%	218	131	-39.9%