FAIR HOUSING IMPEDIMENTS ANALYSIS
2004

MONTGOMERY COUNTY
AND
THE CITY OF KETTERING

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1.0 INTRODUCTION

Montgomery County and the City of Kettering have completed this Analysis of Impediments to Fair Housing Choice (AI) as part of a comprehensive program developed by the Department of Housing and Urban Development (HUD) to assure that communities are meeting requirements "to affirmatively further fair housing" as set forth in the Community Development Block Grant (CDBG) Program. The goal of this analysis is to identify impediments to fair housing and provide recommendations that can be used to ameliorate any fair housing impediments.

This analysis was conducted for the County and City by Donald B. Eager and Associates, LLC (Consultant). The Consultant has used a variety of resources to prepare the analysis. A list of these resources is included in Appendix 1.

Throughout this document we use a number of technical terms related to US Census data, lending data and other information. To help the reader understand what these terms mean we have included in Appendix 2 Glossary of Key Terms.

2.0 FAIR HOUSING AND THE COMMUNITY

Fair Housing means that all citizens and non citizens of the United States can live where they want and can afford without regard to their race, color, national origin, sex, religion or because of their disability or have children in the family (familial status). Fair Housing is protected by federal, state and local laws in Montgomery County and The City of Kettering. Fair Housing law very broadly covers appraisal, renting, sale/buying, financing and insuring of housing.

The consequence of housing discrimination includes: the denial of housing in the area of choice; emotional harm and financial loss; denial of quality of an integrated community and associations; denial of expanding job opportunities in the suburbs; lack of access to greater choices of schools; negative attitudes toward the community; perpetuation of other housing problems and the loss of cultural diversity. Housing discrimination is rarely blatant. It is usually disguised and, more often than not, done with a smile and a handshake. It is important that each community guarantee its current and future residents that they will be able to live where they want and can afford.

Fair Housing is not only established by federal, state and local law, but through hundreds of court cases on every level. The cost of maintaining an effective fair housing program

can be funded through state and federal resources including Community Development Block Grant funds. Nondiscrimination in all aspects of housing - buying, selling, renting, financing, insuring, developing and regulating - is an established benefit and an essential foundation of the community.

2.1 Why Fair Housing is Important to the Community

Communities need to consider fair housing issues at least as importantly as economic and other issues. It is important to encourage residents to actively support and work toward an equal housing market. Housing discrimination tears at the very fabric of the community. It encourages an environment where disputes escalate, sends out a message of apathy, leads to segregated neighborhoods, perpetuates other housing problems and causes financial loss to the community through lost business opportunities. In assuring equal housing, a community makes its development and growth more successful.

The perceptions that fair housing laws are meant for "Blacks and Hispanics" or other minorities are misguided. Fair housing regulations protect every citizen and non-citizens of the United States, no matter their race, color, national origin, sex, religion, familial status (presence of children) or disability. These categories are known as protected classes. Because a community has a small minority population, it does not mean they do not have impediments to fair housing within their community. A good way to recognize impediments is to ask some simple questions:

- ✓ How does the rental market treat families with children, especially single parents?
- ✓ What access do individuals with physical or mental disabilities have to housing?
- ✓ Are regulations designed in a way that limit access to housing for protected classes?
- ✓ What image does the community convey to the outside world? Are the models used to market the community representative of all races?
- ✓ Do some areas within the community have a reputation that would discourage low-moderate income persons or protected classes from attempting to live there?
- ✓ With the pressure of a growing urban area, are minorities or low to moderate-income persons unable to consider significant areas in their housing search because there is no affordable housing?
- ✓ Are any potential home owners eliminating some affordable areas of the community because they would not be able to refinance or obtain adequate home owner's insurance?
- ✓ Are some affordable areas of the community eliminated because there is inadequate access by public transportation?

It is important for Montgomery County and the City of Kettering to consider fair housing law as a guaranteed protection for all people. Only then can the community help its residents share in an important part of the American Dream - living where they choose, without regard to factors that may negatively impact upon them because of race, color, religion, national origin, sex, familial status or disability.

2.2 The Analysis of Impediments to Fair Housing Choice (AI)

Montgomery County and the City of Kettering have already completed an important part of its review of the "health" of the community through the development of its Consolidated Plan for Housing Activities. The AI is the next logical step and part of the ongoing process of community development. Its goal is to make recommendations on how to improve the current situation. The recommendations will assist in developing a Fair Housing Action Plan that will be a cooperative part of the Comprehensive Plan. It is a requirement of the Community Development Block Grant Program that recipients undertake this review and it is one that must be taken seriously.

The AI includes: a demographic and economic profile of the community; a review of activities and issues concerning the local housing industry; a review of local lenders, zoning and housing regulations; current fair housing programs; and, identification of impediments to fair housing choice. The purpose of this analysis is to make the Montgomery County and the City of Kettering, as well as the public, aware of the fair housing issues that are facing their community and to develop strategies to address those issues. This analysis also helps develop an ongoing process for identifying fair housing concerns and problems in Montgomery County and city of Kettering. It is useful in developing a means to inform the citizens of the community about their fair housing rights and responsibilities.

3.0 HOUSING MARKET AND NEEDS ASSESSMENTS

See Maps 1-3

The strengths and weaknesses of a community are the culminations of years of tradition, growth and change. The resulting conditions have implications for the housing and community development needs of a community. The following report provides an overview of significant conditions and trends. It helps to clarify the housing and community development needs and the approaches the County and City will need to take in order to address those needs.

Map 1 shows Montgomery County by jurisdiction. Maps 2 and 3 shows the County and City of Kettering by census tract. These are included since much of the statistical analysis and

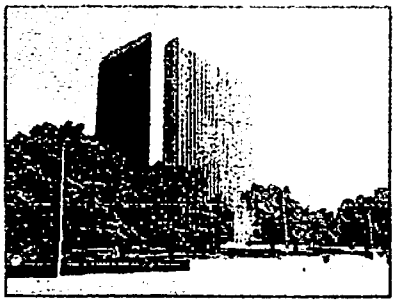
review of income, demographic and other vital data utilizes census tracts and is more helpful if the reader is familiar with the layout of these tracts.

It should be noted that the boundaries for individual census tracts between the years 1990 and 2000 may differ as it relates to Montgomery County and the Cities of Dayton and Kettering. For the purposes of this report, the breakdown of census tracts is as follows: Montgomery County is shown to consist of seventy (70) census tracts, the City of Dayton with fifty-three (53) census tracts in 1990 and fifty-two (52) census tracts in 2000 and the City of Kettering with twenty-three (23) census tracts. In addition, all locales will be addressed separately. Comparisons were made against the same numbered census tracts and/or boundaries wherever possible in order to preserve the integrity of this report. Also, the data may indicate that a category either is nonexistent or falls below the threshold in terms of measurement.

3.1 Location and Size of the Community

Montgomery County

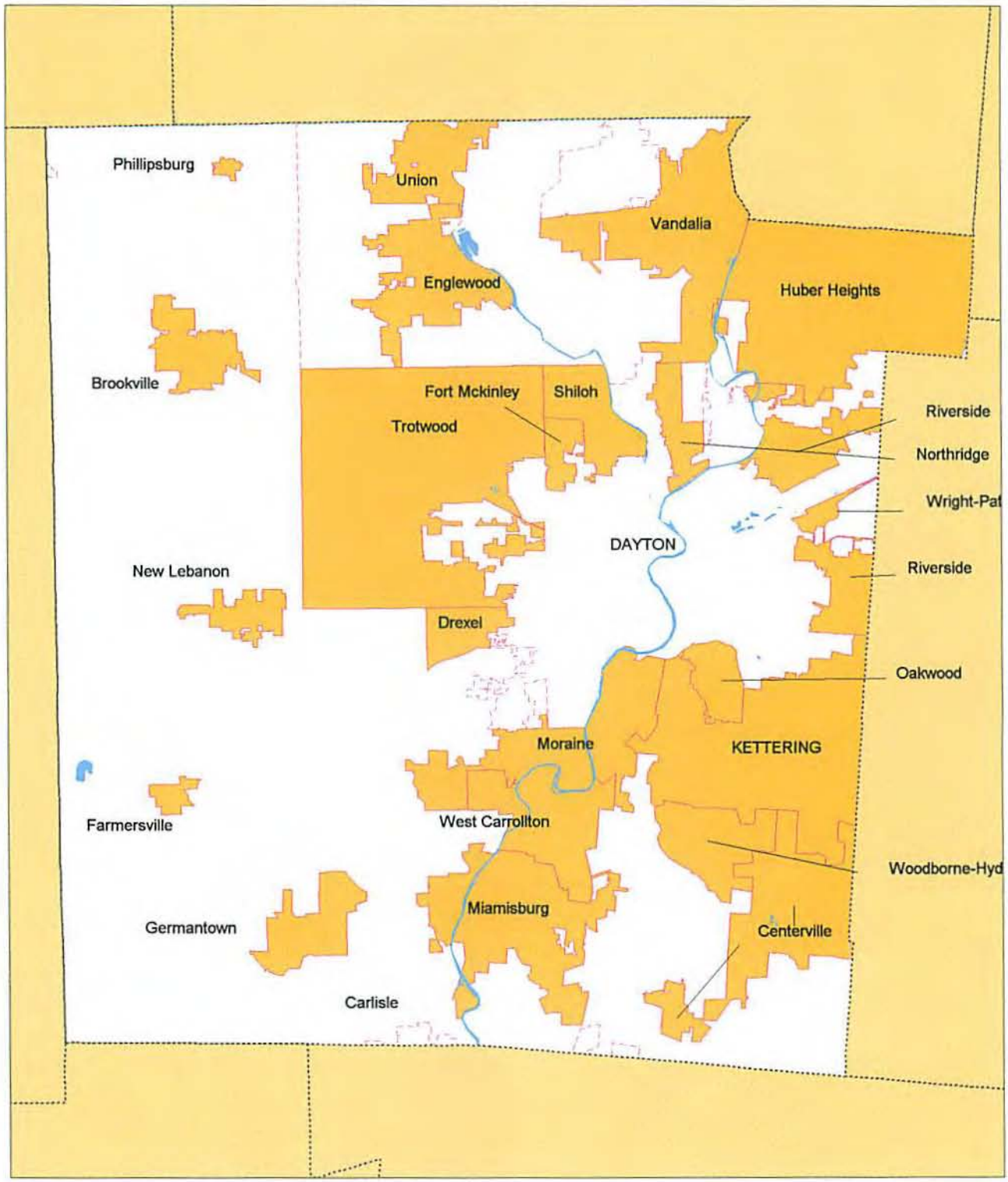
In March 1803, after the admission of Ohio into the Union, Hamilton County was divided and in May 1803, Montgomery County was officially chartered by Act. Montgomery County is the fourth largest in Ohio comprising approximately 461.7 square miles and is located in the southwestern portion of the state. It is bordered by Miami County to the north, Clark County to the northeast and Darke County to the Northwest, Green County to the east and Clinton County to the southeast, Warren County to the the south and Butler County to the southwest and Preble County to the west. It originally consisted of fourteen (14) Townships with the County seat in the City of Dayton but today, due to annexation, there are now ten (10) Townships.[1]



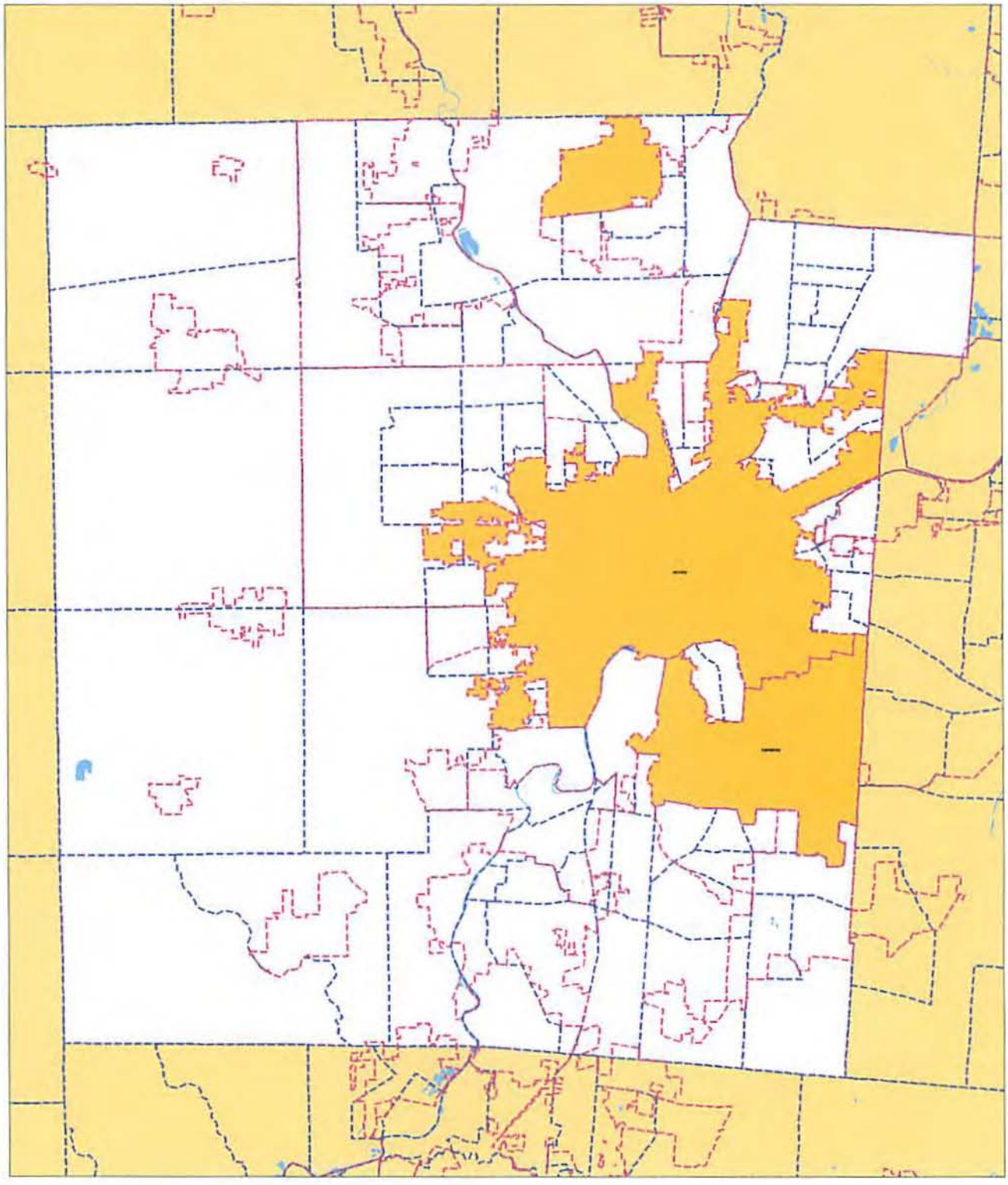
The County is accessible by Interstate Highways 70, 75 and 675, U.S. Routes 35 and 40 and State Routes 4, 48, 49, 201, 202 and 725.

[1] www.odod.state.oh.us/research

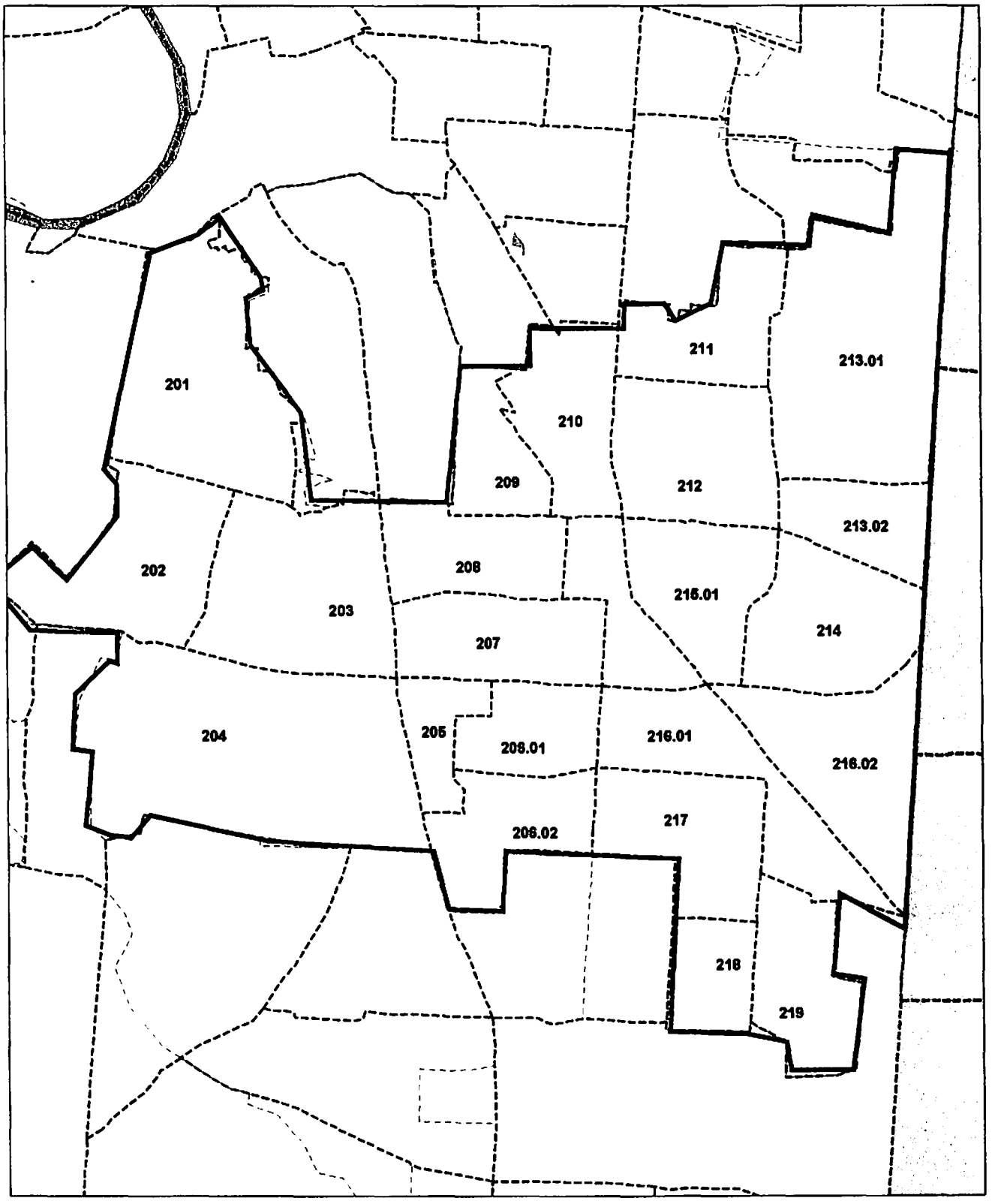
Map 1: Montgomery County by Jurisdictions



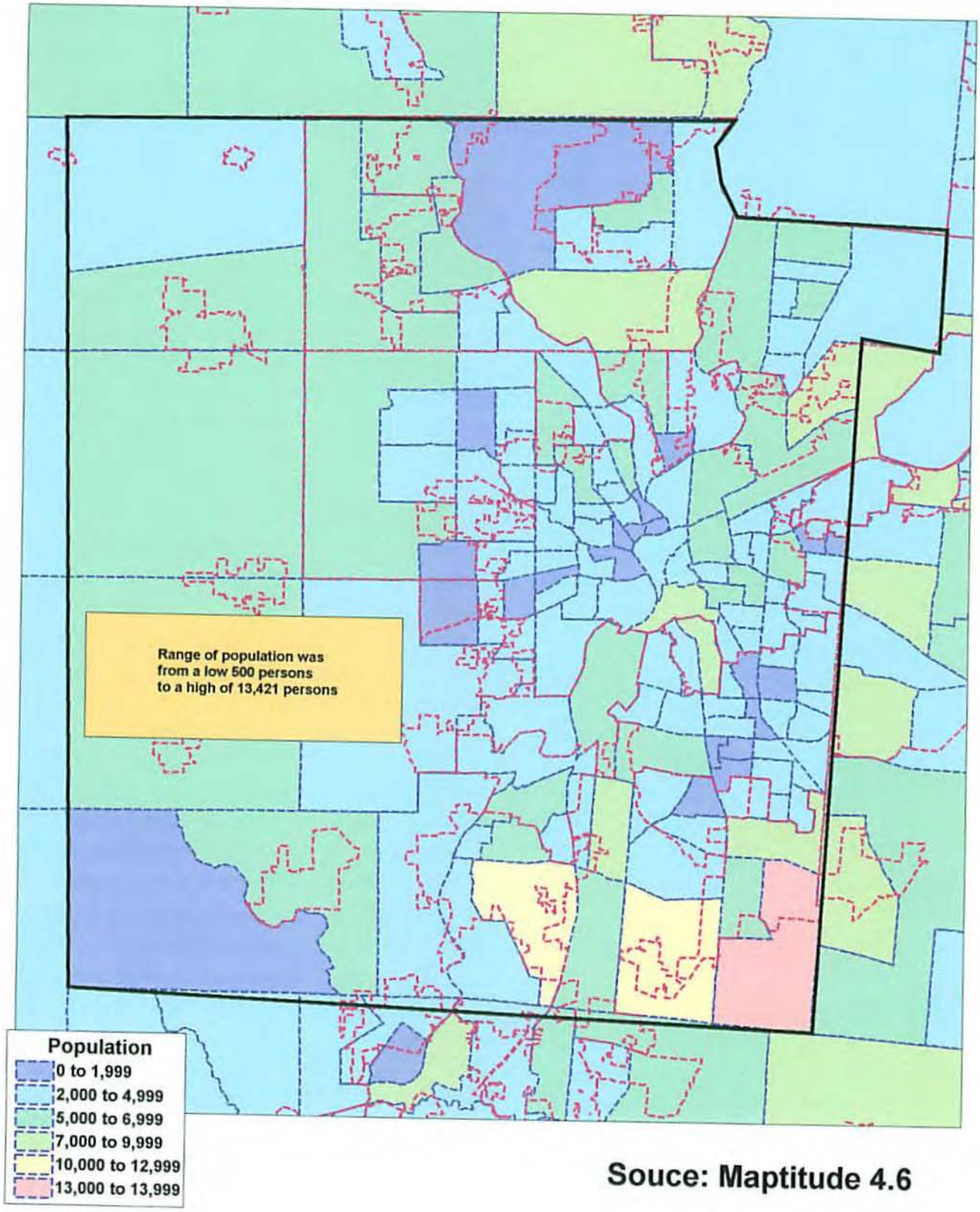
Map 2: Montgomery County By Census Tract



Map 3: The City of Kettering by Census Tract



MAP 4: Population 2000 Montgomery County



Souce: Maptitude 4.6

The Main rivers that flow through the County are the Great and Little Miami Rivers, the Mad River, Stillwater River, Twin Creek and Wolf Creek.[2]

Montgomery County, the home of the Wright Brothers, is the Birthplace of Aviation. Primary employers in the County are those in the manufacturing and service related fields. These include Wright Patterson Air Force Base, Delphi Corporation, General Motors Corporation, NCR Corporation, Reynolds & Reynolds Company, University of Dayton and Kettering Medical Center. In addition, the County serves as the world headquarters for many fortune 500 companies.[3]

It is also known for the Miami-Erie Canal which reached the County seat of Dayton from Cincinnati in 1829 and fueled tremendous growth in the region for many years until the railroad made the canal obsolete in 1910.[4]

Today, Montgomery County is known for its natural resources, abundant open space, vibrant arts, cultural events and abundant regional activities which make it a destination for companies, families and tourists.

The following is the breakdown of the public, special needs and vocational schools in those census tracts of Montgomery County covered by this report and excluding those census tracts in the Cities of Dayton and Kettering which are covered separately:

The Montgomery County school system consists of six (6) different school districts with fifty-three (53) elementary schools, eighteen (18) middle schools, one (1) junior high school, fourteen (14) high schools, one (1) vocational/career school and seven (7) private schools. Student enrollment in the school districts ranges from one-thousand (1,000) to four-thousand (4,000).[5]

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[2] cewww.metroparks.org/maps

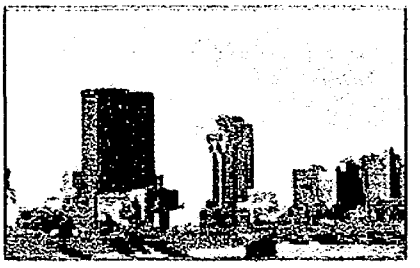
[3] www.mcohio.org

[4] www.geocities.com/heartland

[5] www.montgomery.k12.oh.us

The City of Dayton

The City of Dayton is located at the confluence of the Great Miami, Stillwater and Mad Rivers and Wolf Creek. It is the County seat of Montgomery County and consists of a total area of 56.8 square miles. The City of Dayton was founded April 1, 1796, was Incorporated February 12, 1805 and was granted its charter on March 8, 1841. The City of Dayton was the first (1st) large city in America to adopt a Commission-Manager form of government. The government structure of the City of Dayton is a City Commission which is composed of five (5) citizen members, elected at-large for a four (4) year overlapping term and a Mayor who is elected separately and who serves as the chairperson of the City Commission. The City Manager is appointed by the City Commission who holds the administrative authority over city government.[6]



In the City of Dayton there are twenty-two (22) elementary schools, four (4) middle schools, six (6) high schools and two (2) special needs schools.[7] In addition, there are thirteen (13) charter schools and thirty-three (33) private schools.[8]

The City of Dayton is accessible by Interstates 75 and 675 which run north/south and Interstate 70 and U.S. Highway 35 which run east/west. In addition, State Routes 4, 48, 49, 201, 202 allow the City of Dayton to be easily accessible.

The City of Kettering

The City of Kettering is located approximately five and one-half (5.5) miles southeast of the City of Dayton and covers approximately 18.7 square miles of land area. The City of Kettering was founded in 1852, incorporated and became a village in 1952 and a city in 1955.

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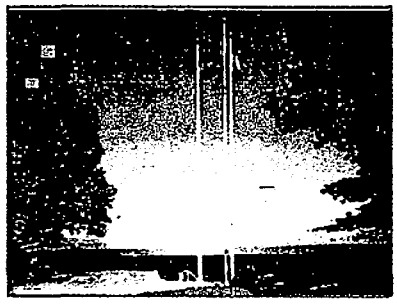
[6] www.en.wikipedia.org

[7] www.dps.k12.oh.us/schools

[8] www.greatschools.net

The government structure of the City of Kettering is by a Home Rule Charter and a Council-Manager form of government with the Mayor serving as its principal representative and spokesperson. The Council members are elected for four (4) year terms and the council is the chief policymaking body of the City of Kettering. It is responsible for appointing the City Manager to direct the city's administrative affairs and responsible for the appointments to the city's many boards and commissions. In addition, a Vice-Mayor is elected by the City Council for a two-year term.



The City of Kettering has nine elementary schools, two middle schools and one high school with a total enrollment of approximately 8,000 students. Several parochial and private schools operate within Kettering including three Catholic elementary schools and one Catholic high school. Two other private schools serve children Pre K through third grade and Pre K through fourth grade. In addition, two Montessori schools operate in the City of Kettering as well.

Population: Montgomery County and the Cities of Dayton and Kettering

See Map 4

Table 3.0 shows the total population of Montgomery County, not including the Cities of Dayton and Kettering. The total population for all of Montgomery County is in a parenthesis. The populations for the cities of Dayton and Kettering represent the total population by for those respective cities.

Table 3.0: Population of Montgomery County and the Cities of Dayton and Kettering, 1990-2000

Location	1990	2000
Montgomery County	303,638 (573,809)	335,381 (559,062)
City of Dayton	206,808	166,179
City of Kettering	60,569*	57,502

Source: *City of Kettering Planning & Development - 1990
American FactFinder - U.S. Census Bureau - 2000

3.2 Minorities and Race

The 2000 distribution by race within Montgomery County and the cities of Dayton and Kettering is shown in Table 3.1. The figures for Montgomery County as shown in the table include Dayton and Kettering. Montgomery County only figures do not include Dayton or Kettering.

See Maps 5-14

The minority (Blacks, Asian, American Indian and Hispanic) composition of individual census tracts by race for the years 1990 and 2000 in the City of Kettering is shown in Table 3.2 and information by tract is shown for Montgomery County (minus Kettering and Dayton) in Table 3.3. Corresponding maps are provided for comparison purposes.

At 45.6%, the City of Dayton has the largest minority population in the County. The City of Kettering has a 4.4% minority population. While the minority population of Montgomery County, including the Cities of Dayton and Kettering, is just less than 23%, 12.5% of the minority population is in Montgomery County, excluding the Cities of Dayton and Kettering.

It should be noted that when the discussion is regarding a high percentage increase in the minority population a comparison should be made to the actual number of the population in question. A population of Blacks for example that is 10 in 1990 and increases to 20 in 2000 is a 100% increase. This may seem high but the growth is only 10 persons.

Table 3.1: Distribution by Race Within Montgomery County and the Cities of Dayton and Kettering, 2000

LOCATION	WHITE	BLACK	AM. INDIAN	ASIAN	HISPANIC	% MIN.	TOTAL
Montgomery County	428,084 (76.6%)	111,030 (19.9)	852 (0.2%)	7,341 (1.3%)	7,096 (1.3%)	22.7	554,403
City of Dayton	88,676 (53.4%)	71,668 (43.1)	323 (0.3)	1,241 (0.6%)	2,686 (1.6%)	45.6	116,179
City of Kettering	54,757 (95.2%)	955 (1.7%)	105 (0.2%)	795 (1.4%)	640 (1.1%)	4.4	57,502
Montgomery County Only	284,651 (74.7%)	38,407 (10.1%)	424 (0.1%)	5305 (1.4%)	3770 (0.9%)	12.5	380,722

Source: American FactFinder - U.S. Census Bureau - 2000

Blacks are by far the largest minority population. Again the bulk of this population resides in the City of Dayton (43.1%), with 10.1% living in the County outside of Dayton and Kettering. Kettering had a black population of 1.7%.

It should be noted that in the tables in this report the indication for Montgomery County does not include the Cities of Kettering and Dayton unless otherwise noted.

Table 3.2: Minority Population, City of Kettering 1990-2000

TRACT	2000 POP. MINORITY	1990 POP. MINORITY	PERCENT CHANGE
201	3.72	2.20	69.0%
202	6.15	1.22	404.1%
203	2.68	0.88	204.6%
204	6.20	2.96	109.5%
205	4.37	2.97	47.1%
206.01	2.83	2.49	13.7%
206.02	2.80	5.34	-47.6%
207	2.92	2.67	9.4%
208	2.79	2.87	-2.8%
209	3.74	1.38	171.0%
210	3.62	6.57	-44.9%
211	5.26	3.00	75.3%
212	5.14	1.02	403.9%
213.01	2.26	3.32	-31.9%
213.02	2.64	3.98	-33.7%
214	4.12	1.67	146.7%
215.01	4.55	1.70	167.6%
215.02	4.66	1.51	208.6%
216.01	4.45	2.17	105.0%
216.02	2.81	3.53	-20.4%
217	4.73	2.07	128.5%
218	15.75	3.24	386.1%
219	3.12	1.95	60.0%

In the City of Kettering census tract 218 had the largest minority population in 2000. (See Map 2 for tract reference) The tract experienced a 386.1% increase in minority population between 1990 and 2000.

Six of the City's tracts experienced a decrease in minority population between 1990 and 2000. Tract's 206.02, 208, 210, 213.01, 213.02 and 216.02. Tract 206.02 had the largest decrease in minority population at -47.6% between 1990 and 2000.

As can be seen on the maps, tracts to the west of Dayton are experiencing the greatest change. This can possibly be attributed to the growth in minority population in the adjoining tracts during the 10-year period.

However, growth in minority population has not necessarily moved the minority population to new tracts, as can be seen by comparing maps from 1990 to 2000. Migration of minorities has been limited in the County and the City of Kettering. (Table 3.3)

In 1990 those tracts in western Dayton and adjacent in the County increased in the percent of minority but there was no growth of minorities further west. (Tract's 701.01 and 601) There was some growth in minority population to the north in tracts 1201.01, 1201.02 and 1201.03.

It was thought that during the 10-year period between the census there would have been signs that the minority population in the County would have found new areas to live rather than remaining in place.

There are various reasons this did not occur, the hope was that interest rates, at an all time low in the late 1990's to the present, would have resulted in an increase in home buyers and a dispersal of the minority population.

The goal of fair housing is not just the right to live where one wants and can afford but also to see a broader range of housing choices and locations fort minorities as well as Whites.

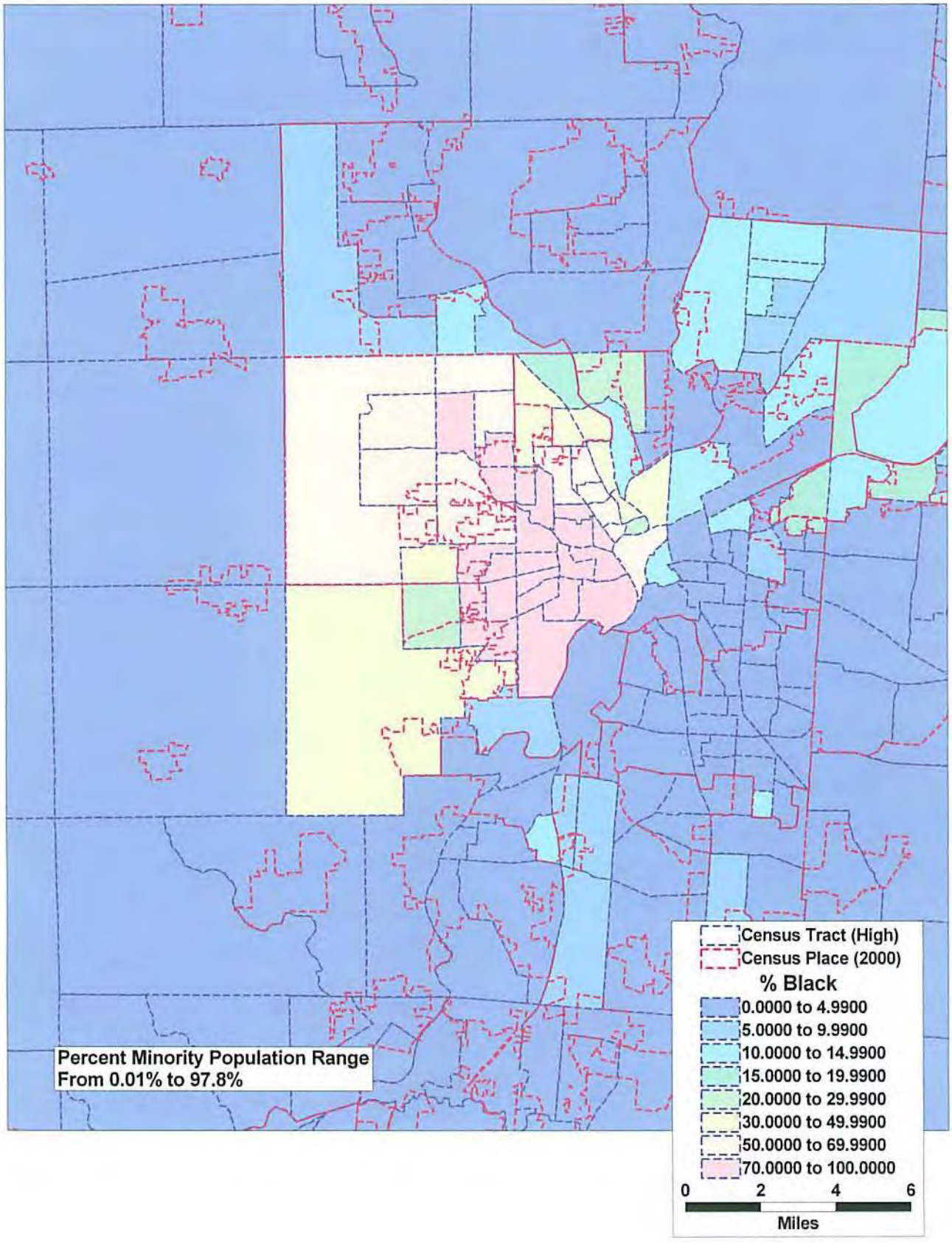
The City of Dayton plays a dominant role in the issues of race for the County and for the City of Kettering. It is obvious from the maps that show population by race that the overwhelming majority of minorities live in the City of Dayton.

While we discuss that segregation exists in the County, the City of Kettering and Dayton it is not unique to these jurisdictions. Ohio has two of the ten most segregated cities in America, Cleveland and Cincinnati. A study conducted in 2004 indicated that more than 77%of the Blacks living in the City would have to move for Cleveland to obtain integration. The City of Dayton had a segregation score of 71.5%.

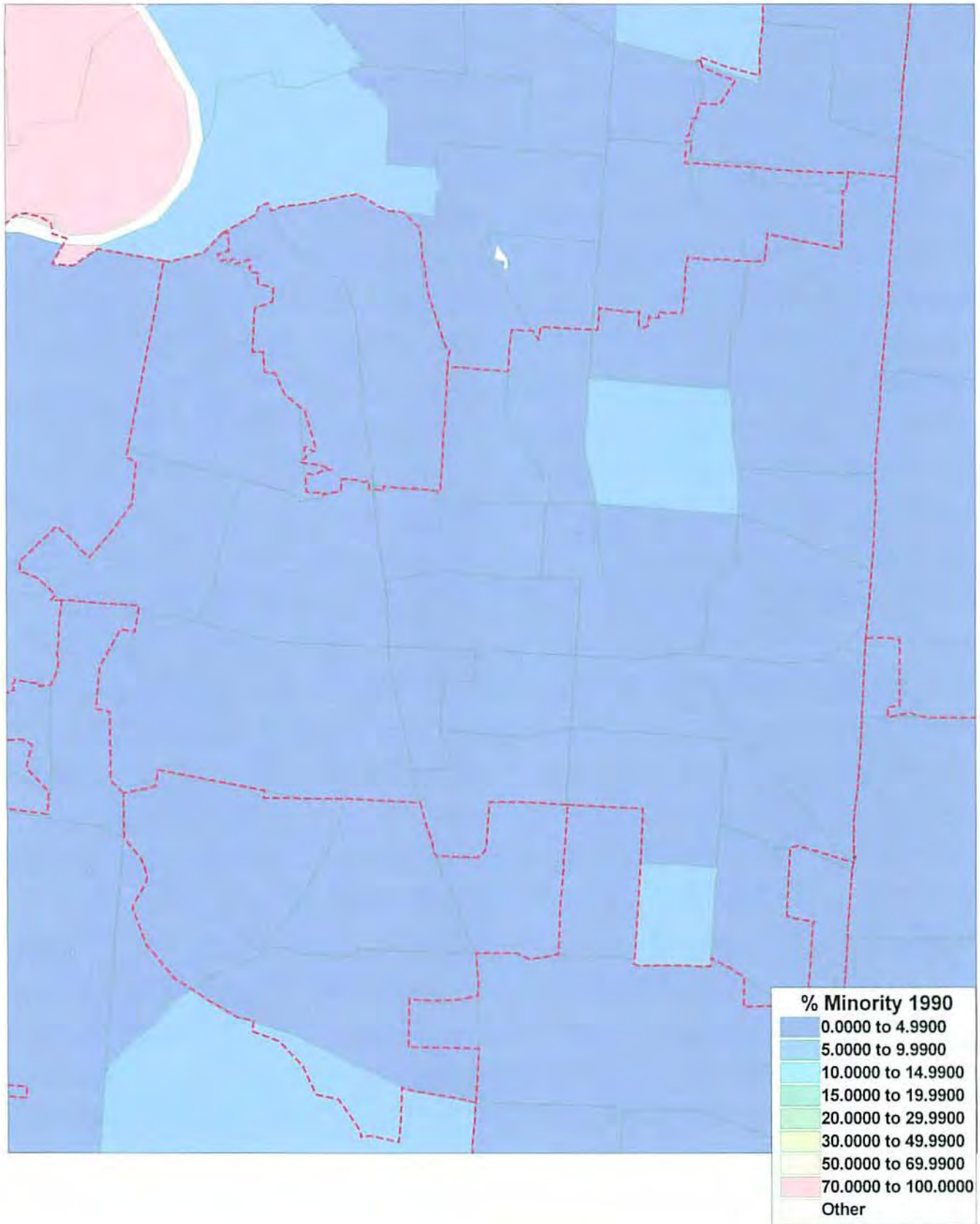
It is important that policies for both the County and the City of Kettering encourage development of housing that would be affordable and Not in My Backyard (NIMBY) issues do not interfere with housing choice.

NIMBY is the response that often comes when a developer or community announces that they will build affordable, low-moderate income or group home in a neighborhood or suburb. Residents in the neighborhood rise up to protest the perceived notions that such a housing development or program will drastically hurt their property values, overcrowd the neighborhood, cause an increase in crime and other concerns. It is especially prevalent in the development of group homes for the disabled or individuals' recovery from various addictions. This attitude can drastically impact the ability of local governments to

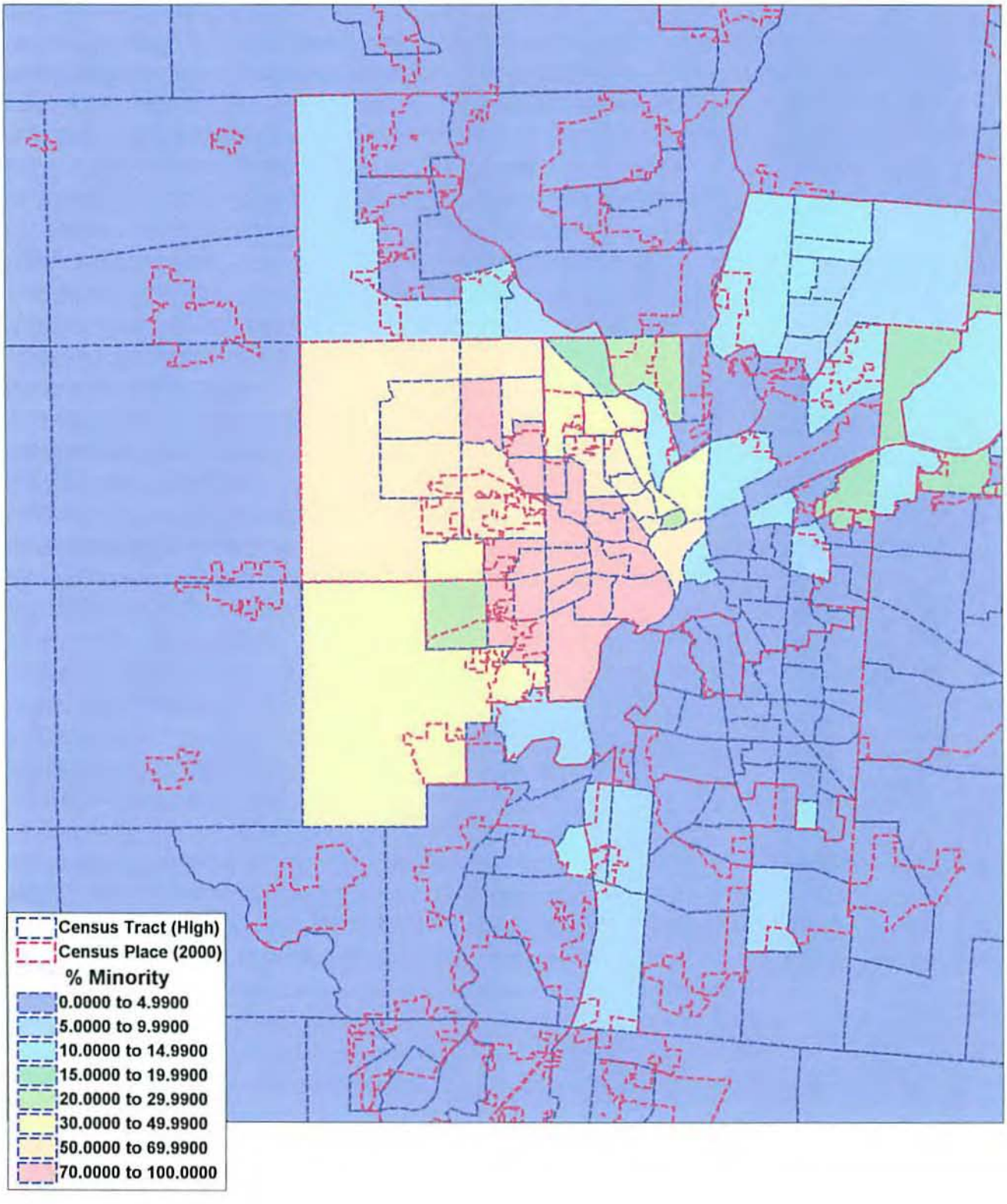
Map 5: Percent Minority Population Montgomery County



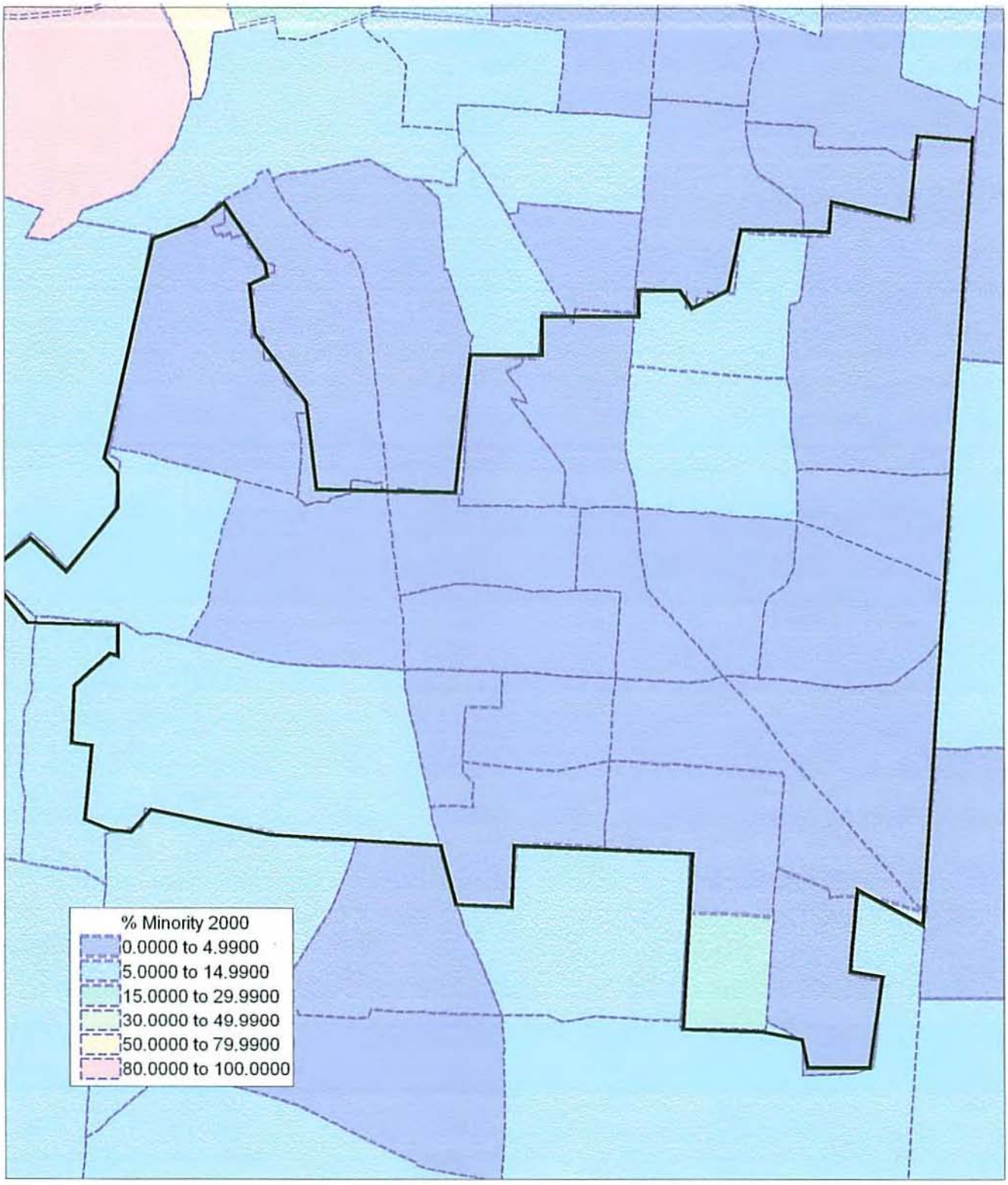
Map 6: Minority Population 1990 City of Kettering



Map 6: % Minority Population Montgomery County - 2000



Map 8: City of Kettering Percent Minority 2000



Source: Maptitude 4.6

plan and produce housing for those who cannot afford to buy or rent market rate housing as the demand for such housing increases. (Appendix 5 includes a document on the myths and facts regarding NIMBY)

According to the Montgomery County FY2003-2007 Consolidated Plan there are three areas with high minority population concentration. Trotwood at 61.4%, Harrison Twp. at 30.4% and Jefferson Twp. at 55.9%. Table 3.4 shows the areas of minority concentration according to the Consolidated Plan.[9]

Table 3.4 shows the population by race (excluding Whites) for the Montgomery County area, excluding Dayton and Kettering. In Montgomery County those tracts close or overlapping into the City of Dayton showed the highest percentage of Black population. Tract's 601.00 through 805.00 had the highest percent of Black population ranging from 22.29% to 82.06%.

[9] Montgomery County FY 2003-2007 Consolidated Plan, Table 1, page 36

Table 3.3: Minority Population by Tract Montgomery County - (Excluding Dayton & Kettering*)

CENSUS TRACT	1990% MINORITY	CENSUS TRACT	2000% MINORITY
1	66.06		
25	8.17	25	10.32
101	0.00	101	2.83
102	1.37	102	2.70
204	3.53	204	6.20
301	1.73	301	9.31
302	10.67	302	9.37
401.01	0.65	401.01	2.61
401.02	4.09	401.02	6.07
401.03	2.15	401.03	3.12
402.01	4.69	402.01	5.96
402.02	3.24	402.02	8.39
403.03	3.94	403.01	6.52
403.03	1.63	403.02	8.41
404.01	6.63	404.01	6.61
404.02	5.61	404.02	10.24
501.01	3.10	501.01	8.83
501.02	4.71	501.02	9.88
501.03	9.38	501.03	14.45
503.01	2.56	503.01	3.01
503.02	0.97	503.02	1.98
503.03	6.80	503.03	16.07
504.01	2.22	504.01	2.54
504.02	0.78	504.02	1.83
505.01	1.81	505.01	5.56
505.02	0.50	505.02	1.71
506	2.69	506	1.21
601	45.03	601	41.01
602	26.45	602	30.77
603	88.25	603	83.47
701.01	38.53	701.01	56.39
701.02	36.83	701.02	60.34
702.01	37.49	702.01	31.94
702.02	74.45	702.02	80.95
703	62.95	703	67.99
704	32.18	704	53.66
705	51.77	705	70.17
706	73.87	706	77.71
707	43.97	707	64.72
801	33.45	801	51.00
802	6.18	802	17.81
803	21.50	803	39.67
804	22.90	804	44.32
805	17.24	805	23.78
806	0.42	806	1.51
807	1.44	807	0.56
903.01	12.07	903.01	16.03
903.02	3.26	903.02	5.99
904	25.14	904	26.24
906	7.02	906	8.59
907	5.69	907	8.75
908	7.23	908	8.07
909	4.39	909	5.42
910	0.88		
1001.01	11.34	1001.01	16.89
1001.02	13.35	1001.02	16.89
1002.01	10.18	1002.01	14.76
1002.02	13.33	1002.02	15.72
1002.03	7.26	1002.03	13.00
1003.01	7.72	1003.01	12.06
1003.02	8.11	1003.02	10.39
1004	6.04	1004	9.78
1101	1.45	1101	1.85
1102	2.82	1102	6.19
1150.02	0.92	1150.02	2.90
1150.11	2.07	1150.11	2.52
1150.12	1.38	1150.12	4.73
1201.01	0.94	1201.01	11.57
1201.02	7.93	1201.02	13.63
1201.03	7.25	1201.03	13.36
1250	2.47	1250	2.56
1251.01	2.94	1251.01	7.46
1251.02	3.03	1251.02	6.31
1301	0.62	1301.01	1.94
		1301.02	1.08
1401	0.38	1401	1.12
1501	0.96	1501	1.28
1601	0.00	1601	0.63
1650	1.96	1650	1.64

Source: American FactFinder - U.S. Census Bureau - 1990 & 2000

*Some Dayton tracts are shown that overlap into Montgomery County. Tracts with no information in 2000 are tracts that changed with that census.

Table 3.4: Composition of Census Tracts by Race within Montgomery County 2000

CENSUS TRACT	% BLACK	% HISPANIC	% ASIAN	% AM. INDIAN
25	6.58	0.02	1.55	0.22
101	0.14	0.02	0.91	0.05
102	0.57	0.01	0.99	0.07
204	2.14	0.01	2.78	0.30
301	4.54	0.02	2.51	0.48
302	7.89	0.00	0.76	0.26
401.01	0.93	0.01	0.94	0.05
401.02	1.35	0.01	3.53	0.14
401.03	0.97	0.01	1.47	0.04
402.01	0.47	0.01	4.46	0.07
402.02	2.41	0.02	4.23	0.14
403.01	1.78	0.01	3.64	0.12
403.02	6.06	0.01	1.26	0.11
404.01	2.74	0.01	2.84	0.16
404.02	3.66	0.02	4.87	0.13
501.01	5.82	0.01	2.19	0.09
501.02	5.05	0.01	3.37	0.04
501.03	6.82	0.01	6.09	0.10
503.01	1.26	0.01	0.65	0.11
503.02	0.93	0.00	0.42	0.24
503.03	10.65	0.03	1.76	0.27
504.01	1.06	0.01	0.65	0.15
504.02	0.66	0.01	0.31	0.12
505.01	2.55	0.01	1.64	0.10
505.02	0.37	0.01	0.33	0.04
506.00	0.14	0.01	0.27	0.25
601.00	40.18	0.01	0.23	0.07
602.00	29.82	0.01	0.17	0.22
603.00	82.06	0.01	0.26	0.26
701.01	54.54	0.01	0.58	0.50
701.02	59.39	0.01	0.28	0.15
702.01	30.65	0.01	0.22	0.45
702.02	79.62	0.01	0.14	0.00
703.00	66.46	0.01	0.03	0.30
704.00	52.12	0.01	0.21	0.25
705.00	68.72	0.01	0.17	0.28
706.00	77.33	0.00	0	0.15
707.00	63.43	0.01	0.21	0.47
801.00	49.25	0.01	0.65	0.25
802.00	16.31	0.01	0.34	0.11
803.00	37.85	0.01	0.61	0.19
804.00	42.29	0.01	0.58	0.25
805.00	22.29	0.01	0.18	0.32
806.00	0.48	0.01	0.18	0.30
807.00	0.2	0.00	0.08	0.20

CENSUS TRACT	% BLACK	% HISPANIC	% ASIAN	% AM. INDIAN
902.02	3.43	0.01	1.30	0.26
903.01	11.11	0.02	2.63	0.37
904.00	17.92	0.05	2.36	0.50
906.00	3.62	0.01	2.87	0.17
909.00	2.62	0.01	1.67	0.03
908.00	4.58	0.01	1.32	0.42
907.00	4.18	0.02	1.46	0.25
1001.01	12.84	0.00	1.99	0.35
1001.02	10.39	0.02	3.98	0.32
1002.01	10.48	0.02	2.38	0.26
1002.02	12.15	0.01	2.04	0.15
1002.03	9.04	0.02	1.89	0.16
1003.01	8.46	0.01	1.71	0.51
1003.02	8.08	0.01	1.42	0.11
1004.00	6.37	0.02	1.30	0.26
1101.00	0.29	0.00	0.52	0.59
1102.00	3.59	0.01	1.30	0.22
1150.02	0.98	0.01	0.61	0.22
1150.11	0.69	0.01	0.80	0.12
1150.12	1.84	0.01	2.27	0.02
1201.01	9.89	0.01	0.80	0.25
1201.02	10.83	0.01	2.15	0.04
1201.03	9.74	0.02	1.61	0.17
1250.00	0.94	0.01	0.35	0.14
1251.01	4.79	0.01	1.56	0.22
1251.02	4.16	0.01	1.03	0.20
1301.01	0.3	0.01	0.15	0.34
1301.02	0.02	0.00	0.54	0.12
1401.00	0.19	0.00	0.23	0.23
1501.00	0.59	0.00	0.16	0.11
1601.00	0.15	0.00	0.10	0.00
1650.00	0.55	0.01	0.25	0.10

Source: American FactFinder - U.S. Census Bureau - 2000

Table 3.5: Percent of Race by Tract: City of Kettering, 2000

CENSUS TRACT	% BLACK	% ASIAN	% AM. INDIAN	% HISPANIC
201	1.51	0.60	0.28	1.33
202	2.47	1.88	0.17	1.63
203	0.99	0.77	0.00	0.92
204	2.14	2.78	0.30	0.97
205	1.78	1.23	0.27	1.09
206.01	0.36	0.78	0.10	1.56
206.02	0.18	1.58	0.23	0.82
207	0.86	0.80	0.22	1.05
208	0.90	0.62	0.00	1.27
209	1.36	1.10	0.29	0.99
210	1.21	0.77	0.55	1.10
211	2.59	1.09	0.19	1.39
212	1.27	2.60	0.24	1.03
213.01	0.40	0.73	0.20	0.93
213.02	0.54	1.22	0.17	0.71
214	1.25	1.48	0.34	1.06
215.01	1.07	1.74	0.40	1.34
215.02	2.29	1.68	0.00	0.72
216.01	1.70	1.19	0.09	1.47
216.02	0.37	1.44	0.20	0.82
217	1.74	2.02	0.04	0.93
218	11.67	2.42	0.04	1.63
219	1.32	0.87	0.09	0.82

Source: American FactFinder - U.S. Census Bureau - 2000

Tables 3.6, 3.6A and 3.6B show the increase/decrease of the population within Montgomery County and the Cities of Dayton and Kettering by race (total does not include "other race" category) between the years 1990 and 2000 as recorded by the U.S. Census Bureau. Although the figures in Table 3.6 indicate that Montgomery County has seen a decrease of .7% in the White population between the years 1990 and 2000. The increase in overall population is due to the increase in the Black, American Indian, Asian and Hispanic populations of between 34.4% and 260.2%. In addition, the table excludes the Cities of Dayton and Kettering.

It further indicates that:

1. **Although the White population remains the majority population of Montgomery County and the Cities of Dayton and Kettering in the 2000 U.S. Census data, there have been decreases in this population category since the 1990 U.S. Census. The decreases are as follows: - .7% in the County, -16.9% in the City of Dayton and -2.4% in the City of Kettering.**
2. **When comparing the 1990 and 2000 U.S. Census data, the Black population in Montgomery County has increased 34.4%. The Black population in the City of Dayton has decreased 2.4% and the Black population of the City of Kettering has increased141.4% during this same period of time.**

3. **When comparing the 1990 and 2000 U.S. Census data, the American Indian population has increased 260.2% in the County, increased by 13.4% in the City of Dayton and by 55.7% in the City of Kettering.**
4. **When comparing the 1990 and 2000 U.S. Census data, the Asian population has increased 37.4% in the County, decreased 5.4% in the City of Dayton and increased 16.9% in the City of Kettering.**
5. **When comparing the 1990 and 2000 U.S. Census data, the Hispanic population has increased 45.5% in the County, increased 80.1% in the City of Dayton and 41.7% in the City of Kettering.**[10]

Again, it should be noted that the census tracts of 1990 and 2000 were compared directly but due to growth or change in boundaries in portions of the County and the cities in this study, figures may vary.

Table 3.6: Population by Race within Montgomery County, 1990-2000

YEAR	WHITE	BLACK	AM. INDIAN	ASIAN	HISPANIC	TOTAL*
1990	266,916	29,583	515	3,798	2,513	303,325
2000	265,113	39,748	1,855	5,217	3,656	315,589
% +/- 1990-2000	(.7%)	34.4%	260.2%	37.4%	45.5%	4.0%

Source: U.S. Census Bureau, 1990 Table P006, P008 (STF1), 2000 Table P7, P11 (SF1) by Census Tract
*Total does not include "other race" category

Table 3.6A: Population by Race within the City of Dayton, 1990-2000

YEAR	WHITE	BLACK	AM. INDIAN	ASIAN	HISPANIC	TOTAL*
1990	128,349	75,958	486	1,328	1,571	207,692
2000	106,609	74,134	551	1,256	2,830	185,380
% +/- 1990-2000	(16.9%)	(2.4%)	13.4%	(5.4%)	80.1%	(10.7%)

Source: U.S. Census Bureau, 1990 Table P006, P008 (STF1), 2000 Table P7, P11 (SF1) by Census Tract
*Total does not include "other race" category

[10] City of Kettering Planning & Development, 1990; U.S. Census Bureau, 2000 Table P7, P11 (SF1)

Table 3.6B: Population by Race within the City of Kettering, 1990-2000

YEAR	WHITE	BLACK	AM. INDIAN	ASIAN	HISPANIC	TOTAL
1990*	59,222	437	79	746	477	60,961
2000	54,757	955	105	795	640	57,252*
% +/- 1990-2000	(2.4%)	141.4%	55.7%	16.9%	41.7%	(.7%)

Source: *City of Kettering Planning & Development - 1990
U.S. Census Bureau, 2000 Table P7, P11 (SF1) by Census Tract **Total does not include "other race" category

3.3 Gender

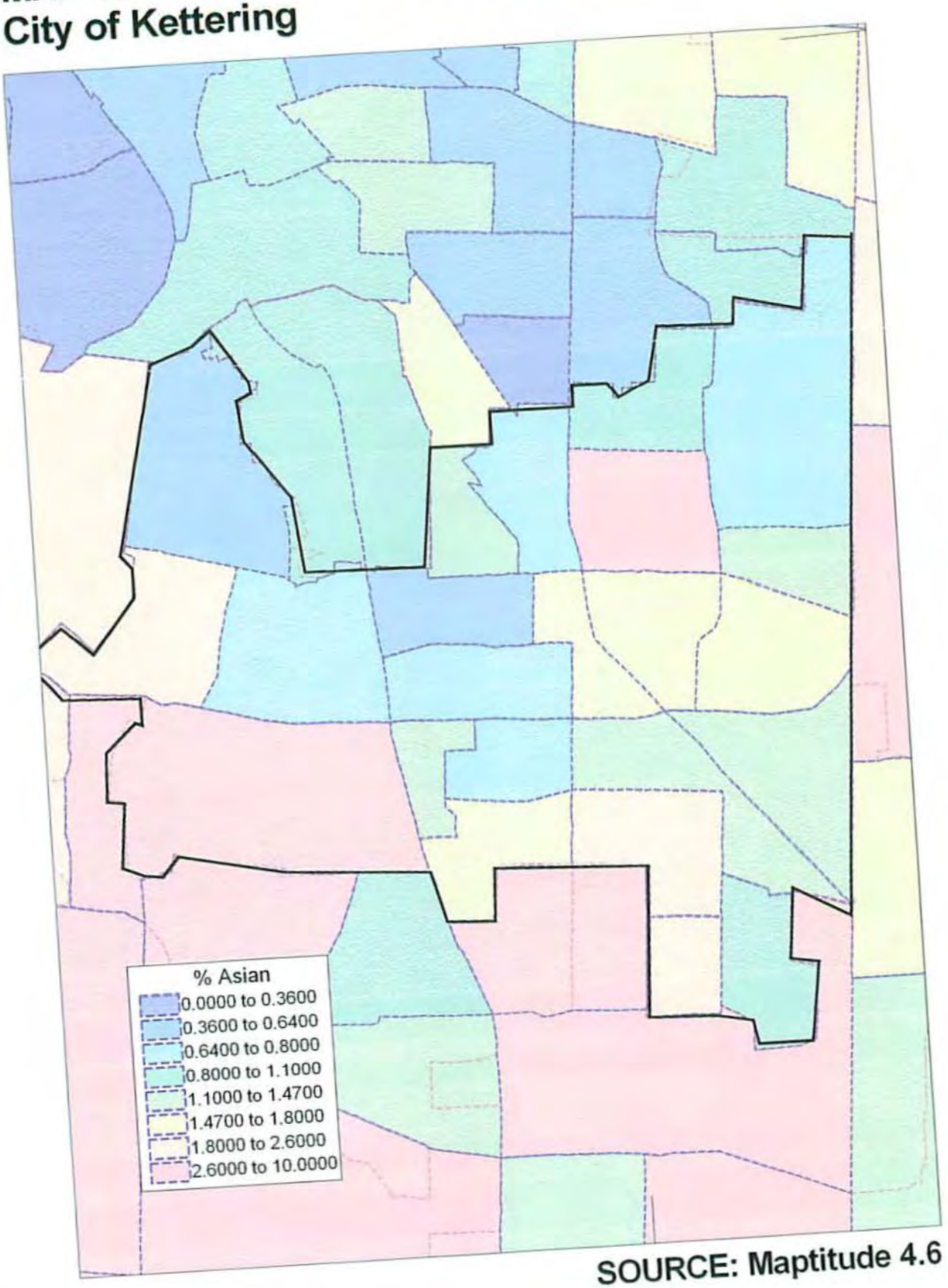
This section will compare the male and female populations of the County. This is important in our overall review for the AI. The differences in population between genders can be a red flag for other problems that might exist. For instance, female headed households are one of the fastest growing poverty groups in the nation, if a high number of females were present in a jurisdiction this would lead to a further examination of that population. Generally it is found that the male and female populations are evenly split with only a few percentage points dividing them. This is true in Montgomery County in Table 3.7.

Table 3.7 indicates that in the total population of Montgomery County and the Cities of Dayton and Kettering, females slightly outnumber males. It is typical for Females to outnumber males in the general population, after the age of 18 and particularly after the age of 65 due to the longer average life-span of women. However, there are anomalies that exist.

In census tracts 506, 603 and 1601 of Montgomery County, males outnumber females in both the general population and those eighteen (18) years of age and older. In census tract 601, males outnumber females in the general population category only.

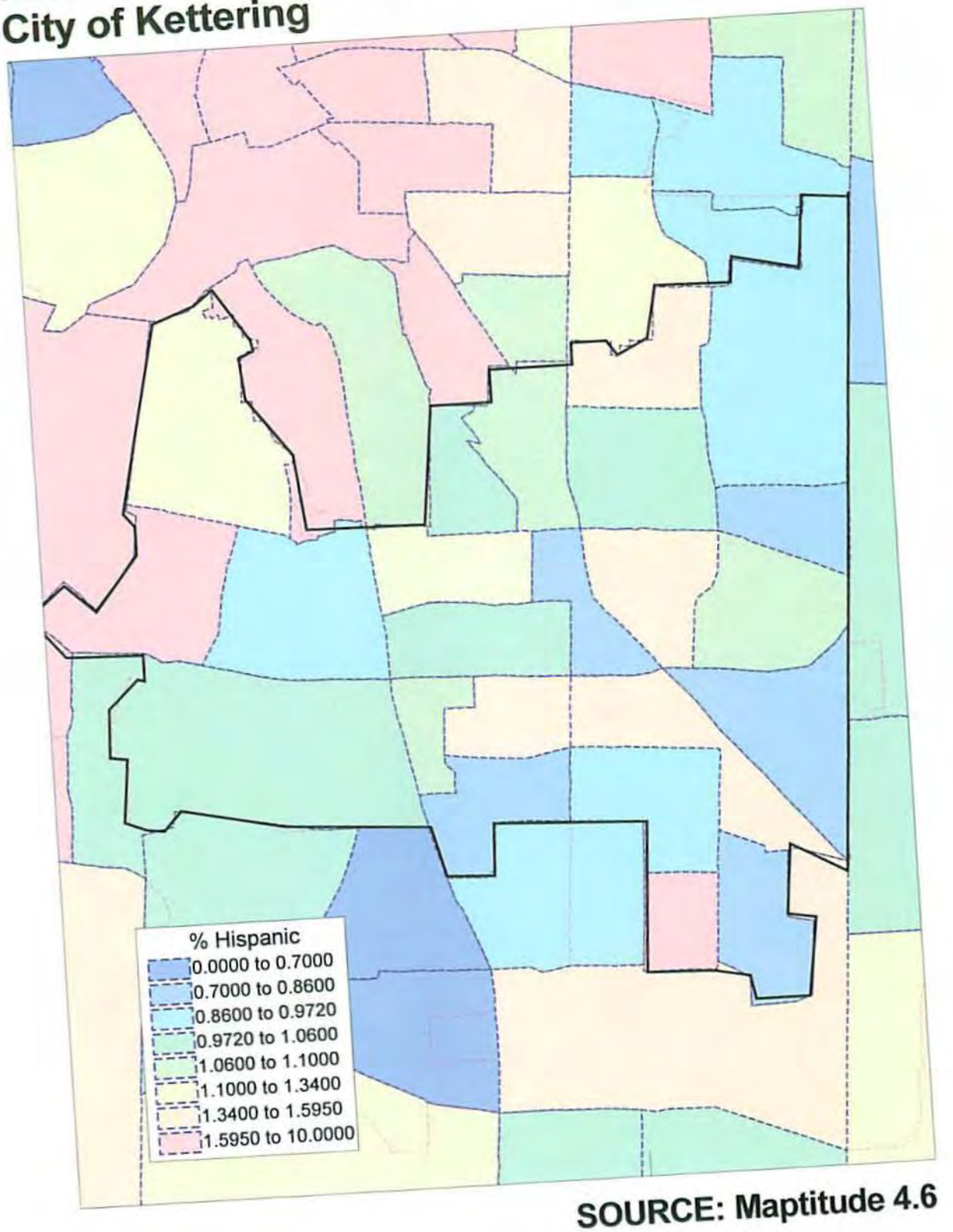
In census tract 12 of the City of Dayton, males outnumber females in the eighteen (18) years of age and older category and in census tract 1101, in the general population category only. In census tracts 13, 14, 15, 19, 20, 21 and 33, males outnumber females both in the general population and for those in the eighteen (18) years of age and older categories. In census tract 903.01 of the City of Dayton, males outnumber females in the

MAP 9: Percent Asian Population 2000
City of Kettering



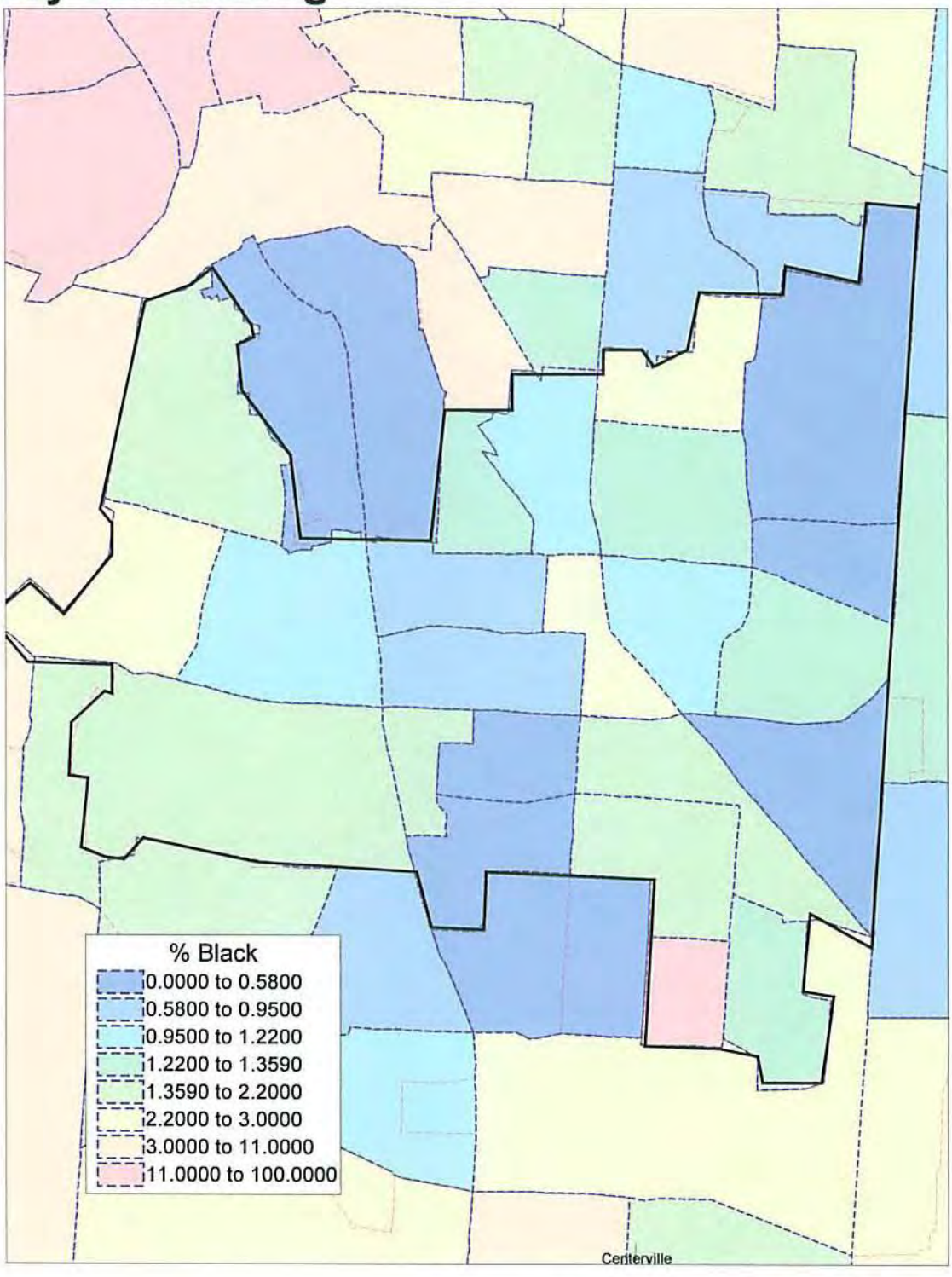
SOURCE: Maptitude 4.6

MAP 10: Percent Hispanic Popuation 2000
City of Kettering



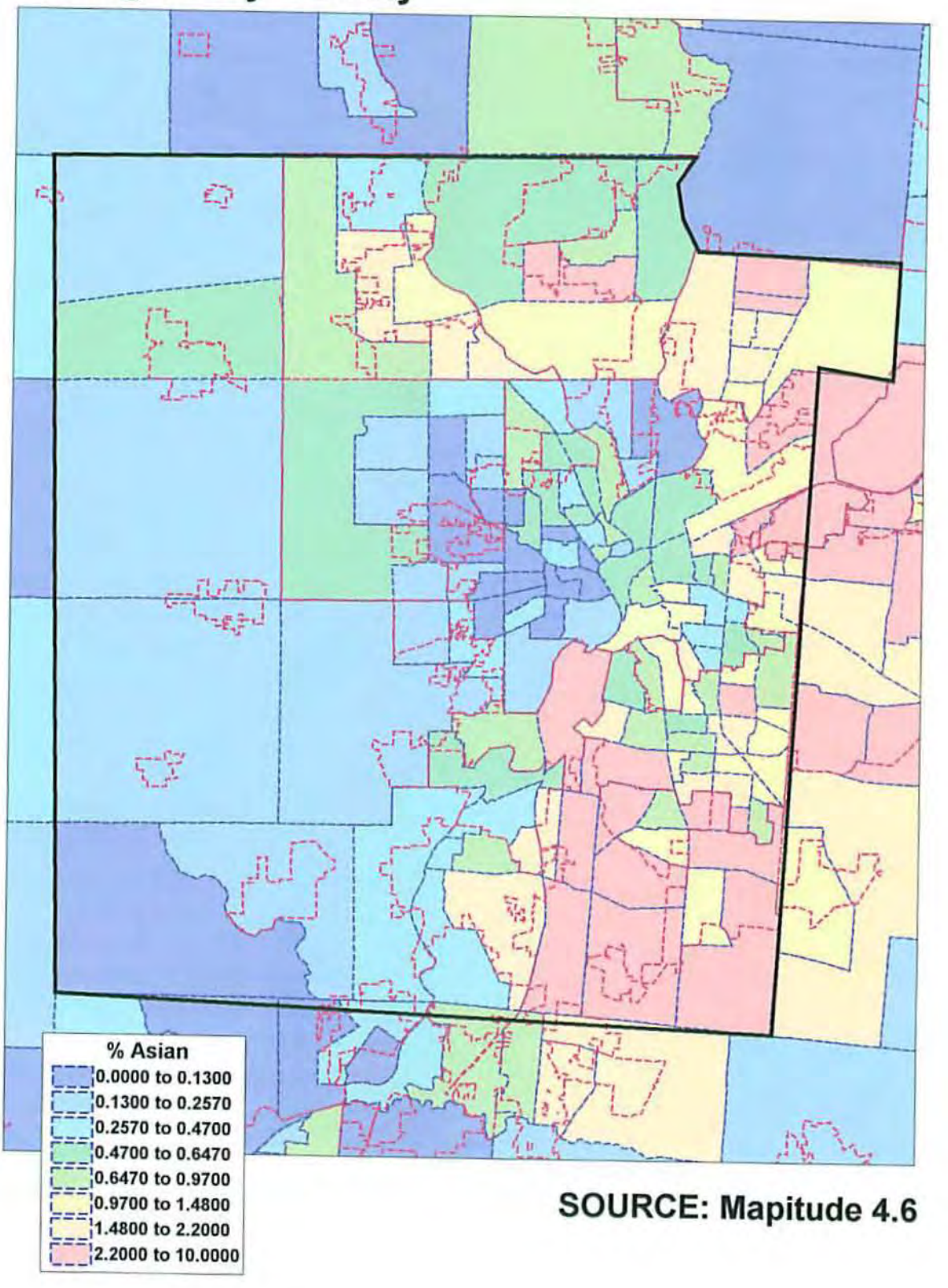
SOURCE: Maptitude 4.6

MAP 11: Percent Black Population
City of Kettering



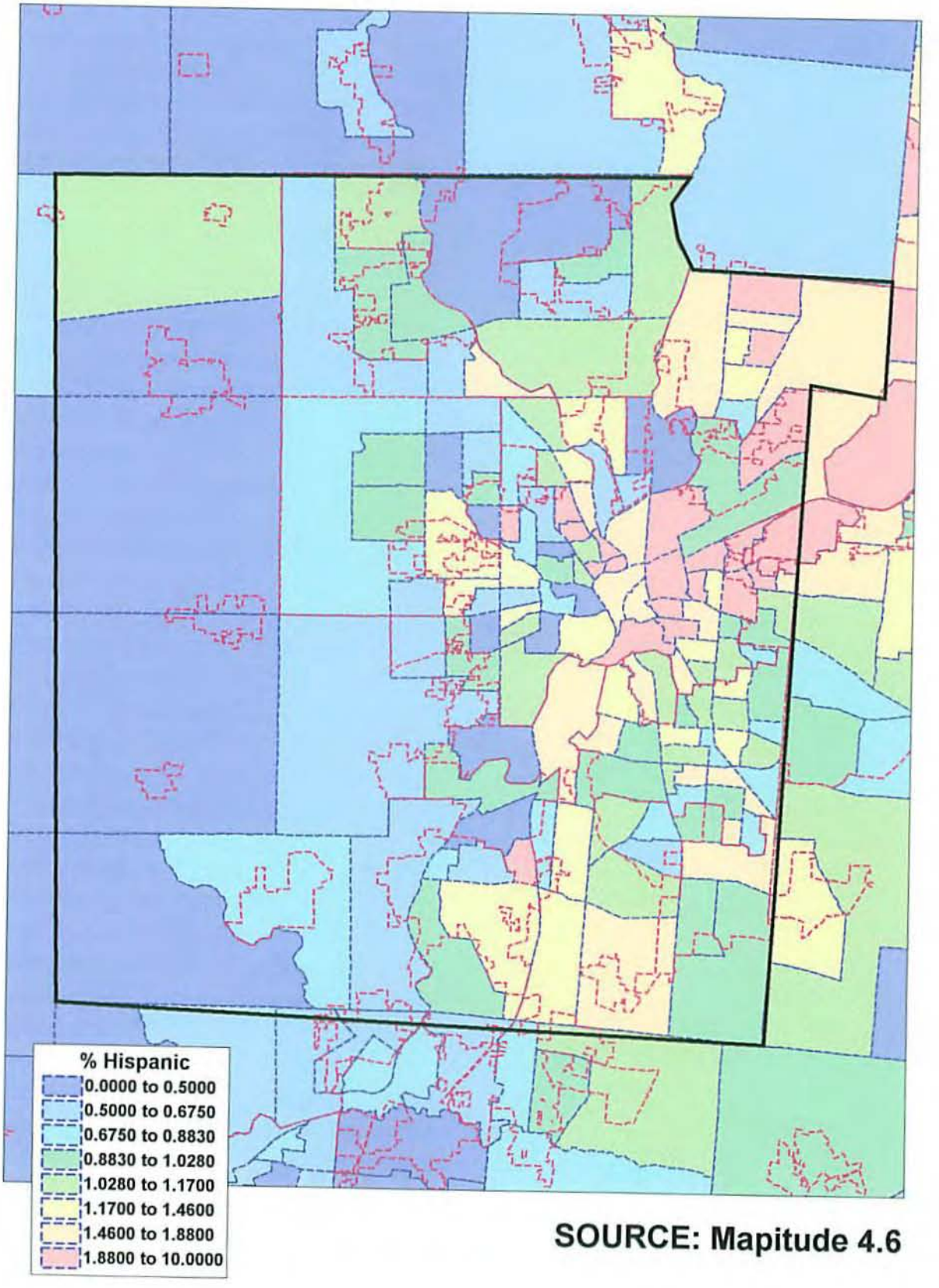
SOURCE: Maptitude 4.6

MAP 12: Percent Asian Population
Montgomery County



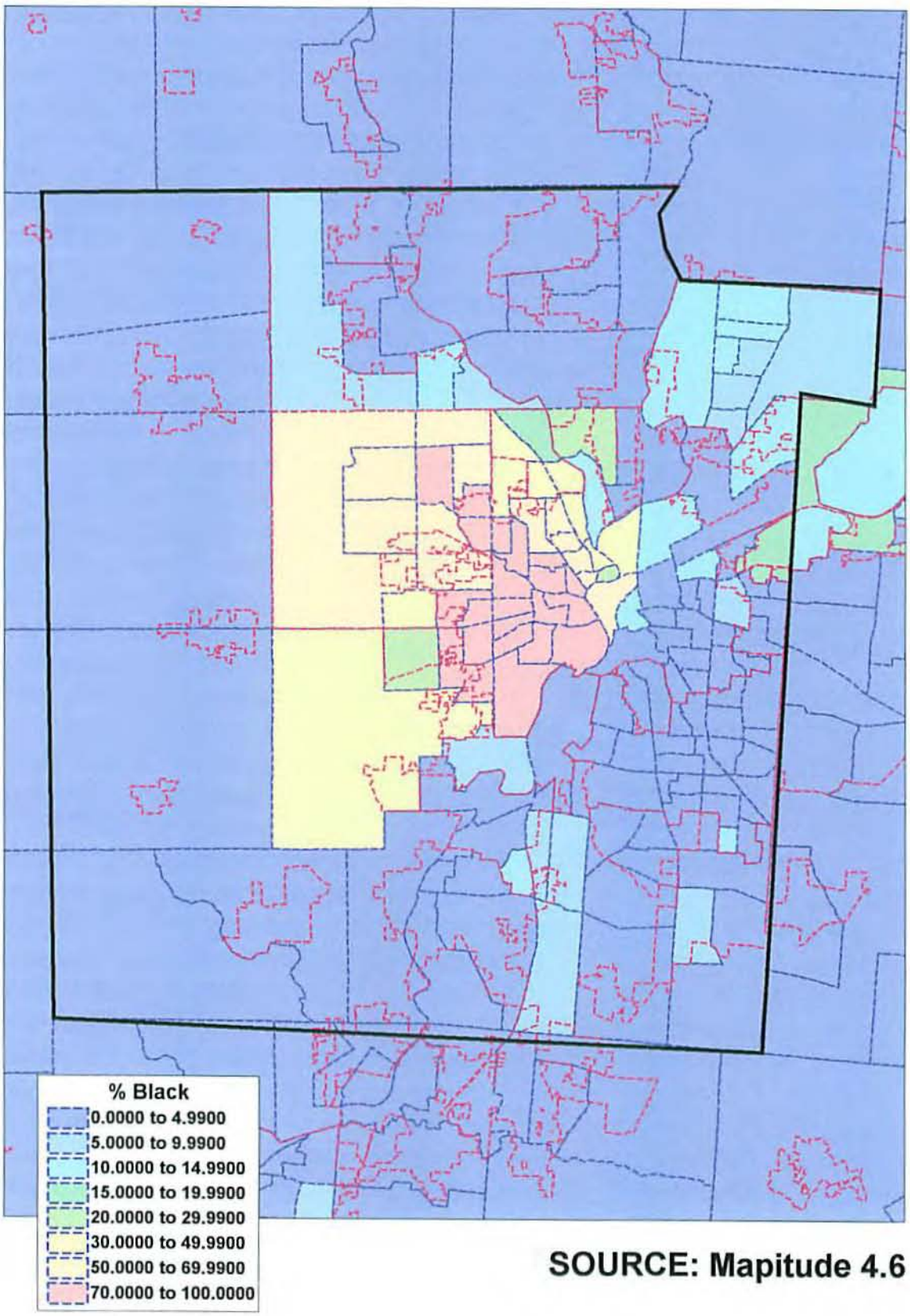
SOURCE: Mapitude 4.6

MAP 13: Percent Hispanic Population
Montgomery County



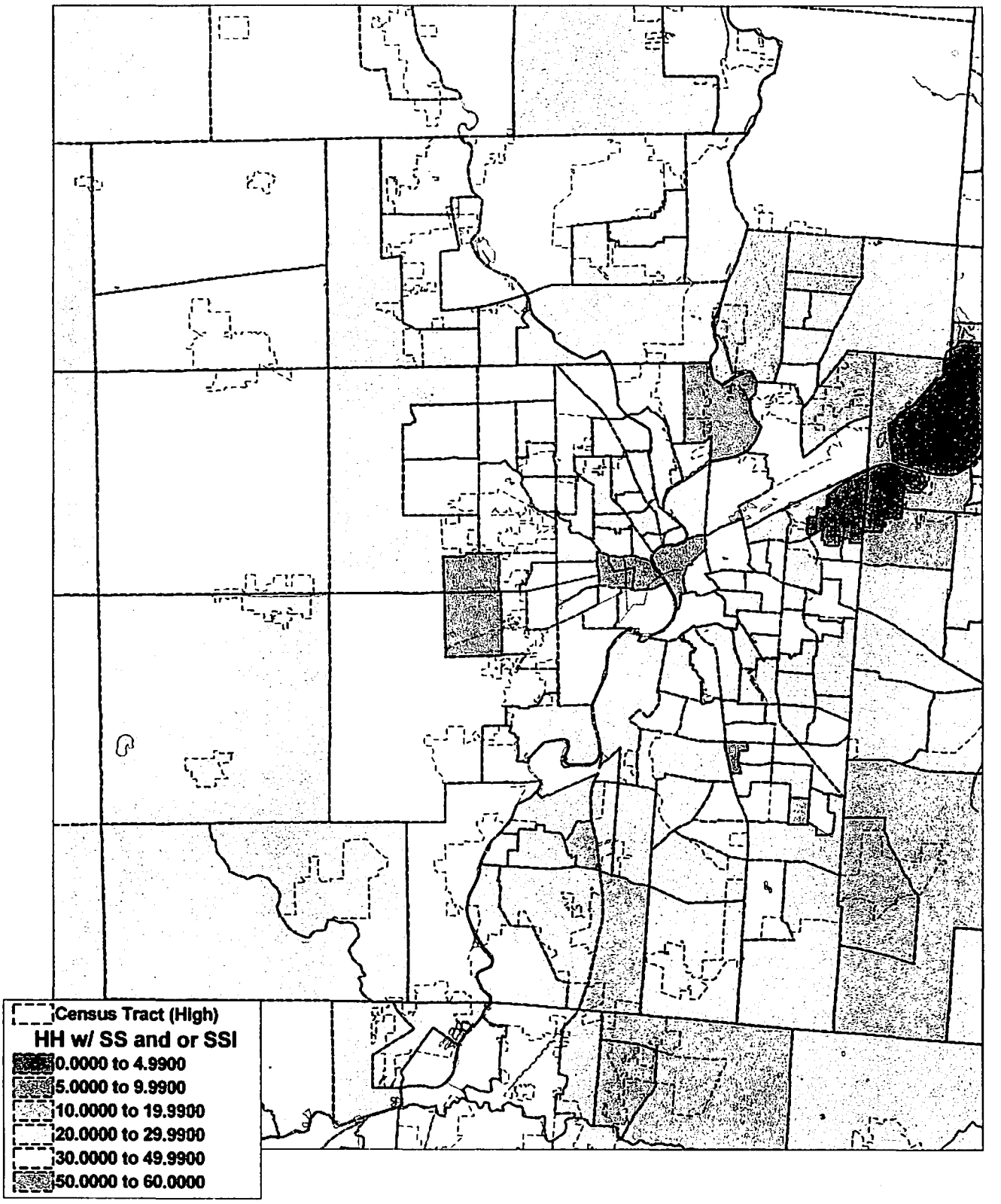
SOURCE: Mapitude 4.6

MAP 14: Percent Black Population 2000
Montgomery County



SOURCE: Mapitude 4.6

Map 15: Households Earning Social Security or Supplemental Security Income



sixty-five (65) years and over category only. Only in census tract 45 do males outnumber females in the general population, those eighteen (18) years of age and older and those sixty-five (65) years of age and older categories.

In census tracts 201 and 213.02 of the City of Kettering, males outnumber females in the general population category only.[11]

Table 3.7: Population of Montgomery County and the Cities of Dayton and Kettering by Gender, 2000

LOCATION	MALE	% TOTAL	FEMALE	% TOTAL	TOTAL
Montgomery County	151,217	48.1%	163,096	51.9%	314,313
City of Dayton	89,788	48.0%	97,461	52.0%	187,249
City of Kettering	27,324	47.5%	30,178	52.5%	57,502

Source: U.S. Census Bureau, 2000 Table DP1 (SF1) by Census Tract

3.4 Family Status

Family status within Montgomery County and the Cities of Dayton and Kettering are shown in Table 3.8.[12] This table indicates family households by presence of people under the age of eighteen (18) by household type. It shows that in the locales of this report that between 31.8% and 46.6% consist of married couples without children under the age of eighteen (18) and that between 23.5% and 34.8% of these have children under the age of eighteen (18). It also indicates that there are between 5.0% and 10.1% Female head of households without children under the age of eighteen (18) and between 10.5% and 25.7% are Female head of households with children under the age of eighteen (18). Male head of households with children under the age of eighteen (18) is between 3.0% and

[11] U.S. Census Bureau, 2000 Table DP1 (SF1) by Census Tract

[12] The table does not include information for non family households which include persons who live alone; don't live alone [but not married]; non relatives that live together and persons that live in institutions or other group quarters

5.3% and Male head of households without children under the age of eighteen (18) is between 1.9% and 3.6%.[13]

There are more Female heads of households than Male head of households within Montgomery County and the Cities of Dayton and Kettering. Female households with children are 3.5 times greater than similar Male households in the County. This follows the national trend.

The importance of this data is threefold - 1, Female head of households with children are the fastest growing poverty population, 2, the impact this population can have on the need for affordable housing and 3, single head of households with children have a high number of housing discrimination complaints.

According to The Ohio Poverty Report - 2003, families with a female-head, no husband present and related children, had a poverty rate of 34.6 percent in 1999. Also single head of households with children are one of the main users of assisted housing whether it is through the housing authority or through other sources.

Table 3.8: Family Status by Presence of People Under the Age of 18 by Household Type within Montgomery County and the Cities of Dayton and Kettering, 2000

	Married CH<18	Married w/o CH<18	Male CH<18	Male w/o CH<18	Female CH<18	Female w/o CH<18	Total Family Households
Montgomery County	30,160	38,069	2,679	1,673	9,723	4,370	86,674
% of Total	34.8%	43.9%	3.1%	1.9%	11.2%	5.0%	
City of Dayton	10,149	13,704	2,272	1,537	11,092	4,348	43,102
% of Total	23.5%	31.8%	5.3%	3.6%	25.7%	10.1%	
City of Kettering	4,977	7,529	433	330	1,501	945	15,715
% of Total	31.7%	47.9%	2.7%	2.0%	5.9%	6.0%	

Source: U.S. Census Bureau, 2000 (SF1) Table P19 by Census Tract

[13] U.S. Census Bureau, 2000 (SF1) Table P19 by Census Tract

3.5 Disability Status

See Maps 15

Tables 3.9, 3.9A and 3.9B show the disability status of the disabled population by jurisdiction. These populations are less than one percent of the population except for Montgomery County where 1.21% of the population are in an institution. This information is important to this report, with the changes in federal and state funding, budget cuts and other pressures being placed on provision of services to disabled persons, it can become an issue for the County and its communities in the future.

Table 3.9: Disability Status, Montgomery County, 2000

	0-18	18-64	65 AND OLDER	TOTAL	% OF TOTAL POPULATION*
Males & Females w/ disabilities non-institutionalized	1	350	257	608	.19%
Males & Females w/ disabilities institutionalized	44	473	3,282	3,799	1.21%
% of Total Population*	.01%	.26%	1.13%	1.40%	

Source: U.S. Census Bureau, 2000 Table DP1-QTP12 (SF1) by Census Tract *Percent of total civilian population excluding the Cities of Dayton and Kettering

Table 3.9A: Disability Status, City of Dayton, 2000

	0-18	18-64	65 AND OLDER	TOTAL	% OF TOTAL POPULATION*
Males & Females w/ disabilities non-institutionalized	247	926	44	1,217	.65%
Males & Females w/ disabilities institutionalized	71	425	705	1,201	.64%
% of Total Population*	.17%	.72%	.40%	1.29%	

Source: U.S. Census Bureau, 2000 Table DP1-QTP12 (SF1) by Census Tract *Percent of total civilian population within the City of Dayton only

Table 3.9B: Disability Status, City of Kettering, 2000

	0-18	18-64	65 AND OLDER	TOTAL	% OF TOTAL POPULATION*
Males & Females w/ disabilities non-institutionalized	0	30	1	31	.05%
Males & Females w/ disabilities institutionalized	10	31	479	520	.85%
% of Total Population*	.01%	.10%	.79%	.90%	

Source: U.S. Census Bureau, 2000 Table DP1-QTP12 (SF1) by Census Tract *Percent of total civilian population within the City of Kettering only.

According to the Alcohol, Drug Addiction and Mental Health Services Board (ADAMHS), persons with serious mental disabilities have chronic illness which is distinguished by diagnosis, duration and degree of impairment in daily functioning. For the purposes of the County and City of Kettering, those individuals in need of housing placement include the groups of individuals who have been diagnosed with both mental and physical disabilities. The ADAMHS Board serves more than 4,000 adult individuals with serious mental disabilities in Montgomery County, through its community health centers. Many mentally ill individuals have difficulty in both obtaining and in maintaining employment. They are usually very low-income and have difficulties finding housing that is suitable to their needs, and that is safe, clean and sanitary.[14]

To meet the housing needs of persons with mental illnesses in Montgomery County the ADAMHS Board and its various agencies provide housing alternatives. These range from semi-independent apartments to institutional facilities for the mentally ill. Approximately 700 are currently housed in these combined housing options. Table 3.10 shows existing housing available for mentally disabled persons in the County.[15]

[14] Montgomery County Consolidated Plan, FY 2003-2007, page 15

[15] Ibid, page 15

Table 3.10: Existing Housing for Adults with Serious Mental Disabilities[16]

Types of Housing	Providers	Number of Residential/Households Served by Location of Units			
Financially Supported Independent Housing		City of Dayton	City of Kettering	Balance of County	Total Mont. County
Rental Subsidies	Eastway Corp.	173	36	56	265
Scattered site project-based units	Miami Valley Housing Opp. (MVHO)	74	0	144	218
	Shelter & care tenant based rental subsidy	158	12	105	275
Apartment with on site support	Eastway Corp. & MVHO	36	8	22	66
Apartment w/o on site support	Eastway Corp.	0	0	8	8
Foster care & adult care homes	Eastway Corp. Through contracts with operators	88	0	80	96
Agency operated group-living	Places Inc.	12	0	24	36
	Eastway Corp.	0	12	0	12
Homes for aged/rest homes	Eastway Corp. Through agreements with agencies/operators	21	0	0	21

Source: The Alcohol, Drug Addiction and Mental Health Services Board of Montgomery County

[16] Ibid, page 17

Table 3.11: Characteristics of the Mentally Ill Served by the ADAMHS Board for Montgomery County

Sex	
Male	44%
Female	56%
Race/Ethnic Origin	
White	57%
Black	42%
Asian	0%
Hispanic	0%
Native American	0%
Other	2%
Employment Status	
Employed full or part-time	15%
Not employed, but able to work	35%
Retired	3%
Student	28%
Homemaker	7%
Disabled and unable to work	7%
Unknown	5%
Educational Status	
8th grade or less	16%
Some high school	17%
High school or GED	30%

Table 3.11: Continued

Trace or technical school	2%
Some College	11%
College education 2 year or 4 year	4%
Graduate courses/degree	5%
Primary Source of Income	
Supplemental Security Income (SSI)	10%
Social Security Disability Income (SSDI)	5%
No Income	45%
Supported by families or friends	12%
Other entitlements, i.e., ADC, GR, etc.	7%
Wages	14%
Other	7%

In the 2002 Census of Severely Mentally Disabled (SMD) Adults showed a need for 935 housing units in addition to those that were currently in the system. New housing units have been developed since that time; however, the number of SMD persons in treatment in Montgomery County has increased more, out pacing the acquisition of new units.[17] With changes in housing assistance available through public housing and Section 8 Vouchers on the decline the hope of alleviating this housing shortage for SMD or other disabled persons is bleak.

The statistics show that as individuals with disabilities age, there is a greater need for housing. As clients age, so do their care givers, causing a decrease in their ability to provide support and assistance; therefore, the need for housing alternatives rises. Until the number of housing units increases to address the needs, the need to provide support services to the individual, as well as the care giver, is needed. The people In most need are elderly parents of adult children between the ages of 25 and 60 years of age or older who still live at home. Other groups include: families with a single head of household, adults and children who are non-ambulatory or multi-handicapped (with or without families) and adults who are dually diagnosed. Support services would include: flexible respite services for elderly parents caring for their children at home, transportation for all

[17] Montgomery County Consolidated Plan, FY 2003-2007, page 16

segments of the population and day care for children and adults while parents or care providers work.[18]

The Montgomery County Board of Mental Retardation and Developmental Disabilities (MCBMRDD) monitors the residential needs and oversees residential support services for people with Mental Retardation and Developmental Disabilities in the County. The MCBMRDD has identified current individuals who are on their waiting lists as follows[19]:

1. Residential Waiting List - 116
2. Emergencies - 33
3. Services Substitution (persons not living in the least restrictive environment) - 283
4. Aging Care giver - 325

As funds from the State and Federal Government dwindle, nonprofit housing agencies, providers of housing services, public housing authorities and local jurisdictions will increasingly feel the pressure of increasing needs and decreasing resources. Reliance on creative funding, alternative financing and other innovations will be necessary to rehab or build new units and to maintain rental assistance. Table 3.12 shows housing options for persons served by MCBMRDD.

Table 3.12: Housing Options for Persons With Mental Retardation & Developmental Disabilities

# Units	Montgomery County	Dayton	Kettering	Balance of County
Supported Living (1-4 Persons)	78	15	4	59
Group Homes (5-12)	14	0	2	12
Large Facilities (36)	2	0	0	2
Institutions (90-100+)	2	0	0	2
Emergency Shelters	1	0	0	1

[18] Montgomery County Consolidated Plan, FY 2003-2007, page 16

[19] Ibid, page 19

In terms of fair housing the lack of adequate safe and sanitary housing for persons with disabilities is a growing issue. While fair housing laws have strong language/coverage for persons with disabilities and there is strong enforcement the housing providers are at best unaware or at worst just don't care. A sign of concern regarding the availability of accessible housing is that recently MVFHC received a grant to do an "inventory" of multi-family housing. This inventory is to determine how accessible units are for the disabled. Once this study is completed there will be a better picture of the extent of the problem that the disabled have experienced in their search for housing. However, whether it is one complaint or one hundred the problem is there.

Another symptom of the problem is the NIMBY response that new group homes, housing for the disabled, etc. encounter when they try to build or convert housing for the disabled. This is especially true in suburban neighborhoods.

3.6 Income Characteristics of Protected Classes

See Maps 16- 17

Tables 3.13 and 3.13A reflect the actual 2000 (1999 reported) Median Household Income (MHI) for the census tracts for Montgomery County and the City of Kettering by Race. It should be noted that the Median Household Income for Montgomery County is for the seventy (70) census tracts as represented in this report. Upon review of the Median Household Income within Montgomery County, it is apparent that there exists concentrations of low-income individuals in every race category. The MHI for all of Montgomery County, including the Cities of Dayton and Kettering, in 2000 was $40,156.[20]

The MHI for the seventy (70) census tracts in Montgomery County ranged from $21,078 in census tract 602 to $102,503 in census tract 101. The census tract with the smallest increase in MHI since the 1990 U.S. Census Bureau data was census tract 1201.03 at 7.3%, while the largest increase was noted in census tract 505.02 at 63.6%.

The MHI for the twenty-three (23) census tracts comprising the City of Kettering for the year 2000 was $45,051.[21] The MHI ranged from $31,908 in census tract 211 to $67,969 in census tract 206.02. The census tract with the smallest increase in MHI since the 1990 U.S. Census Bureau data was census tract 217 at -.35%, while the largest increase was noted in census tract 210 at 72.3%. With the exception of census tract 217, there have

[20] U.S. Census Bureau, 2000 Table P53 (SF3) by Census Tract

[21] U.S. Census Bureau, 2000 Table P53 (SF3) by Census Tract

been increases in MHI in all census tracts since 1990. Upon review of the MHI within the City of Kettering, it is apparent that there exists concentrations of low-income individuals in every race category.

For comparison purposes, the MHI for both Montgomery County and the City of Kettering was higher than that of the City of Dayton for the same period of time.

In Montgomery County, the MHI for the White population exceeds that of all other race categories in twenty-one (21) of the seventy (70) census tracts. It exceeds the MHI for the County in forty-four (44) census tracts.[22]

In the City of Kettering, the MHI for the White population exceeds that of all other race categories in four (4) of the twenty-three (23) census tracts. It exceeds the MHI of the city in twelve (12) of the census tracts.[23]

In Montgomery County, the MHI for the Black population exceeds that of all other race categories in thirteen (13) of the seventy (70) census tracts but only three (3) census tracts where each race category is present. It exceeds the MHI of the County in thirty (30) of the census tracts.[24]

In the City of Kettering, the MHI for the Black population exceeds that of all other race categories in four (4) of the twenty-three (23) census tracts. It exceeds the MHI of the city in two (2) of the census tracts.[25]

The MHI income for Hispanic and Native American households was less than their White and Black counter parts. Only in those tracts that had Blacks reporting did they show higher MHI than Blacks.

Interestingly, Asians showed some of the highest MHI in both Montgomery County and the City of Kettering. Of course part of this can be explained by the number of households reporting as Asian would be significantly smaller than Whites or Blacks so their MHI would then be larger. If a tract had only five Asian households reporting and all had incomes of $125,000, then their White and Black counterpart's MHI would be less because they are a larger population.

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[22] U.S. Census Bureau, 2000 Table P152A (SF3)

[23] Ibid

[24] U.S. Census Bureau, 2000 Table P152B (SF3)

[25] Ibid

Table 3.13: Median Household Income within Montgomery County by Race, 2000

CENSUS TRACT	WHITE	BLACK	AM. INDIAN	ASIAN	HISPANIC
101	104,129	0.00	18,750	0.00	52,500
102	71,545	0.00	0.00	27,279	37,417
301	32,205	30,000	41,250	65,625	18,750
302	41,842	12,375	18,750	0.00	23,750
401.01	63,438	0.00	0.00	56,250	102,264
401.02	111,696	45,781	0.00	184,972	36,250
401.03	72,143	85,489	0.00	162,500	0.00
402.01	68,152	0.00	0.00	162,500	3,000
402.02	49,571	59,531	90,957	53,239	18,625
403.01	82,080	116,576	0.00	104,000	125,906
403.02	56,159	21,125	0.00	26,250	26,250
404.01	67,813	39,583	24,583	61,250	87,266
404.02	57,844	37,273	39,792	79,828	83,166
501.01	41,790	32,200	0.00	45,000	31,250
501.02	53,929	35,455	0.00	64,766	24,844
501.03	56,118	38,158	0.00	45,804	55,417
503.01	33,023	26,750	0.00	0.00	50,250
503.02	50,729	71,250	0.00	33,750	50,588
503.03	42,500	30,313	0.00	29,500	23,750
504.01	55,344	42,500	56,250	28,750	54,444
504.02	36,140	0.00	0.00	13,750	53,750
505.01	46,862	34,038	4,028	46,000	24,861
505.02	37,757	0.00	0.00	0.00	0.00

506	41,475	0.00	0.00	0.00	0.00
601	43,244	41,033	0.00	0.00	0.00
602	22,299	14,706	0.00	0.00	0.00
603	16,964	27,188	0.00	0.00	41,750
701.01	41,769	35,970	0.00	22,875	11,607
701.02	35,208	32,460	0.00	0.00	41,250
702.01	22,845	14,063	0.00	0.00	0.00
703	27,109	23,657	0.00	0.00	20,208
704	35,819	40,385	43,542	0.00	51,250
705	33,713	46,202	30,481	0.00	0.00
706	26,607	52,406	0.00	0.00	0.00
707	31,875	34,787	58,750	0.00	0.00
801	30,783	30,924	52,778	43,542	64,125
802	43,175	71,528	21,250	0.00	0.00
803	40,114	35,313	0.00	26,250	6,250
804	26,856	25,341	0.00	19,792	16,250
806	30,754	0.00	0.00	0.00	0.00
904	37,405	35,100	90,957	21,932	30,625
906	22,274	35,179	0.00	70,357	37,500
907	42,337	75,559	0.00	28,750	72,917
908	47,375	51,094	80,488	41,250	12,292
909	43,065	27,083	0.00	85,489	56,154
910	37,917	15,000	0.00	41,786	33,750
1001.01	50,021	40,882	0.00	33,421	93,153
1001.02	58,962	73,750	39,861	46,905	35,000

1002.01	43,929	42,279	0.00	60,865	48,750
1002.02	48,415	52,981	0.00	44,375	16,719
1002.03	50,642	65,625	7,083	40,714	43,214
1003.01	47,944	49,063	0.00	29,271	46,500
1003.02	44,871	39,405	0.00	200,000+	18,750
1004	46,354	47,500	36,250	126,855	69,886
1102	60,160	59,625	48,750	39,583	19,583
1150.02	49,750	41,250	58,750	85,489	33,750
1150.11	38,368	24,722	0.00	46,250	32,222
1150.12	57,550	126,201	6,250	40,714	75,168
1201.01	61,575	66,875	0.00	2,500-	75,487
1201.02	66,314	80,228	0.00	62,917	127,308
1201.03	43,409	46,500	0.00	0.00	18,500
1250	51,197	53,452	0.00	0.00	125,526
1251.01	57,373	60,714	175,597	41,607	200,000+
1251.02	41,845	33,235	0.00	27,500	13,625
1301.01	52,587	0.00	0.00	0.00	0.00
1301.02	39,645	0.00	0.00	80,488	0.00
1401	42,702	0.00	162,500	0.00	0.00
1501	45,668	146,286	0.00	0.00	56,250
1601	56,579	0.00	0.00	0.00	0.00
1650	49,232	125,715	0.00	71,250	21,250

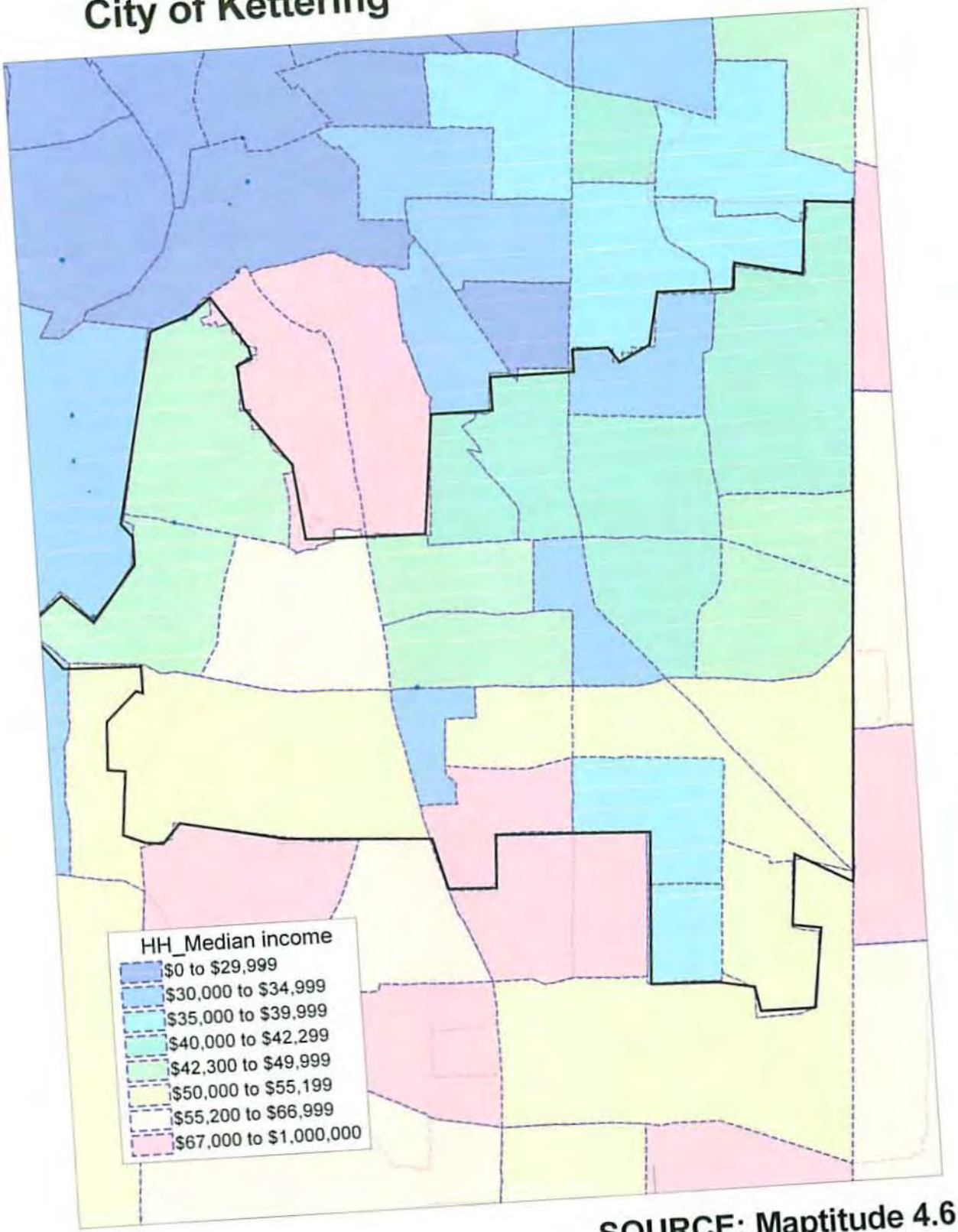
Source: U.S. Census Bureau, 2000 Tables P152A, B, C, D, H (SF3) by Census Tract

Table 3.13A: Median Household Income within the City of Kettering by Race, 2000

CENSUS TRACT	WHITE	BLACK	AM. INDIAN	ASIAN	HISPANIC
201	45,375	20,833	0.00	85,489	17,500
202	45,160	42,292	0	11,458	74,000
203	64,299	21,250	0	0	0
204	48,693	57,167	0	58,365	125,651
205	32,011	51,250	16,250	0	18,750
206.01	50,362	0	0	0	55,417
206.02	68,438	0	53,750	0	108,750
207	45,598	63,750	73,750	51,250	43,750
208	48,950	53,500	127,308	0	57,083
209	40,566	11,250	0	65,714	16,250
210	40,566	43,750	0	6,250	16,250
211	32,031	29,583	11,250	50,536	21,458
212	40,417	37,188	73,750	59,375	18,750
213.01	40,054	16,250	56,250	0	0
213.02	42,917	56,250	0	48,750	0
214	50,052	41,932	6,250	45,250	20,000
215.01	41,133	38,125	0	47,321	21,250
215.02	34,934	37,778	0	0	0
216.01	53,618	34,844	0	18,571	28,750
216.02	55,833	26,458	0	42,083	0
217	38,988	17,500	0	66,250	0
218	40,000	21,607	75,487	54,688	23,750
219	54,385	31,071	0	0	80,488

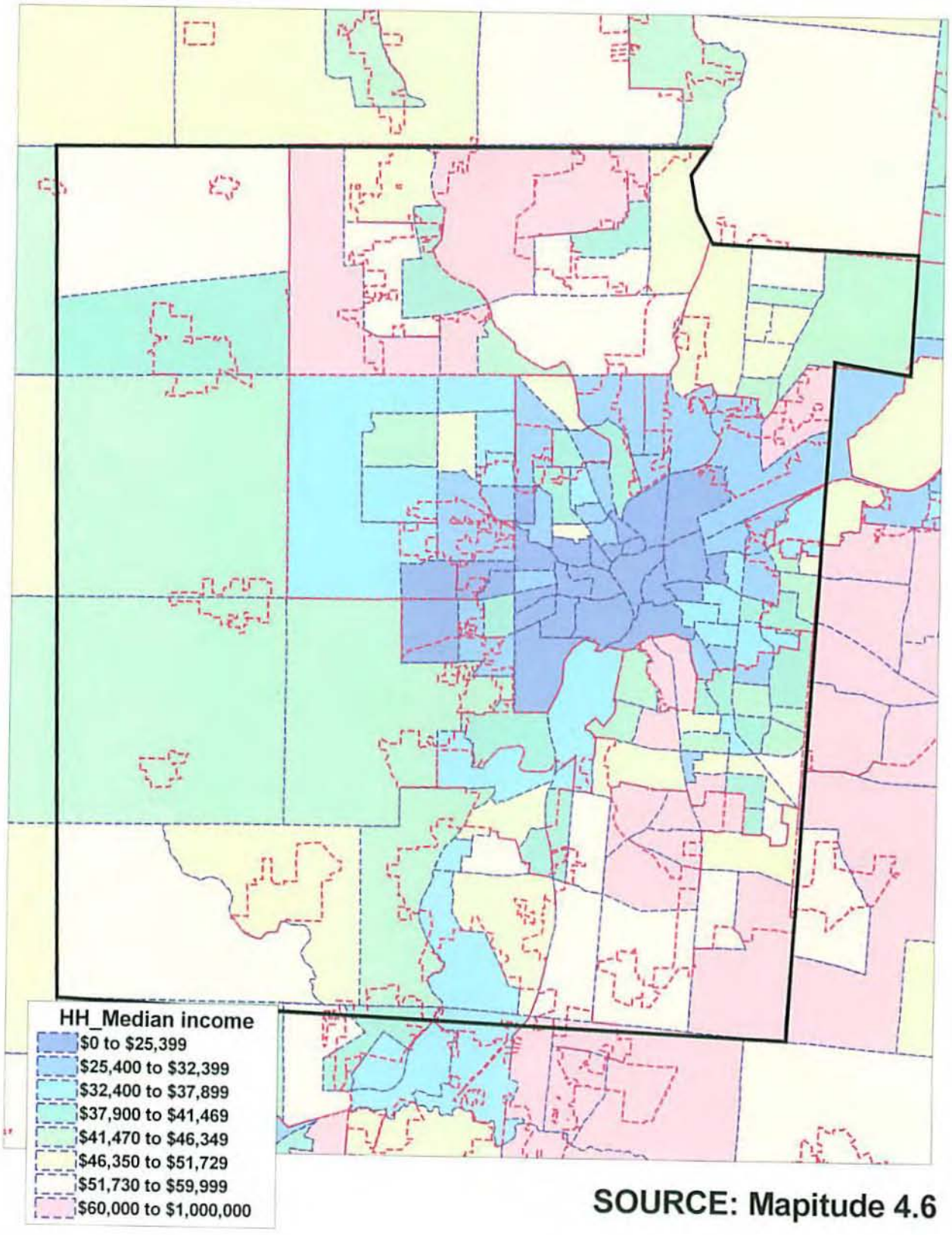
Source: U.S. Census Bureau, 2000 Tables P152A,B,C,D,H (SF3) by Tract

MAP 16: Median Household Income
City of Kettering



SOURCE: Maptitude 4.6

MAP 17: Median Household Income
Montgomery County



SOURCE: Mapitude 4.6

3.7 Poverty and Minorities

The incidence of poverty by race within Montgomery County and Kettering are shown in Tables 3.14, 3.14A and 3.14B. (Poverty is defined as households below 50% Median Household Income) The percent of the population, as determined by race, living below poverty where poverty status has been determined in Montgomery County and Kettering is 6.6% and 4.5%, respectively. The percentage indicated in the discussion for each race by jurisdiction will not equal 100% since "other race" is not included.

The breakdown by percent of each race category by population and percent of those living in poverty are as follows:

White Population: In Montgomery County, the White population makes up approximately 85% of the 2000 population and accounts for 5.2% of those living below poverty.

In the City of Dayton, the White population makes up approximately 53.3% of the 2000 population and accounts for 15.8% of those living below poverty.

In the City of Kettering, the White population makes up approximately 95.7% of the 2000 population and accounts for 4.2% of those living below poverty.

Black Population: In Montgomery County, the Black population accounts for approximately 12.0% of the 2000 population with 16.2% living below poverty.

In the City of Dayton, the Black population accounts for approximately 40.4% of the 2000 population with 28.6% living below poverty.

In the City of Kettering, the Black population accounts for approximately 1.8% of the 2000 population with 16.8% living below poverty.

American Indian: In Montgomery County, the American Indian population makes up approximately .2% of the 2000 population and accounts for 6.1% of those living below poverty.

In the City of Dayton, the American Indian population makes up approximately .3% of the 2000 population and accounts for 38.0% of those living below poverty.

In the City of Kettering, the American Indian population makes up approximately .2% of the 2000 population and accounts for 20.0% of those living below poverty.

Asian Population: In Montgomery County, the Asian population makes up approximately 1.7% of the 2000 population and accounts for 10.9% of those living below poverty.

In the City of Dayton, the Asian population makes up approximately .7% of the 2000 population and accounts for 14.0% of those living below poverty.

In the City of Kettering, the Asian population makes up approximately .3% of the 2000 population and accounts for 10.9% of those living below poverty.

Hispanic Population: In Montgomery County, the Hispanic population makes up approximately 1.1% of the 2000 population and accounts for 10.9% of those living below poverty.

In the City of Dayton, the Hispanic population makes up approximately 1.3% of the 2000 population and accounts for 28.4% of those living below poverty.

In the City of Kettering, the Hispanic population makes up approximately .9% of the 2000 population and accounts for 28.4% of those living below poverty.[26]

Table 3.14: Montgomery County: Poverty Status in 2000 by Race, 2000

	WHITE	BLACK	AM. INDIAN	ASIAN	HISPANIC	TOTAL*
At/Above Poverty	246,538	30,699	605	4,521	3,059	285,422*
Below Poverty	13,427	5,925	39	554	375	20,320*
Total	259,965	36,624	644	5,075	3,434	305,742*
% Below Poverty by Race	**5.2%**	**16.2%**	**6.1%**	**10.9%**	**10.9%**	**6.6%**

Source: U.S. Census Bureau, 2000 Tables P159A,B,C,D,H (SF3) by Census Tract *Total does not include "other race" category.

[26] U.S. Census Bureau, 2000 Tables P159A,B,C,D,H (SF3) by Census Tract *Total does not include "other race" category.

Table 3.14A: City of Dayton: Poverty Status in 2000 by Race, 2000

	WHITE	BLACK	AM. INDIAN	ASIAN	HISPANIC	TOTAL*
At/Above Poverty	83,659	51,627	305	1,039	1,612	138,242*
Below Poverty	15,674	20,708	187	169	640	37,378*
Total	99,333	72,335	492	1,208	2,252	175,620*
% Below Poverty by Race	**15.8%**	**28.6%**	**38.0%**	**14.0%**	**28.4%**	**21.3%**

Source: U.S. Census Bureau, 2000 Tables P159A,B,C,D,H (SF3) by Census Tract *Total does not include "other race" category.

Table 3.14B: City of Kettering: Poverty Status in 2000 by Race, 2000

	WHITE	BLACK	AM. INDIAN	ASIAN	HISPANIC	TOTAL*
At/Above Poverty	52,457	795	84	733	572	54,641
Below Poverty	2,300	160	21	62	68	2,611
Total	54,757	955	105	795	640	57,252*
% Below Poverty by Race	**4.2%**	**16.8%**	**20.0%**	**7.8%**	**10.7%**	**4.6%**

Source: U.S. Census Bureau, 2000 Tables P159A,B,C,D,H (SF3) by Census Tract *Total does not include "other race" category

3.8 Poverty and Gender

The incidence of poverty by Gender within Montgomery County and the Cities of Dayton and Kettering are shown in tables 3.15, 3.15A and 3.15B. These tables indicate that poverty affects females in Montgomery County 2.2% more than males. In the City of Dayton, poverty affects females 3.5% more than males and in the City of Kettering the poverty affects females 2.1% more than males.

Within Montgomery County the poverty rate for both males and females is, approximately 6.7%, in the City of Dayton, 21.7% live below poverty and in the City of Kettering, 4.4% live below poverty.

Table 3.15: Montgomery County: Poverty Status by Gender*, 2000

	Males	Females	Total*
At/Above Poverty	139,987	147,367	287,354
Below Poverty	8,231	12,486	20,717
Total	148,218	159,853	308,071
% Below Poverty by Gender*	**5.6%**	**7.8%**	**6.7%**

Source: U.S. Census Bureau, 2000 Table PCT49 (SF3) by Census Tract *Total of population for whom poverty status has been determined.

Table 3.15A: City of Dayton: Poverty Status by Gender*, 2000

	Males	Females	Total*
At/Above Poverty	66,248	70,472	136,720
Below Poverty	16,455	21,494	37,949
Total	82,703	91,966	174,669
% Below Poverty by Gender*	**19.9%**	**23.4%**	**21.7%**

Source: U.S. Census Bureau, 2000 Table PCT49 (SF3) by Census Tract *Total of population for whom poverty status has been determined.

Table 3.15B: City of Kettering: Poverty Status by Gender*, 2000

	Males	Females	Total*
At/Above Poverty	26,335	28,518	57,468
Below Poverty	899	1,660	2,642
Total	27,234	30,178	60,110
% Below Poverty by Gender*	**3.3%**	**5.5%**	**4.4%**

Source: U.S. Census Bureau, 2000 Table PCT49 (SF3) by Census Tract *Total of population for whom poverty status has been determined.

3.9 Poverty Status by Family Type and Presence of Children

See Map 18 - 21

Tables 3.16, 3.16A and 3.16B demonstrate the effects of poverty status on family type and presence of children. Female headed households with children are by far the largest poverty population in Montgomery County and its jurisdictions.

In Montgomery County, 19.2% of married couples with children under the age of 18 live below poverty. More than 50% (50.8%) of Female Head of Households with children under the age of 18 live below poverty. Similar Male households have 2.2% living below poverty. For all households at or below poverty, 3,264 (77.1%) have children under the age of 18.

In the City of Dayton, 12.6% of married couples with children under the age of 18 live below poverty. Female Head of Households with children under the age of 18 had 63.1% living below poverty. Similar Male households have 8.1% living below poverty. For all households at or below the poverty level, 6,249 (83.9%) have children under the age of 18.

In the City of Kettering, 14.2% of married couples with children under the age of 18 living below poverty. Female Head of Households with children under the age of 18 had 52.7% living below poverty. Similar Male households have 4.7% living below poverty. For all households at or below the poverty level, 368 (71.6%) have children under the age of 18.

Table 3.16: Montgomery County: Poverty Status by Family Type & Presence of Children, 2000

Family Type	At/Above Poverty	Below Poverty	Total*
Married, CH<18	29,902 (35.9%)	815 (19.2%)	30,717 (35.1%)
Married, No CH < 18	38,426 (46.2%)	685 (16.2%)	39,111 (44.7%)
Male HH, CH < 18	2,592 (3.1%)	256 (6.0%)	2,848 (3.3%)
Male HH, No CH< 18	1,445 (1.7%)	95 (2.2%)	1,540 (1.8%)
Female HH, CH < 18	7,106 (8.5%)	2,193 (51.8%)	9,299 (10.6%)
Female HH, No CH < 18	3,762 (4.5%)	190 (4.5%)	3,952 (4.5%)
	53,331 (99.9%)	4,234 (99.9%)	87,467 (100.0%)

Source: U.S. Census Bureau P90 (SF3) by Census Tract *Total of population for whom poverty status has been determined.

Table 3.16A: City of Dayton: Poverty Status by Family Type & Presence of Children, 2000

	At/Above Poverty	Below Poverty	Total*
Married, CH<18	10,361 (28.9%)	942 (12.6%)	11,303 (26.1%)
Married, No CH < 18	13,316 (37.2%)	629 (8.4%)	13,945 (32.2%)
Male HH, CH < 18	1,504 (4.2%)	607 (8.1%)	2,111 (4.9%)
Male HH, No CH< 18	1,424 (4.0%)	163 (2.2%)	1,587 (3.7%)
Female HH, CH < 18	5,896 (16.5%)	4,700 (63.1%)	10,596 (24.5%)
Female HH, No CH < 18	3,311 (9.2%)	409 (5.5%)	3,720 (8.6%)
	35,812 (100.0%)	7,450 (99.9%)	43,262 (100.0%)

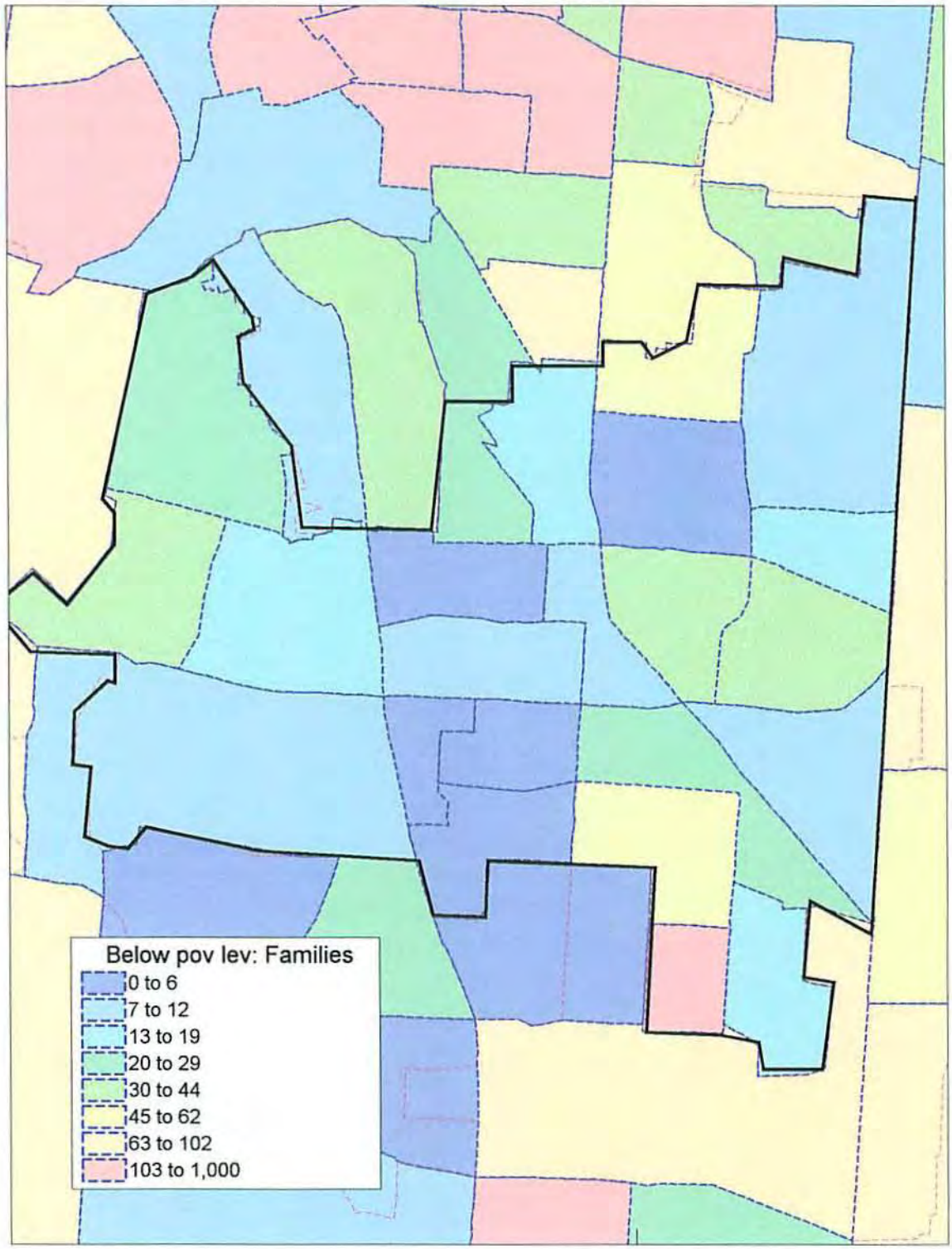
Source: U.S. Census Bureau, 2000 Table P90 (SF3) by Census Tract *Total of population for whom poverty status has been determined.

Table 3.16B: City of Kettering: Poverty Status by Family Type & Presence of Children, 2000

Family Type	At/Above Poverty	Below Poverty	Total*
Married, CH<18	5,510 (58.7%)	73 (14.2%)	5,583 (56.4%)
Married, No CH < 18	759 (8.0%)	117 (22.8%)	876 (8.8%)
Male HH, CH < 18	523 (5.6%)	24 (4.7%)	547 (5.5%)
Male HH, No CH< 18	395 (4.2%)	0 (0.0%)	395 (4.0%)
Female HH, CH < 18	1,322 (14.1%)	271 (52.7%)	1,593 (16.1%)
Female HH, No CH < 18	880 (9.4%)	29 (5.6%)	909 (9.2%)
	9,389 (100.0%)	514 (100.0%)	9,903 (100.0%)

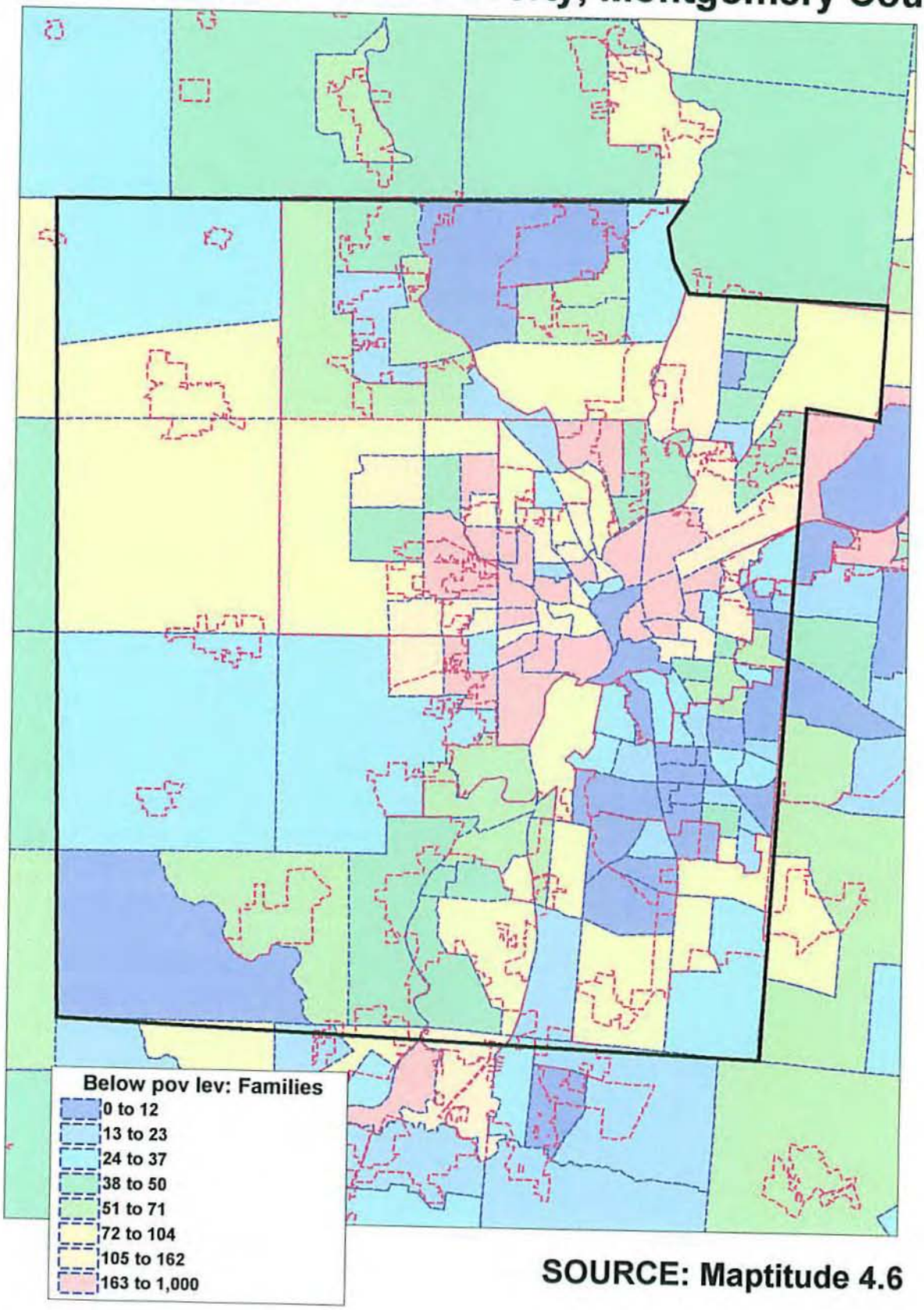
Source: U.S. Census Bureau, 2000 Table P90 (SF3) by Census Tract *Total of population for whom poverty status has been determined.

MAP 18: Families Below Poverty - Kettering



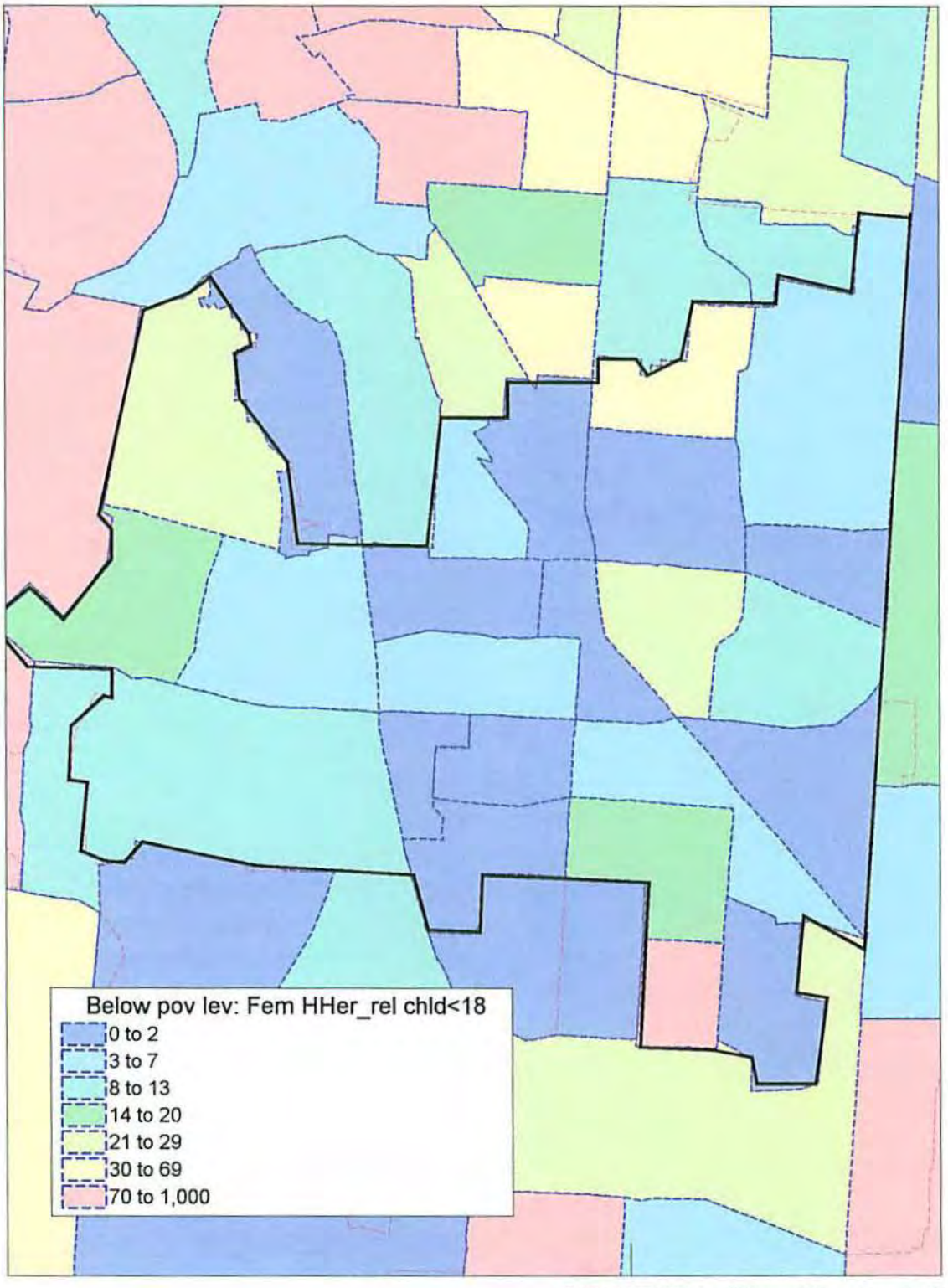
SOURCE: Maptitude 4.6

MAP 19: Familes Below Poverty, Montgomery County



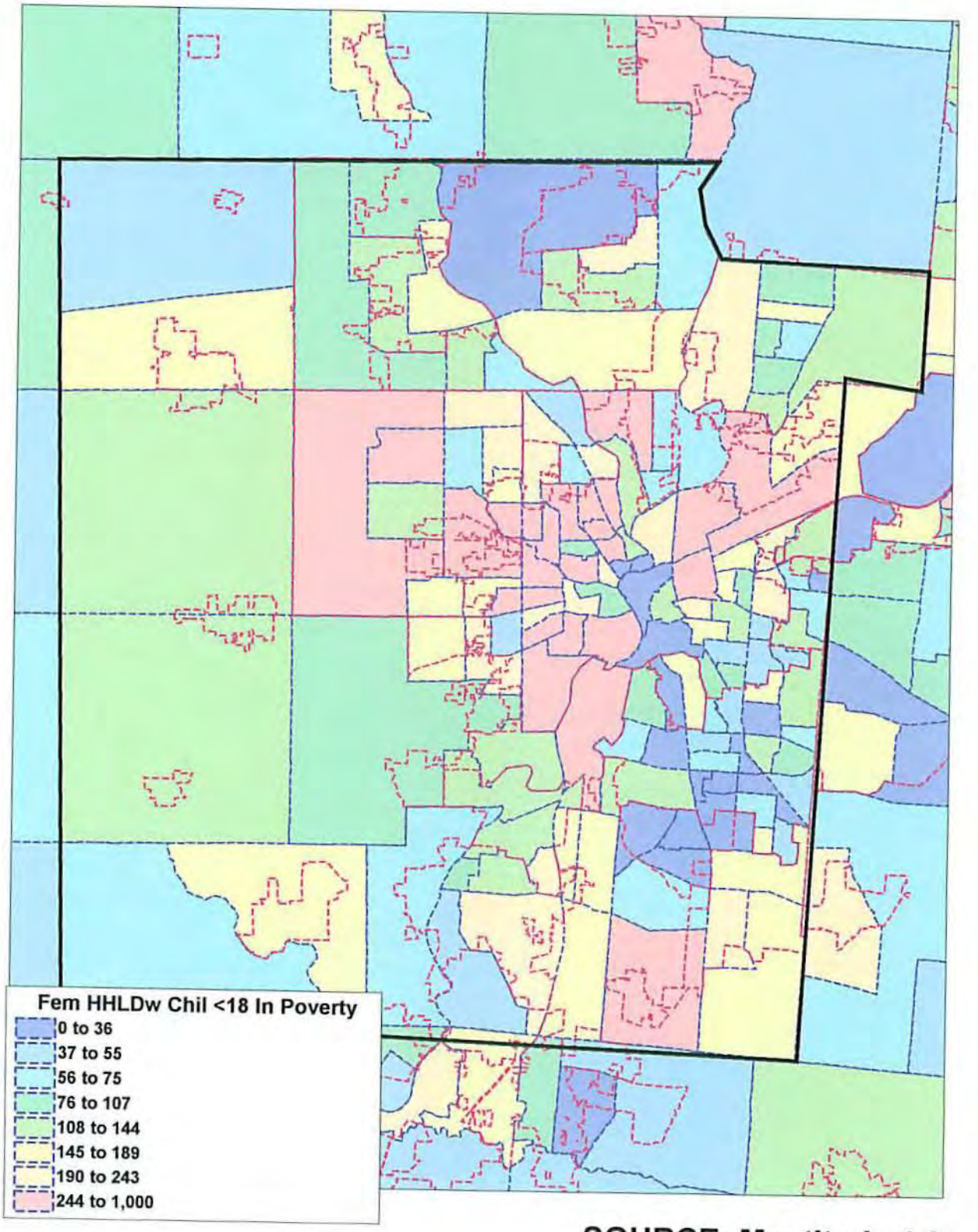
SOURCE: Maptitude 4.6

MAP 20: Below Poverty Level Female HH with Related Children Under 18



SOURCE: Maptitude 4.6

MAP 21: Below Poverty Level - Female HH With Children Under 18 - Montgomery County



SOURCE: Maptitude 4.6

3.10 Persons Receiving Supplemental Security Income

It should also be noted that Supplemental Security Income (SSI) is received by 3,926 persons (1.2%) in the seventy (70) census tracts in Montgomery County, 5,507 persons (2.9%) in the fifty-two (52) census tracts in the City of Dayton and 560 persons (.9%) in the twenty-three (23) census tracts in the City of Kettering. The total persons receiving SSI in all census tracts of Montgomery County, including the Cities of Dayton and Kettering, are 9,903 persons which represent 1.8% of the total population.[40]

4.0 ECONOMICS AND TRANSPORTATION

This section will review various issues regarding the economic health of the area and the transportation support for residents in the County and City of Kettering. There are a wide variety of topics discussed from unemployment rates, to largest employers, to income by job classification. The purpose of this section is to try and get a sense of the economic structure in the County and how that might apply to purchasing power of residents and affordability of housing. For instance, if a community has a high unemployment rate it can result in an increase in foreclosures, the repair homes being diminished, and lessen the ability to afford and buy homes. If current housing prices are high and not attainable by a majority of workers in the County then this drives residents to other counties or cities and reduces the ability of local jurisdiction to expand their tax base. Those who are working and paying taxes within the community cannot afford to live near their work place, this increases commutes, decreases the tax base, among other problems.

4.1 Employment Status Profile

For the purpose of this report, the labor force includes all people classified in the civilian labor force plus members of the U.S. Armed Forces (people on active duty with the United States Army, Air Force, Navy, Marine Corps, or Coast Guard). The civilian labor force consists of people classified as employed or unemployed. When considering the labor force of Montgomery County including Dayton, Montgomery County excluding Dayton, the City of Kettering and the City of Dayton, data from the U. S. Census Bureau - American FactFinder - Ohio 2000 indicates Kettering has the highest percentage (66.4%) of their population in the labor force while Dayton has the lowest at 59.5%. The State of Ohio reports a labor force of 64.8% while the United States reports a lower rate of 63.9%. Table 4.0 shows labor force data.

[40] U.S. Census Bureau, 2000 Table P63 (SF3) by Census Tract

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[40] U.S. Census Bureau, 2000 Table P63 (SF3) by Census Tract

Table 4.0: Labor Force Participation Rates and Numbers

Economic Characteristic	Montgomery Cty Including the City of Dayton		Montgomery Cty Excluding the City of Dayton		City of Kettering		City of Dayton	
In Labor Force	64.1%	279,635	66.0%	202,952	66.4%	30,544	59.5%	76,683

Source: U.S. Census Bureau - American FactFinder - Ohio 2000

The American FactFinder - Ohio 2000 civilian labor force (persons over 16 years and excluding the Military) data shows that Montgomery County has a combined labor force of 279,635 which is 50.1% of the total County population of 559,062 persons. The City of Dayton's civilian labor force makes up 46.2% (76,683) of its population of 166,179. The City of Kettering has the largest percentage civilian labor force of the three with 53.2% (30,544) of their total population of 57,502. Montgomery County, excluding the City of Dayton, has a civilian labor force of 202,952. This is 51.7% of 392,883 Montgomery County population outside the City of Dayton. Again, Kettering has the highest percentage and Dayton the lowest. The States of Ohio and the United States report the civilians labor force to be considerably higher with a percentage of 64.8 % and 63.9%, respectively. Civilian labor force data is shown in Table 4.1.

Table 4.1: Civilian Labor Force 2000

Economic Characteristic	**Montgomery County Including the City of Dayton**	**Montgomery County Excluding the City of Dayton**	**City of Kettering**	**City of Dayton**
Total Civilian Labor Force*	279,635	202,952	30,544	76,683

Source: U.S. Census Bureau - American FactFinder - Ohio 2000

The most recent 2003 unemployment rate in Montgomery County was higher than the annual average for the previous five years - 6.3%. The annual average unemployment rate in the County during the last five years was as low as 3.7% in 2000. During the three years since the 2000 rate of 3.7%, the unemployment rate has increased 0.6%, 1.3% and 0.7% respectively. Looking at the civilian labor force numbers, we see a different picture: 2001 showed an increase of 1.6%; 2002 showed a decrease of 1.4%; and, 2003 an increase of 0.4%. Statewide, for 2003, the annual average unemployment rate was 6.0% to 6.9% while the U.S. unemployment rate for the same period was 6.0%. The Montgomery County Local Area Unemployment Statistics (LAUS) are shown in Table 4.2.

Table 4.2: Montgomery County - Local Area Unemployment Statistics (LAUS) 1998-2003

Year	Total Civilian Labor Force	Employed	Unemployed	Unemployment Rate
2003	279,450	261,832	17,618	6.3
2002	278,270	262,618	15,652	5.6
2001	282,332	270,257	12,075	4.3
2000	277,863	267,570	10,293	3.7
1999	278,508	267,854	10,654	3.8
1998	281,203	269,772	11,431	4.1

Source: U.S. Department of Labor - Bureau of Labor Statistics - Local Area Unemployment Statistics

Table 4.3: Civilian Labor Force - Employed, Unemployed and Unemployment Rate 2000

Geographic Area	Total Civilian Labor Force	Employed	Unemployed	Unemployment Rate
Montgomery County Excluding Dayton	200,807	193,148	7,659	2.5%
City of Kettering	30,345	29,337	1,008	2.2
City of Dayton	76,216	69,126	7,090	5.5%

Source: U.S. Census Bureau - American FactFinder - Ohio 2000

When looking at Table 4.3, we find that Kettering's unemployment rate is the lowest of the three geographic areas and Dayton's unemployment rate is more than double that of Montgomery County excluding Dayton. For the same year, Ohio's rate of unemployment was 3.2% while the U.S. rate was 3.7%.

Related Occupations and Sales and Office. The City of Dayton shows the highest rate in three areas - Service, Construction, Extraction and Maintenance and Production, Transportation and Material Moving. Kettering holds the highest rate for Farming, Fishing and Forestry.

Table 4.6: Occupation Employed Civilian Population 16 and Over - 2000

Subject	Montgomery County	Montgomery County Excluding Dayton	City of Kettering	City of Dayton
Management, Professional and Related Occupations	33.5%	36.2%	39.5%	25.7%
Service	14.8%	12.6%	12.0%	21.1%
Sales and Office	26.8%	27.3%	28.8%	25.3%
Farming, Fishing and Forestry	0.1%	0.1%	0.2%	0.1%
Construction, Extraction and Maintenance	7.7%	7.7%	6.5%	7.8%
Production, Transportation and Material Moving	17.1%	16.1%	13.0%	20.0%

Source: American FactFinder - U.S. Census Bureau - Ohio 2000

Next we will look at Montgomery County - Economic Structure 2000 - Value Added by Sector and Employment by Sector. Value Added is a broad measure of income that includes employee compensation (wages, salaries, benefits), proprietary income (self-employment), other property income (interest, rent, royalties, dividends profits) and indirect business taxes (excise and sales taxes). Employment in this context includes full-time and part-time workers and the self-employed in all sectors, including Agriculture, FIRE (finance, insurance, real estate), TCPU (transportation, communications, public utilities) and Trade includes wholesale and retail.

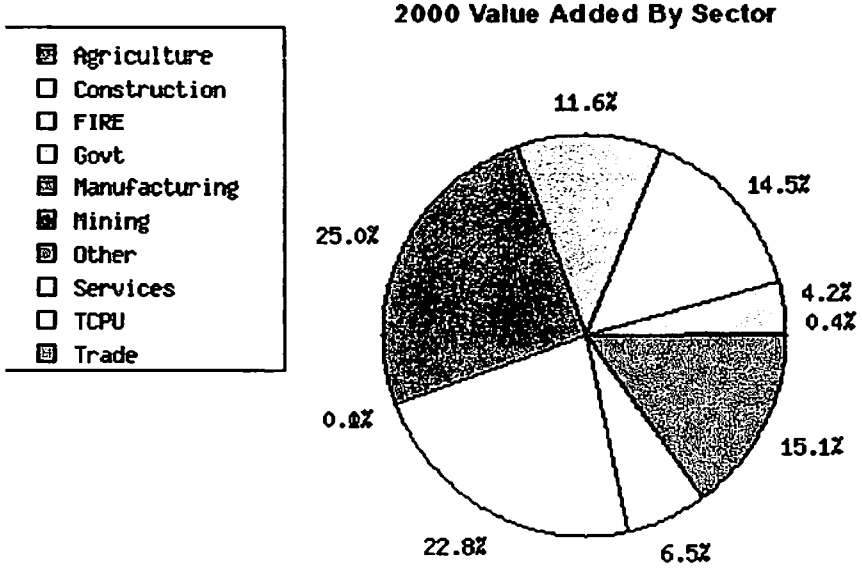
First, we will take a look at the pie-chart for 2000 Value Added by Sector. Manufacturing and Services with 25.0% and 22.8% respectively for a total of 27.8% provide by far the

greatest amount of income for Montgomery County. Following not too closely behind Manufacturing and Services, we have Trade (wholesale and retail) at 15.1% and FIRE (finance, insurance, real estate) at 14.5% of County income. Government is the fifth largest income producer in the County.

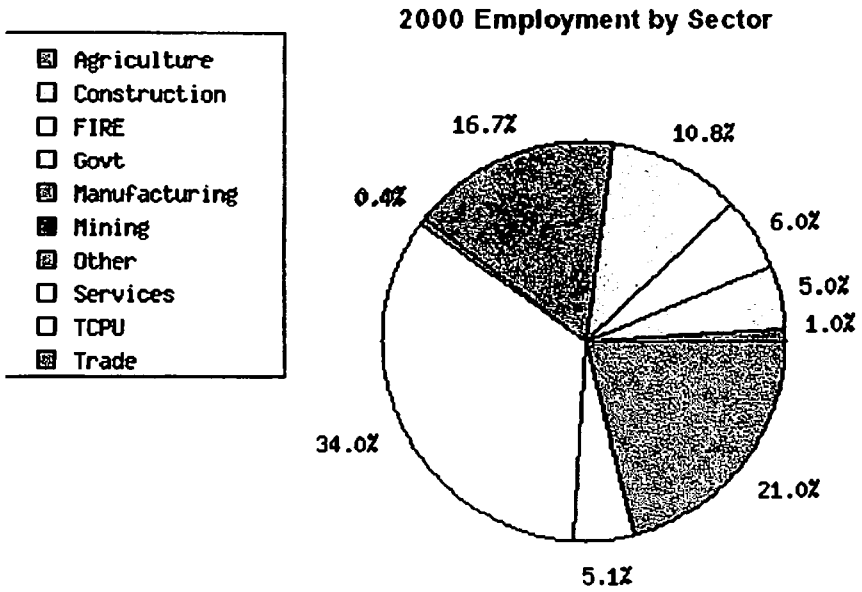
Lastly, we will examine the pie-chart for 2000 Employment by Sector. The largest employment sector by 13% is Services reporting 34.0%. Trade with 21.0% and Manufacturing with 16.7% are the next largest sectors. Government, at 23.2% less than Service, holds fourth place with 10.8%.

Manufacturing, although not the largest employment sector (16.7%), is the largest income for the County at 25.0%. Likewise, FIRE (finance, insurance, real estate), Government and TCPU (transportation, communications, public utilities) are larger income producers than employers.

Montgomery County (Ohio) - Economic Structure
Chart 4.1 and Chart 4.2



Total Value Added (millions): $20,712
* Warning: (negative) values pushed to 0.



Total Employment (workers): 373,052

Source: Ohio State University - Extension Data Center - Montgomery County Profile

Montgomery County (Ohio) - Economic Structure
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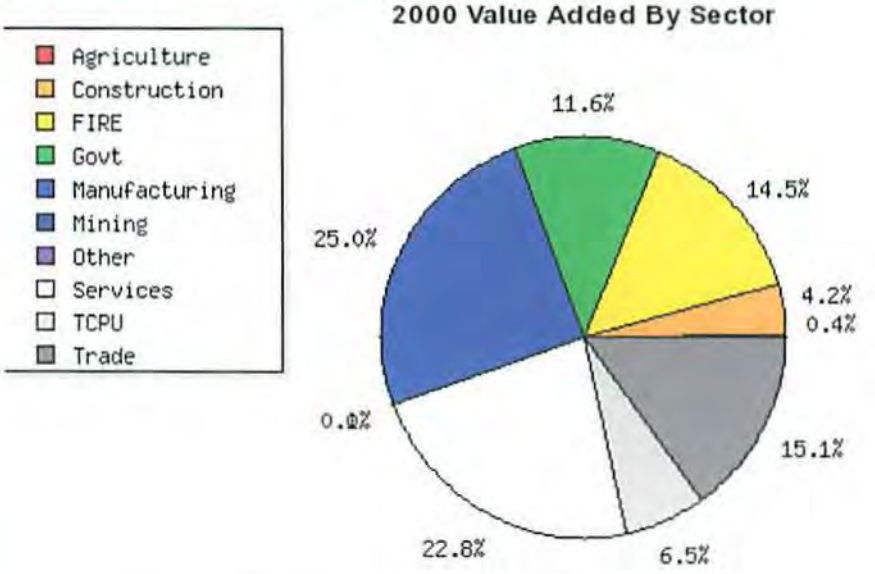

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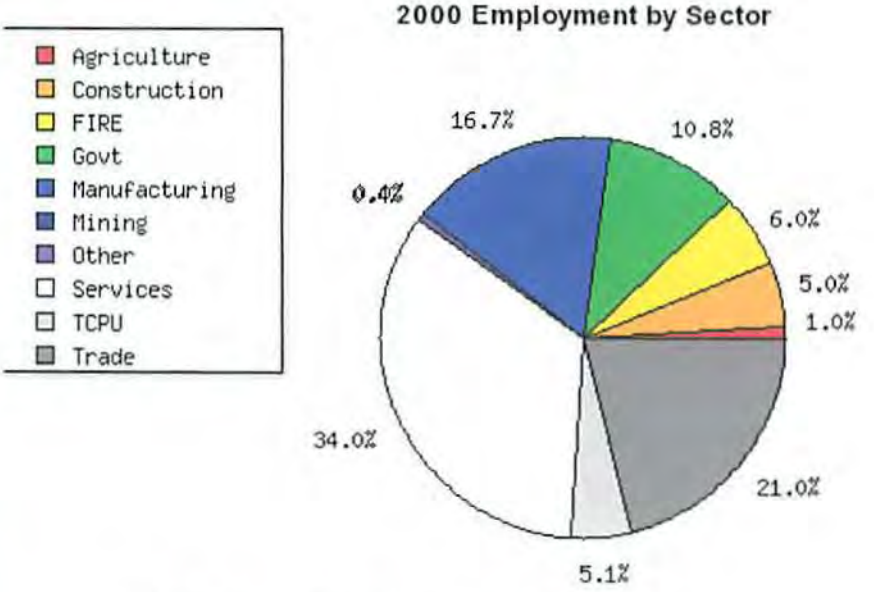


Total Employment (workers): 373,052

Source: Ohio State University - Extension Data Center - Montgomery County Profile

4.3 Industry Profile

Table 4.7 shows the number of employees for 2000 and 2003 and the number change of 21 industries during that period for Montgomery County. Although four of the 21 industries do not have change amounts, 17 do have the change listed which will allow us to determine whether these major industries employees are increasing or decreasing in number. Only seven of the 17 industries increased their number of employees while 10 decreased. During 2000, there were 289,598 employees in these major industries while in 2003 there were only 263,770 - a reduction of 25,828 employees. Five major industries lost more than 30,000 employees between 2000-2003: Manufacturing (17,229); Administration, Support, Waste Management, Remediation Services (7806); Retail Trade (2657); and, Transportation & Warehousing (2586). The industry of Management of Companies & Enterprises increased in employee number more than any other - 3341 additional employees.

Table 4.8 shows the number of establishments for 2000 and 2003 and the number change of 21 industries during that period for Montgomery County. Analyzing this will allow us to determine whether these major industries are increasing or decreasing in number. Eleven of the industries increased their number of establishments while 10 decreased. During 2000, there were 13,263 establishments in these major industries while in 2003 there were 13,041 - a reduction of 222 establishments. Five major industries lost 380 establishments between 2000-2003: Construction (101); Administration, Support, Waste Management, Remediation Services (74); Retail Trade (73); Other (68); and, Manufacturing (64). The industry of Professional, Scientific & Technical Services increased establishments more than any other - 48 additional establishments.

Table 4.9 shows the industry payroll for 2000 and 2003 and the change of industry payrolls during that period for Montgomery County. Analyzing this will allow us to determine which major industries are increasing or decreasing payroll. Sixteen of the industries increased their payroll while only 5 decreased. During 2000, the payroll was $9,488,641 in these major industries while in 2003 it was $8,945,289 - a reduction of $543,352. Five major industries lost $1,125,087 between 2000-2003: Manufacturing ($813,786); Administration, Support, Waste Management, Remediation Services ($138,783); Transportation & Warehousing ($92,235); Construction ($59,182); and, Auxiliaries (excluding Corporate, Subsidiary and Regional Management) ($21,101). The industry of Management of Companies & Enterprises increased payroll more than any other - $188,959 in additional payroll.

Table 4.7: Montgomery County Industry Employee Number 2000-2003

Industry Code	Number of Employee 2000	Number of Employees 2003	Change
Forestry, fishing, hunting and agri. support	20-99*	17	NA
Mining	20-99*	124	NA
Utilities	1000-2499*	849	NA
Construction	10,646	12,464	1818
Manufacturing	54,667	37,438	-17229
Wholesale Trade	13,249	12,817	-432
Retail Trade	34,043	31,386	-2657
Transportation & Warehousing	10,227	7,641	-2586
Information	9,627	9,583	-44
Finance & Insurance	10,552	11,065	513
Real Estate, Renting & Leasing	3,503	3,452	-51
Professional, Scientific & Tech. Services	14,233	16,273	2040
Management of Companies & Enterprises	10,365	13,706	3341
Admin., Support, Waste Mgt., Remediation. Serv.	22,984	15,178	-7806
Educational Services	8,378	9,230	852
Health Care and Social Assistance	40,456	42,123	1667
Arts, Entertainment & Recreation	2,326	2,119	-207
Accommodation & Food Service	23,256	23,365	109
Other Services (except Public Admin.)	16,212	15,459	-753
Auxiliaries (except Corporate, Subsidiary and Regional Mgt.)	1,665	1,255	-410
Other/Unclassified Est.	100-249*	14	NA
TOTAL	**289,598**	**263,770**	**-25,828**

* No specific numbers available, number range only

Source: U.S. Census Bureau: 2000 County Business Patterns (NAICS) - Montgomery OH Major Industry

Table 4.8: Montgomery County Industry - Number of Establishments 2000-2003

Industry Code	Number of Establishments 2000	Number of Establishments 2003	Change
Forestry, fishing, hunting and agriculture support	8	7	(1)
Mining	6	10	4
Utilities	17	20	3
Construction	1,039	938	(101)
Manufacturing	941	877	(64)
Wholesale Trade	829	815	(14)
Retail Trade	2,030	1,957	(73)
Transportation & Warehousing	273	267	(6)
Information	233	234	1
Finance & Insurance	877	893	16
Real Estate, Renting & Leasing	510	548	38
Professional, Scientific & Tech. Services	1,283	1,331	48
Management of Companies & Enterprises	136	136	0
Admin., support, waste mgt., remediation serv.	708	634	(74)
Educational Services	138	162	24
Health Care and Social Assistance	1,367	1,413	46
Arts, Entertainment & Recreation	176	160	(16)
Accommodation & Food Service	1,074	1,101	27
Other Services (except Public Admin.)	1,489	1,481	(8)
Auxiliaries (except Corporate, Subsidiary and Regional Mgt.)	34	30	(4)
Other/Unclassified Est.	95	27	(68)
TOTAL	**13,263**	**13,041**	**(222)**

Source: U.S. Census Bureau: 2000 County Business Patterns (NAICS) - Montgomery OH Major Industry

Table 4.9: Industry by Payroll ($1000) 2000-2003

Industry Code	Payroll ($1000) 2000	Payroll ($1000) 2003	Change
Forestry, fishing, hunting and agriculture support	0	568	568
Mining	0	5,254	5,254
Utilities	0	51,190	51,190
Construction	473,210	414,028	(59,182)
Manufacturing	2,461,398	1,647,612	(813,786)
Wholesale Trade	575,788	588,825	13,037
Retail Trade	645,807	656,658	10,851
Transportation & Warehousing	355,794	263,559	(92,235)
Information	459,326	507,269	47,943
Finance & Insurance	401,128	434,822	33,694
Real Estate, Renting & Leasing	90,978	95,881	4,903
Professional, Scientific & Tech. Services	592,344	693,600	101,256
Management of Companies & Enterprises	721,107	910,066	188,959
Admin., support, waste mgt., remediation serv.	473,227	334,444	(138,783)
Educational Services	156,956	177,641	20,685
Health Care and Social Assistance	1,336,333	1,502,411	166,078
Arts, Entertainment & Recreation	37,341	39,852	2,511
Accommodation & Food Service	238,776	244,298	5,522
Other Services (except Public Admin.)	303,697	345,796	42,099
Auxiliaries (except Corporate, Subsidiary and Regional Mgt.)	82,198	61,097	(21,101)
Other/Unclassified Est.	0	418	418
TOTAL	**9,488,641**	**8,945,289**	**(543,352)**

Source: U.S. Census Bureau: 2000 County Business Patterns (NAICS) - Montgomery OH Major Industry

Table 4.10 shows the percentage of employees for each major industry during 2000. The largest percentage of employees are found in Education, Health and Social Services, Manufacturing, Retail Trade and Professional, Scientific, Management, Administrative and Waste Management Services. Montgomery County, excluding Dayton, has four of the highest percentages - Agriculture, Construction, Manufacturing, Wholesale Trade - and three of the lowest - Educational, Health and Social Services, Arts, Entertainment, Recreation, Accommodation and Food Services and Other Services (Except Public Administration)

Table 4.10: Industry Employee Percentage 2000

Subject	Montgomery County	Montgomery County Excluding Dayton	City of Kettering	City of Dayton
Agriculture	0.3%	0.3%*	0.1%	0.2%
Construction	5.2%	5.3%	4.6%	5.2%
Manufacturing	18.1%	18.7%	16.8%	16.3%
Wholesale Trade	3.1%	3.4%	3.1%	2.3%
Retail Trade	12.1%	12.5%	12.8%	10.8%
Transportation and Warehousing and Utilities	4.8%	4.8%	2.8%	5.1%
Information	2.6%	2.7%	3.2%	2.3%
Finance, Insurance and Real Estate	5.5%	6.0%	6.2%	4.2%
Professional, Scientific, Management, Administrative and Waste Management Services	10.0%	10.4%	12.5%	8.9%
Educational, Health and Social Services	20.7%	19.9%	20.7%	23.0%
Arts, Entertainment, Recreation, Accommodation and Food Services	7.6%	6.7%	8.4%	10.1%
Other Services (Except Public Administration)	4.4%	4.3%	4.5%	4.5%
Public Administration	5.6%	5.1%	4.3%	7.0%

Source: American FactFinder - U.S. Census Bureau - Ohio 2000 * Highest ** Lowest

4.4 Income and Wages Profile

Communities across the country are recognizing the importance of affordable housing to their future economic and social well-being. Economic growth is at risk when growth in jobs and population are not matched by the growth in the supply of affordable housing. For businesses, the ability to attract and retain labor depends partly on the availability of decent and affordable housing.

Among the social concerns are basic issues of equity for low-moderate income working families. In many communities, people who provide the bulk of vital services - teachers, firefighters, police officers and laundry and restaurant workers - often themselves cannot afford to live there. Yet, it is often in these communities where affordable housing for working families is most needed and that the most opposition to such housing exists. Moreover, a host of social problems can occur when working families face a shortage of affordable housing. Family disruption, overcrowding and congestion degrade the quality of life in the communities for all residents.

Using Graph 4.1 (a, b, c), thirty-one occupations and home ownership of an average priced home in Montgomery County during 2003 are analyzed. These particular occupations were selected because they are all traditional jobs that rely on traditional wages.

Second, Graph 4.2 (a, b, c) shows housing costs on the rental side for 24 occupations that typically attract first-time entrants into the workforce, recent immigrants and other participants such as welfare-to-work job seekers. The cost of housing was calculated using the HUD Fair Market Rents for a Montgomery County one-bedroom, two-bedroom and three-bedroom apartment. The "an hourly wage needed to afford" unit was figured using an accepted standard of affordability as developed by the National Low-Income Housing Coalition - the wage that must be earned so that the rent does not exceed 30 percent of income.

Finally, Graph 4.3 (a, b) shows all occupations, in the most recent Montgomery County Occupational Wage Survey Estimates, whose average hourly wage would not meet the "Hourly Wage Needed to Afford" standard for even a one-bedroom apartment. Where there are gaps between wages earned and what is actually required to make the cost of housing affordable, working families make adjustments by devoting a disproportionate share of their income to housing while cutting back on other necessities.

For Graph 4.1 a, b and c, the average sale priced home, according to the Dayton Area Board of REALTORS®, is the mathematical average of all sold homes reported during the calendar year 2003 in Montgomery County. "Annual Income Needed" to qualify for a

Wages and the Cost of Housing in Montgomery County, OH
Homeownership Market

$130,647

4.1 Graph

SOURCE: Labor Market Info Classic State of Ohio(ODJFS) Occupational Wage Survey

A. Annual Income Needed
B. Aircraft Mechanic
C. Bookkeeper
D. Coating, Painting, and Spraying Machine Setters, Operators, and Tenders
E. Computer Operators
F. Computer Support
G. Computer-Controlled Machine Tool Operators, Metal and Plastic
H. Cafeteria, and Food Concession
I. Crushing, Grinding and Polishing Machine Setters, Operators and Tenders
J. Customer Service Representatives
K. Electrical and Electronic Equipment Assemblers

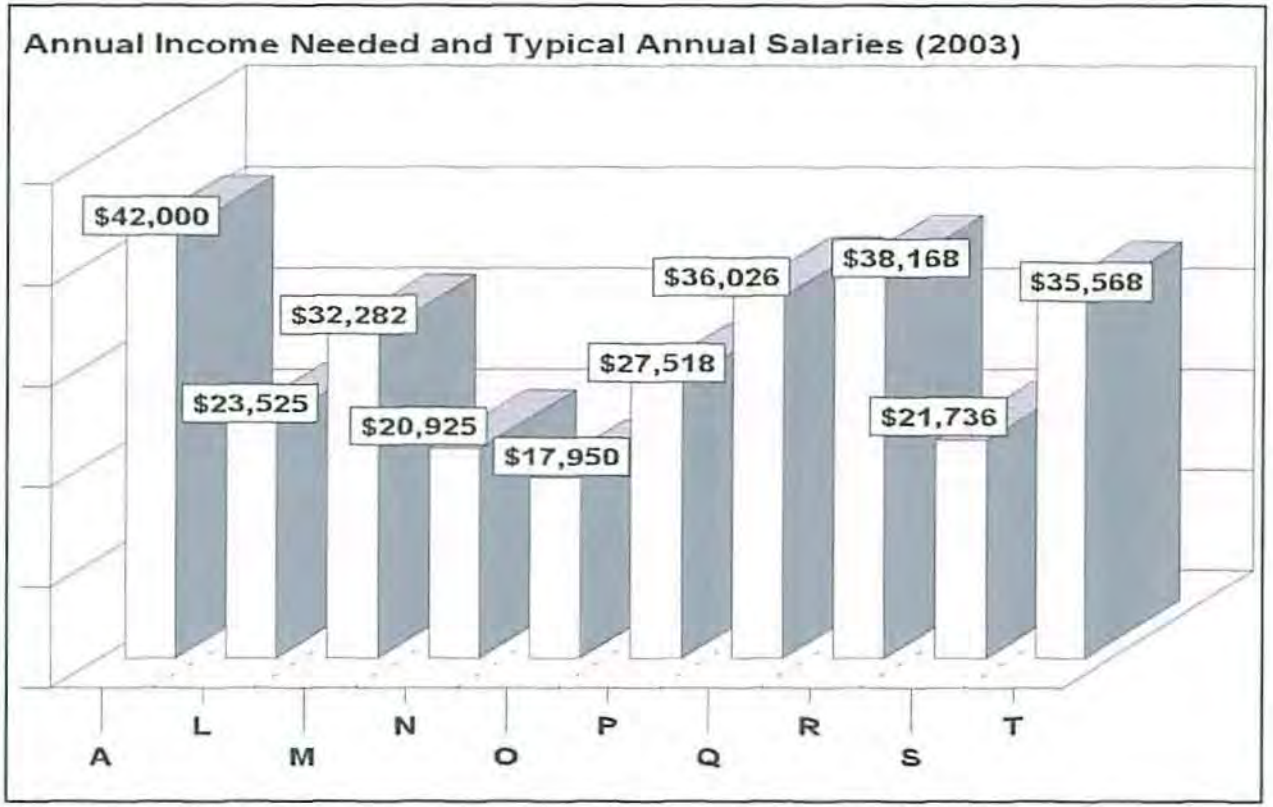
***Average Sale Price** is the mathematical average of all sold homes reported during the calendar year.
Source: Dayton Area Board of REALTORS - Average Sales Price From 1973 to 2004

Wages and the Cost of Housing in Montgomery County, OH - Homeownership Market

$130,647

L. Electronic Equipment Installers and Repairers, Motor Vehicles
M. Executive Secretaries and Administrative Assistants
N. File Clerks
O. Food Preparation Workers
P. Forging Machine Setters, Operators, and Tenders, Metal and Plastic
Q. Grinding, Lapping, Polishing and Buffing Machine Tool Setters, Operators and Tenders
R. Inspectors, Testers, Sorters, Samplers and Weighers
S. Janitors and Cleaners
T. Lay-Out Workers Metal and Plastic

4.2 Graph



SOURCE: Labor Market Info Classic State of Ohio(ODJFS) Occupational Wage Survey

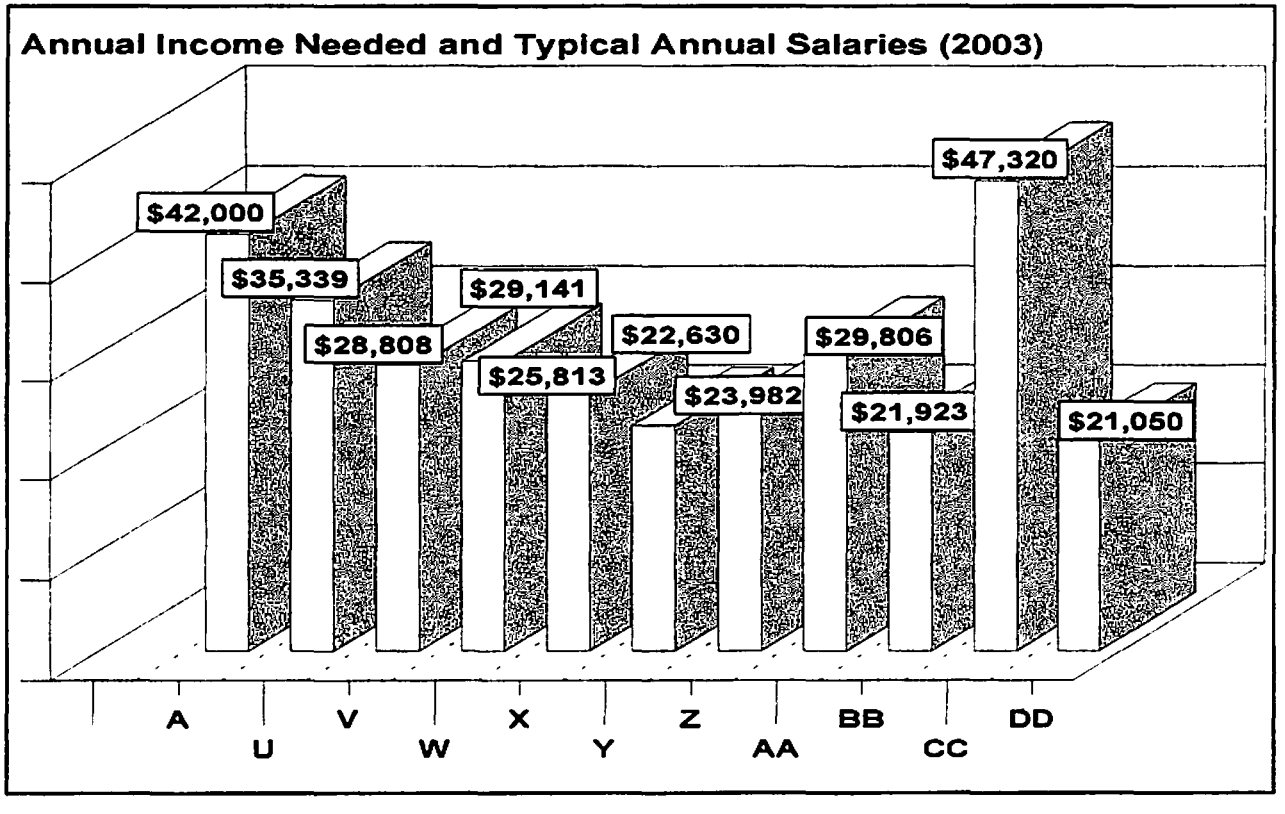
***Average Sale Price** is the mathematical average of all sold homes reported during the calendar year.
Source: Dayton Area Board of REALTORS - Average Sales Price From 1973 to 2004

Wages and the Cost of Housing in Montgomery County Ohio Homeownership Market

2003
Average Priced Home
$130,647

A. Annual Income Needed
T. Lay-Out Workers, Metal and Plastic
U. Licensed Practical and Licensed Vocational Nurses
V. Machine Feeders and Offbearers
W. Medical and Clinical Laboratory Technicians
X. Medical Records and Health Information Technicians
Y. Nursing Aides, Orderlies and Attendants
Z. Office Clerks, General
AA. Payroll and Timekeeping Clerks
BB. Receptionist and Information Clerks
CC. Registered Nurses
DD. Stock Clerks & Order Fillers

4.3 Graph



SOURCE: Labor Market Info Classic Occupational Wage Survey

***Average Sale Price** is the mathematical average of all sold homes reported during the calendar year.

mortgage was calculated using the average interest rate prevailing in 2003, assumes a 10 percent down-payment, minimal debt, reasonably good credit, the use of private mortgage insurance and includes estimated PITI (principal, interest, taxes and insurance) for a $130,647 home.

Of the 29 average occupations such as aircraft mechanic, bookkeeper, computer operator, executive secretary and registered nurse included, only two qualified for an average priced home - aircraft mechanic ($45,864) and registered nurse ($47,320). Fourteen of the 27 remaining occupations earned at least two-thirds ($28,000 and over)of the annual income needed, 10 earned between one-half ($21,000-$28,000) and two-thirds and three less than half ($21,000 or less)of the annual income needed.

For Graph 4.2 a, b and c, the FMR or Fair Market Rent during 2003 for a one-bedroom was$459 per month, for a two-bedroom $585 per month and for a three-bedroom $755 per month in Montgomery County according to HUD. The Hourly Wage Needed to Afford is the hourly wage that must be earned so that rent does not exceed 30 percent of income, a standard measure of affordability. The Hourly Wage Needed to Afford was $8.83, $11.25 and $14.52 for a one, two and three-bedroom apartment respectively.

Of the 25 entry level occupations, three earned the Hourly Wage Needed to Afford to afford a three-bedroom apartment, 14 of the remaining occupations earned the Hourly Wage Needed to Afford to afford a two-bedroom apartment, four of the remaining eight earned the Hourly Wage Needed to Afford to afford a one-bedroom apartment and four did not earn the Hourly Wage Needed to Afford to afford a one-bedroom apartment.

For Graph 4.3 a and b, we again utilize the most recent data from the Occupational Employment Statistics (OES) survey - Occupational Wage Survey Estimates for Montgomery County. Three hundred and sixty-four (364) occupations are included in this data. **Of the 364, twenty-one or 5.8% did not earn the Hourly Wage Needed to afford a one-bedroom apartment - $8.83. Of these 21 occupations, child care workers earned the highest wage and waiters/waitresses the lowest.**

Ultimately, affordable housing is not only a question of bottom line economics, but of equity. The housing cost and wage review in this section attempts to put a "face" on the affordable housing problem confronting many working families.

Table 4.11 shows the percentage of persons using various methods to commute to work in the four geographic areas. The most commonly used method was car, truck or van - drove alone. Montgomery County, excluding Dayton, used drove alone more than any

other geographic area and just slightly more than Kettering. Next, in terms of highest use, was car, truck or van - car-pooled. Dayton reported the highest percentage of persons who car-pooled at 11.6%. In fact, Dayton reported the highest percentages in four methods of commuting - car-pooled, public transportation, walked and other means. Public transit was least used in the City of Kettering and then Montgomery County excluding Dayton. Kettering reported the highest percentage of persons working at home with 2.9% and Montgomery County reported the highest mean travel time to work (minutes).

Table 4.11: Commuting To Work 2000

Subject	Montgomery County	Montgomery County Excluding Dayton	City of Kettering	City of Dayton
Car, truck, or van - drove alone	83.7%	87.3%	87.5%	73.6%
Car, truck, or van - car-pooled	8.6%	7.5%	6.5%	11.6%
Public transportation - including cab	2.7%	1.2%	1.1%	7.0%
Walked	2.2%	1.1%	1.4%	5.3%
Other means	0.6%	0.5%	0.6%	0.9%
Worked at home	2.2%	2.4%	2.9%	1.6%
Mean travel time to work (minutes)	21.2	21.1	19.6	21

Source: American FactFinder - U.S. Census Bureau - Ohio 2000

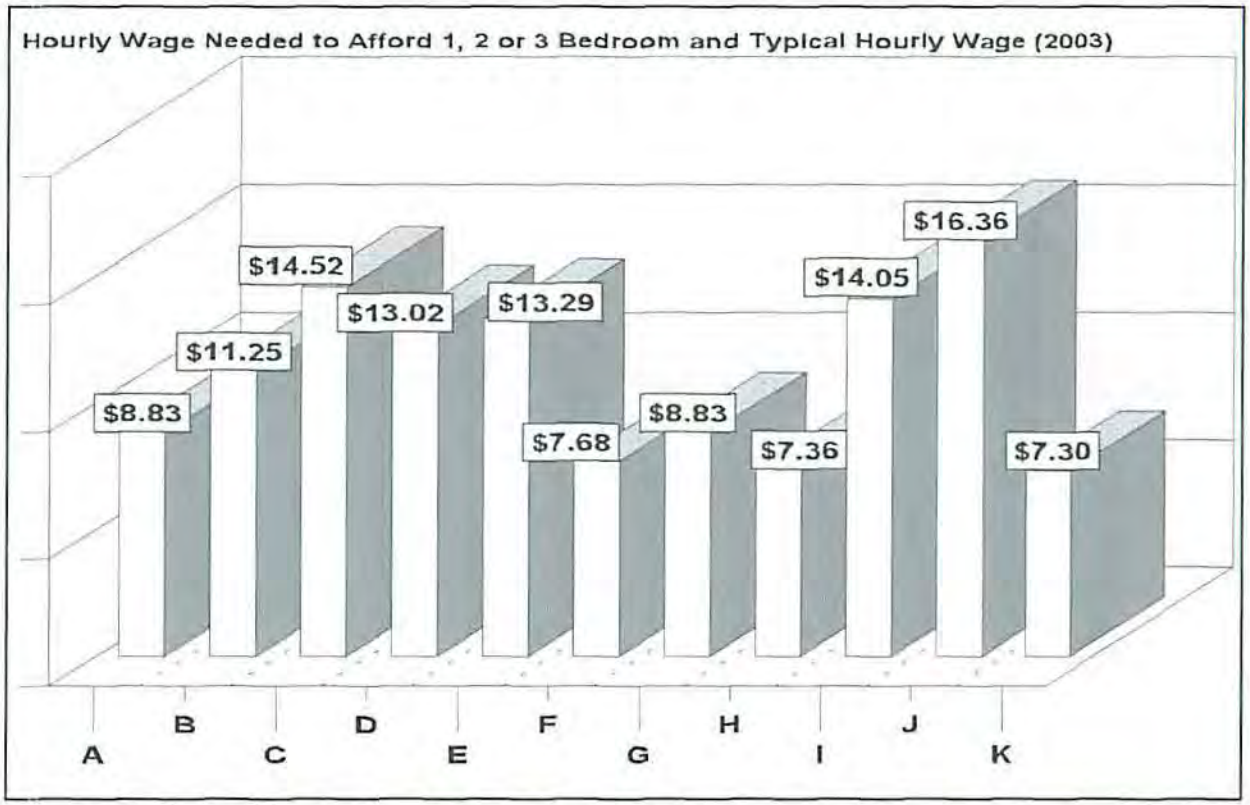
Table 4.12 shows the commuters in and commuters out of Montgomery County and the net change between 1990 and 2000 for seven neighboring counties. This table is significant because it reveals whether commuting workers from other counties are increasing or decreasing and whether Montgomery County's out of County commuting workers are increasing or decreasing.

The net change from 1990-2000 for six of the seven is negative. Only Preble was positive. In two counties, fewer commuters are coming in and more are going to - Greene and Clark. Greene County which reports the greatest number of commuters in 1990 (26,305) and in 2000 (24,925) also reported the greatest decrease of commuters during that same period - (-6292). Miami, Warren, Preble, Butler and Darke all report increased numbers of commuters into Montgomery County for 2000. Montgomery County reported an increased number of commuters traveling to each of the seven counties from 1990 to 2000.

Wages and the Cost of Housing in Montgomery County, OH - Rental Market

1 BR $459/Month
2 BR $585/Month
3 BR $755/Month

4.2a Graph



SOURCE: Labor Market Info Classic State of Ohio(ODJFS) Occupational Wage Survey

D. Billing and Posting Clerks and Machine Operators
E. Bookkeeping, Accounting and Auditing Clerks
F. Cashiers
G. Child Care Workers
H. Combined Food Preparation and Serving Workers, Including Fast Food
I. Computer Operators
J. Construction Laborers
K. Cafeteria, Food Concession, and Coffee Shop

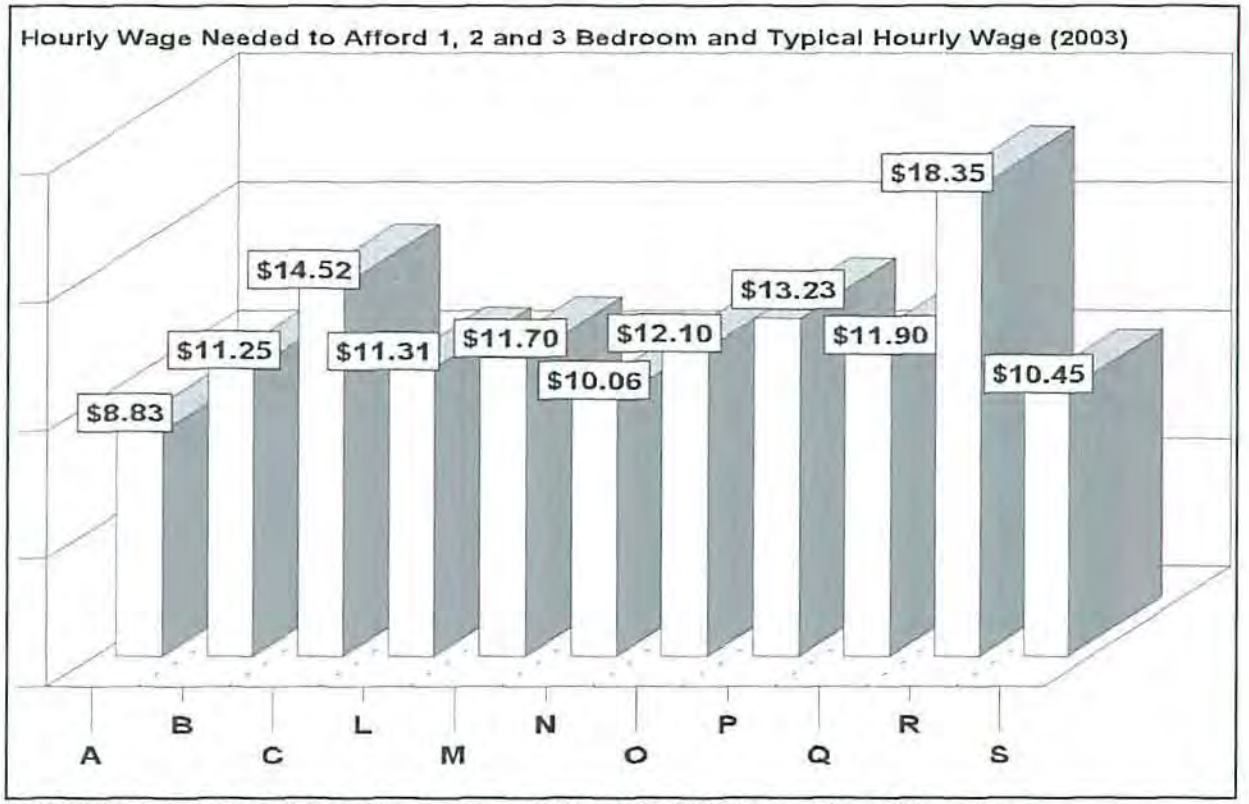
****Fair Market Rents** are determined by the U.S. Department of Housing and Urban Development. The **Hourly Wage Needed to Afford** is the hourly wage that must be earned so that this rent does not exceed 30 percent of income, a standard measure of affordability.

Wages and the Cost of Housing in Montgomery County, OH - Rental Market

RENTAL MARKET

1 BR $459/Month
2 BR $585/Month
3 BR $755/Month

4.2b Graph



SOURCE: Labor Market Info Classic State of Ohio(ODJFS) Occupational Wage Survey

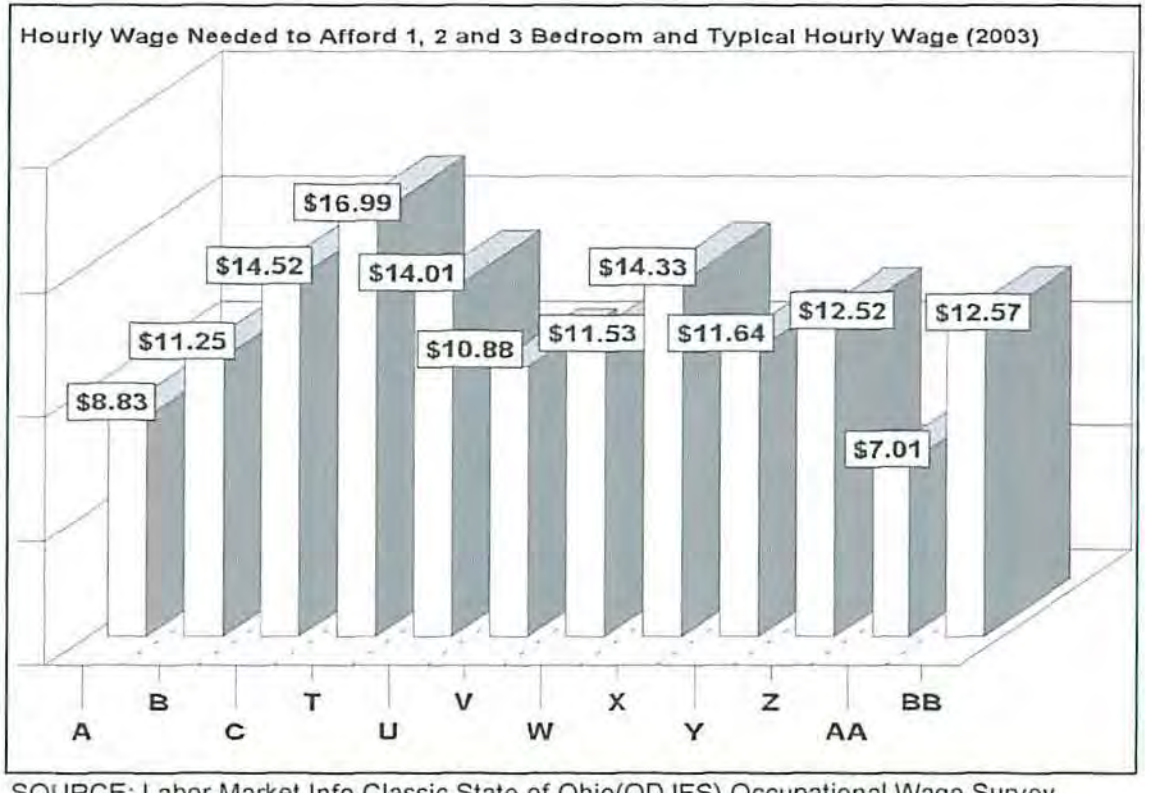
L. Electronic Installers and Repairers, Motor Vehicles
M. Emergency Medical Technicians and Paramedics
N. File Clerks
O. Firefighters
P. Forging Machine Setters, Operators, and Tenders, Metal and Plastic
Q. Grinding, Lapping, Polishing and Buffing Machine Tool Setters,
R. Inspectors, Testers, Sorters, Samplers and Weighers
S. Janitors and Cleaners

Fair Market Rents are determined by the U.S. Department of Housing and Urban Development. The **Hourly Wage Needed to Afford** is the hourly wage that must be earned so that this rent does not exceed 30 percent of income, a standard measure of affordability.

1 BR $459/Month
2 BR $585/Month
3 BR $755/Month

T. Lay-Out Workers Metal and Plastic
U. Licensed Practical and Licensed Vocational Nurses
V. Machine Feeders and Offbearers
W. Medical and Clinical Laboratory Technicians
X. Medical & Health Information
Y. Nursing Aides, Orderlies and Attendants
Z. Office Clerks, General
AA. Payroll &Timekeeping Clerks
BB. Word Processors & Typists

Wages and the Cost of Housing Rental Market
Graph 4.2c



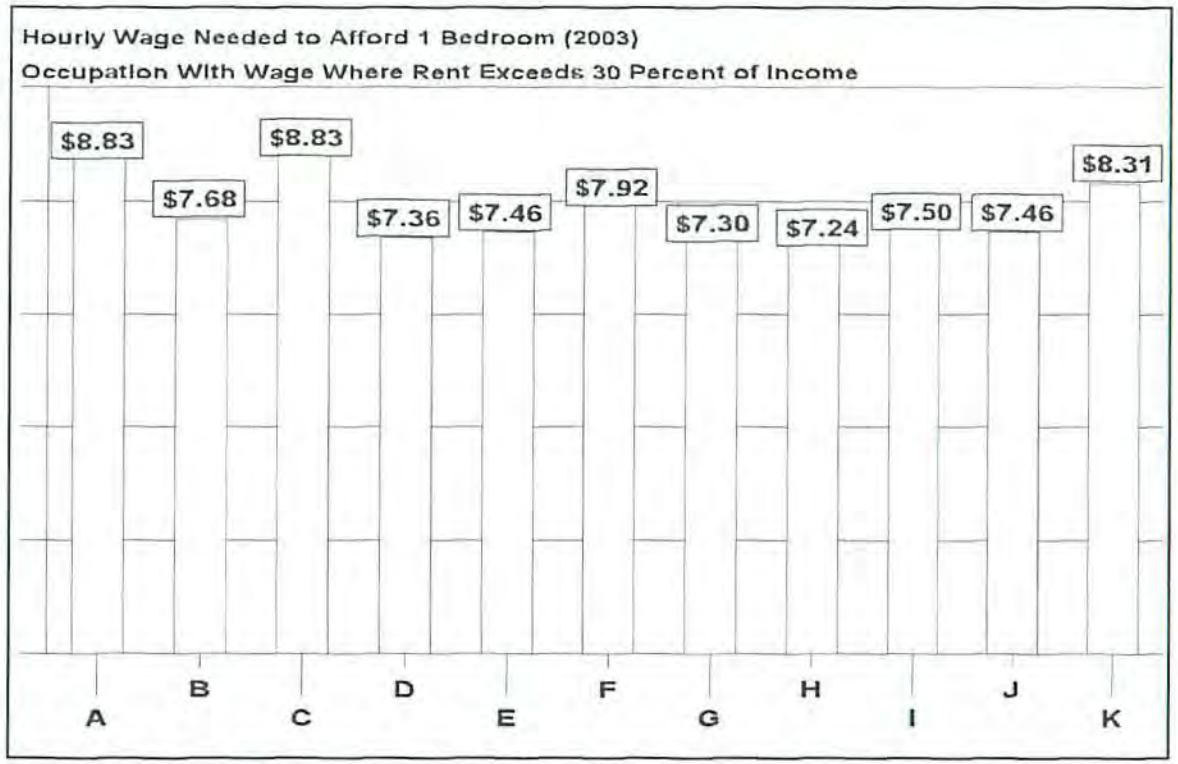
SOURCE: Labor Market Info Classic State of Ohio(ODJFS) Occupational Wage Survey

****Fair Market Rents** are determined by the U.S. Department of Housing and Urban Development. The **Hourly Wage Needed to Afford** is the hourly wage that must be earned so that this rent does not exceed 30 percent of income, a standard measure of affordability.

1 BR $459/Month

B. Cashiers
C. Child Care Workers
D. Combined Food Preparation and Serving Workers Including Fast Food
E. Cooks, Fast Food
F. Cooks, Short Order
G. Cafeteria, Food Concession, and Coffee Shop
H. Dining Room and Cafeteria Attendants and Bartender Helpers
I. Dishwashers
J. Food Batchmakers
K. Food Servers Nonrestaurant

Wages and the Cost of Housing - Rental Market
4.3a Graph



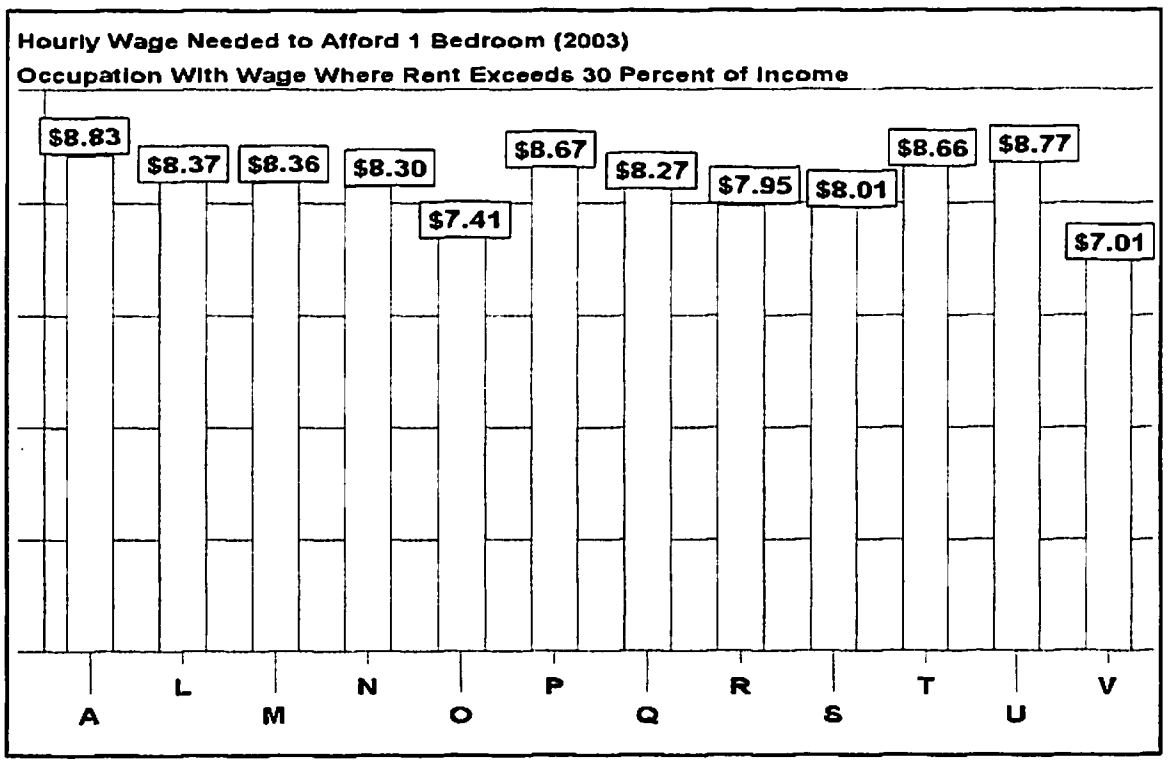
SOURCE: Labor Market Info Classic State of Ohio(ODJFS) Occupational Wage Survey

Fair Market Rents are determined by the U.S. Department of Housing and Urban Development. The **Hourly Wage Needed to Afford** is the hourly wage that must be earned so that this rent does not exceed 30 percent of income, a standard measure of affordability.

1 BR $459/Month

L. Hosts and Hostesses, Restaurant, Lounge and Coffee Shop
M. Laundry and Dry-Cleaning Workers
N. Maids and Housekeeping Cleaners
O. Nonfarm Animal Caretakers
P. Packers and Packagers, Hand
Q. Parking Lot Attendants
R. Pharmacy Aides
S. Pressers, Textile, Garment, and Relate Materials
T. Service Station Attendants
U. Taxi Drivers and Chauffeurs
V. Waiters and Waitresses

Wages and the Cost of Housing - Rental Market
Graph 4.3b



SOURCE: Labor Market Info Classic State of Ohio(ODJFS) Occupational Wage Survey

****Fair Market Rents** are determined by the U.S. Department of Housing and Urban Development. The **Hourly Wage Needed to Afford** is the hourly wage that must be earned so that this rent does not exceed 30 percent of income, a standard measure of affordability.

During 1990, there were 65,299 commuters coming into Montgomery County. In 2000, there were 67,503 commuters coming in from the seven counties surveyed, for an increase of 2,204 or 3.4%. During 1990, there were 29,579 workers commuting from Montgomery County to the seven counties. In 2000, there were 40,143 commuting from Montgomery County for an increase of 10,564 or 35.7%. Clearly, the most significant observation from Table 4.13 is that during a 10-year period, workers commuting out increased at 10 times that of workers commuting in - 35.7 (out) and 3.4 (in).

Table 4.12: Montgomery County - Commuting 1990-2000*

County	Commuters In *Coming from*			Commuters Out *Traveling to*			Net		
	1990	*2000*	*Change*	*1990*	*2000*	*Change*	*1990*	*2000*	*Change*
Greene	26305	24925	-1380	19302	24214	+4912	7003	711	-6292
Miami	9908	11368	+1460	3139	4722	+1583	6769	6646	-123
Warren	9955	11325	+1370	2441	4488	+2047	7514	6837	-677
Clark	8430	7856	-574	1557	2517	+960	6873	5339	-1534
Preble	4100	4837	+737	794	933	+139	3306	3904	+598
Butler	4171	4635	+464	1989	2622	+633	2182	2013	-169
Darke	2430	2557	+127	357	647	+290	2073	1910	-163

Source: US Census Bureau County to County Worker Flow
*Residents retained: 211,194 (81.4%) - sorted by top 7 counties

Finally to complete Section 4, we will review the 24 major employers or employers which employ the most workers in Montgomery County. Table 4.13 lists the major employers, their product or service and their number of employees. The following map - *Montgomery County Major Employers* - shows a star pattern for 20 of the Montgomery County major employers. Major employers in Table 4.13 which are located outside of Montgomery County are highlighted in pink.

Five of the 24 largest major employers are associated with the automotive industry (car and truck). Five of the 24 are associated with the medical/heath industry and four are associated with higher education.

Seven of the 24 major employers are located outside the County - Wright-Patterson Air Force Base (Fairborn), Honda of America Manufacturing (Troy), ABX Air, Inc. (Wilmington), AK Steel Corporation (Middletown), International Truck & Engine (Springfield), Upper Valley Medical Center (Troy) and Cedarville College (Cedarville).

These seven employ some 51,985 County residents. Five of the eleven largest major employers are located outside the County.

Table 4.13: Major Employers in Montgomery County 2004

Employer	Product or Service	Number of Employees
Wright-Patterson Air Force Base	National Security and International Affairs	22000
Honda of America Manufacturing	Auto & Motorcycle Manufacturer	13200
Premier Health Partners	Medical and Surgical Hospitals	9000
Delphi Automotive Systems	Motor Vehicle Parts Manufacturing	8700
ABX Air, Inc.	Air Freight	6800
Kettering Medical Center	General Medical and Surgical Hospitals	6300
GM Moraine Assembly Plant	Motor Vehicles, Parts and Accessories	4208
AK Steel Corporation	Steel Mill	4200
NCR Corporation	Computer Equipment and Support	2700
Wright State University	Public University	2658
International Truck & Engine	Truck and Bus Bodies	2500
Behr America	Motor Vehicle Parts Manufacturing	2400
Elder-Beerman Corporation	Department Stores	2300
LexisNexis	Electronic Information Services	2300
Veterans Affairs Med. Ctr.	General Medical and Surgical Hospital	2100
Menlo Worldwide	Transport Freight Worldwide	2100
National City Mortgage	Mortgage Banking	2100
Copeland Corporation	Air Conditioning and Refrigeration Equip.	2000
Upper Valley Medical Center	Medical and Surgical Hospital	1800
University of Dayton	Private University	1775
Cox Ohio Publishing	Dayton & Springfield Daily Newspapers	1724
Children's Medical Center	Children's Hospital	1500
Cedarville College	Liberal Arts College	1485
Sinclair Community College	Community College	1485

Source: Dayton Area Chamber of Commerce - Pink background indicates employer not in County

Seventeen major employers are located in Montgomery County. Twelve of the major employers are located within or on the fringe of the Dayton city limits. Five are located well outside Dayton city limits. All major employers within the County are located near an Interstate Highway (I-75 or I-70), a U.S. Route (35) or a State Route (St. Rt. 49, St. Rt. 48, St. Rt. 4).

After looking at major employers and their locations in and out of the County, a number of things stand out in Table 4.12. For Montgomery County when considering commuting: Montgomery County car, truck or van - drove alone at 83.7% is higher than Ohio or U.S. percentages which are 82.8 and 75.7 respectively. Montgomery County car, truck or van - car-pooled at 8.6% is lower than Ohio or U. S. Percentages which are 9.3% and 12.2%; and, Montgomery County Public Transportation - including cab at 2.7% is higher than Ohio at 2.1% but lower than the U.S. at 4.7%. This data reveals that, given the location of the major employers, neither car-pooling nor public transportation is used adequately by workers.

5.0 - ADVERTISING IN MONTGOMERY COUNTY and the CITY OF KETTERING

In simple terms, discriminatory real estate advertising is prohibited by the Fair Housing Amendments Act (FHAA) of 1988. This means the law applies to classified advertising, display advertising, inserts or any other types of real estate advertising that a newspaper or magazine may publish. It also applies to any type of advertising or written material that a real estate business may distribute or use, whether it is brochures, direct mailings, radio or television advertising, multiple listing services (MLS), posters, billboards, application forms or other documents, signs or videos.

In Section 804, the FHAA specifically states that it shall be unlawful to make, print, or publish, or cause to be made, printed or published any notice, statement, or advertisement, with respect to the sale or rental of a dwelling that indicates any preference, limitation, or discrimination based on race, color, religion, sex, disability, familial status, or national origin, or an intention to make any such preference, limitation, or discrimination.

Housing is an integral part to the success of a community care for many people with mental disabilities, discrimination has been a major barrier of access to adequate housing. In an effort to eliminate such discrimination and to support the right of people with a disability to live in the community of their choice, Congress included in the FHAA prohibitions against discrimination of persons with a mental disability in the provision of housing. In addition, it also prohibited discrimination of families with children. The provisions of the act also establish stronger administrative enforcement mechanisms and provide for stiffer penalties to expand coverage to include these specific classes in addition to those protected classes initially covered.

There are special rules applicable to senior complexes and the advertising for such senior complexes. The FHAA provides that housing for older persons includes three categories of housing: (1) housing provided under a state or federal program that HUD determines is "specifically designed and operated to assist elderly persons"; (2) housing intended for and only occupied by persons who are 62 or older; and (3) housing "intended and operated for occupancy by at least one person 55 years of age or older per unit," which means that the housing must have at least 80 percent of its units occupied by at least one person 55 years of age or older, must have facilities and services designed to meet the needs of older persons and must adhere to the policies and procedures that demonstrate an intent to provide housing for persons 55 or older. The FHAA also provided for certain "transition" rules for existing complexes.

Although the FHAA does not address the issue of advertising for senior complexes, the HUD regulations make clear that there is a parallel exemption from the discriminatory advertising provisions. Therefore, advertising for qualified "housing for older persons" under the FHAA may make reference to the age of the desired residents.

Advertising guidelines have been the subject of great debate since they were enacted in 1988. In order to clarify the confusion over terms and phrases that were considered a violation of the regulations, the Housing and Urban Development (HUD) agency issued further guidelines that provide a more reasonable review method in order to determine what constitutes discriminatory advertising.

Originally, terms such as "excellent view", "walk-in closet", "bachelor" or "bachelorette" and names such as "The Baptist Home" could have been viewed as discriminatory. Currently, when these are placed in their proper context, they are not "red-flagged" as discriminatory. Besides words indicative of race, color, religion, sex, disability, familial status, or national origin, colloquialisms, or words or phrases used regionally or locally, which might imply or suggest race, color, religion, sex, disability, familial status or national origin should be avoided as well. In addition, catch words and phrases such as "restricted", "exclusive", "private", "integrated", "traditional", "board approval" or "membership approval" and symbols or logotypes which imply or suggest race, color, religion, sex, disability, familial status or national origin should also be avoided.

It should also be noted that the liability does not exist only with publishers of any print media or broadcasters of radio and television advertising for the sale or rental transaction of a residential dwelling. It also includes persons or companies who conduct the sale or rental transaction of a residential dwelling such as advertising agencies, sales firms, real estate professionals and management companies. In addition, their clients can be held liable as well. Jury cases involving discriminatory real estate advertising in the Washington, D.C. -Baltimore, Maryland area have resulted in jury awards of $850,000 and $2 million. In addition, a successful plaintiff in a discriminatory advertising suit is generally entitled to have the court order the defendant to pay the plaintiff's attorneys' fees, which can be significant. It should also be noted that where the defendant has acted in reckless

disregard of the plaintiff's civil rights, punitive damage awards are also available under federal law. (Smith v. Wade, 461 U.S. 30, 37 - in 1983)

Caution should be noted when describing either a geographical area or giving directions as they can imply a discriminatory preference, limitation, or exclusion. These can include the names of facilities which cater to a particular racial, national origin or religious group, such as country club or private school designations. In addition, the names of facilities which are used exclusively by one sex may indicate a preference.

All forms of print media should indicate that all housing advertised in their classified sections abide by the FHAA. The HUD regulations contain a special provision applicable to publishers. They provide that all publishers should publish at the beginning of their real estate advertising section a notice including language to the following effect:

All real estate advertised herein is subject to the Federal Fair Housing Act, which makes it illegal to advertise "any preference, limitation, or discrimination because of race, color, religion, sex, disability, familial status, or national origin, or intention to make any such preference, limitation, or discrimination." We will not knowingly accept any advertising for real estate which is in violation of the law. All persons are hereby informed that all dwellings advertised are available on an equal opportunity basis.

In addition, telephone numbers for local fair housing organizations or agencies which home seekers may call for information if they feel they have been the victim of housing discrimination should be included in the publisher's notice.

In conjunction to the above disclaimer, all advertising for housing, including lending, should include the "Equal Housing Opportunity" slogan or logo according to HUD regulations. The logo is to be placed in all advertising that is larger than two (2) column inches and it should be legible.

Finally, the use of human models in real estate related advertising are regulated by HUD. Frequently, display advertising will include photos or drawings of individuals enjoying the amenities of the complex or the neighborhood to make the housing seem appealing to potential home seekers. It is only common sense that a message may be sent by the race, sex, age or family status of the persons in the advertisements.

It is defined that "models should be clearly definable as reasonably representing majority and minority groups...". If models are used in photographs, drawings or other graphic techniques, they should "indicate to the general public that the housing is... (available)... to all without regard to race, color, religion, disability, familial status or national origin and is not for the exclusive use of one such group." However, one of the changes that has been seen since the fair housing advertising guidelines went into effect has been the decreasing number of these types of ads by REALTORS®, landlords, management companies and rental complexes.

As part of this analysis, the Consultant reviewed the real estate and apartment print advertising placed in the Sunday real estate sections of The Kettering-Oakwood Times, the Dayton Daily News Classified Section, the Dayton Daily News Real Estate Plus insert, the Times Weekend Edition and the Times Community Newspapers Home Source.

More than five-hundred (500) for-sale and for-rent ads were reviewed that included single-family, multi-family and mobile home/manufactured housing. The *Fair Housing Advertising Manual*[41] was used as a guide. This manual is one of the various multimedia educational materials produced by the Fair Housing Council of Greater Washington.

It should be noted that time constraints permitted only a limited review of local print advertising. The review found - no "adults only", "perfect for retired couple", "no pets" "No Section 8" or other types of discriminatory advertising and there was no advertising that was problematic in its phrasing or that would require notification.
However, the following was noted:

1. Although the publisher's fair housing notice was present in all print media reviewed where real estate advertising appeared, it was more prominent in the Dayton Daily News Real Estate Plus insert and the Times Community Newspapers Home Source than in the other print media mentioned above. Although there are no guidelines on print size, the publisher's fair housing notice was easier to read in these inserts and therefore is very commendable and recommended as an example for other print media in the area.

2. In the Kettering-Oakwood Times there were numerous display ads by local real estate companies affiliated with nationally recognized real estate firms that either did not show the Equal Housing Opportunity ("EHO") logotype or the recommended HUD wording in their advertising.

In both inserts of the Dayton Daily News Real Estate Plus and the Times Community Newspapers Home Source, the ads for the "Featured Home of the Week" lacked the EHO logotype in all instances.

It was also noted that in one case, a full-page ad for one office of a local REALTOR® displayed both the REALTOR® logo and the EHO logotype while an ad appearing in a later edition of the same newspaper, but from a different branch, lacked both.

There was one real estate company that took out a 2½-page ad but the EHO logotype appeared on only pages one and two. In the Times Weekend Edition there were display ads with and without the EHO logotype from individual advertisers of the same real estate

[41] Fair Housing Advertising Manual - Miller, Cassidy, Laroca & Lewin, 1996 - Guide to Compliance with Real Estate Advertising Discrimination Laws for Washington D.C. Area Publishers and Advertisers

firm indicating that there is either little or no review of the advertising being placed or no policy regarding the use of the EHO logotype. There was one instance of a locally recognized lender's advertising without displaying the EHO logotype.

In both the Kettering-Oakwood Times and the Dayton Daily News, some builders used the EHO logotype while others did not.

It should be noted that of the more than five-hundred print ads reviewed, most were ads placed by or on behalf of real estate professionals and the absence of the EHO logotype indicates that there is a lack of a review process prior to submission to the publisher by the real estate professional who should know better, no publisher review of the submitted advertising or a combination of the two. Therefore, it is recommended that the publishers and all advertisers should engage in a pre-publication review of real estate ads including at least the following checks:

a) screen for the use of discriminatory words, phrases, symbols, directions or other verbal cues;

b) screen for the composition of human models depicted in ad campaigns and for other visual cues:

c) screen for the use of the appropriate EHO logotype or statement.

This advertising policy should provide clear guidelines for all. This will allow the public to be aware that the publishers and advertisers are adhering to their obligations as set forth under federal, state and local law regarding fair housing.

In addition, the publishers should also provide for meaningful enforcement mechanisms. This makes it clear to anyone wishing to advertise that business will not be accepted from those who are engaging in advertising discrimination. It should also be made clear that compliance with this policy is a term and condition of doing business.

In short by following the steps above and common sense, the publishers and all advertisers can avoid potential liability to themselves.

Although there were no "no-pets" ads found and while it is well within the rights of a landlord/owner to bar pets from their units, it does raise the concern of companion animals used by disabled individuals. The question becomes, "Will the no-pet policy include companion animals or will an accommodation be made?"

If a person who has a companion animal is looking for an apartment, they will generally bypass "no-pet" ads rather than hassle trying to work out the accommodation. The ideal situation would be for those with this restriction to include in their advertising " . . . except companion animals."

Although no "No Section 8" advertising was observed, it should be noted that there is always a concern that this statement may be found in rental advertising. Even though the source of income and rental assistance are not protected under state or federal fair housing law, those who receive assistance can include minorities, women with children and other protected classes. Therefore, this type of an ad would be a "red flag" to discriminatory practices. In addition, although there was no advertising that discouraged Section 8 vouchers, there was no advertising found that welcomed it.

While the lists of questionable words, phrases and symbols, listed above, may seem extensive at first glance, in fact, a publisher who is sensitive to the requirements of the law will quickly develop a sense of the type of advertisements which may raise a question under the law.

In short, the basic test for any advertiser should be: Would the ordinary reader construe the advertising as sending a message of preference for or against a particular class of home seeker?

6.0 PURPOSE AND PARAMETERS OF MORTGAGE LENDING

See Maps 22-23

At the heart of housing discrimination are mortgage lending practices. For many people, the goal of home ownership is contingent on their ability to obtain a mortgage. The issue of color, race, national origin, sex, religion, familial status or disability may still shut the door to home ownership. Mortgage lenders continue to refuse to do business in low-moderate income neighborhoods and minority neighborhoods. These discriminatory policies are holdovers from a past that would not allow loans to people who would represent an "inharmonious racial group" to neighborhoods. The policies of local lenders, real estate agents and even the federal government (through the Federal Housing Administration and Veterans Administration loan policies) assured that our country would grow with segregated cities. The most basic right of all Americans, to live where they want and can afford, was denied throughout the housing market.

Appendix 4 provides an extensive set of tables that provide information on lenders as a peer group and selected individual lenders. The reader is strongly encouraged to review the Appendix while reviewing this section of the report.

6.1 Sub-Prime and Predatory Lending

What makes a sub-prime lender different from a predatory lender? Most sub-prime lenders serve a need by targeting borrowers with sub-par credit histories, some can be

Although no "No Section 8" advertising was observed, it should be noted that there is always a concern that this statement may be found in rental advertising. Even though the source of income and rental assistance are not protected under state or federal fair housing law, those who receive assistance can include minorities, women with children and other protected classes. Therefore, this type of an ad would be a "red flag" to discriminatory practices. In addition, although there was no advertising that discouraged Section 8 vouchers, there was no advertising found that welcomed it.

While the lists of questionable words, phrases and symbols, listed above, may seem extensive at first glance, in fact, a publisher who is sensitive to the requirements of the law will quickly develop a sense of the type of advertisements which may raise a question under the law.

In short, the basic test for any advertiser should be: Would the ordinary reader construe the advertising as sending a message of preference for or against a particular class of home seeker?

6.0 PURPOSE AND PARAMETERS OF MORTGAGE LENDING

See Maps 22-23

At the heart of housing discrimination are mortgage lending practices. For many people, the goal of home ownership is contingent on their ability to obtain a mortgage. The issue of color, race, national origin, sex, religion, familial status or disability may still shut the door to home ownership. Mortgage lenders continue to refuse to do business in low-moderate income neighborhoods and minority neighborhoods. These discriminatory policies are holdovers from a past that would not allow loans to people who would represent an "inharmonious racial group" to neighborhoods. The policies of local lenders, real estate agents and even the federal government (through the Federal Housing Administration and Veterans Administration loan policies) assured that our country would grow with segregated cities. The most basic right of all Americans, to live where they want and can afford, was denied throughout the housing market.

Appendix 4 provides an extensive set of tables that provide information on lenders as a peer group and selected individual lenders. The reader is strongly encouraged to review the Appendix while reviewing this section of the report.

6.1 Sub-Prime and Predatory Lending

What makes a sub-prime lender different from a predatory lender? Most sub-prime lenders serve a need by targeting borrowers with sub-par credit histories, some can be

characterized as ***predatory lenders***. Predatory lenders target specific populations, such as low-income, minority and/or elderly home owners, with high-pressure marketing techniques, charging excessive fees, frequent refinancing or "flipping" the loan and often misleading the borrower. Communities within the greater Montgomery County area are not immune to this practice. In low and moderate income and minority neighborhoods one or two sub-prime or predatory lenders often dominate the market, while prime lenders have very small market shares or are not to be found.

Each year, millions of consumers are targeted by sub-prime lending institutions to secure high cost mortgage and/or retail loans. Sub-prime lenders specialize in offering credit to consumers who may have credit blemishes or consumers with "B" or "C" credit, while conventional lenders focus their marketing efforts on consumers with few or no blemishes or those with "A" credit. With promises of easy payment plans, debt consolidation and quick approval, predatory lenders lure many consumers who have found it difficult or impossible to access low-cost loans in the conventional market, as well as many unassuming consumers who do qualify for traditional loans. According to recent studies by Freddie Mac, (a government sponsored enterprise that purchases mortgages from lenders and packages them into securities which are in turn sold to investors), between 25-35% of consumers receiving high cost loans in the sub-prime market qualified for conventional loans[48]

Since wealth for the vast majority of Americans is tied to property ownership, this system is threatening to deprive many Americans of their wealth by stripping them of their home's equity and, in some cases, foreclosing on the homes of people who cannot afford the exorbitant interest rates and high points. It is estimated that approximately 25% of all sub-prime loans contain one or more terms that can be classified as predatory.[49]

The ability to determine the extent of predatory lending in the greater Montgomery County community is made more difficult since many such lenders are not regulated. Frequently, they fall outside the HMDA reporting requirements and thus no aggregate data is available on their loan activity, other than the loans sold into the secondary market to Fannie Mae and Freddie Mac.

Mainstream financial institutions have excluded many of the groups targeted by predatory lenders when marketing loan products. Often, such institutions are much less interested in issuing smaller loans. Additionally, these unknowing consumers find themselves in these devastating positions through a lack of financial savvy. The lending process is very complicated with numerous forms to be completed. Many consumers are ill prepared to deal with the enormous volume of complicated paperwork that is given to them during the loan process. Reports show that consumers simply do not understand the process. Thus, the consumers have little choice but to trust the lender. The very person who is trying to

[48] Information for this discussion provided by Miami Valley Fair Housing Center, Dayton OH

[49] Council on Homelessness and Housing in Ohio, 2000

sell them the loan is the only person giving them advice on the quality of that loan and what the terms of the loan mean.

Most predatory lenders, however, do not provide quality counseling for consumers seeking their products and use the consumer's ignorance as a ripe opportunity to recap huge profits from selling money in this industry. Recent studies show that sub-prime lenders are far more profitable than their conventional counterparts. For instance, a small analysis of seven national lenders reveals that the earnings-to-loan volume ratio for sub-prime lenders is substantially higher than that for conventional or prime lenders.

Many times, consumers are paying too much interest for credit they secure and they are persuaded into purchasing credit life and disability insurance products for which they have little or no use. Moreover, these loans are often secured with consumers' property and fair housing organizations have received complaints from consumers who are about to lose their homes because they cannot afford the high cost of the loan they obtained.

According to The Woodstock Institute, from 1993 to 1998, loans made by prime lenders rose substantially slower than those by sub-prime lenders. Prime lenders had an increase in home purchase loans of 38% and a 2.5% increase in refinance loans. Corresponding increases among sub-prime lenders were 760% and 890% respectively. One possible reason for this dramatic increase in loans made by sub-prime lenders pertains to the increasingly segmented system of consumer finance with higher income communities as the main target of more highly regulated banks, thrifts (formerly called savings and loan) and their affiliates who seek to cross-sell account and investment products. At the same time, lending to lower income and minority communities is often viewed as an isolated line of business, in which the focus is on the short-lived transaction and associated fees. Lenders active in these communities tend to be mortgage and finance companies subject to substantially less regulation than banks and thrifts.

The Center for Responsible Lending (CRL) estimates that predatory lending of all kinds costs low-income borrowers over $16 billion each year which is comparable to the amount spent by the U.S. government on funding for CDBG, Head Start and public housing combined!

Throughout this lending review, the dominant role sub-prime lenders can have in a local market has been discussed. While the presence of sub-prime lenders is important in assuring that all households have access to credit, it can be a concern when lenders who have no commitment to the community are dominating the market. Table 7.1, 7.2 and 7.3 highlight those sub-prime lenders of Montgomery County's 36 largest lenders by all applications for 2000, 2001 and 2002. Overall market share for each is included.

In 1999, County Corp., a non-profit housing and economic development agency for Montgomery County, Ohio, noticed a high number of refinancing of their low-interest rate loans. Concurrently, Consumer Credit Counseling Service, a HUD-approved mortgage default counselor for VA/FHA mortgages in the Miami Valley, noted that within two years,

mortgage default counseling increased over 500 percent, from one to four cases per week to four to five cases per day. Alarmingly, the Miami Valley fair Housing Center and Legal Aid Society noted an increase in calls regarding mortgage default and discrimination. In addition, foreclosures were increasing exponentially, leaving entire neighborhoods blighted by foreclosed upon, boarded up homes.

As a result, a committee was formed to study the issue and identify a program for addressing predatory lending. The development of the Predatory Lending Solutions program took approximately two years and implementation began in January 2001.

This program offers prevention and intervention services to Miami Valley families who are current or potential victims of predatory lending practices. The project has involved a collaborative effort between Consumer Credit Counseling, the Home Ownership Center of Greater Dayton, and the Miami Valley Fair Housing Center, the lead agency for the project. The program includes four main components: community education and outreach, intervention and rescue services; local community impact research, and legislative support.

The results of the program thus far indicate that it is making a difference in the area by providing basic information to those most vulnerable populations, thus preventing an even greater crisis in the community. This is achieved by helping those who are victims to reduce their loss if possible, and by attempting to bring this devastating practice to a halt so there will be no more victims of predatory lending.

6.2 Check-Cashing Locations as Predatory

See Maps 24-25

One of the largest issues facing changing neighborhoods is the loss of retail and commercial businesses. As neighborhoods change, and become more minority or low-income, one of the first things that becomes apparent is the loss of businesses that help support and sustain the neighborhood. As cities begin to work to revitalize neighborhoods, it is important that efforts are made to revitalize the business climate as well.

This section reviews the impact of check-cashing and payday loans on a neighborhood. As neighborhoods decline or go through changes, often you will see local banks moving out and replacing their services with ATM machines, while check-cashing offices begin to fill the need the banks left.

Check-cashing outlets - also referred to as "currency exchanges" cash payroll, government and personal checks for a fee. People use check-cashing outlets rather than traditional financial institutions for a variety of reasons. Some do not have access to or cannot afford to use banks due to rising fees or are unable to maintain minimum balance requirements.

Others have privacy concerns or do not want their funds accessible to creditors. A number of consumers use check-cashing outlets for the convenience.[50]

Many check-cashing stores and other companies are now offering "payday loans" which go by a variety of names: "check advance loans", "post-dated check loans", "delayed deposit loans", or "deferred presentment loans." While they have many names they all have the same predatory result. Typically, the consumers write personal checks payable to the lender for a future date when they are due to repay the loan, which is generally their next payday.

The cost for these "convenience" or "helping you out" loans can be extremely high. The "fee" being paid is really interest. In some states, a company can charge a maximum of $15 on a $10 loan for a two-week period, which, when considered over time, calculates to a 390% annual percentage rate (APR). Often, borrowing $500 results in $75 in fees and interest. As noted in the earlier section, such extremely high rates are part of the definition of what makes a loan predatory.

Map 24 shows the same information by Median Household Income. Map 25 shows the location of check-cashing stores in Montgomery County by minority population. Consistently these institutions are located in the highest minority areas. However, when this map is compared to Map Lending 26 it is clear that they are operating almost side by side with local lenders. This is unusual, since in most areas of similar size one would find that "check-cashers" generally fill in where Banks have left a market.

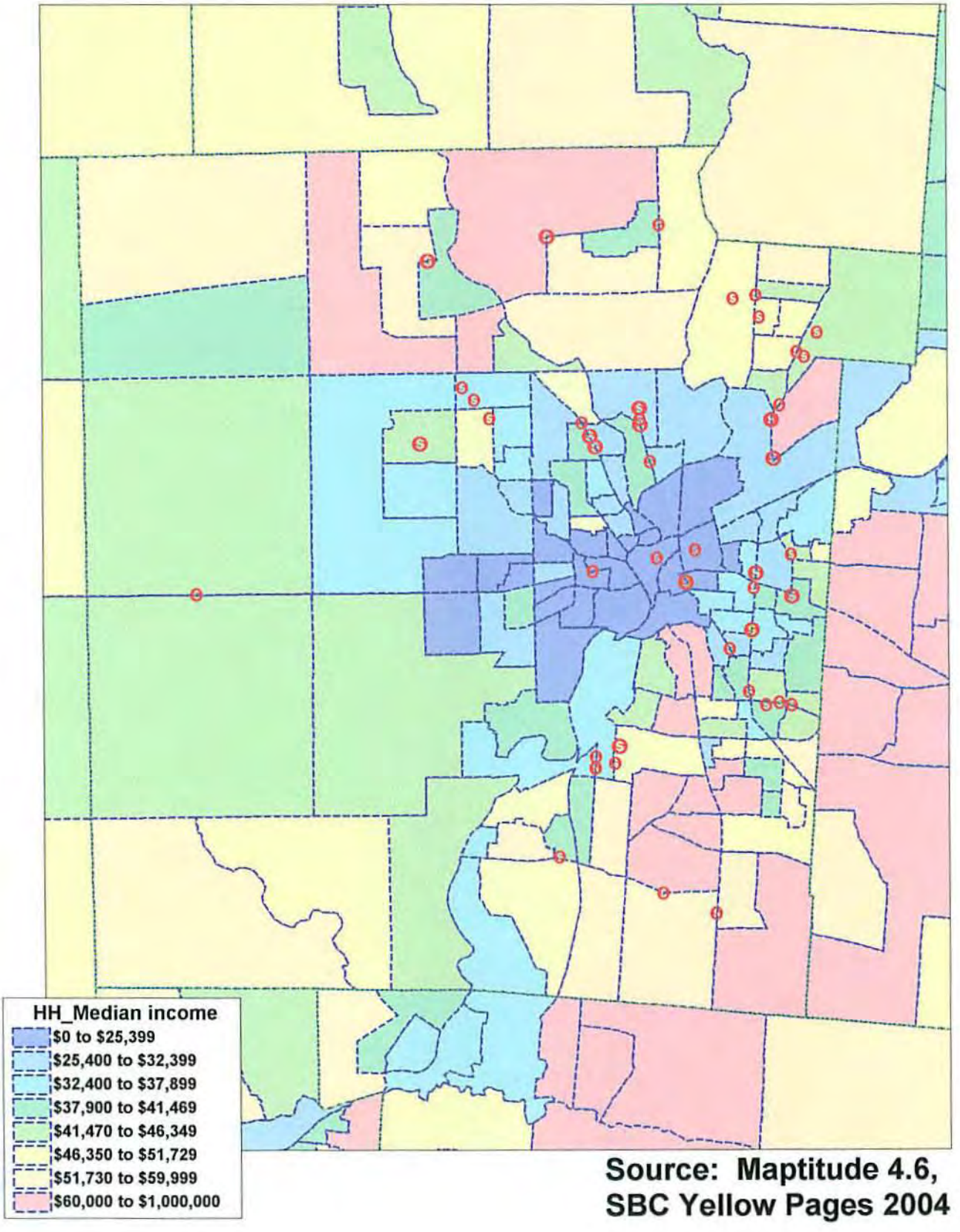
6.3 Montgomery County Lending

This report concentrates on those lenders that possess 2% or greater of the mortgage market in Montgomery County's lending market. This review is based on 2000 to 2002 Loan Application Register (LAR) reports from individual lenders. In addition, a review is included for overall activity for the three-year period. A more detailed analysis is provided for 1999 to 2001 and more specifically for 2002.

The statistical databases used for the analysis contained in this report were Peertrax HMDA Analyzer and Maptitude 4.6. Peertrax is a data software program based on the annual reports made by individual lenders to their respective federal financial regulator agencies. Each institution's HMDA data set is organized along FDIC, Office of the Comptroller of Currency (OCC) and Federal Reserve geography units. These units record the data on each reported loan application: type, purpose, action taken, race or national origin, sex, type of purchase, income category and reason for denial. Maptitude 4.6 is a mapping software program used in conjunction with Peertrax to assure consistency of the HMDA data. The use of these software programs allows a very precise look at HMDA

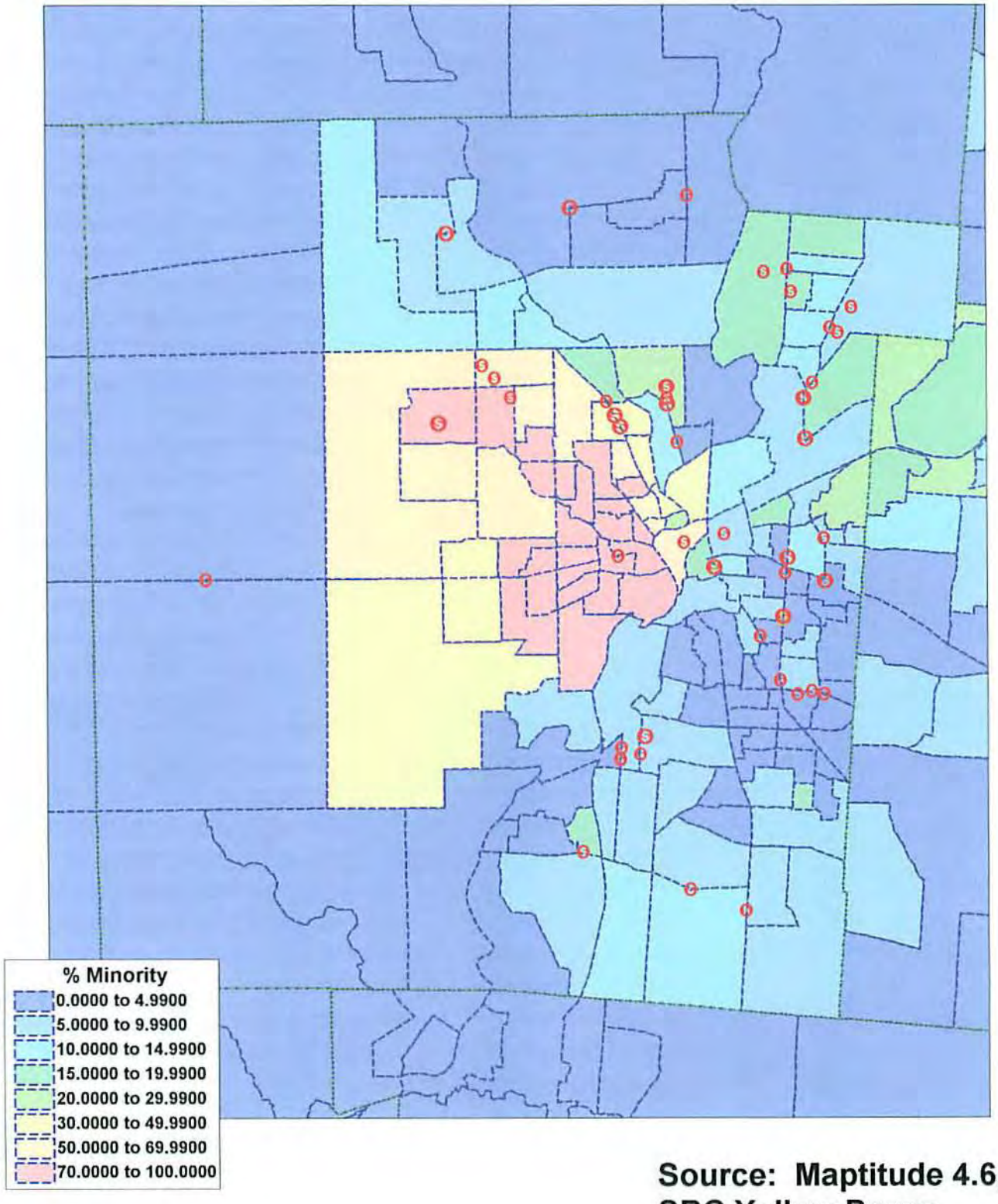
[50] Tips to Avoid Predatory Practices-Check-Cashing & Payday Loans-Valuable Service or Legal Sharking, Ohio Attorney General publication, 2000

MAP 24: Location of Check Casher's & Pawn Shops By Median Household Income



Source: Maptitude 4.6,
SBC Yellow Pages 2004

MAP 25: Check Cashers & Pawn Shops by Percent Minority



Source: Maptitude 4.6, SBC Yellow Pages

lending data for those census tracts within the City limits. It is critical, when comparing information in this report to future analyses, that future data be geographically comparable.

The results of this analysis may be used to identify institutions that need to improve their lending performance in several areas:

- Applications, Originations and Denials based on race of the applicant.
- Applications, Originations and Denials based on racial population of the census tract.
- Applications, Originations and Denials based on applicant income.
- Applications, Originations and Denials based on income of the census tract.

Inadequate lending performance results in various long term and far ranging community problems. Disinvestment is the most devastating result. Disinvestment in Montgomery County neighborhoods by lenders reduces housing finance options for borrowers and weakens competition in the mortgage market for low and moderate income neighborhoods. High mortgage costs, less favorable mortgage loan terms, deteriorating neighborhoods, reduced opportunities for home ownership, reduced opportunities for home improvement and the lack of affordable housing are only a few of the consequences of inadequate lending performance. In addition, financial decay in the business sector is also a result of disinvestment – business relocation, closure and bankruptcy. On the other hand, full service local lenders, that have traditionally served residents and businesses, are the main cogs in the wheel that keep neighborhoods stable.

Significant changes are occurring in the lending market, not only in Montgomery County but throughout the United States. The number of lenders in the State is shrinking. It is becoming a common occurrence to read about national lenders buying local lenders. These national lending institutions are becoming increasingly more active locally. The market share of national corporations is growing yearly. Previous lending studies undertaken by the Consultant reveals that these national lenders often place an emphasis on less risky loans such as refinancing and home improvement. When lenders "target market" their mortgage lending activity to limited segments of the market, minority and low-moderate income borrowers have less opportunity for a home purchase.
This project does not examine all lending issues as they relate to performance and service. Issues such as: comparison of loan terms and conditions, patterns of branch openings and closings and record of investment in community development projects fall outside the scope of the HMDA database. This analysis does consider: race, racial population, applicant income and income of census tracts.

This analysis should not be used to determine or identify discriminatory practices by individual lenders. It should be used as a tool to determine only the lending performance of lenders in the specific area based on HMDA data. Unregulated lenders who are not required to submit HMDA reports are not monitored and have not been included in this analysis.

6.4 Analysis

This report presents comparative findings on the performance of the largest lenders in Montgomery County, Ohio (excluding the City of Dayton) based on reported HMDA data. The City of Kettering is included with Montgomery County data since the banks located in Kettering are also located in Montgomery County, however, some specific information for the City of Kettering is reported in the tables in this analysis.

The focus of this report is on all applications (all types and purpose) and on Conventional Home Purchase applications, originations and denials and a brief discussion is included on Conventional Refinancing as well. As noted above, the Federal Financial Institutions Examination Council's HMDA data is compiled only for the census tracts contained within Montgomery County using Peertrax HMDA Analyzer. Data in all of the tables related to lending throughout this analysis are compiled from this data unless otherwise noted.

Two forms of tables are used to compare the performance of individual lenders with each other. Text Tables show lenders on different variables and Reference Tables (found in Appendix 4) rank lenders on market share of applications and other actions. Readers interested in a particular lender can readily access its performance on all variables in the Reference Tables.

Many lenders are subsidiaries of larger banking corporations or holding companies. Their internal structure has been undergoing change during the 1990's, adding complexity to our selection of lenders for study.

Reference Tables are included to give the reader all data used in developing sections of this report. Data is reported for White and Black applications in the County. HMDA data also reports Hispanic, American Indian, Asian and Other Race borrowers, each of which is usually small (less than 3% of the total) and on which we have performed no analysis.

Tables report data for income categories by groups of census tracts and applicant income based on median household income ($40,156), low-moderate income, middle-income and upper income. These categories are defined according to U.S. Department of Housing and Urban Development (HUD) criteria as follows:

- Low-income - less than 50% of median household income ($0 - $20,078)
- Moderate-income - between 50 - 80% of median household income ($20,079 - $32,125)
- Middle-income - between 80% - 100% and 100% - 120% of median household income ($32,126 - $40,156 / $40,157 - $48,181)
- Upper Income - more than 120% of median household income (= > $48,182)

Our analysis of racial equity looks at both origination yields and denial rates. Traditionally, many CRA studies have utilized denial rates or Black/White disparity ratios as the prime indicator of lending performance. This report focuses on loans originated and loans

denied. Since both are significant, we look at what a lender **did** as well as what a lender **did not** do.

There are also philosophical reasons for giving at least as much attention to those loans which were made as contrasted with those which were not. In this study, philosophical and methodological reasons both point in the direction of giving greater emphasis to lenders' performance on mortgage loan originations than on mortgage loan denials.

6.5 All Mortgage Activity Montgomery County

The metropolitan area has an abundant supply of both new and pre-owned homes dispersed throughout the County, Kettering and surrounding suburban communities. According to the Dayton Area Board of REALTORS®, the average sale price of a newly constructed house in Montgomery County during 2002 was $128,096 which increased to $133,180 in 2004.[51]

See Map 26 - 29

The cost of housing in Montgomery County is consistently lower than the national average. According to the National Association of Homebuilders, the median sales price for a home in the Dayton-Springfield MSA was $114,000. Based on the 2004 estimated Median Family Income of $57,700, over 81% of homes in the MSA are affordable for those earning median family income.[52] The MSA ranks twenty-second in affordability in the nation and seventeenth in the Midwest region.

Table 6.0 shows the average price of a home and the percent of appreciation for the Montgomery County area including the City of Dayton. This information is provided through the Dayton Area Board of REALTORS®. The purpose of this table is to show how affordable housing can be and that the investment in a single-family home can be a strong source of wealth for families.

Table 6.0: Average Sales Price of Homes Montgomery County/Dayton Area

Year	Average Sale Price	% Appreciation
2000	$122,421.00	1.97%
2001	$126,375.00	3.23%
2002	$128,096.00	1.36%
2003	$130,647.00	1.99%
2004	$133,180.00	1.94%

[51] www.dabr.com

[52] Ibid

Table 6.1 shows the racial/ethnic population for the City of Kettering and Montgomery County. This table is repeated from an earlier Section to make it easier to reference since it is used as the basis for the review of lending based on race.

Table 6.1: Montgomery County Population by Race and Ethnicity 2000

Race	% 2000 Montgomery County	% 2000 City of Kettering
White	74.7	95.2
Black	10.1	1.7
Am. Indian	0.1	0.2
Asian/Pacific Islander	1.4	1.4
Hispanic	0.9	1.1

Source: U.S. Census, 1990 and 2000

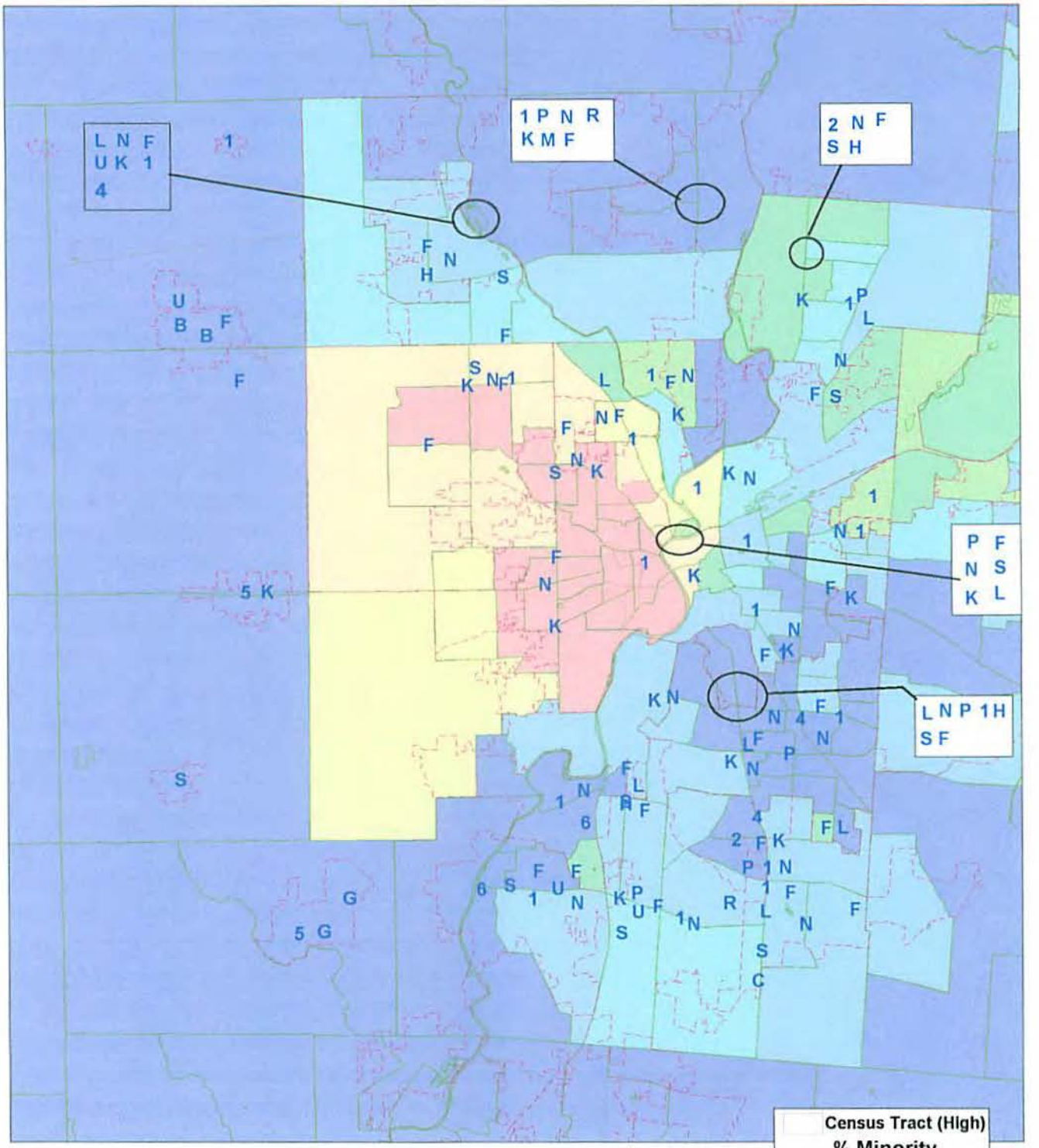
Median household effective buying income (EBI), which is analogous to disposable personal income, was $44,649 in the MSA in 2003 compared to the national median of $38,365. The Dayton-Springfield MSA ranked fourth in Ohio. The higher level of disposable income in Montgomery County indicates a greater number of persons are potentially able to become home owners or to improve their properties.

From the late 1990's a very strong economy extended employment and boosted income for many Americans and Montgomery County was not immune to these trends. For most of this period, mortgage interest rates were quite low and have continued to be low even though the economy has slowed down. These positive economic trends provided a favorable environment for households to secure and refinance home loans because they gave consumers a positive sense of job security, income growth and the ability to afford credit.

With these trends, Montgomery County experienced an increase in the number of lenders in the market. Figure 1 shows the number of lenders offering mortgage products in the County. Between 2000 and 2002 the number of lenders in the market increased slightly, from 400 to 422. However, those lenders handled an increasing number of applications over the 3-year period.

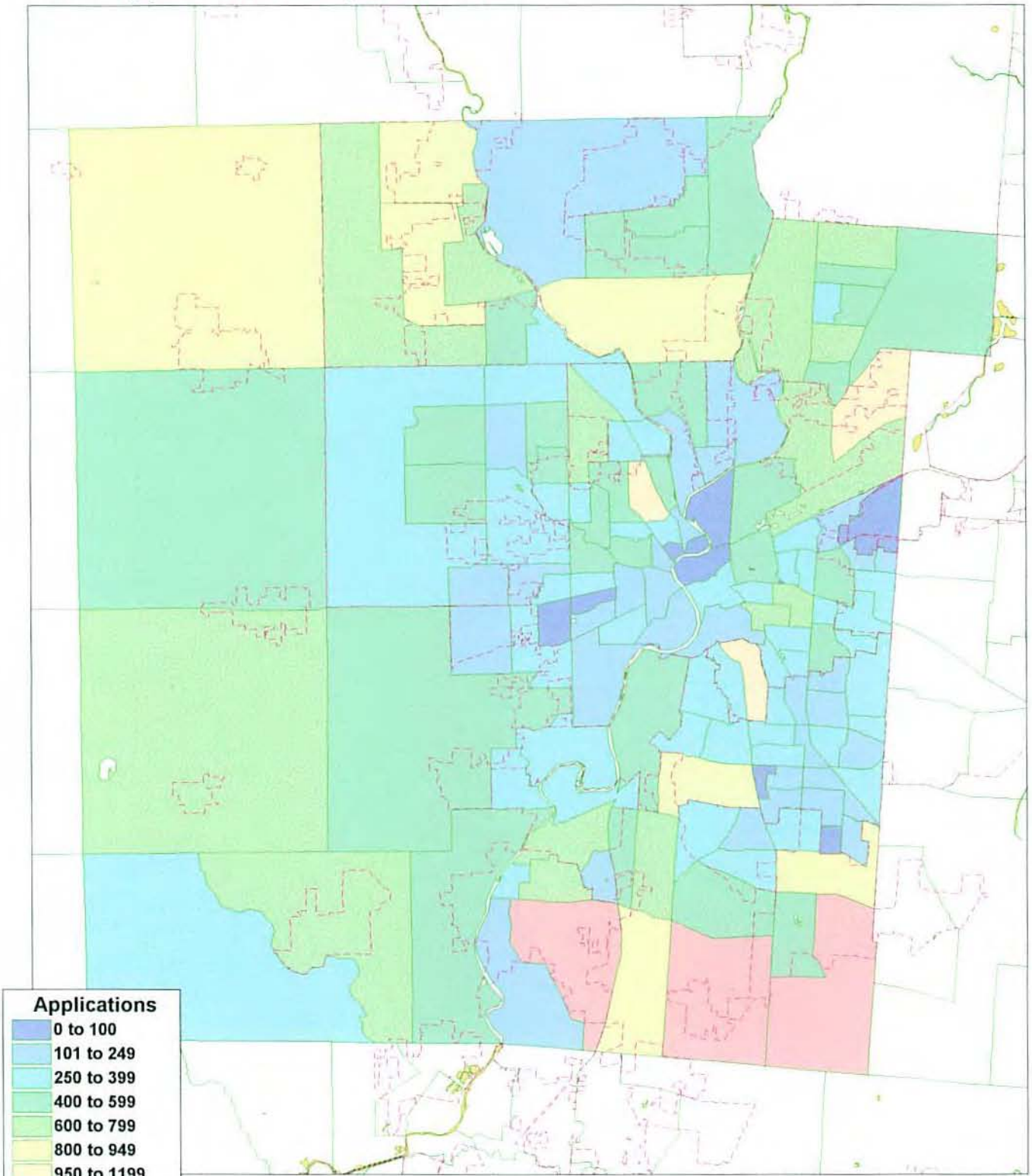
Figure 2 shows the number of applications accepted for all loan types and loan purposes for the three-year period. (Map 27 shows applications by census tracts for 2002) Between 2000 and 2002 the number of applications rose more than 19,000, a 60% increase from 2000. Again, it is important to remember that this data is based on **reported** loan applications and does not include applications from unregulated lenders.

MAP 26: Location of Lenders by % Minority



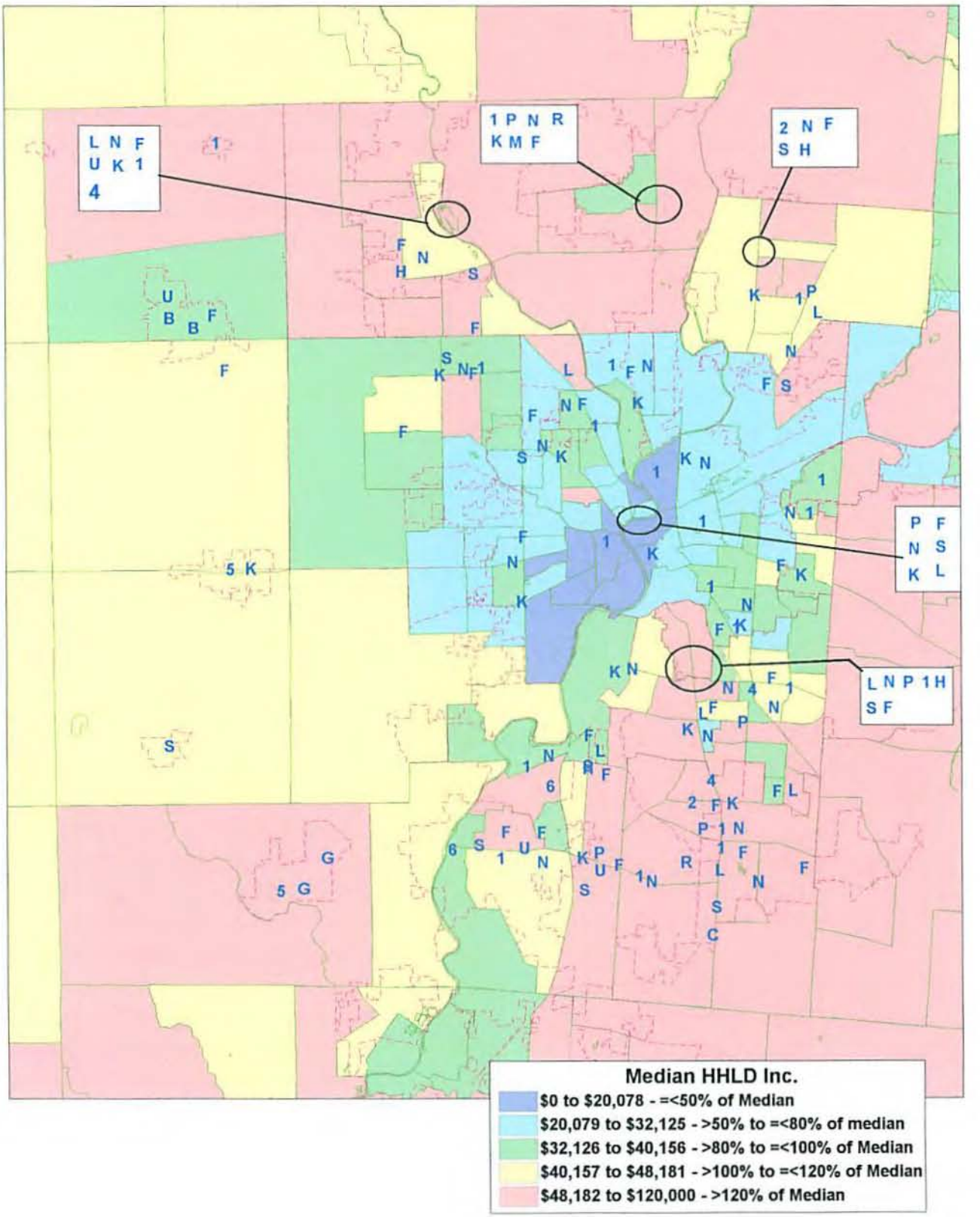
1st Nat'l Bank Germantown - G, Advantage Bank - 5,
Brookville Nat'l Bank, FifthThird - F, Unizan - U,
Bank One NB - 1, Liberty Savings Bk - L, National City - N,
Repubic Bank - R, Community Nat'l Bk - C, US Bank - S,
Key Bank - K, Citizens NB of SW Ohio - 2, Huntington NB - H,
Park Nat'l Bk - 3, Providetn Bk - P, Union Savings Bk - 4,
Farmers & Merchants Bk - 6, Monroe Fed. Savings Bk - M

MAP 27: Number of Applications Montgomery County - All Types and Purpose 2002

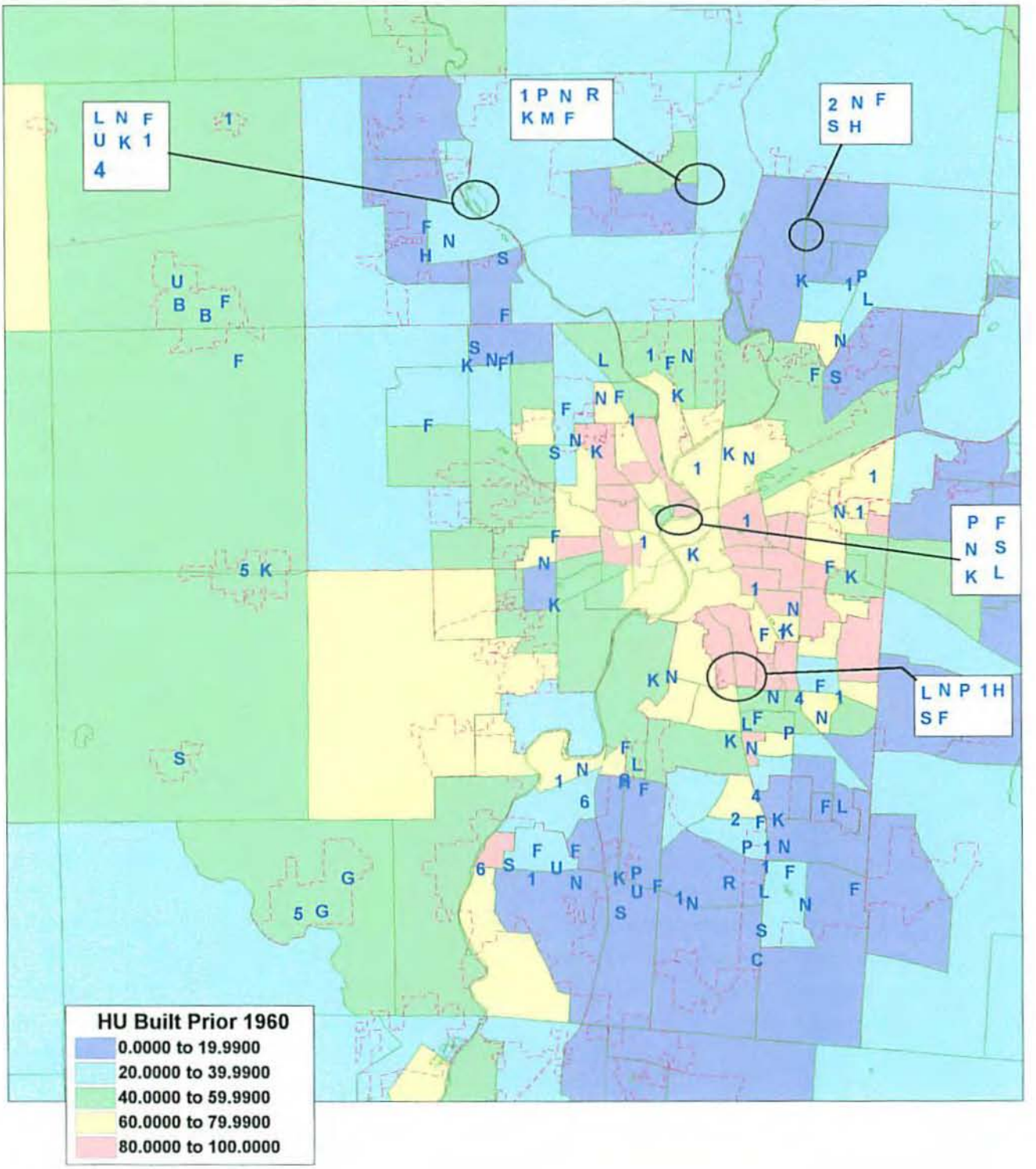


Source: Maptitude 4.6 & Peertrax 2002

MAP 28: Lenders by Median Household Income



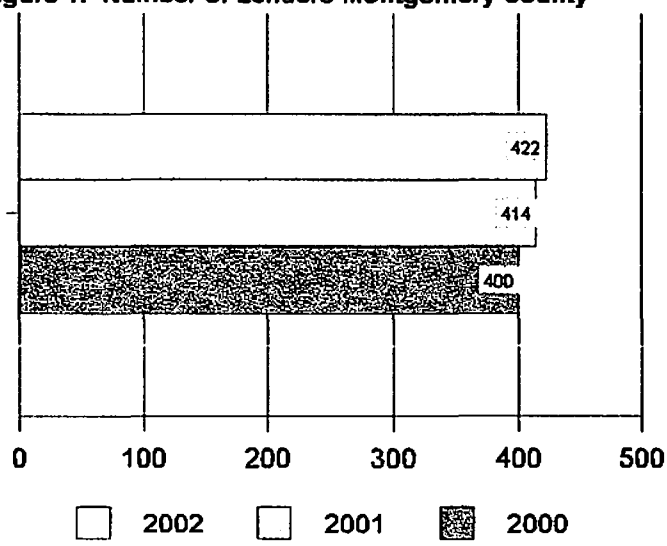
MAP 29: Location of Lenders by Homes Built Prior to 1960



Important to a community's financial well-being are home ownership rates. The community expects potential home buyers to have access to mortgage credit. Programs that offer home ownership must be available without regard to discrimination, income or profession. To truly live up to fair housing law, all persons must have the ability to live where they want and can afford. Access to mortgage credit enables residents to own their homes and access to home improvement loans allows them to keep older houses in good condition. All of these help keep neighborhoods attractive and residents vested in their community.[53]

Inadequate lending performance results in various long term and far ranging community problems. Disinvestment is probably the most devastating result. Disinvestment by lenders reduces housing finance options for borrowers and weakens competition in the mortgage market for low and moderate-income neighborhoods. High mortgage costs, less favorable mortgage loan terms, deteriorating neighborhoods, reduced opportunities for home ownership, reduced opportunities for home improvement and the lack of affordable housing are only a few of the consequences of inadequate lending performance. Financial decay in the business sector as well as the private sector is also a result of disinvestment, business relocation, closure and bankruptcy. Full service local lenders that have traditionally served residents and businesses are critical to keeping neighborhoods stable.

Figure 1: Number of Lenders Montgomery County



As noted earlier, significant changes are occurring in the lending market, not only in Montgomery County but throughout the United States. The "newest" issue to emerge from the changes in the market is the substantial growth of the sub-prime market and the impact that these lenders have on communities and neighborhoods. Increasingly, more and more local commercial banks are losing market share to lenders outside the community who have little or no stake in it.

The physical presence of financial institutions in communities facilitates relationships with banks. Location is the primary concern for a community. Areas that are left without branches or only access to ATM machines must find alternative sources (check-cashing businesses or finance companies) for services, which can be more expensive than traditional financial institutions or credit unions.

[53] Federal Reserve Bank of Cleveland, Fall 2000

Table 6.2 indicates those lenders that would be considered "home town lenders" with offices or branches located in Montgomery County. These are also the same lenders who are shown on Maps 26, 28 and 29. While the lenders locations on the map are not exact, they are as close as possible.

Map 26 shows the location of Montgomery County lenders by percent of minority population. Maps Lending 28 and 29 show the location of lenders by median household income (2000) and housing built prior to 1959.

One of the interesting points that Map 26 shows is that except for those lenders located in the central business district of Dayton, where little or no housing is available, there are very few lenders located within Dayton neighborhoods, especially comparing high percent minority neighborhoods to those low minority areas in the County.

Table 6.2: Lenders Located in Montgomery County and Number of Offices

Lender Map Code	Lender	No. of Offices	Community Locations
B	Brookville National Bank	2	Brookville
	Brookville S and L	1	Brookville
1	Bank One, NA	24	Centerville, Dayton, Englewood, Huber Heights, Miamisburg, Phillipsburg, Vandalia, W. Carrollton, Wright-Patterson AFB, Kettering
F	Fifth-Third Bank	39	Brookville, Centerville, Dayton, Englewood, Miamisburg, Trotwood, Vandalia, W. Carrollton, Kettering, Madison Twp.
U	Unizan Bank, NA	3	Brookville, Centerville, Englewood
L	Liberty Savings Bank, FSB	10	Centerville, Dayton, Englewood, Huber Heights, Kettering
N	National City Bank	30	Centerville, Dayton, Englewood, Harrison Twp., Huber Heights, Kettering, Miamisburg, Oakwood, W. Carrollton
R	Republic Bank	2	Centerville, Vandalia
C	Community Nat'l. Bank	1	Centerville
S	US Bank, NA	11	Centerville, Dayton, Farmersville, Huber Heights, Miamisburg, Oakwood, Trotwood, W. Carrollton
K	Keybank, NA	16	Dayton, Englewood, Harrison Twp., Kettering, Miamisburg, Moraine, New Lebanon, Trotwood, Washington Twp., Vandalia, Wayne Twp.
2	The Citizens Nat'l. Bank of S.W. Ohio	2	Dayton, Huber Heights
H	The Huntington Nat'l. Bank	5	Dayton, Englewood, Huber Heights, W. Carrollton
P	The Provident Bank	9	Dayton, Miamisburg, Vandalia
3	The Park National Bank	1	Dayton
4	Union Savings Bank	3	Dayton, Englewood, Kettering
5	Advantage Bank	2	Germantown, New Lebanon
G	First Nat'l Bank of Germantown	2	Germantown
6	Farmers & Merchants Bank	2	Miamisburg, W. Carrollton
M	Monroe Federal S & L	1	Vandalia

Local lenders are discussed in various tables throughout this section of the report. The information is for the lenders above as a peer group and is not shown by individual lender. This peer group is identified as "Local Lenders" in the appropriate tables.

Areas within Montgomery County that have high minority tracts also have fewer lenders than their low minority neighbors. Many of the lenders that access minority tracts that are fifteen percent or higher are located on the edge of these tracts. This is especially noticeable in the south-eastern part of the County near Miamisburg and Washington Township. Map 26 indicates that low minority areas, between zero percent and ten percent, are much better served by lenders than those in tracts with a higher minority population. This is especially true in those tracts where the minority population is over thirty percent.

The same holds true when considering household income, as illustrated by Map 28. (see income breakout information on page 91). The higher the median income, the larger the number of lender offices available. The lowest income areas in the County (predominately in and around the City of Dayton) have only 3 lenders outside of the central business district. Those tracts that are over 120% of the median income have a variety of lenders to choose from.

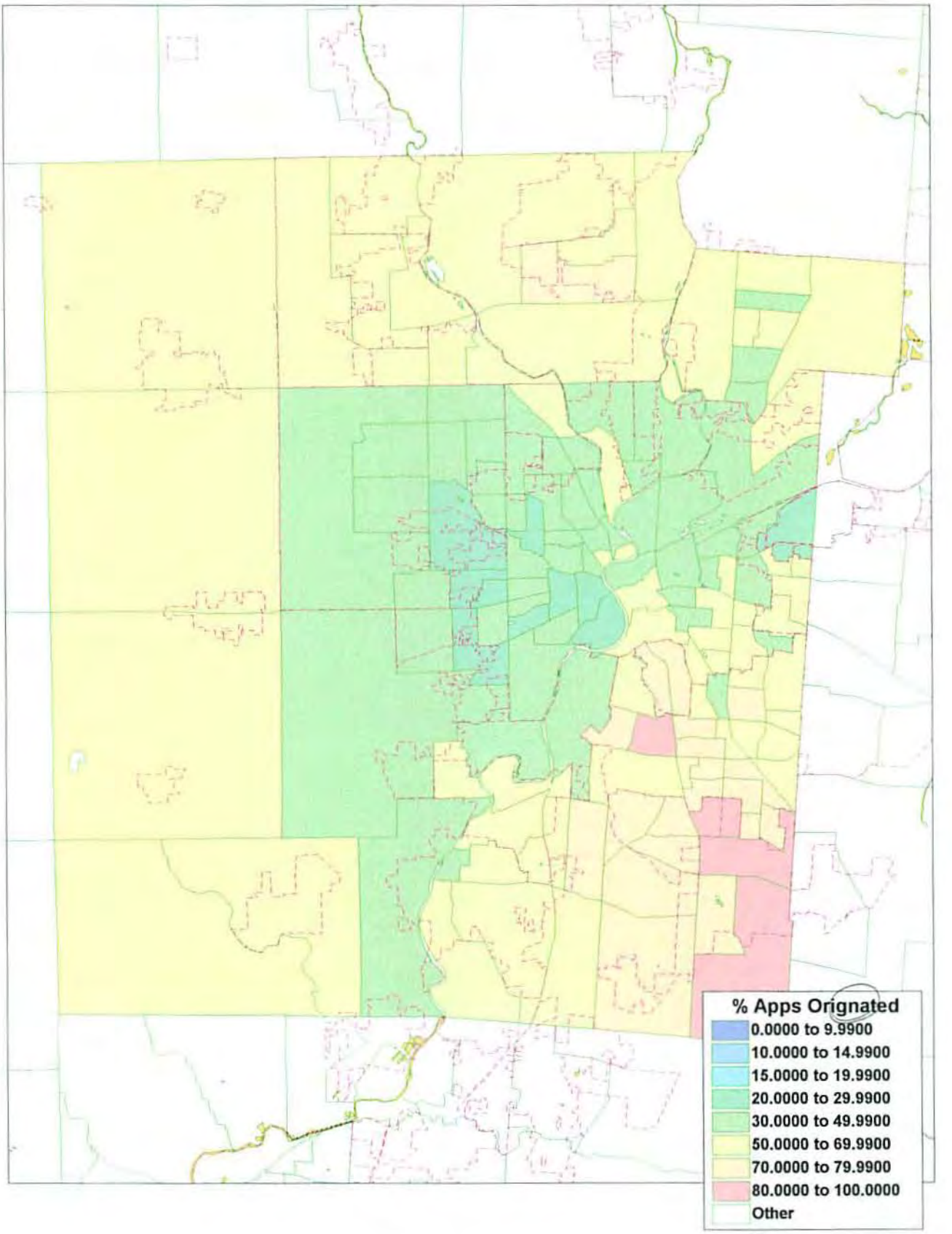
Map 29 shows the location of lenders by housing units built prior to 1960. The older the housing stock, the fewer the lenders that are available to residents. Again the oldest housing stock in the County is in and around the City of Dayton. While this issue and those found in Map 26 and 28 seem to have the larger impact in the City of Dayton, the concern still transfers into the County and the City of Kettering. The more the housing stock deteriorates, incomes drop and minorities are not migrating as their White counterparts, the more problems the County will face. The concern that fewer lenders are located in these areas also leads to concerns of disinvestment and this impacts all areas of the County. To find that minorities have moved little between 1990 and 2000 in the County is especially troublesome considering the number of programs available to get more people into homes and the lowest interest rates in years.

6.6 Action on Applications

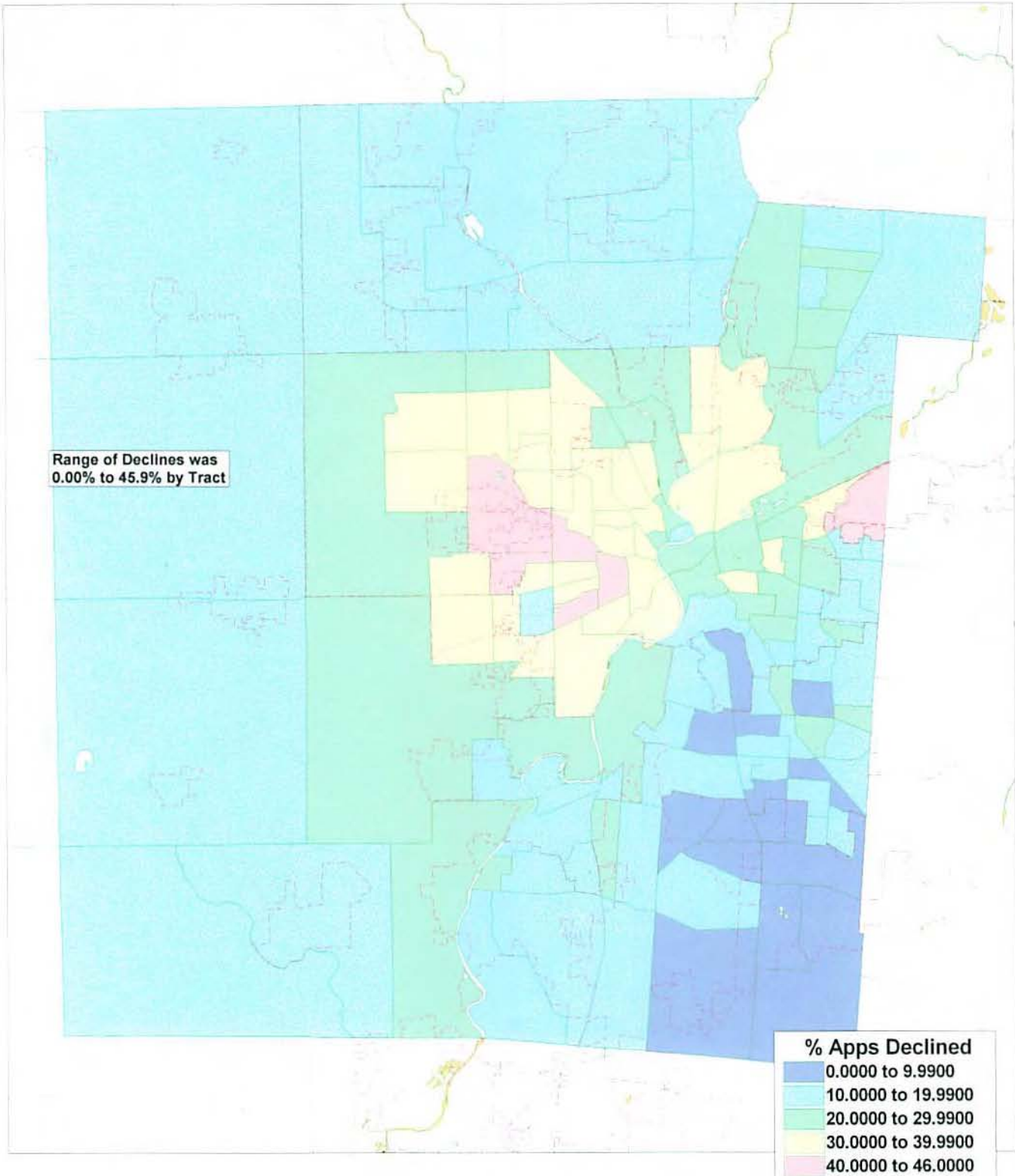
See Maps 30-31

Considering that over the three-year period the number of applications grew substantially, it is important to discuss what happens to those applications. Often it is found that lenders receive a high number of applications and then deny an equally high number of those applications. Caution should always be taken when it shows that a lender approves one-hundred percent of their applications when they are only receiving ten or twelve in the first place.

MAP 30: Percent of Applications Originated - 2002



MAP 31: Percent of Applications Declined



Another factor of concern, as mentioned, is high application rates met with high denial rates. Lenders might be accepting as many applications as possible and then accepting only those with A or A+ credit. Other issues are those applications that are received but have little or no reporting attached to them. This shows as "Not Available" in the HMDA data such as Race Not Available. Often this area will be twenty-percent or higher. With the changes that have taken place in the mortgage market, such as internet banking, applications over the phone or through mail-in applications, race and other HMDA information might not be recorded leading to a high percentage of "Not Available".

Table 6.3 below shows action taken on applications received in Montgomery County (excluding the City of Dayton) from 2000 to 2002.

Table 6.3: Applications and Action Taken On All Montgomery County Applications 2000-2002

Action Taken On Applications	2000		2001		2002	
	#	%	#	%	#	%
Applications	31690	100%	47883	100%	50858	100%
Originations	17817	56.2%	29756	62.1%	33121	65.1%
Denials	7251	22.9%	8581	17.9%	7814	15.4%
Approved Not Accepted	3405	10.7%	4218	8.8%	4135	8.1%
Apps. Withdrawn	2530	8.0%	4376	9.1%	4632	9.1%

Those applications that were "Approved but Not Accepted" are applications that, for whatever reason, the customer was declined the loan. This could be for a number of reasons such as the customer changing their mind, changes in loan terms and conditions or increased interest rate, etc. Those applications that are "Withdrawn" are when a customer decides not to go forward with the application either because they find another lender that they decide to use or for other reasons.

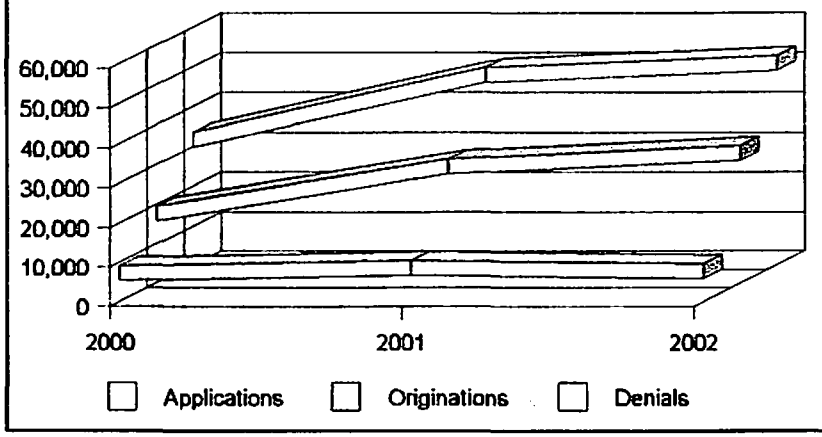
In 2000 the ratio of originations to applications was almost two to one, at 1.8. The ratio between originations and denials was 2.4, meaning almost two and one-half loans were originated for every denial. By 2002 the percentage of originations had dropped only slightly to 55.4% as opposed to 56.2% in 2000. The year 2001 had the highest percentage of applications originated at 62.1%.

Denials dropped five percent between 2000 and 2001 and dropped two percent between 2001 and 2002. However, the number of applications increased over 28,000 between 2000 and 2002, yet denials stayed fairly level. Applications that were withdrawn showed a

small increase between 2000 and 2002 of slightly over one percent, while approved but not accepted decreased by more than two percent.

Figure 3 shows, graphically, action taken on all applications by all types and purpose for 2000, 2001 and 2002. The figure shows that as applications increased so did originations, while denials remained fairly constant over the three-year period.

Figure 3: Action on All Applications



6.7 Largest Lenders in Montgomery County

This section will review those lenders who have two percent or more share of the mortgage market in Montgomery County, excluding Dayton. A review of Tables 6.4 and 6.9 provides more detail on the largest lenders in the County. This is important in order to see who are the major players in the mortgage market. Often it is lenders from outside of the community or sub-prime lenders. The list can be surprising especially when compared to those lenders who have office locations within the County. (Table 6.4)

The market share for each lender is included in parentheses and sub-prime lenders are highlighted.

These lenders are the leaders in terms of all mortgage types (Home Purchase, Refinancing and Home Improvement). It should be noted that only regulated loans are required to be reported as part of the HMDA data.

In each of the three years, the lenders in Table 6.4 had over 40% of the total market. In 1999 there were twelve lenders with a combined market share of 40.4% of the mortgage market, in 2000 there were 13 lenders with 47% combined market share and by 2001 there were 12 lenders with 45.8%. In each of the three years, sub-prime lenders had a presence in the market - 2000 was 10.7%, 2001 was 14.3% and in 2002 it was 17.7%.

When the discussion shifts to conventional home purchase, the list of lenders will change somewhat in that some lenders focus their market in refinancing more than they do on the home purchase.

Table 6.4: Montgomery County Largest Lenders - 2 Percent or Greater of Total Reported Mortgage Market: 2000 - 2002 (Percent Market Share)

2000	2001	2001
Bank One, NA (8.7%)	National City Bank (6.5%)	National City Mortgage (6.0%)
National City Bank (5.6%)	National City Mortgage (6.1%)	ABN AMRO Mortgage (5.5%)
National City Mortgage (4.7%)	Bank One, NA (5.4%)	Union Savings Bank (5.5%)
Fifth Third Mortgage (3.0%)	Fifth Third Mortgage (4.5%)	Fifth Third Mortgage (5.2%)
Firstar Bank. NA (3.0%)	ABN AMRO Mortgage (3.7%)	Countrywide Home Loans (4.0%)
Advanta National Bank (2.4%)	Countrywide Home Loans(3.4%)	Beneficial Corporation (3.4%)
Wells Fargo Home Mort (2.3%)	Union Savings Bank (3.1%)	National City Bank (3.3%)
Countrywide Home Loans (2.3%)	Beneficial Corporation (2.5%)	Wells Fargo Home Mort (3.2%)
Associates Home Equity (2.3%)	Wells Fargo Home Mort (2.7%)	Washington Mutual Bank (2.8%)
Nationascredit Financial. Serv. (2.1%)	Household Finance (2.5%)	GMAC Mortgage (2.5%)
Ameriquest Mortgage (2.0%)	Flagstar Bank FSB (2.4%)	Household Finance (2.3%)
Aegis Mortgage (2.0%)	GMAC Mortgage (2.2%)	Flagstar Bank (2.1%)
	US Bank NA (2.0%)	
Total Market Share: 40.4%	**Total Market Share: 47.0%**	**Total Market Share: 45.8%**

6.8 Government-Backed Applications

See Map 32

In 2000, 70.1 million families in the U.S. owned their own homes which was an increase of 10 million from 1993. The role of government-backed loans, especially FHA, in America has been significant since the programs inception in the 1940's. Over 30 million families have used FHA as their source for home mortgages in the last 6 decades. FHA's market share over recent years has remained stable at around 20% of the total housing market. This is in spite of shrinking mortgage rates that FHA often cannot match, the increase in sub-prime lending, the availability of competing mortgage programs from the conventional mortgage market and other actions.

FHA has always been the lender for low-income households, minorities and those with less than stellar credit. In 1999, one-fifth of all home purchases in the United States were FHA loans and of this, two fifth's were for Blacks and Hispanics. Table 6.5 shows how Montgomery County compared to the Nation in FHA activity.

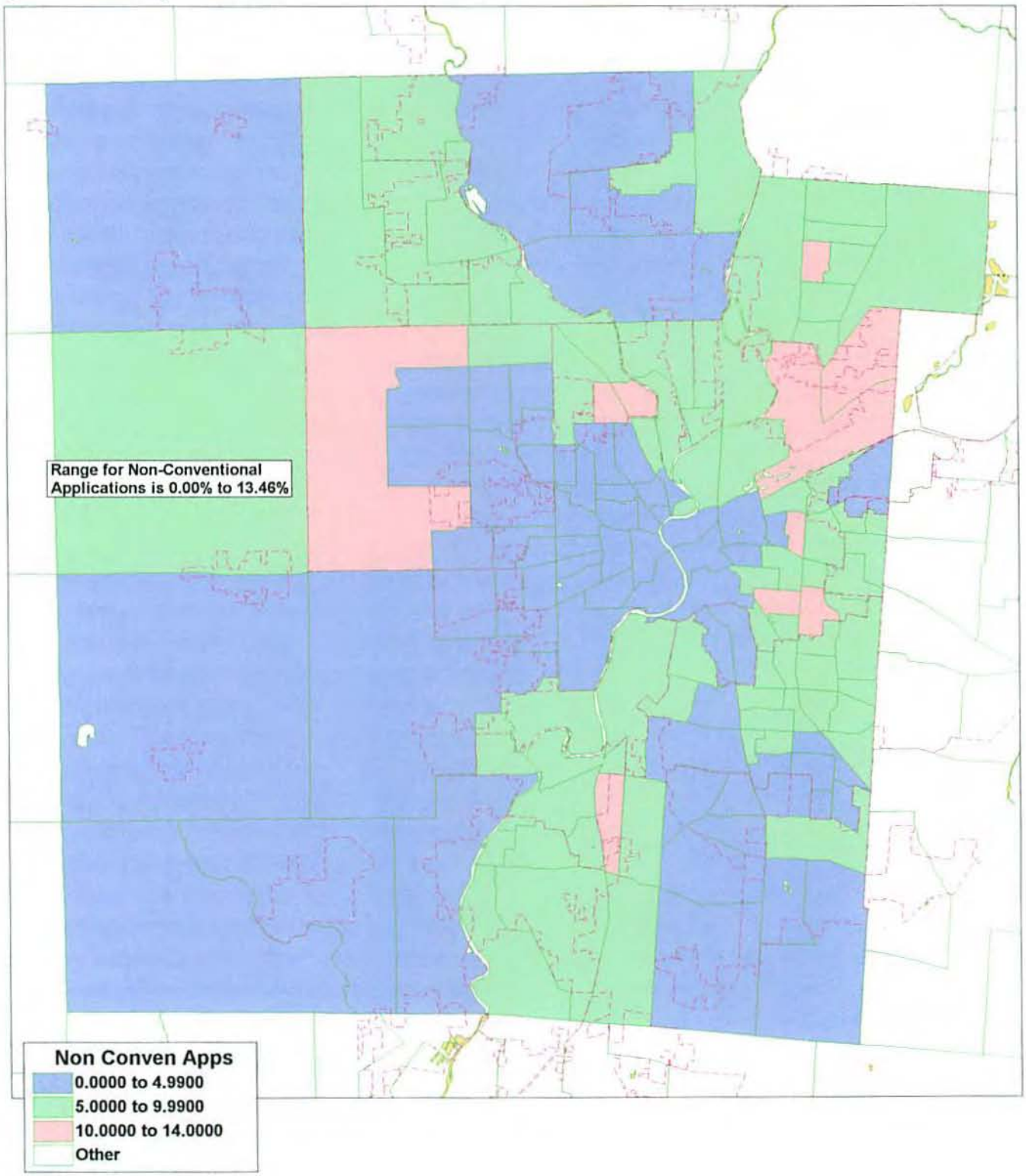
Table 6.5: FHA Application Comparisons by Race and Income 2000

	Total	Black /Hispanic	Low/Mod Income Applicants	Low Income Tracts	High Minority Tracts (20%+)	All Other Minorities
Nation 2000	29.0%	40.0%	42.0%	30.0%	31.0%	35.0%
County 2000	10.2%	29.4%	22.4%	4.0%	16.5%	8.5%
County 2001	10.0%	26.6%	21.7%	3.6%	21.5%	19.6%
County 2002	8.9%	25.3%	20.3%	7.0%	22.8%	40.2%

Montgomery County had 3,222 FHA applications in 2000, constituting 10.2% of the total market, in 2001 there were 4,796 for 10% of market and in 2002 there were 4,537 FHA applications for 8.9%. As the number of applications rose in the last three years the number of FHA applications dropped.

However, the percent of minorities using FHA were below the national average in 2000 and showed a consistent drop from 2000 to 2002. The percent of low to moderate- income applicants also was below the national average in 2000 and showed a decrease over the three-year period. High minority tracts (tracts with a 20% or more minority population) showed an increase over the three year period. Other minorities showed the largest

MAP 32: Percent Applictions Non-Conventional (FHA/VA) 2002



change of any category going from 8.5% in 2000 to 40.2% in 2002. This category includes Native American and Asian home buyers. In 2002, 34% of the 206 applications received were from Native Americans for FHA loans.

Veterans Administration (VA) and Rural Development applications made up less than 3% of the applications between 2000 to 2002. Thus, these applications had little impact.

Conventional applications for mortgage loans are the overwhelming market in Montgomery County, making up 88% of all applications in 2002. Over the years, as the total number of applications increased the number of FHA applications has declined.

Table 6.6 shows the breakout by conventional and government-backed (FHA & VA) applications for Montgomery County. Still, government-backed loans have not been completely ignored by borrowers in the City.

Table 6.6: Comparison of Conventional and All Government-Backed Applications

	2000	2001	2002
Conventional	87.6%	87.0%	88.2%
Government-Backed	12.4%	12.9%	11.8%

Table 6.6 is simply a comparison of conventional versus FHA, VA and similar government-backed loans. It does not separately break out community lending products. Those will be discussed in a separate section.

6.9 Refinancing and Home Improvement Activity

See Maps 33-34

While conventional home purchase is of great importance, activity in refinancing and home improvement is equally important. This should be an area of concern in the County because the trend is for refinancing activity to far exceed home purchase or home improvement. With the focus of much of the mortgage industry on refinancing through mailings, e-mail, internet advertising and tv/radio, it is little wonder that this part of the mortgage market is the most active.

Refinancing and home improvement loans should be the easiest to obtain since the lender is dealing with a known borrower who has equity in the home and has a commitment to the dwelling. Table 6.7 indicates action taken on refinancing and home improvement applications. Even when one considers the credit issues some home owners will have, it would be reasonable to expect that denials of such loans would be less than originations and this held true in Montgomery County.
Perhaps the most significant point in Table 6.7 is the jump in refinancing applications from

2000 to 2001 where the number of applications increased 2.2 times (17,037 applications). Applications between 2001 and 2002 also increased but by less 4,000 applications.

The origination percentages also increased between 2000 and 2001 by 17% and by more than 3% between 2001 and 2002. Denial rates dropped during the three-year period from a high of 30.2% in 2000 to a low of 16.7% in 2002.

Table 6.7: Action taken on Refinancing and Home Improvement Applications 2000-2002

	Applications	Originated	Denied
2000 Refinancing	14,281	40.5%	30.2%
Home Improvement	4,605	43.8%	35.7%
2001 Refinancing	31,318	57.3%	19.4%
Home Improvement	3,705	43.5%	35.0%
2002 Refinancing	35,286	60.8%	16.7%
Home Improvement	2,471	46.9%	33.9%
2002 Local Lenders Refinancing	7,587	69.3%	14.8%
2002 Local Lenders Home Improvement	1,297	39.7%	41.8%

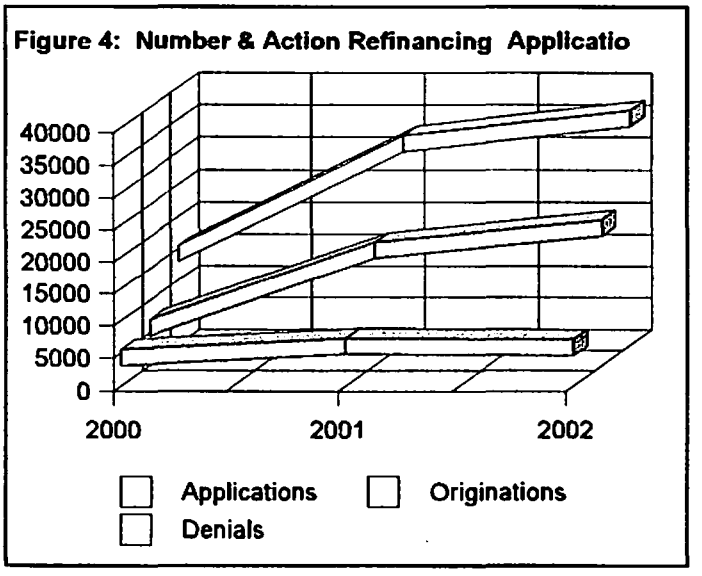
Home Improvement applications dropped over the three-year period from 4,605 in 2000 to 2,471 in 2002. Originations to denial rates have always been high in this mortgage product. In 2000, 43.8% of the applications were originated while 35.7% of them were denied. By 2002, 46.9% were originated while 33.9% were denied. Local lenders as a group fared somewhat better than all lenders, approving a higher percentage of refinancing applications and denying a lower percentage.

High home improvement denial rates are a concern for the community. Home owners who are unable to secure home improvement loans will be unable to maintain and improve their properties and subsequently will be unable to command a fair market price for their homes. This can lead to deteriorating neighborhoods.

One factor for higher denial rates for home improvement loans, rather than for home purchase and refinancing loans, may be the volume of advertising, encouraging home owners to use their home equity to pay for college tuition, vacations and debt consolidation. In these instances, the loan, though secured by the home, has no direct

impact on the community or the condition of the property.

Another factor is the practice of allowing home owners to borrow up to 125% of the appraised value of their home. While not as popular now as it was in the mid to late 1990's, this practice may encourage borrowers to seek loans they cannot repay.



The community may desire to look more closely at the types and uses of such loans. Home owners become absentee landlords because they are unable to sell their homes.
These same owners, if denied access to home improvement loans, will not be able to maintain their homes in good repair, negatively influencing the residents and the community.

Figure 4 shows the number of refinancing applications and the action taken on these applications from 2000 through 2002 in Montgomery County.

As refinancing applications increased, the number of originations increased at almost the same pace while denials remained relatively steady during the three-year period. This is the same pattern as noted earlier for conventional home loans.

Table 6.8 shows action on refinancing applications by race in the County. The data during the three-year period contained in this table experienced some of the lowest interest rates in decades and was a period when refinancing mortgage activity outpaced home ownership mortgages. White applicants during this time had a far better chance to make an application and have it approved than minority applicants. While origination rates for refinancing loans were lower than home ownership mortgages and denials were higher for all races, Whites still had a higher percentage of originated loans and a lower percentage of denials than Black or Hispanic applicants.

The "race not available" category also showed high percentages of applications, leading to the speculation that many of the applications were received by phone or on the internet. During this period there was a high rate of advertising for refinancing from both sub-prime and prime lenders.

Table 6.8: Action on Refinancing Applications by Race

	2000 Apps.	2000 Orig	2000 Denials	2001 Apps.	2001 Orig	2001 Denials	2002 Apps.	2002 Orig	2002 Denials
Black	8.5%	33.8%	36.8%	5.0%	47.9%	27.8%	5.1%	49.2%	24.2%
Hispanic	0.3%	39.5%	32.6%	0.4%	40.5%	19.8%	0.4%	68.1%	11.8%
White	42.8%	50.9%	24.6%	51.4%	72.0%	12.9%	56.3%	74.4%	9.9%
Not Avail.	43.7%	34.3%	34.3%	39.7%	41.2%	25.9%	34.5%	39.9%	26.5%

Of the three years shown, 2001 was the worst year for Blacks and Hispanics in terms of refinancing applications. Blacks dropped almost 100% in the percent of refinancing applications, from 8.5% in 2000 to 5.0% in 2001 and by 2002 they had only increased .1%. As a comparison, during those same years, Hispanics never had 1% of the applications and applications from Whites increased each of the three years, from 42.8% to 56.3%.

When Blacks and Hispanics did manage to get in the door to make an application, they were denied at a greater rate than Whites. In 2001, the worst year for Blacks, they were denied twice as often as Whites. It is important to remember that the number of applications received from Blacks and Hispanics were small compared to their White counterparts. In 2002, of the 35,286 applications received, only 1,790 were from Black applicants and only 144 were from Hispanic applicants while Whites accounted for 19,879 applications. Again, the "not available category" had over 12,000 applications. The high numbers of applications with race "not available" is not limited to Montgomery County but is a national problem.

According to Jason Dietrich, Office of the Comptroller of the Currency, "HMDA contains a surprisingly high percentage of applications that lack race data and those percentages have trended upward."[54] The FFIEC website highlights in its guide to HMDA reporting for 2003 the requirement, effective on January 1, 2003, to collect race and sex data on telephone applications.[55] This new requirement will allow more accurate monitoring of lending institutions for fair lending compliance. But just as that new effort was recently put into place, the regulatory agencies in late 2004 were considering changes to HMDA reporting requirements that would make it difficult to continue to get HMDA data from a large percentage of lenders in the Country.

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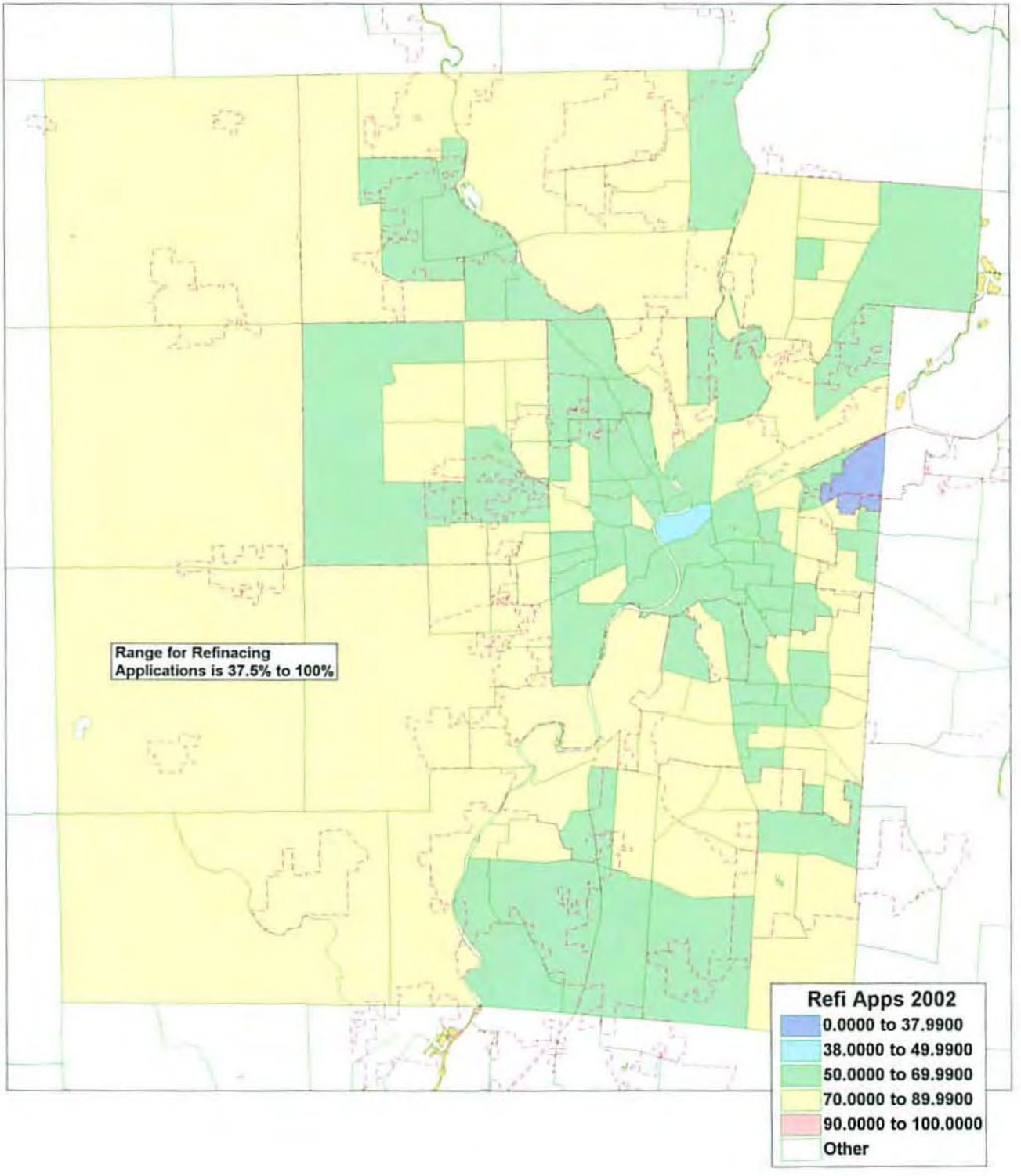
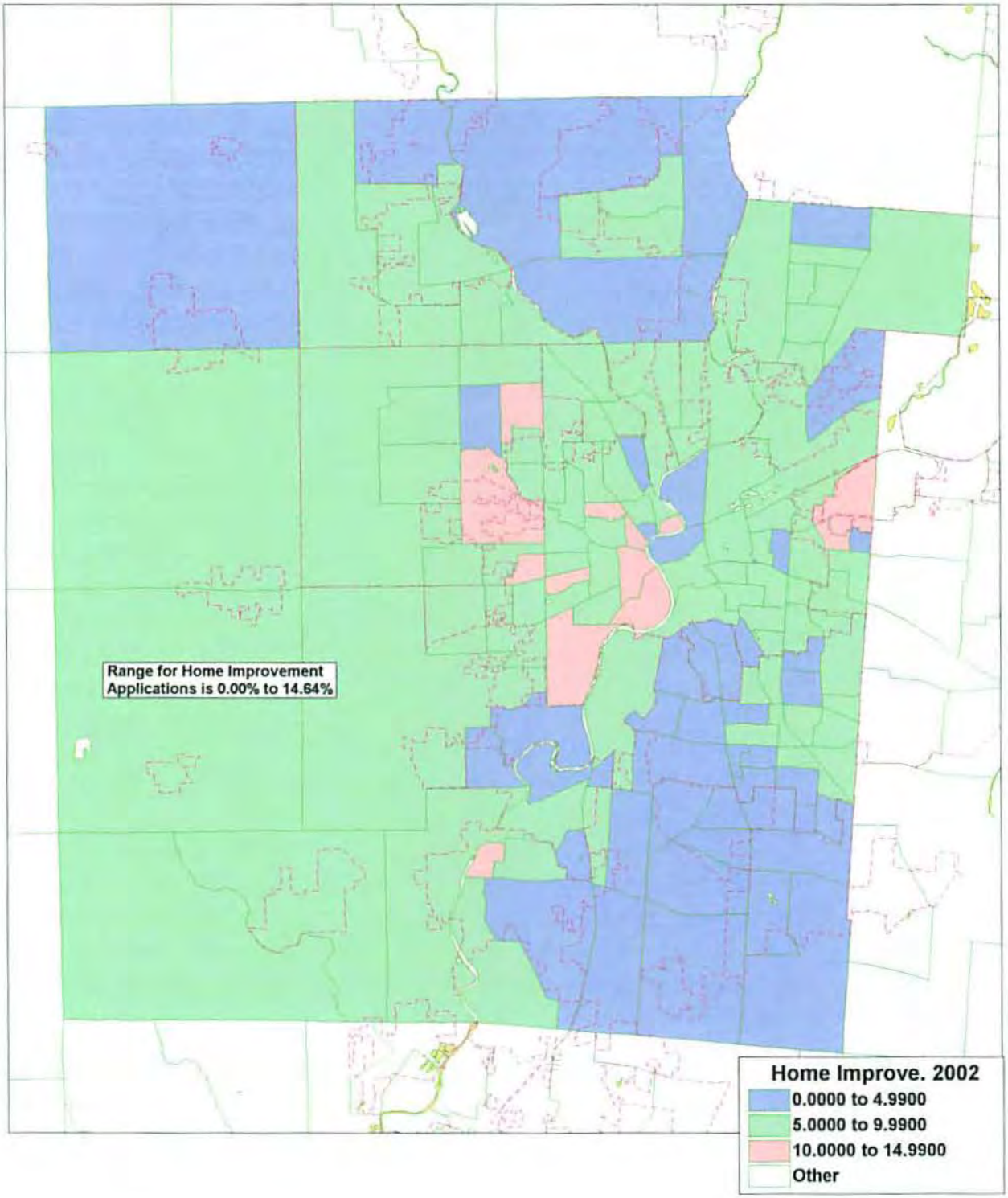
[54] Dietrich, Jason, Missing Race Data in HMDA and the Implications for Monitoring of Fair Lending Compliance", March 2001

[55] Federal Financial Institutions Examination Council's website www.ffiec.gov/hmda, September 12, 2003

MAP 33: Percent Refinancing Applications 2002



MAP 34: Percent Applications Home Improvement 2002



6.10 Conventional Home Purchase

Conventional home purchase loans are a strong indicator of how many families are able to purchase single-family housing in the City. Conventional loans are those that are generally available to those with the best credit ratings. The Reference Tables, found in the Appendix section, are used for the bulk of the discussion in this analysis. These tables detail information for each of the largest mortgage lenders in Montgomery County.

Those lenders in Table 6.9 have over 41% of the conventional home purchase market in Montgomery County. In each of the three years shown, local home town lenders or their mortgage equivalent, had the majority of the market, however, sub-prime lenders made a showing also. While not nearly as dominate as local lenders, they still were active in the market. Home town lenders had 25% of the market in 2000 compared to 12.2% for sub-prime lenders. In 2001 they had 27% of the market while sub-prime lenders had 10.3%. In 2002 the rate was 23.8% compared to 12.8%.

This is a healthy sign for the County and the City of Kettering. When local lenders have a strong market share in conventional home purchase, it shows that they have a commitment to home ownership rather than placing all their effort in refinancing as is seen in other large urban areas in the country. Local lenders as a group were just shy of 14% for total applications for conventional home purchase of the total 10,920 applications they received.

Table 6.9: Lenders with 2.0 Percent or More of Conventional Home Purchase Market, 2000 - 2002(Percent Market Share)

2000	2001	2002
Fifth Third Mortgage (6.9%)	Fifth Third Mortgage (7.0%)	Fifth Third Mortgage (7.6%)
National City Mortgage (6.8%)	National City Mortgage (6.9%)	National City Mortgage (6.3%)
Associates Home Equity (4.3%)	National City Bank (5.4%)	Countrywide Home Loans (5.4%)
Wells Fargo Home Mort (3.8%)	Wells Fargo Home Mort (4.4%)	Wells Fargo Home Mort (4.5%)
Countrywide Home Loans (3.3%)	Countrywide Home Loans (3.6%)	National City Bank (3.9%)
Union Savings Bank (3.3%)	Republic Bank (2.9%)	Union Savings Bank (3.7%)
National City Bank (3.2%)	Union Savings Bank (2.7%)	First Franklin Financial (3.2%)
Bank One, NA (3.1%)	Liberty Lending Serv (2.4%)	ABN AMRO Mortgage (3.2%)
Liberty Lending Serv. (2.6%)	First Franklin Financial (2.3%)	Washington Mutual Bank (2.7%)
Republic Bank Mortgage (2.1%)	Liberty Savings Bank (2.1%)	Republic Bank (2.3%)
First Franklin Financial (2.0%)	GMAC Mortgage (2.0%)	
Total Market Share: 41.4%	**Total Market Share: 41.7%**	**Total Market Share: 46.0%**

Comparison of Table 6.6 with Table 6.9 shows that, when we consider only conventional home purchase applications, the list of largest lenders changes only slightly. The lenders that lead the market, when all types of mortgage products were considered, are still the same lenders when only conventional home purchase is considered. National City Bank, Bank One, National City Mortgage and Fifth Third Mortgage were strong in both areas, leading the list of lenders with sizeable market shares.

Table 6.10 shows the percentage of originations and denials for conventional home purchase applications within the City of Montgomery County. Origination rates were considerably higher than denial rates in each of the three years

Table 6.10: Conventional Home Purchase Applications by Action

Year	Applications	Originated	Denied
2000	9,373	75.5%	11.6%
2001	7,617	71.1%	13.5%
2002	7,874	73.6%	10.8%
Local Lenders 2002	1,517	81.3%	7.4%

The lowest year for denials was 2000 and 2002 while it was also the highest year for number of applications and the percent of originations.

6.11 Conventional Home Purchase - Race

See Map - 35

According to a recent study report by the Pew Hispanic Center in 2002, Blacks and Hispanics had a respective median net worth of $5,998 and $7,932, which is shockingly low, compared to Whites median net worth of $88,651. This low rate for Blacks and Hispanics was a decline from their 2000 median net worth levels while for Whites it was an increase.[56]

Home ownership is one of the most reliable and accessible ways for economically disadvantaged people to close the wealth gap and obtain a secure position in the middle class. However, despite the reduction in interest rates to record lows and the numerous mortgage products designed for low-moderate income households, less than 50% of Blacks and Latino families have achieved home ownership compared to roughly 75% of White families.[57]

Table 6.11 shows lenders by the number of conventional home purchase applications received by the race of the applicants. The number of White applications was far greater than black applications even considering the high number of "race not available" applications. Considering the number of applications received, the representation of Blacks and Hispanics is dismal.

[56] Poverty & Race, Vol 14, No. 1, Jan/Feb 2005, Page 17

[57] Ibid

Table 6.11: Number and Percent of Applications by Race

Year	White		Black		Hispanic		Not Available	
	#	%	#	%	#	%	#	%
2000	6,012	64.1%	705	7.5%	40	0.4%	2,249	24.0%
2001	5,386	70.7%	609	8.0%	30	0.4%	1,359	17.8%
2002	5,702	72.4%	618	7.8%	52	0.7%	1,198	15.2%
Local Lenders 2002	1,168	77.0%	57	3.8%	10	0.7%	240	15.8%

Lenders in the County were over 8.5 times more likely to receive an application from Whites than from Blacks in 2000, in 2001 they were 8.8 times more likely and in 2002, 9 times more likely. With 10% of the population in the County Black, the lenders were close to that benchmark in percent of applications while looking at applications as a percent of population, they were closer to the Black population than to the percent of White population. (74.7%) Still, with the little growth of the minority population in new tracts between 1990 and 2000 as discussed previously, it would be hoped that Blacks would have done better. Due to the size of the Hispanic population in the County being less than 1%, they will not be discussed in the following sections.

Table 6.12 reflects the activity for conventional home purchase applications, originations and denials for Black and White applicants as a percent. While lenders showed that they originated 60% of Black applications they received, it is of little consequence when the number of applications they received from Black applicants is considered. In 2000, of more than 9,000 applications received, only 705 were from Blacks while in 2002, with the number of applications reduced to 7,874, only 618 were from Blacks. It is encouraging to know that when Blacks do get in the door, they have more than a 50% chance of being approved, compared to Whites who have a 75% chance, but obviously getting in the door is the issue.

As noted earlier, the double digit percentage of missing race data creates problems in conducting a fair lending analysis. Hopefully, the requirements initiated in 2003 requiring lenders to obtain this information, even in telephone applications, will help. Certainly, seeing such a combination of issues such as the high percentages of "race not available" and minority applications withdrawn raises a concern regarding the equitable treatment of minority applications.

MAP 35: Minority Level by Tracts According to HMDA Reporting Data

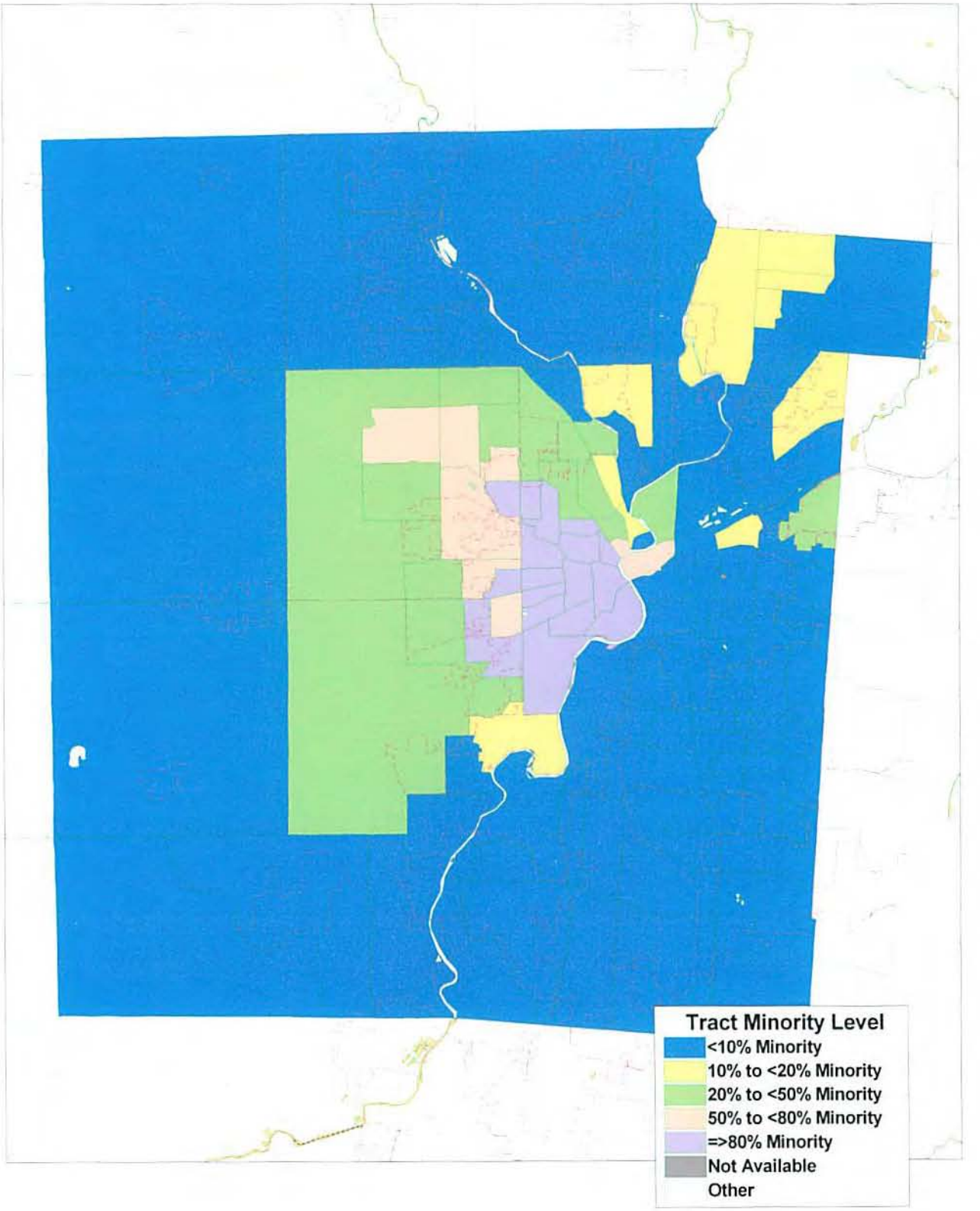


Table 6.12: Conventional Home Purchase - Percent of Applications, Originations and Denials by Race

Year	Applications		Originations		Denials	
	White	Black	White	Black	White	Black
2000	64.1%	7.5%	77.5%	60.1%	10.2%	22.1%
2001	70.7%	8.0%	77.6%	50.2%	9.9%	26.1%
2002	72.4%	7.8%	79.7%	60.2%	8.0%	16.2%
Local Lenders 2002	77.0%	3.8%	84.7%	70.2%	6.0%	10.5%

Local lenders in 2002 had a higher applications rate for Whites than that for Blacks, almost twenty times higher. Considering again that ten percent of the population in Montgomery County is Black, local lenders fell far short of that benchmark. While they did not meet the benchmark of the White population either, they were only off by a few percentage points, while they missed the Black benchmark by almost seven percent. In numbers, the local lenders received 1,517 applications for conventional home purchase, of that total 1,168 were from Whites and only 57 were from Blacks. With this in mind when we considered that local lenders originated 70% of their applications from Blacks it means only 40 total applications were approved. Over 960 applications were approved for Whites, 84.7%.

Data in Table 6.13 is a Black/White Yield Ratio, which compares the lenders success in turning Black applications into originations with their success in turning White applications into originations. A ratio of 1.0 indicates that Black and White origination rates are equal. A ratio above 1.0 indicates that Black originations rates are greater than White origination rates. A ratio below 1.0 indicates that Black origination rates are less than White origination rates.

When Black individuals and families did make applications, origination rates were 60% in 2000 and 2002 and 50% in 2001. However, it should be noted that only 7.7% of all applications for the three-year period in Montgomery County were Black applicants. Once more this highlights the need to market loan products more aggressively to the minority communities in Montgomery County.

TABLE 6.13: BLACK/WHITE YIELD RATIO

	% Black Originated*	% White Originated+	Black/White Yield Ratio
2000	60.1	77.5	1.2
2001	50.2	77.6	1.5
2002	60.2	79.7	1.3

* Of Black Applications + Of White Applications

Table 6.14 presents data on the percentage of Black and White conventional home purchase applications that ended in a denial and the Black/White denial ratios.

TABLE 6.14: BLACK/WHITE DENIAL RATIO

	% Black Denied*	% White Denied+	Black/White Yield Ratio
2000	22.1	10.2	2.2
2001	26.1	9.9	2.6
2002	16.2	8	2

* Of Black Applications + Of White Applications

While yield ratios on originations were very close to being even, the ratio for denials is a different story. In each of the three years, Blacks were denied twice as often as Whites by lenders.

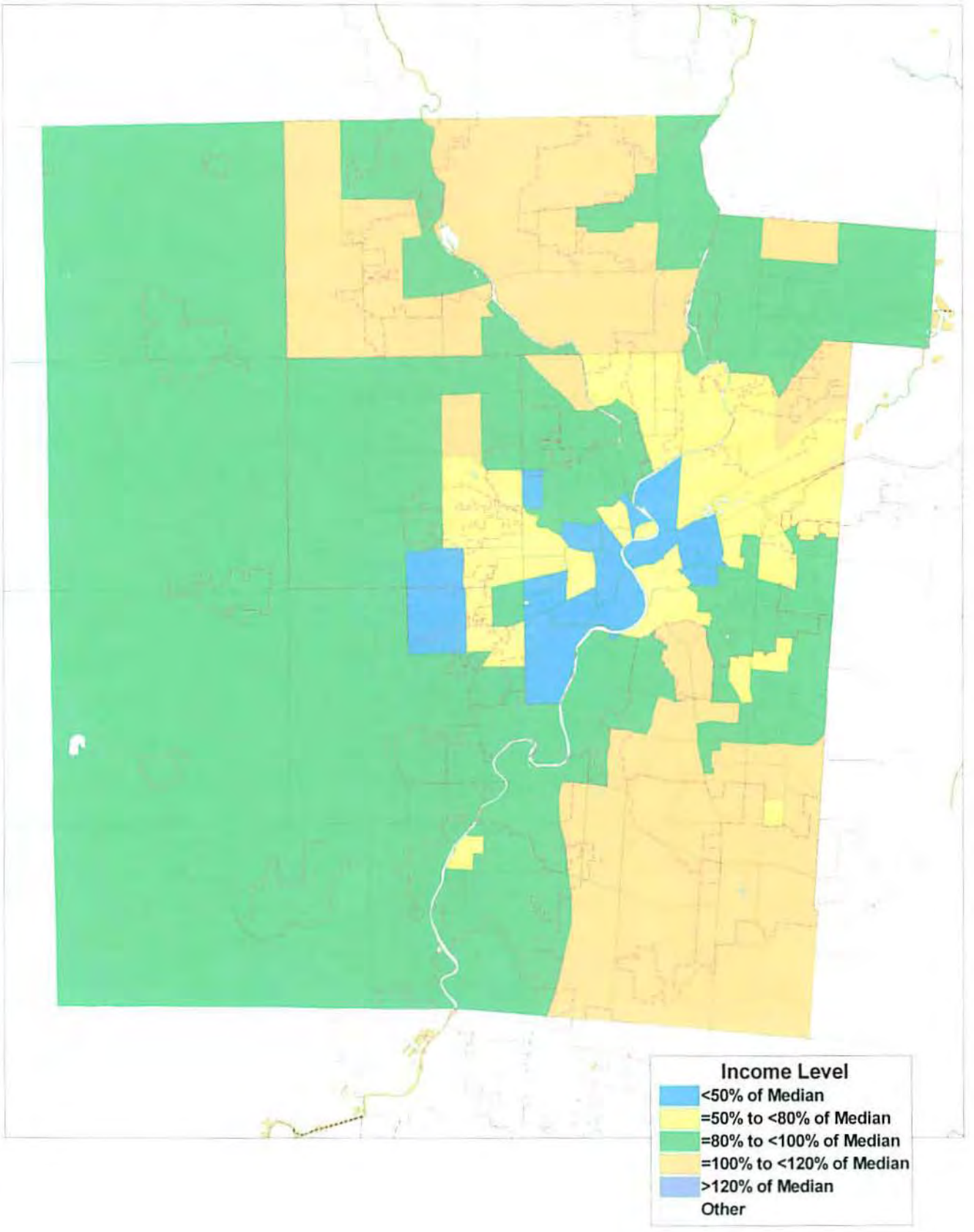
In Montgomery County, the issue is not just that Blacks are denied more than Whites, but the fact that they don't even get in the door to make an application is a more significant concern. It is very difficult to celebrate the high origination rates for Black applicants by lenders when they make up only 705 of some 9,000 applications for conventional home purchase mortgages.

6.12 Conventional Home Purchase - Applicant Income

See Map - 36

This section analyzes lender performance on another important community reinvestment goal: making mortgage credit available to persons of low-moderate income (80% or less of median household income). According to the U.S. Census 2000, the Median Household Income for 1999 in Montgomery County was $40,156. Also according to the U.S. Census for 2000, approximately 40% of the Montgomery County households were low-moderate income households.

MAP 36: Median Income Level According to HMDA Reporting Data



The HMDA database for lender provides an income breakdown of mortgage loan applicants at the application, origination and denial stage of the lending process. From this information, we can assess which lenders have been most successful in servicing the mortgage credit needs of low-moderate income households.

Table 6.15 shows lenders by the percent of conventional home purchase applications received from low-moderate income applicants. Lenders combined for over 32% of the low-moderate income market share in the County. The year 2002 had the highest percentage of low-moderate income applications with 38.9% while the lowest year was 2000 with 32.2%. This was also the year with the largest number of conventional home purchase applications. The average for the three-year period is 34.9% for low-moderate income applicants. Local lenders in 2002 showed the same results in applications from low-moderate income applicants as all lenders.

Table 6.15: Percentage Applications from Low-Moderate Income Applicants

Year	# Low-Mod Apps.	% Low-Mod Apps.
2000	3028	32.3%
2001	2679	35.2%
2002	3062	38.9%
Local Lenders 2002	557	36.7

Table 6.16 below compares lenders in terms of originations from upper income and low-moderate income applicants. The Countywide average for originations is 64% for low-moderate income applicants and 81% for upper income applicants. The year 2002 was the highest for originations in both low-moderate and upper income applicants.

Table 6.16 Originations to Low-Moderate Income Applicants

Year	% Originations*	
	Low-mod. Inc. Applicants	Upper Inc. Applicants
2000	64.5%	81.3%
2001	62.8%	79.6%
2002	65.3%	82.2%

*As a percent of total originations

There was a range of other action on applications from low-moderate income applicants. Table 6.17 below shows how low-moderate income applicants fared in the City. As expected, some lenders had a high percentage of denials but others had very low denials. Applicants might withdraw or turn down an approved application for a number of reasons,

either from finding a better offer to changes in interest rates or changes in loan terms. It would be expected that the percentage of such action would be relatively insignificant and make up a very small percentage of the applications. In Montgomery County, an average of 9% of applications were approved but not accepted and the withdrawal rate averaged 5.5%.

Table 6.17: Action Taken on Conventional Home Purchase Low-Moderate Income

Lender	Approved Not Accepted	Denied	Withdrawn	Closed Incomplete
2000	9.2%	19.7%	5.1%	1.5%
2001	8.3%	21.8%	5.9%	0.0%
2002	9.5%	16.9%	5.5%	2.7%
Local Lenders 2002	5.7%	7.4%	4.8%	0.7%

In 2002 local lenders denial rates were significantly lower than all lenders for the same year. All lenders denied more than twice as many applications as local lenders. Local lenders were also below their counterparts in approved not accepted, withdraw and incomplete.

It should be pointed out that unlike reporting on race, applicant income has far less "not available" reporting. Lenders in the County had less than 4% of their applications in this category in 2001 and 2002 while in 2001 there was more than 13% "not available".

6.13 Conventional Home Purchase - Race and Applicant Income

Table 6.18 shows application, origination and denial percentages for the lenders by income group for Black applicants and White applicants. While the low overall numbers of applications from Blacks make much of the data in this section less significant than it would be if the applications numbers were higher, it is important because it gives some indication of how Blacks and Whites fare in obtaining conventional home loans when income levels are considered. As indicated earlier, it is clear that application rates for Black applicants are far lower than White applicants.

Middle-income Blacks were an almost non-existent market with the lenders. Those applicants earning between 100% and 120% of median income accounted for the lowest number of applications for Blacks in all years. Whites, in the same income category, were twelve times more likely to make an application than their Black counterparts.

In all income groups Whites fared better in each category from applications, origination and denials. Whites had higher origination rates and lower denial rates in each category. In many cases the rate of applications of Whites to Blacks was two to three times greater.

Table 6.18: Application Action by Race and Income

Year & Applicant Income	BLACK			WHITE		
	Apps.	Originati on	Denia ls	Apps.	Originatio ns	Denials
2000						
<80% (Low/Moderate)	331	57.4	24.2	1990	69.4	16.5
>=80-<100% (Middle)	122	52.5	23.8	889	77.8	9.8
>=100-<120% (Middle)	77	71.4	15.6	813	78.6	3.5
>=120% (Upper)	155	67.7	20	2092	84.3	4.2
Not Available	20	50	20	228	79.8	4.2
TOTAL	705	60.1	22.1	6012	77.5	7.5
2001						
<80%	286	45.4	34.6	1981	73.7	14.7
>=80-<100%	106	55.7	20.8	866	78.6	8.2
>=100-<120%	50	52	18	732	81.7	7.5
>=120%	169	58.6	16	2138	85	4.5
Not Available	22	72.7	9.1	166	72.3	12
TOTAL	633	52.1	25.1	5883	79.5	9.1
2002						
<80%	353	56.6	19.5	2312	76.1	11.4
>=80-<100%	95	58.9	17.9	942	83.5	6.9
>=100-<120%	58	70.7	10.3	729	84.2	5.3
>=120%	126	78.6	4	2039	86.4	3.6
Not Available	19	47.4	15.8	239	76.2	6.7
TOTAL	651	62.2	15.4	6261	81.5	7.3

Even when lenders report high Blacks origination rates, Blacks are still not getting in the door to make an application. It should also be noted that, as origination rates for Blacks were lower than Whites, denial rates for Blacks were higher than Whites. In each income level, the denial rates were usually higher for Blacks than for Whites.

6.14 - Conventional Home Purchase - Census Tracts with 20% or Greater Minority Population

The next portion of the analysis examines the percentage of lender activity benefitting or impacting geographic areas of different racial composition. In other words, how did the ten largest lenders fare in minority neighborhoods? Table 6.19 lists lenders in conventional home purchase applications from census tracts with 20% or greater minority applications. Map Lending 16 shows those census tracts in the County that have 20% or more minority population.

Table 6.19 also provides information on the percent of applications, originations and denials for census tracts with 20% or greater minority population. Lenders are reducing their potential market for their loan products by concentrating their efforts in those tracts that are less than 20% minority. It is wrong to think that there are not potential home buyers in these tracts.

While Map 36 shows that there are only a few census tracts in the County that meet the 20% or greater minority benchmark, it should be noted that the data discussed in Table 6.19 is for Montgomery County excluding Dayton.

Overall 81.6% of applications in 2002 came from tracts with 10% or less minority. The impact of this might not be as troublesome considering that there are a few tracts meeting the 20% or greater benchmark. This fact does not mean that the low number of applications are not a concern for the County.

Table 6.19: Lending Actions in 2001Census, Tracts 20% or Greater Minority

	Applications*		Originations	Denials
	#	%	%	%
2000	1312	14.0%	59.5%	23.3%
2001	852	11.2%	46.5%	28.8%
2002	816	10.4%	51.6%	23.4%
Local Lenders 2002	90	5.9%	64.4%	15.5%

* As a percent of total conventional home purchase applications

Local lenders in 2002 had only 5.9% (90) of their applications from these tracts. While they did originate a higher percent of applications in 2002 than all lenders in Montgomery County, the low number of applications received makes this fact less encouraging. Local lenders did have a lower denial rate than all lenders.
Again, the critical factor is not so much in the rate of denials for lenders, but rather the lack of applications from census tracts with higher concentrations of minority populations.

6.15 - Conventional Home Purchase - Tract Income

The last portion of the analysis examines lender activity benefitting or impacting low-moderate income census tracts. All conventional home purchase data in this section comes from low-moderate income census tracts. Table 6.20 lists lenders by year, by application, originations and denials percentages.

Table 6.20: Lending Activity in Low-Moderate Income Tracts - Montgomery County

	APPLICATIONS*	ORIGINATIONS**	DENIALS**
2000	9.6%	7.5%	18.6%
2001	8.3%	5.7%	17.4%
2002	7.5%	5.6%	17.2%
Local Lenders 2002	5.5%	4.6%	15.9%

* Of total home purchase applications ** as a percent of total originations *** as a percent of total denials

As a percent of total applications, low-moderate income tracts had less than 10% of applications. Of those applications in 2001 and 2002, three times as many applications were denied than were originated. In 2000 denials were 2.4 times that of originations.

Table 6.21 compares the application rates from the HMDA data of low-moderate income applicants to low-moderate income tracts. This comparison reveals that lenders are servicing low-moderate income applicants more than low-moderate income tracts.

Table 6.21: Applications from Low-Moderate Income Applicants and Low-Moderate Income Tracts

	APPLICATIONS			
	% LMI APPS *	# LMI APP.	% LMI TRACTS	# LMI TRACT
2000	32.3%	3028	9.6%	902
2001	35.2%	2679	8.3%	630
2002	38.9%	3062	7.5%	597

6.16 - Community Lending Efforts

On the positive front, there are a number of community lending products available on the market that are designed to increase the participation of low and moderate income individuals and families in home purchases. These products were primarily designed by Fannie Mae and Freddie Mac and are being offered through individual lenders and through a consortium of lenders.

7.0 ZONING AND HOUSING REGULATIONS

Another aspect of discrimination necessary to discuss is barriers to fair housing resulting from zoning and subdivision regulations. Whether certain zoning and subdivision controls are, in fact, discriminatory is controversial. However, several cities have been successfully sued by the federal government over the manner in which they were zoned.

A view of representative studies of the nature of zoning discrimination shows that, as observed by Professor Richard T. Lai, Arizona State University, in his paper *The Effect of Exclusionary Zoning on Affordable Housing*, "If land-use zoning for the purpose of promoting reason, order and beauty in urban growth management is one side of the coin, so can it be said that exclusion of housing affordable to low and moderate income groups is the other ... as practiced, zoning and other land-use regulations can diminish the general availability of good quality, low-cost dwellings...." [58] Concerning the adoption and administration of building codes, Dr. Lai states "...local building codes also often serve an Exclusionary function...(they) have become a considerable barrier to the potential economics that could be realized through manufactured housing techniques.".

7.1 Introduction

Not In My Backyard, Removing Barriers to Affordable Housing, was published by the Advisory Commission on Regulatory Barriers and Affordable Housing. In the forward, then HUD Secretary Jack Kemp wrote that "the Commission's disturbing conclusion is that exclusionary, discriminatory and unnecessary regulations constitute formidable barriers to affordable housing..."[53] *Not In My Backyard...*, cites excessive subdivision standards, fees, slow and burdensome permitting processes, applying building codes for new construction to rehabilitation and NIMBY as among the most serious barriers.

The Advisory Commission concluded that states should take action to alleviate barriers to affordable housing. "States are in a unique position, for both constitutional and practical reasons, to deal with regulatory barriers to affordable housing. Constitutionally, all authority exercised by units of local government over land use and development derives wholly from the State... which is therefore uniquely situated to undertake reform of the collage of local regulations, as well as the State requirements that overlay them."

Patricia E. Salkin, Director of the Government Law Center, Albany Law School, offers a balanced view of the theoretical degree to which land use and building controls add housing cost in her April 1993 article in the publication, *Land Use Law*. Ms. Salkin

[58] The Effects of Exclusionary Zoning on Affordable Housing, Richard T. Lai, 1991, p.3

[53] Not In My Backyard, Removing Barriers to Affordable Housing, 1991, p. 2

correctly speculates that "It is time to openly discuss and debate the Report (*Not In My Backyard...*) and perhaps launch an empirical study to refute or substantiate the document - just how much do land-use regulations drive up the cost of housing? The real public policy issue in the debate is this: What is the most constructive balance between the public interest in affordable housing versus the public interests involved in land-use control?"[54]

The Council of State Community Development Agencies (COSCDA), published *Making Housing Affordable: Breaking Down Regulatory Barriers - A Self-Assessment Guide for States* published in the late 1990's. The 'Guide' cites the common issues raised about regulatory barriers and notes that: "...most states do not easily or readily intervene in local land use matters. Few issues are as politically sensitive - and potentially damaging to state elected officials - than local zoning, subdivision and building regulations. States can assume a leadership role in advancing and encouraging thoughtful modification of land use and development regulation."[55] While this lays the burden on the State, the City and County should consider their role in assuring that they are not involved in promoting barriers to equal housing. The Guide includes the following recommendations for evaluating how regulatory barriers may be impediments and how they may be modified:

1. States should require that all communities have comprehensive plans which include a housing element

2. States should establish mandatory, preemptive statewide building codes

3. Infrastructure needs should be tied to the capital improvement and housing elements approved in the comprehensive plan

4. States should enact legislation mandating the circumstances and conditions upon which local governments may impose impact fees. Such legislation should allow exemptions or reduced fee schedules for lower income housing

5. States should take a leadership role in providing education and technical assistance for local officials, developers, residents and other interested parties in planning and regulatory issues

Four key areas were reviewed as part of the analysis. They were selected because of the possible adverse effects they could have on families and persons with disabilities.

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[54] Land Use Law, Patricia E. Salkin, 1993, page 7

[55] Making Housing Affordable: Breaking Down Regulatory Barriers - A Self-Assessment Guide for States, p. 1

A. Definitions used for "families", "group homes", "dwelling unit"
B. Regulations (if any) regarding "group homes"
C. Ability for "group homes" or other similar type housing to be developed.
D. Unreasonable restrictions, costs on developing multi-family housing units, such as lot size requirements, impact fees, setbacks.

Discriminatory zoning regarding group homes is probably one of the most litigated areas of fair housing regulations. Across the country advocacy groups for the disabled are filing complaints over restrictive zoning codes and in most cases these groups are prevailing.

Perhaps one of the most influential court rulings regarding zoning and group homes was The City of Edmonds vs. Oxford House, Inc. This case also addresses the issue of the definition of family contained in zoning regulations. The fundamental part of this case was whether a definition of family that allowed for unlimited related individuals in a unit but limited unrelated individuals to five or fewer was discriminatory.[56]

The court said that this definition of family violates the federal fair housing regulations (42 USC 3604(f)(3)(b). The majority of the court found that the open-ended numerical potential of a traditionally nuclear family is so much greater than the limit of five unrelated persons, that the city was not making a reasonable accommodation for disabled individuals.

Considering the impact of the Fair Housing Amendments Act of 1988, the Uniform Federal Accessibility Guidelines, Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act, entitlement grantees must exercise extraordinary diligence in their efforts to conform their policies and procedures to the ever-evolving requirements of the law. This is especially true with regard to zoning and building regulations, where developers rely upon grantees to establish the boundaries within which they can operate.

As far as can be determined, Montgomery County and the City of Kettering conduct their housing programs in an affirmative manner and without restrictive policies that would adversely affect members of the protected classes.

7.2 Local Review of Zoning Codes

Among the most important protections provided by the Fair Housing Amendments Act of 1988 are those afforded to families with children and the handicapped, or persons with disabilities. Notably, the developing crisis in affordable housing that the nation experienced in the eighties had a particularly devastating effect upon these protected

[56] Court Mandates Redefinition of Family, Robert F. Manely, O.P.C. Newsletter, December 10, 1995, p. 10 and 11

classes. Accordingly, Congress imposed specific safeguards against policies, customs and practices that, by their impact or design, discriminate against these groups.

In addition to interdicting private acts of discrimination, entitlement grantees should be especially vigilant regarding the impact of zoning regulations and building codes upon these two vulnerable populations. For instance, provisions in zoning regulations that define which living arrangements constitute a "family" can unduly restrict where group homes for the disabled can be placed. Similarly, restrictions governing the placement of multifamily complexes can unduly burden families with children by isolating them in densely populated, high traffic commercial areas. In summary, entitlement grantees should regularly review their zoning and building regulations, especially if such a review has not been conducted since the enactment of the Fair Housing Amendments Act of 1988.

The Montgomery County Zoning Ordinances

A review was conducted of all township zoning ordinances and many of the villages for conformance with fair housing regulations. On the whole we found none of the ordinances to be in non-compliance. As a matter of fact most of the zoning codes were mirror images of one another and were all passed within a few years of one another. Most were over twenty years old and some had been amended.

We could find no issues with lot size requirements, set backs, development fees, or square footage requirements. However we did find that most should consider changing their definitions to better reflect today's changing families. Almost all of the codes had definitions for families that were restrictive on the number of non-blood members that could occupy a housing unit. With today's changing families it would serve them well to consider a more liberal definition.

Consistent with most zoning codes, the Montgomery County code define terms contained within the various regulations. The Ordinance's definition of "family" is always pivotal, since it sets the parameters for the number and relationships between individuals who are permitted to occupy single-family homes in what is usually the most coveted residential district in the County. Most definitions were as follows:

Family: One or more persons living together and sharing common living, sleeping, cooking and eating facilities within an individual housing unit, *no more than three of whom may be unrelated.*

Although the above definition appears liberal on its face, in operation it could potentially prove troublesome. In effect, persons "related" by blood, marriage or adoption can live together in relatively unlimited numbers in an "individual housing unit", while those who are

"unrelated" are limited to three persons.

All zoning codes that were reviewed in the County had a designation for "Community Oriented Residential Social Service Facilities." This designation allows for facilities which provide residential services to a group of individuals of whom one or more are unrelated. The groups included are: mentally retarded, handicapped, aged, disabled, and undergoing rehabilitation. The facilities also are to provide services to meet the needs of residents and be duly licensed and provide supervision. Facilities include: foster homes for children and adults, social care homes, intermediate care homes, and halfway houses.

We applaud this section of the zoning code because it affords complete coverage for all possible needs of families and individuals. It is supportive and reasonable in its scope. We would recommend this section to all who are looking for reasonable definitions for "group homes."

City of Kettering - Zoning Regulations

In the review of impediments to fair housing choice that was conducted in 1998 a review of The City of Kettering's Zoning Code was conducted. When reviewing these documents for the current impediments analysis we found that the document had not been updated to reflect recommendations discussed in 1998. In light of that we have included comments from that document in the attachments of this report. It should be noted that since the last review of the zoning code there has been numerous court cases regarding fair housing issues. As far as we can determine from these cases those issues raised in 1998 are still at issue. However, it is up to the City to determine if those issues raised are serious enough to warrant a revision of the current code.

The City Kettering updated their Property Maintenance Code since the last analysis was completed. A review of that document found no issues or concerns. Concerns raised in the past were addressed.

8.0 LOCAL FAIR HOUSING PROGRAMS AND ACTIVITIES

Both the Montgomery County and the City of Kettering have developed a relationship with the Miami Valley Fair Housing Center (MVFHC) to assist in community fair housing efforts. This contractual relationship provides a comprehensive fair housing program that includes education, outreach and enforcement.

The MVFHC offers training throughout the year to educate landlords/owners, real estate professionals, lenders and other members of the housing industry regarding fair housing rights and responsibilities. They have worked with these groups and organizations to assure an equal and open housing market.

The Ohio Civil Rights Commission (OCRC) has an agreement with the Department of Housing and Urban Development to undertake all fair housing complaints filed with HUD and/or with the OCRC. This agreement is based on the fact that Ohio Fair Housing Law is "substantially equivalent" to federal fair housing laws and regulations. It simply means that all complaints filed with HUD will be directed to the OCRC for investigation and resolution.

The City of Kettering supports fair housing through the Kettering Board of Community Relations and it's participation with the MVFHC. The Kettering Board of Community Relations was organized by city council in 1969. Their primary effort is to promote fair housing through educational programs. The Board offers educational opportunities in a variety of ways, an annual fair housing poster contest, tenant-landlord workshop and an event that honors Black History Month. They also work with the City to promote the City's first time home buyers seminar.

A fair housing survey was distributed to determine issues and the extent if any of housing discrimination. Most felt that housing was available in the City without discrimination. Of those responses that felt problems exist it was with the protected classes of race and familial status. All felt that efforts should be made to inform the disabled community regarding fair housing rights. Regarding familial status the response showed concern for female headed households, especially low-income households.

As mentioned earlier in the report the City of Kettering contracts with the Miami Valley Fair Housing Center to handle any complaints of housing discrimination. This partnership includes systemic testing (random testing of the housing market.)

Table 8.1 shows the complaints received by the MVFHC for 2002 through 2004 by protected class and type.

2004 - Of the total complaints received, MVFHC filed twelve administrative complaints with HUD, Ohio Civil Rights Commission (OCRC) and/or the Dayton Human Relations Council, ad filed four cases in Federal Court. Additionally, the Center filed 35 lawsuits on behalf of victims of predatory mortgage lending.

2003 - Of the total complaints received, MVFHC filed sixteen administrative complaints with HUD, OCRc, and/or the Dayton Human relations Council, and filed no complaints in Federal Court. Additionally, MVFHC filed 61 lawsuits on behalf of victims of predatory mortgage lending.

2002 - Of the total complaints received MVFHC filed nine administrative complaints with HUD, OCRC, and/or the Dayton Human Relations Council, and filed two cases in Federal Court. Additionally, MVFHC filed 14 lawsuits on behalf of victims of predatory mortgage

lending.

There were no indications that minority real estate professionals in the Montgomery County or Kettering area were being barred from participating in any of the local REALTOR Boards or from accessing the Multiple Listing Service (M.L.S.) which can be a crucial part of their ability to provide services. In many cases, both majority and minority real estate professionals were members of both the REALTORS® and the REALTIST (National Association of Real Estate Brokers). REALTIST is a national organization formed by and for African-American real estate professionals in the early part of the century when they were denied membership in the National Association of REALTORS®.

After numerous requests, information regarding direct complaint filings with the Ohio Civil Rights Commission was not made available to the Consultants for this report.

Table 8.1 - Complaints Received by MVFHC 2002-2004

Protected Class	Rental	Sales	Harassment	Predatory Lending	Total
2004					
Race	29	8			37
Disability	37	1			40
Familia Status	18		2		18
Sex	2				2
National Origin	5	1			2
Color					6
Religion					0
Other	4			391	395
Total	95	10	2	391	498
2003					
Race	16				16
Disability	24				24
Familia Status	7	1			8
Sex	3				3
National Origin	2				2
Color					0
Religion					0
Other	2			424	426
Total	54	1	0	424	479
2002					
Race	21				21
Disability	12				12
Familia Status	15				15
Sex					0
National Origin	5				5
Color					0
Religion					0
Other	2			885	887
Total	55	0	0	885	940

8.1 LEGAL ACTIONS

There were no legal actions against the County or the City regarding discriminatory housing policies or CDBG activities. However, it should be noted that the Montgomery County area has been the location of many precedents setting fair housing cases. Two of these cases set the foundation for developing litigation in insurance redlining:

Dunn vs. Midwestern Indemnity Company
McDiarmid vs. Economy Fire & Casualty Company

9.0 INSURANCE REDLINING

Thirty-three years ago the National Advisory Panel on Insurance in Riot Affected Areas made a critical observation that:

See Map - 37-40

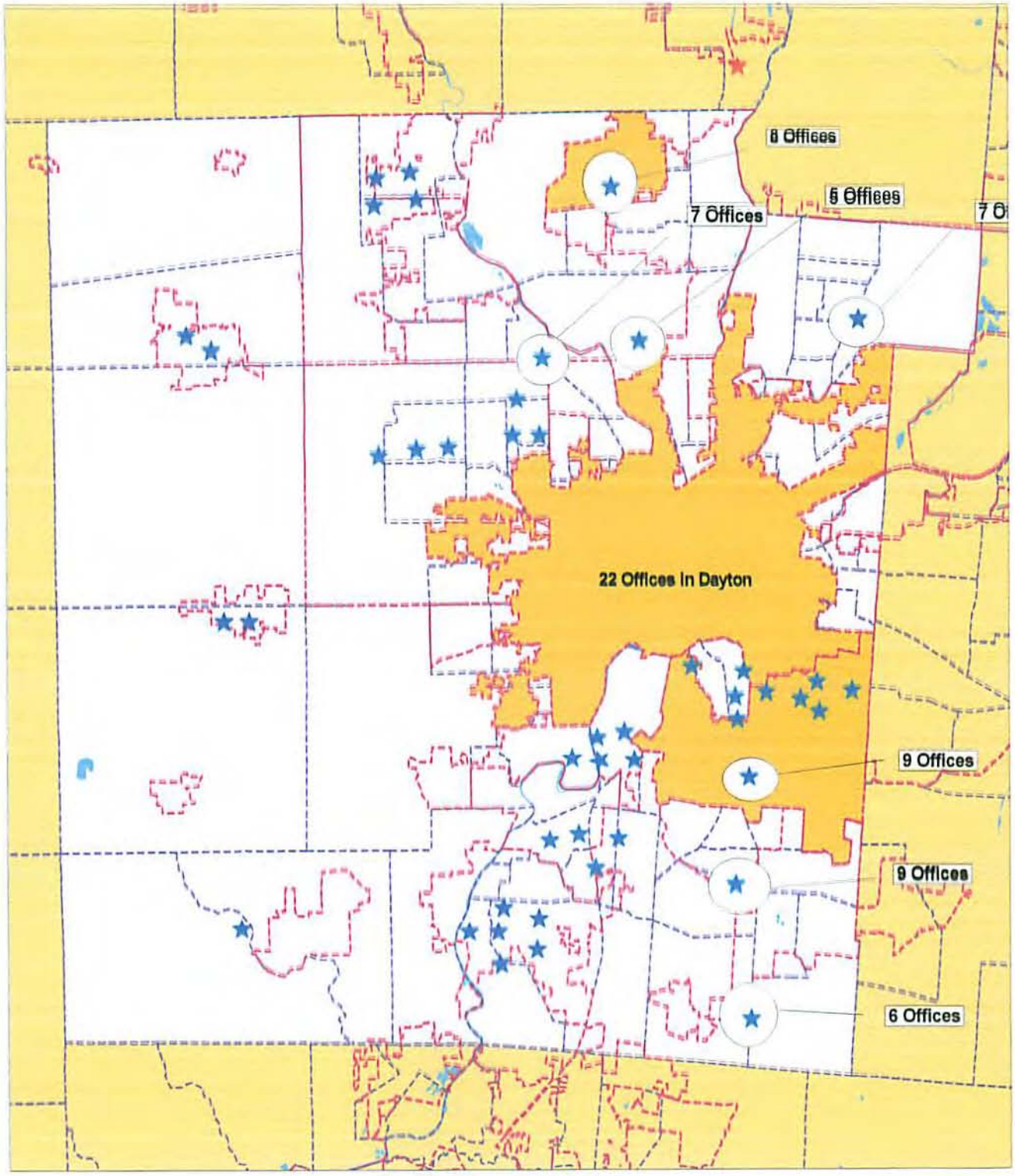
Insurance is essential to revitalize our cities. It is a cornerstone of credit. Without insurance, banks and other financial institutions will not - and cannot - make loans. New housing cannot be repaired. New businesses cannot expand, or even survive.
Without insurance, buildings are left to deteriorate; services, goods and jobs diminish. Efforts to rebuild our nation's inner cities cannot move forward. Communities without insurance are communities without hope.

This statement can accurately describe cities in 2004 as well as those in 1968. This statement hits home in the Montgomery County area also. Obviously there are many reasons for the conditions many communities find themselves in today. As the City tries to address the many issues and demands to strengthen neighborhoods, repair deteriorating housing and create more affordable housing one of the road blocks is the practice of insurance redlining.

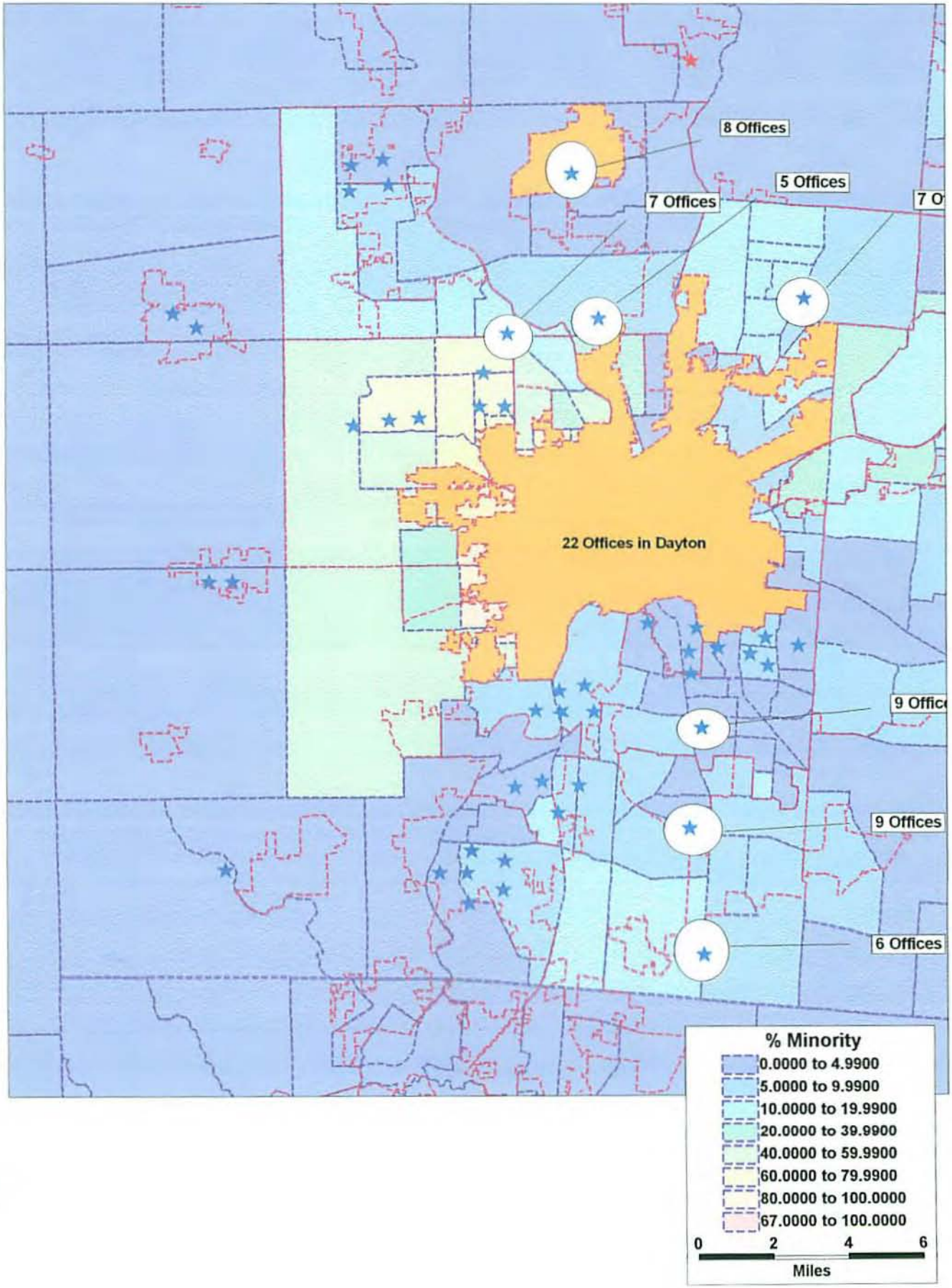
Insurance redlining occurs when insurance agents, offices and/or companies decide that certain areas of the community will not be offered home owners insurance, that the number of policies offered will be limited to a certain number or that they will not offer all the various home owners policies that they have. For example, an insurance company or agent may refuse to underwrite a home owner replacement cost policy. This policy allows the home owner to rebuild his home as close to its original condition as possible and is a very popular form of insurance. In many minority and low-income neighborhoods, insurance companies would refuse to offer this policy and would offer only the very basic of policies or no policies at all.

Racial minorities, low-income neighborhoods and neighborhoods containing large numbers

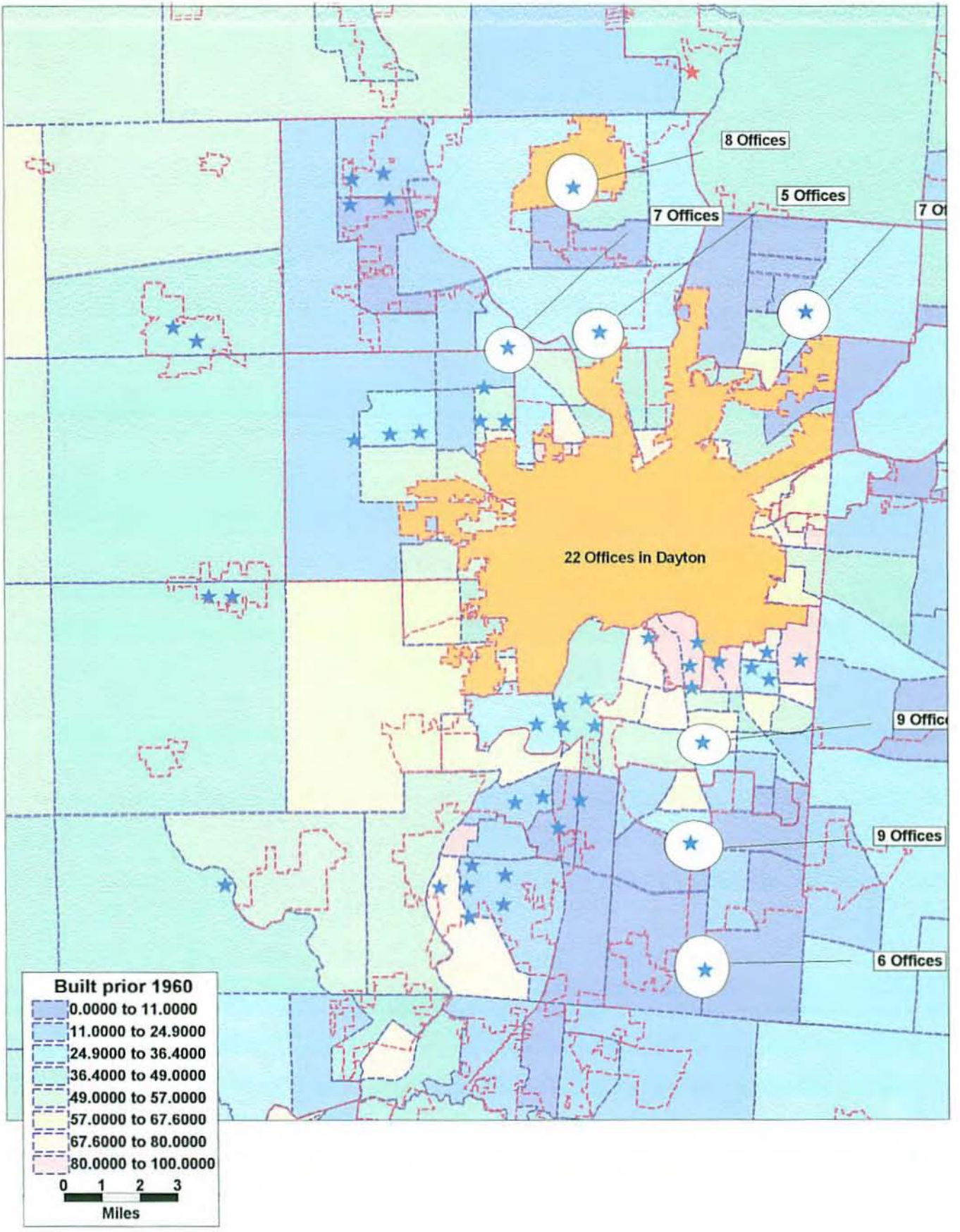
MAP 37: Locations of Home Owners Insurance Offices



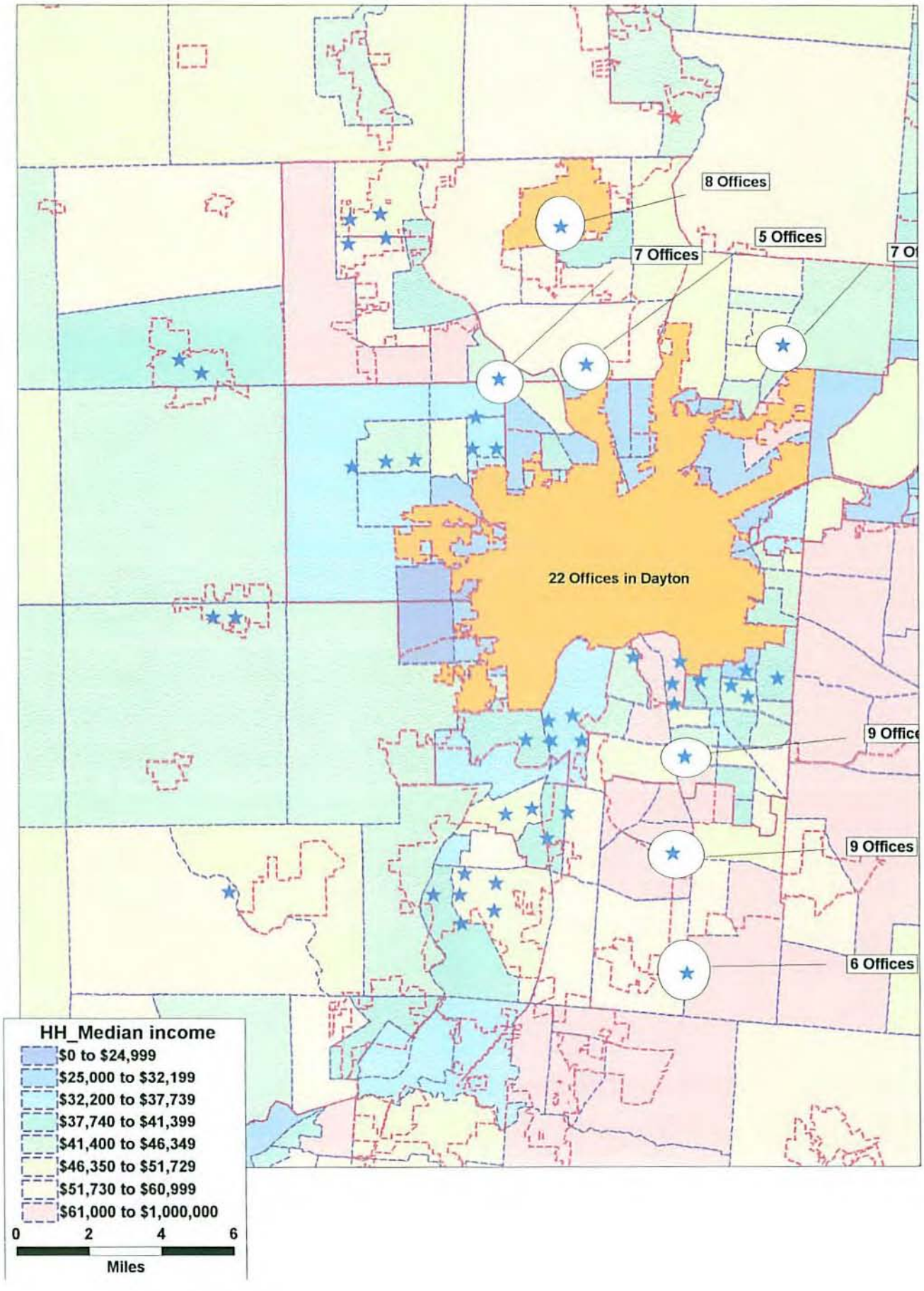
Map 38: Insurance Office Locations by Minority Population



Map 39: Insurance Office Location by Home Built Prior to 1960



Map 40: Insurance Office Location by Median HH Income



of minorities are discriminated against in the provision of property insurance. If intentional racial discrimination is not widespread, traditional industry practices still adversely affect racial minorities and minority neighborhoods. The lack of insurance coverage caused by not offering policies in these neighborhoods or limiting such policies to the most basic coverage is an impediment to the redevelopment of urban communities.

Research and investigations throughout the United States have shown that residents of minority communities have been discouraged from purchasing insurance while residents of predominately white neighborhoods have been encouraged to do so. These studies, including the U.S. Department of Housing and Urban Development's *National Housing Survey*, show evidence of a racial gap in the availability of property insurance. While part of the gap can be explained by financial considerations of the insured, conditions of properties and general risk related factors, the racial gap typically remains substantial even after these factors are taken into consideration.

Many traditional industry-underwriting practices, which may have some legitimate business purpose also adversely, affect minorities and minority neighborhoods. Many companies have minimum value and maximum age requirements for properties to qualify for their home owner policies. For example, a home would be disqualified if it was valued at $25,000 or $35,000 or less or was constructed before 1950. In some studies minorities were required to produce a credit check or meet for an interview with the agent before being given a quote.

Each insurance company files its own rating programs and has its own mutually exclusive guidelines for establishing rates and tiers in Ohio. These programs are not consistent and there is no statutory requirement that they be consistent. In the areas of tenant rental insurance and home owner insurance, the companies have widely divergent perspectives on what they will write and how they will determine their rates. However, to remain competitive, companies do not stray too far from one another.

9.1 Rating Practices

Insurance companies establish a base rate (sometimes referred to as an "overall" rate) that is determined primarily by the specific location of the housing. Each company first determines a base rate based on the premiums they receive from a given geographic area, the losses incurred within that area and the expenses of that company to write and administer the policies. Thus, the amount of coverage in the past within a particular area of the County or City directly impacts present rates offered by a given insurance company. If the company has historically under served a geographic section of the community, the current base rate will reflect the historic lack of premiums within that area. This can have the effect of perpetuating the lack of insurance services resulting from historic redlining or other causes.

Some companies have two rating tiers and others may have as many as four tiers in the area of home owner insurance. Tiers are much less common in the area of tenant home owner insurance, though a few companies may have more than one tier. The determination of what rating tier to apply is more a function of the person or persons applying for the insurance as opposed to the location of the property. Tier structures can then cause changes to the base rate depending on a number of factors.

The most significant factors used to establish the rate tiers are:

- Loss history of the individual
- Age of the property, though the specific age used is variable (i.e., some companies may have higher rates or not write insurance for houses older than twenty-five years while other companies will use forty years or older).
- Value of the dwelling
- The lines of coverage, such as auto insurance, with the same company
- Years insured with the company

The use of age and the value of the dwelling as determinants of rates can have a significant impact on the older sections of Montgomery County and the City of Kettering, this is especially true of the City of Dayton where there is housing stock older and typically of less value. While these two factors alone can increase the rates for insurance being offered and even discourage companies from offering a full range of products in these geographic areas. The demographic analysis of the community in Section 3 clearly shows that a disproportionate number of Blacks and Hispanics live in these older sections. Even though the use of age and value of the dwellings are neutral policies, they can still may well impact Black and Hispanic communities in a negative manner.

9.2 Credit-Scoring

Credit scoring is still being used to a great extent in Ohio and Montgomery County as a criterion for determining rate tiers, although it may play a role as an underwriting tool. By its use as an underwriting tool, a credit score can become a barrier to individuals and families who are trying to purchase a home or rent housing, where a landlord requires tenants to carry rental insurance as part of the lease. Considering the minorities usually have a higher poverty rate compared to Whites it is reasonable to assume that the use of credit scoring as a property insurance underwriting tool, will result in a discriminatory impact on minorities who are disproportionately represented in low-income categories.

In a ruling on September 3, 2003, the 5th U.S. Circuit Court of Appeals allowed a nationwide class action brought by six minority policyholders challenging insurers' use of credit scoring in pricing both automobile and home owner's policies to continue. In *Dehoyos, et. Al. v. Allstate Corp. et. al.*, the minority plaintiffs allege that Allstate's use of credit-scoring violates federal civil rights laws (42 U.S.C. 1981 and 1982) and the housing

law (42 U.S.C. 3601). The plaintiffs argue that Allstate employs a nationwide scheme of intentional racial discrimination against minorities, charging them higher premiums for property and casualty insurance that whites have to pay. They also argue that Allstate uses credit scores, a factor they contend has no reasonable relationship to risk of loss, to justify placing minority applicants in more expensive policies than those in which whites are placed. The plaintiffs allege that Allstate has violated both federal civil rights and housing laws by engaging in a pricing practice that is racially discriminatory because if its disparate impact on minorities. Disparate impact claims involve procedures that are not intentionally discriminatory but result in discrimination.

9.3 Recent Lawsuits

A lawsuit filed in the late 1990's against Citigroup, Travelers Property and Casualty and Aetna Casualty & Surety in federal district court in Washington, D.C. alleged that the companies engaged in pervasive discriminatory practices and maintained underwriting standards and policies that restrict, limit or deny home owners insurance in predominantly Black, Latino and integrated neighborhoods in the Unites States. The suit was brought by six nonprofit fair housing agencies from various areas of the United States, using testing and investigational techniques identified policies, practices and underwriting standards that severely limited or denied insurance coverage needed to repair, replace or rebuild homes located in older neighborhoods that were Black, Latino or integrated. In addition, fair housing and community groups placed Travelers and Aetna on notice regarding their discriminatory policies in the late 1970's. All of these insurance companies settled their lawsuits and have since changed many of their policies on a national level, including in Montgomery County.

These lawsuits are typical of those being filed and settled in recent years. State Farm, Nationwide and Liberty Mutual are three other companies that have run afoul of fair housing laws and agreed to change their national policies and practices. Some of the illegal practices found in those investigations included: charging Blacks more for the same coverage or offering inferior coverage; requiring additional background information from applicants in minority or low-moderate income neighborhoods; offering Whites replacement cost coverage, but denying it to Blacks; maintaining minimum age restrictions; maintaining minimum value restrictions; requiring inspections of homes in minority neighborhoods more frequently; and referring callers from minority neighborhoods to other insurance companies.

9.4 Location of Agents

While the scope of this analysis does not allow for insurance redlining investigations and testing, we were able to look at one key element of insurance redlining. A critical factor in the marketing of insurance is the location of offices/agents. A majority of the property

insurance policies sold by most agents are to insure properties in neighborhoods in which the agent is located. Studies have shown that the distribution of agent locations is clearly related to the racial composition of neighborhoods.

Table 9.0 - Local Insurance Agencies

INSURANCE COMPANY	TOTAL NUMBER OF OFFICES
AAA Insurance	5
Allstate Insurance	25
American Family Insurance	28
Erie Insurance Group	13
Farmers Insurance	10
Grange Insurance	16
Motorists Insurance Comps.	9
Nationwide Insurance	15
State Farm Insurance	52
Total	173

Source: SBC Yellow Pages: Montgomery County and Surrounding Area, 2004

Montgomery County is served principally by SBC Yellow Pages. There are over 400 listings of insurance agents and or offices. Few insurance companies highlight the location of their agents, making it difficult for persons to identify offices located near them. In addition, the fewer the agents in a given area of the community, the more difficult it can be to find them. The marketing approaches insurance companies choose to use have a direct impact on what audiences those companies reach.

It is difficult to determine which agent is located in the City of Dayton or Kettering or in the County. While the address is given in most cases the community is not indicated. Again unless the consumer is very familiar with the community they would not know whether a agent is in their community or another. This is especially true with similar street names such as Main Street or Broadway Ave., etc.

The sheer number of insurance agents in the area made it very difficult to map. Therefore, only those offices were selected that specifically indicated that they sold/offered home owner insurance policies in the yellow pages, these offices were then mapped using Maptitude 4.6. However, the lack of offices in older, low-income and minority neighborhoods is a concern that warrants further study.

9.5 Offices Compared to Minority Population Density

First, the office locations were compared to density of minority populations in the County, including Dayton and Kettering. As can be seen the higher the minority population the fewer the offices. (Map 38)

Considering those census tracts in terms of minority percentage as found on Map 37, tracts with 50% and greater concentrations of minority populations have almost no insurance offices. This also holds true for those tracts that contain 35% or more minority populations. Thus, very few agents are readily available in neighborhoods with large percentages of Black, Hispanic, or other minority populations.

9.6 Offices Compared to Income Levels

Second, the insurance office locations were compared to census tract income levels. Neighborhoods of predominately minority and low-moderate income residents consistently have limited neighborhood home owners insurance office locations. There are a number of tracts in County where median incomes are low or low-moderate income. These tracts are also without a significant number of insurance offices especially when they are compared to the predominately White areas and those over 100% of median income. This review by income levels indicates that income alone is not the only operant factor in the location of insurance offices. It should be noted that the tracts with the lowest median household income are the same census tracts as those with high percentages of minority populations. (Map 40)

9.7 Offices Compared to Age of Housing

Next, insurance office locations were compared to the age of the housing by census tract location. Map 38 shows that areas housing built prior to 1960, fared no better than areas of predominately minority and low-moderate income residents. The vast majority of insurance offices were located in census tracts with housing built after 1961. (Map 39)

9.8 Offices Compared to Owner-Occupied Housing

The last issue considered was the argument that the housing units in areas with no insurance offices are predominately renter occupied. Map 39 shows the location of offices by the percent of owner-occupied housing units. The neighborhoods with the highest percent of minority and the lowest median income show owner-occupied percentages of over 40%.

The lack of access to insurance undermines redevelopment efforts, locks people out of critical markets and contributes to the concentration of poverty. Lack of access to insurance products and services may be affected by the location of offices and other

factors we have examined, such as credit scores for underwriting criteria and the price of insurance reflected in base rates. When such factors are based on factors like poverty, age of housing and property locations, they are heavily correlated to race, national origin and other protected characteristics.

9.9 Lack of Reporting Requirements

A second and significant concern is the difficulty in obtaining any reports identifying the number and scope of insurance coverage being offered by race/ethnicity and geographic area. The insurance industry has no equivalent to HMDA data. This lack of reporting requirements hinders the monitoring and accountability of the insurance industry to determine the scope of any impediments to fair housing choice created by the inability of persons to obtain home owners or rental insurance.

While it is hard to document insurance redlining and discriminatory acts in the local market it is felt by those who monitor such issues that anecdotal evidence is available. Often individuals seeking insurance are not aware that they are getting a higher rate, that certain types of coverage for their homes are not being offered and that some agents just don't write insurance in those areas. This is one reason location of offices is so important. National studies have shown that homeowners look for agents in and near their neighborhood for insurance. The ideal response would be to have funding for an investigation of insurance redlining much like what is done for predatory lending or lending discrimination. However budget reduction on a national, state and local level make this response even more difficult.

10.0 COMMUNITY ISSUES

Between January 1 and February 1, 2005, this Consultant contacted 35 City of Kettering and 26 Montgomery County individuals associated with community organizations and agencies who are then mailed, faxed or emailed a survey focusing on housing issues in the City of Kettering and Montgomery County area. This survey offered several questions and was designed to elicit responses in order to document how those living within the community viewed their own housing barriers. Directors or managers at each agency were contacted first by telephone and were encouraged to answer questions in any way they felt necessary.

10.1 City of Kettering

Of the 15 City of Kettering agencies and organizations responding

- 12 (80%) believed that accessibility, due to the age of the available housing stock, is problematic for individuals with disabilities.

- 9 (60%) believed that the lack of jobs/job training was the problem for individuals in getting out of homelessness.
- 8 (53%) indicated that finances were the reason for people not being able to achieve affordable, safe and decent housing.
- 5 (33%) felt that government/private programs were the reason for individuals achieving affordable, safe and decent housing.
- 6 (40%) felt that local housing programs or the housing authority was doing a good job while 4 (27%) felt it was mediocre, 3 (20%) felt it was doing a poor job and 2 (13%) made no comment.9 (60%) felt there were transportation problems.
- 10 (67%) said there were employment problems with 9 (60%) indicating that there was a lack of lower income jobs.
- 11 (73%) knew of down payment assistance or local programs that help with affordable housing ownership.
- 9 (60%) knew of lenders participating in programs to help affordable home ownership.
- 12 (80%) knew about rehab programs for existing housing stock.

The responses of the fifteen community organizations, agencies and individuals have been classified into nine areas impeding housing choice. That data is included in Table 10.0 below.

TABLE 10.0: COMMUNITY AGENCY SURVEY

IMPEDIMENT	# Responding	Percentage
Accessibility	12	80%
Employment Problems	10	67%
Transportation Problems	9	60%
Finances	8	53%
Local Housing Programs/Housing Authority	6	40%
Participation of Local Lenders in Home Ownership Programs	6	40%
Government/Private Programs	5	33%
Down payment Assistance Programs	4	27%
Rehab Programs for Existing Housing Stock	3	20%

There is limited housing that addresses the accessibility factor. Most housing is older and the costs associated with making them accessible is identified as the major impediment to housing choice by over eighty percent (80%) of those who responded.

Over half of the respondents indicated that finances, transportation and employment problems were a barrier to housing.

Below are comments by some of the community organizations, agencies and individuals related to specific barriers they indicated impacted affordable housing.

Affordability - Many organizations mentioned that the overall housing stock is well kept, safe and comfortable but not necessarily what those in the lower income brackets can afford.

"Much housing is owned by absentee landlords who are focused on profit."
"Concern about increasing insurance rates, home maintenance costs, upkeep (i.e. yard work), taxes and major repairs (i.e. roof, gas line, window, siding)."
"One difficulty...is being able to compete in the marginally over-priced housing market." In addition, "the new home mortgage products that require no down payment and relatively low interest rates, potential buyers are advised that they can afford much more than their income can support."
"The so-called affordable housing is still too expensive for the job market."

Conditions - (Quality, or lack there of, of housing units)

"There are fewer and fewer rehab programs with the demise of programs like 203K or Title II (too many restrictions for people to use)...combined with environmental issues (lead/mold)..."
"Due to a lack of funds, housing would have to be in lower-cost center city and neighborhoods "abandoned" by those who traditionally supported the infrastructure and provided support for the neighborhood. Such areas often do not have a strong sense of community, leaving residents without services, interested neighbors and logistical support."
"...housing is available to those who can afford to invest in outdated homes that are structurally sound but need renovation via mechanical system updates, structural modifications, etc."
"The city has a substantial supply of housing that is 30-50 years old which needs care. Without the financial means to address those needs, people are living in less than decent housing..."
"I see obsolete housing in older neighborhoods-both inner cities and inner-rung suburbs that simply do not meet the needs of families today."

Credit - Another recurring concern among the respondents was the extreme difficulties faced by those with bad credit or no credit.

"Unwillingness to get help when financial problems arise."
"Lack of financial education."
"...a perception that they will not be able to pay, making a prospective landlord less likely to rent or charge additional fees up-front."

Criminal Histories - Several community organizations, agencies and individuals mentioned those with criminal histories.

"...the growing problem of persons coming out of prison settings, yet being unable to a) obtain a job and b) being able to obtain housing..."
"...a perception that they will not be able to pay, making a prospective landlord less likely to rent or charge additional fees up-front."

Drug Problems - Much like the situation with criminal records, drug problems can frequently stand as barriers to fair housing choice.

"Even without a criminal record, many recovering drug users can find it very difficult to find safe and affordable housing."
"Clearly, drugs, alcohol and mental health issues add to this problem."
"...it seems so connected to issues of drug and alcohol and mental illness..."
"...a perception that they will not be able to pay, making a prospective landlord less likely to rent or charge additional fees up-front."

Employment Issues - Complaints about the local economy and about the lack of employment choices for those in Kettering served as a common theme in many of the responses received.

"People live in what they can afford."
"Kettering has historically been dependent on GM manufacturing jobs which are dwindling. Many of the new jobs that have surfaced are in the service sector with the typical low wage opportunities."
"Kettering has few blue-collar or industrial jobs for those without good administrative, communication and entrepreneurial skills."
"Both for schooled and unschooled individuals, the job skills of the individuals often don't meet the job needs."

Homelessness - (Families and individuals without housing)

"...it seems so connected to issues of drug and alcohol addiction and mental illness that is very difficult to solve without a very strong network of services and options."
"A big issue...is often single men have just given up ""Some don't want to (get out of homelessness). Those that do want to, do not have the skills to acquire a job.""They lack direction and do not have a strong peer group to provide support."

Lack of Education - There were numerous, although varied, responses from the respondents regarding the educational programs available or not available to individuals.

"They do a good job with the resources they have."
"The Housing Authority seems to do a good job in getting the word out in newsprint and other media source (i.e. cable programming) about their programs."
"Efforts should not stop after the closing; an effective education/counseling/referral network should be developed to assist home owners after they have purchased a home."
"It would be helpful to develop additional communications that promote these programs."
"We do have a first time home owner mortgage assistance program although it is fairly difficult to meet the qualifications."
"What housing authority?"
"Programs in Kettering are good but limited due to small amount of money allocated to these programs."
"...those from outside the community...would not know about them and could not access them anyway prior to owning the property."
"I know about their programs but not how they actually work."

Lack of Services - Most community organizations, agencies and individuals agreed that the City of Kettering did offer services to individuals to obtain affordable housing.

"Yes - frankly, there may be too many programs.""I think the local housing assistance programs are wonderful. I only wish the REALTORS® were either more educated and took an interest or stayed out of it so that the buyers obtained everything available to them."
"Kettering has limited funds to help first-time home buyers obtain an attractive mortgage."
"At least part of our current high foreclosure rate is probably due to home ownership assistance, down payment assistance."
"Programs in Kettering are good, but limited due to small amount of money allocated to these programs."
"The city does not convey a clear standard of what constitutes safe, decent housing for residents."

Mental Health Problems - Most of the community organizations, agencies and individuals specifically addressed those with physical disabilities. However, there were a few instances where the subject of mental disabilities was addressed by the respondents.

"People with mental disabilities have a very difficult time assimilating into the Kettering community."
"Many neighborhoods have not responded well to group homes trying to locate there."
"The city's current zoning code permits group care homes as a conditional use in many residential districts."
"Approval process for these facilities requires a public hearing."

Racial Streaming/Steering - There were very limited responses on racial streaming but they should be noted.

"There is a perception that potential residents are being steered away from living in Kettering if and when they do not fit the general demographic of upper income white traditional family.""...assistance programs do not encourage movement to Kettering from other cities."
"Kettering has a very homogenous population which sets the stage for individuals that do not fall into the traditional Caucasian family are immediately suspect."

Uncooperative Landlords - There were very few comments regarding landlords from the respondents. However, several respondents had very specific complaints. Some were similar to comments made in other areas.

"...a perception that they will not be able to pay, making a prospective landlord less likely to rent or charge additional fees up-front."
"Much housing is owned by absentee landlords who are focused on profit."
"I see a continuously dwindling source of safe, affordable, decent housing-particularly for rentals. I see a huge reliance politically on home ownership over rental housing and sometimes rental is really what people need."
"Increasing insurance rates, maintenance costs, upkeep (yard work), taxes and major repairs."

10.2 Montgomery County Responses

Of the 13 Montgomery County agencies and organizations responding:

- 5 (38%) believed that availability is the major barrier for individuals with disabilities in achieving housing.
- 5 (38%) believed that the lack of jobs/job training was the problem for individuals in getting out of homelessness while 4 (31%) believed that substance abuse was the problem.
- 6 (46%) indicated that the reason for people not being able to achieve affordable, safe and decent housing is due to the lack of them.
- 6 (46%) felt that government/private programs were the positive reasons for individuals achieving affordable, safe and decent housing while 6 (46%) felt it fostered stability/increased self-esteem.
- 6 (46%) felt that local housing programs or the housing authority was doing a good job while 1 (8%) felt it was only mediocre and 7 (54%) felt it was doing a poor job.
- 7 (54%) felt that there were transportation problems.
- 12 (92%) said there were employment problems.
- 10 (77%) knew of down payment assistance or local programs that help with affordable housing ownership.
- 11 (85%) knew of lenders participating in programs to help affordable home ownership.

- 10 (77%) knew about rehab programs for existing housing stock.

The responses of the thirteen community organizations, agencies and individuals have been classified into nine areas impeding housing choice. That data is included in Table 10.1 below.

TABLE 10.1: COMMUNITY AGENCY SURVEY

IMPEDIMENT	# Responding	Percentage
Employment Problems	12	92%
Transportation Problems	7	54%
Availability	6	46%
Government/Private Programs	6	46%
Local Housing Programs/Housing Authority	6	46%
Jobs/Job Training	5	38%
Down payment Assistance Programs	3	27%
Rehab Programs for Existing Housing Stock	3	27%
Participation of Local Lenders in Home Ownership Programs	2	15%

When asked about the problems that individuals with disabilities faced, the availability factor was more dominant than the accessability factor according to the respondents. Most of the respondents (54%) agreed that public transportation was a major impediment to housing choice for those with disabilities or for those working late-night shifts.

In addition, the respondents indicated that the major impediment to housing choice, by over ninety percent (90+%), is due to the steady decline in employment availability.

Below are comments by some of the community organizations, agencies and individuals related to specific barriers they indicated impacted affordable housing.

Affordability - Many community organizations, agencies and individuals mentioned that there is a shortage of affordable housing stock.

"The shortage of affordable, safe and decent housing that is on or near public transportation routes."
"The biggest negative in achieving affordable housing is the lack of them."
"Housing labeled "affordable" that is constructed through the federal Low-Income Housing Tax Credit (LIHTC) program often has rent that is equal to or are in excess of the market rate units."

Conditions - There were numerous comments directed towards the need for a program that targets the maintenance of rental properties for low-income tenants.
"People need an adequate income to maintain housing and utilities.""There are very limited rehab programs for existing stock - particularly for existing rental housing.""...many moderate to low-income renters are forced to live in units that do not even meet the local housing code."
"Most...is extremely aged, not well maintained and there is no agency or governmental unit systemically addressing even code enforcement, let alone habitability of the affordable housing."
"...most, if not all, are targeted to home owners to the exclusion of rental properties."
"There is a need for rehab programs for rental properties."
"(There) should be both carrots and sticks for owners of rental properties to rehab and maintain their properties."

Credit - Another concern among the respondents was the extreme difficulties faced by those with bad credit or no credit.

"Bad credit and rental histories are problems for individuals trying to leave homelessness..."
"Lack of financial education."
"Inability to access affordable housing due to...unpaid utility bills or other credit problems."
"...inability to rent an apartment or house because of poor or no credit history."

Criminal Records - There were a few community organizations, agencies and individuals who mentioned that housing choice was limited by those unemployed or with criminal histories.

"Inability to access affordable housing due to inadequate income, previous problems with evictions or criminal records
"...a perception that they will not be able to pay, making a prospective landlord less likely to rent or charge additional fees up-front."
"It is difficult for the homeless to obtain and keep stable employment due to frequent firing and criminal records of the past."

Drug Problems - Much like the situation with criminal records, drug problems were mentioned as barriers to fair housing choice. Even without a criminal record, many recovering drug users can find it very difficult to find safe and affordable housing.

"Challenges include unstable income...drug/alcohol addiction."
"Affordable housing is located in drug infested and crime ridden neighborhoods."
"Lack of support network...addictions..."
"Many homeless cope with...drug addiction that prevents them from having a stable,

adequate income or using their benefits appropriately."

Employment Issues - This issue was mentioned as the primary reason for the lack of housing choice for those in Montgomery County.

"...inadequate or unstable income..."
"Yes, we've been hit hard by job losses which leads directly to housing problems...""We have serious employment problems because we have a large population of under skilled."
"Many will work for Temporary Work agencies which is not always enough money to keep people housed on a long-term basis."
"There are not enough decent paying jobs to fill the need."
"Yes, the...area continues to struggle with the loss of manufacturing and other well-paying jobs. The jobs that are being created or are available do not pay as well..."
"Unemployment is up..."
"Lack of employment is an issue, be it lack of willingness on the part of the individual or the lack of opportunity in the area..."

Homelessness - This issue appears to be related to a number of factors according to the comments from the respondents. The common thread appeared to be employment, the ability to utilize public transportation to get to the jobs available and training.

"The lack of job opportunities for those who are homeless."
"The lack of sufficient public transportation so that people who are homeless can get to appropriate jobs."
"A stable lifestyle."
"...equipping them with skills and resources."
"...not enough training in independent living skills."
"A steady source of income...better education and access to transportation are a few of the major problems."
"Transportation between schools, work and home."
"...many need to take an honest look at what is the cause of their homelessness."

Lack of Education - (Impact on education as it relates to housing, employment, etc.)

"...some lack training and education to earn enough money..."
...lack of home management skills."
"The key to breaking the cycle of homelessness is...strengthening families with adequate follow-up and equipping them with skills and resources."
"...better education..."
"...some homeless are poor money managers..."

Lack of Services - Most community organizations, agencies and individuals agreed that

Montgomery County offered numerous services to individuals to obtain affordable housing. However, many of those services appear to be directed to those interested in purchasing rather than those who can only afford to rent.

"In general, housing is more affordable in Dayton than in many areas of the country. Especially for those in the market to buy a home, there are many options available at reasonable prices."
"There are programs to meet the needs of all income ranges from very low to very high and targeted to first-time and repeat home buyers."
"The lack of a down payment is no longer an obstacle for attaining home ownership."
"All lenders offer an affordable home purchase program."
"There is sufficient down payment assistance available to those who are creditworthy."
"All local federally regulated lenders participate in affordable home ownership programs. Again, creditworthiness is usually the issue."
"There are some community programs to help in affordable housing but due to lack of or very little income...the homeless do not qualify for such programs."
"Local housing assistance programs, particularly the housing trust has been too focused on bricks and mortar projects, without an equal focus on housing services to be provided to the people who will or do reside in that housing."
"The Dayton Metropolitan Housing Authority is a complete mess. They are not customer friendly...employees have horrible attitudes...employees are not properly trained nor do they have the appropriate understanding or respect for the Fair Housing Act."
"It would also be important to have some programs to transition from renters to home owners."
"...local lenders seem to want to "build" things but are not eager to support delivery programs that keep families in affordable housing."
"I feel that more of (a) broader range of services is needed in local housing assistance programs."

Physical/Mental Health Problems - Unlike those with criminal records or drug problems, there were numerous instances where the subject of mental/physical disabilities were addressed by the respondents.

"...some homeless are in denial of needing mental health treatment..."
"...they suffer from duality. By this I mean they are drug addicted and have mental challenges. Society doesn't have enough resources to rehabilitate them but we can still provide them with decent shelter, food, medicine, etc..."
"I think more focus should be placed on prevention and less on trying to rehab the un-rehabable."
"Agencies that deal with providing services to people with disabilities are focused on financial assistance and health care. The agencies are not good referrals for housing needs for people with disabilities."

"Lack of support network..."
"Developers and builders are skeptical as to the need and consider the construction of accessible units a risk."
"...slow responses in awarding disability money, including SSDI, SSI and welfare disability."
"Individuals with disabilities are often in nursing homes and cannot leave because there is insufficient low-income affordable housing."
"Individuals with disabilities have trouble locating housing that meets their needs..."
"Housing searches for people with disabilities...are unnecessarily long and difficult."
"Many homeless cope with mental illness...that prevents them from having a stable, adequate income or using their benefits appropriately."

Racial Streaming - There was only one response that implied racial streaming but should be noted.

"The HA (housing authority) currently continues to pursue a policy with its Section 8 waiting list that...is discriminatory and has a disparate impact upon African-Americans."
"...this has the effect of keeping more African-Americans locked into HA owned properties and unable to secure Section 8 vouchers which would enable them to potentially move into non-poverty saturated and less diverse neighborhoods in the surrounding suburban communities, if they so choose."

Uncooperative Landlords - There were very few comments regarding landlords from the respondents. However, several respondents had very specific complaints.

"...finding landlords that will allow residents to modify their rental units..."
"Section 8 vouchers are good because of the program's portability but landlords would need to want to rent to a person given the housing standards and the low rents."
"...most housing providers do not advertise whether or not their property is accessible and then many who do advertise accessibility do so improperly because the units are not really accessible."
"...housing provider's ignorance of their obligations to grant reasonable accommodations and allow reasonable modifications for those with disabilities."

11.0 CONCLUSIONS, IMPEDIMENTS & RECOMMENDATIONS

Federal Law mandates that every federal entitlement community be responsible for affirmatively furthering fair housing. Federal regulations go further than merely making this a requirement. Local communities must *certify* they will affirmatively further fair housing and assume the responsibility of fair housing planning by conducting an analysis of impediments to fair housing. This report is a search for evidence that a policy, practice,

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Federal Law mandates that every federal entitlement community be responsible for affirmatively furthering fair housing. Federal regulations go further than merely making this a requirement. Local communities must *certify* they will affirmatively further fair housing and assume the responsibility of fair housing planning by conducting an analysis of impediments to fair housing. This report is a search for evidence that a policy, practice,

standard or method of administration, although neutral on its face, operates to deny equal housing choice to an individual because of their race, color, religion, sex, national origin, religion, familial status or disability. The document produced as a result of this research is generally called the Analysis of Impediments to Fair Housing Choice (AI).
The AI has reviewed a variety of questions that may affect the fair housing "health" of the community. It reviewed the practices and provisions of lending institutions, local housing-related codes and regulations, advertising for housing, past and present fair housing activities, the real estate and rental industry and affordable housing programs and issues. It also reviewed the concerns of affordable housing and how housing policies can affect the low and moderate income population. While some of these concerns, on their face, do not constitute fair housing related concerns, they can have an impact on equal choice in housing.

The availability of housing and housing programs is important to a community. It does little good to provide home ownership programs if lenders that administer the programs require different terms and conditions of certain races, religions or sex. A rental rehabilitation program can offer the opportunity for individuals to live in safe and sanitary housing, but when a landlord/owner discriminates in his choice of tenants because of family status, race, disability, etc. the program does the community little good.

Some may argue that fair housing should only be concerned with the issues of equal choice or that fair housing should have nothing to do with the development of housing programs. Another argument is that Fair Housing Law protects persons based on race, religion, color, sex, national origin, familial status and disability and that other issues such as the source of income, martial status and age has nothing to do with fair housing. However, this is not true. Recent decisions by the courts are indicating that any policy or activity, however neutral on its face, that denies housing is of concern to the court and should be of concern to the community. The impact of fair housing considerations on the development of accessible multi-family housing is another example illustrating this point.

Challenges are also being made in Montgomery County and the City of Kettering regarding age, marital status, sexual preference and the provision of services to low-moderate income (LMI) housing developments. Challenges reflect how fair housing laws and regulations respond and ultimately adapt to the housing concerns of the community. Current challenges should be used as an indicator by the community to adjust established policy to meet the housing needs of the protected as well as the unprotected classes.

We do find that Montgomery County and the City of Kettering have developed a strong working relationship with the Miami Valley Fair Housing Center and the Kettering Board of Community Relations. This relationship allows for a proactive response to community fair housing issues. Many of the programs that each organization offer provides residents with a strong response to their problems. Both the City and the County are encouraged to continue to support and utilize these resources.

Below is a summary of the key findings and identified impediments and related recommendations. The Consultant will both identify resources to implement these recommendations and suggest a feasible timetable.

11.1 NIMBY Issues

Negative attitudes and community hostility is often directed toward group homes, proposed affordable housing units (project - based subsidized housing) and/or affordable single family home developments that are proposed in neighborhoods which are not economically distressed or racially isolated.

The so-called NIMBY syndrome and its cousin BANANA (Build Absolutely Nothing Anywhere Near Anything), present both a formidable challenge and an opportunity to communities and developers of affordable housing and assisted housing. The challenge is obvious: the successful siting of needed housing. The opportunity is subtle, but significant: the administration of the project from its initial planning stages in a way that embodies the respect for human dignity, perseverance and hope.

Recommendation:

1. Create materials for use by the City and County, community-based organizations and the local fair housing agency to help educate residents who have concerns about new or existing group homes, public or assisted housing and other locally unwanted land use for the benefit of LMI households so that residents may better understand the potential benefits of such housing to the community as a whole.

2. Develop a NIMBY packet that can be given to developers of multi-family housing, group homes and other housing that would provide information regarding NIMBY and suggestions on ways to reduce NIMBY for their developments.

11. 2 Fair Housing Enforcement

One of the most remarkable characteristics of the County and the City is its dual housing market. For whatever reason, indifference, policies, or outright discrimination, the housing markets have evolved into its present level of segregation. This is especially true in the City of Dayton and shows the power that a large urban center can have on surrounding communities. Whether it is "white-flight", economic or fear, the fact is that the County and City of Kettering continues to be predominately White. We discussed earlier the fact that minority population changed little in where minorities lived between 1990 and 2000 census reports as well as a review of the maps included in this Analysis of Impediments shows that the areas that are predominately minority are also predominantly low-moderate

income.

This is not a new pattern. These are the same neighborhoods that existed 20 years ago. REALTORS®, insurers, lenders, landlords and others in the housing market who discriminate perpetuate these racial and ethnic divisions. Segregation is detrimental to the community by any objective measure. It is costly in both human and economic terms.

To remain "substantially equivalent" to the HUD administrative enforcement process, the County and the City must fully investigate all housing discrimination cases that are not resolved through conciliation and bring enforcement actions when evidence warrants.

As outlined in the fair housing program section of this analysis the City and County continues to receive calls regarding fair housing discrimination, in 2004 there were over four hundred calls regarding housing discrimination issues. To the County and City's credit they use MVFHC as their designated fair housing resource. This organization brings many years of experience and success in fair housing education, outreach and enforcement.

1. In addition to the provision of education and resources on fair housing issues and public forums for citizens to report housing discrimination, maintain and enhance the MVFHC and the Kettering Board of Community Relations capacity to respond to and follow up on matters relating to illegal discrimination, including housing discrimination.

2. Continue to support fair housing testing to ensure that fair housing laws are enforced and meritorious cases brought forward.

3. Increase efforts to collaborate and cooperate between the local government, Ohio Civil Rights Commission, non-profit fair housing enforcement agencies and U.S. Department of Housing and Urban Development in order to; Gather and share information, in a consistent and comparable manner, related to fair housing issues; Assist in further analysis of impediments to fair housing choice; Increase efficiency and effectiveness of fair housing enforcement and education.

11.3 Accessibility

There is a historic lack of compliance with the Federal Fair Housing Act's Design and Construction standards related to accessible housing. This continues to a high concern, especially the reviewing of multifamily housing plans to ensure compliance with those requirements.

The other critical issue today is the need to increase the amount of affordable and

accessible housing stock in the community and to ensure that persons with physical or mental disabilities can fully enjoy their housing. The lack of handicap-accessible housing and the presence of mental or physical disabilities were both cited by the community agencies as significant barriers to their clients' ability to find housing.

The MVFHC has received complaints regarding accessibility issues and feels that there are problems, especially in new construction of multi-family housing. Recently the MVFHC received a grant from HUD to conduct an inventory of multi-family housing regarding accessibility.

Recommendation:

1. Educate developers, non-profit organizations and architects about ways they can enhance the accessibility of existing units and increase the availability of accessible units. Using a similar plan developed with the NIMBY response, a packet of information regarding the responsibilities of the architect, the developer and the builder regarding accessible multi-family construction. This information would systematically inform housing providers and residents about their right to reasonable accommodations and modifications under fair housing law through the development and distribution of materials.

11.4 Insurance Issues

When the distribution of the minority population in the County is compared to the locations of insurance offices, it is obvious that the potential for problems exist. As noted in the Insurance section, the ability to obtain insurance is at the heart of the development of successful home ownership programs, of revitalizing neighborhoods and of assuring an equal housing market. Limiting this ability affects the cities, the lenders, the real estate industry, the sellers and the buyers. The lack of access to insurance undermines redevelopment efforts, locks people out of critical markets and contributes to the concentration of poverty. Again this is an area where the City of Dayton emits the greatest influence on the surrounding area.

Anecdotal information indicates that while this issue is not discussed as much as say predatory lending, it is still a concern of fair housing advocates in the City and County.

Recommendation:

1. Working with MVFHC the City and County should explore ways to determine the extent of insurance redlining issues in the area. One way to do this would be through a study of the home owners' insurance market, if and when

funding could be secured to underwrite such a project, to determine the scope of the problems and to identify potential systemic approaches to eliminate insurance barriers to fair housing choice. The lack of any reporting by the insurance industry also needs to be addressed in this study. Also using the resources of MVFHC and the Kettering Board of Community Relations a focus group could be developed to explore this issue further with the hope of opening a dialogue between advocates and the industry.

11.5 Lending Issues

Lenders are clearly not reaching the minority communities and, when they do receive applications from non-White individuals and families, those applications are more likely to be denied. Even considering that the County's minority population was 10% and that the City of Kettering had an even smaller population the lack of service to minorities is still an issue. Thus the dream of home ownership is still eluding many qualified members of the minority communities, this is a critical issue, since the purchase of a home is the primary way individuals and families build wealth. Without that asset base in the geographic areas with high percentages of minorities, there will be limited community reinvestment, including businesses like grocery stores and other retail services.

Recommendation:

1. Promote quality home ownership education in both English and Spanish, especially aimed at the low and moderate income markets. Encourage the lending industry to conduct an ongoing campaign to increase minority loan applications for the purchase of homes including the provision of education to real estate professionals on the use of community lending products for LMI clientele.

2. Conduct annual reviews of lending institutions using HMDA data to determine if applications from non-White individuals and families are rising and if denial rates are comparable to White borrowers in the same income levels. Identify and develop a means of collecting equivalent data on non-regulated lenders that do not report HMDA data and include them in the annual review. Present a seminar to area lenders, advocates, and others on results of HMDA analysis.

11.7 Real Estate Issues

Geographic steering of Whites and minority groups continues the historic patterns of segregation. The maps showing the minority concentrations in specific census tracts support this conclusion.

Recommendation:

1. Work with MVFHC and the Kettering Board of Community Relations develop education programs in English and Spanish on real estate steering and disparate treatment issues as they relate to the real estate industry. Since White buyers are as likely to be steered away from some areas and towards others, it is important that the educational efforts are community-wide and not just to the non-White members of the community. It is also important that this education program consider all the protected classes under fair housing laws as part of the audience.

GLOSSARY OF KEY TERMS

Applicant Income - Annual income of person(s) applying for a loan.

Benchmark - percentage or standard used to measure specific portion of a population.

Black:White Denial Ratio/Disparity Index - Percent of Black denials divided by percent of white denials.

Census Tract - Designated geographical area determined by the U.S. Bureau of Census. Used to determine and report socio-economic data. All States, counties and cities are broken down by census tracts.

Census Tract Income – The average income of the entire census tract. Generally reported as "median income".

CRA/Community Reinvestment Act (CRA) (1977) - 12 U.S.C. S2901 et seq. - Regulatory legislation that regulates mortgage lenders' performance in meeting the credit needs of the community they serve.

Denial Rate/Declination Rate - Percentage of loan applications refused. Determined by number of denials divided by number of applications.

Ethnicity – Related to the National Origin of an individual, rather than Race. For instance, "Hispanic" is an ethnic designation, not a racial designation.

Family - A family is a group of two people or more (one of whom is the householder) related by birth, marriage, or adoption and residing together; all such people (including related subfamily members) are considered as members of one family.

Family household - A family household is a household maintained by a householder who is in a family (as defined above), and includes any unrelated people (unrelated subfamily members and/or secondary individuals) who may be residing there. The number of family households is equal to the number of families. The count of family household members differs from the count of family members, however, in that the family household members include all people living in the household, whereas family members include only the householder and his/her relatives.

Household - A household consists of all the people who occupy a housing unit. A household includes the related family members and all the unrelated people, if any, such as lodgers, foster children, wards, or employees who share the housing unit. A person living alone in a housing unit, or a group of unrelated people sharing a housing unit such as partners or roomers, is also counted as a household. The count of households excludes group quarters. There are two

major categories of households, "family" and "nonfamily". (See definitions of Family household and Nonfamily household).

Household, family, or subfamily, Size of. The term "size of household" includes all the people occupying a housing unit. "Size of family" includes the family householder and all other people in the living quarters who are related to the householder by birth, marriage, or adoption. "Size of related subfamily" includes the husband and wife or the lone parent and their never- married sons and daughters under 18 years of age. "Size of unrelated subfamily" includes the reference person and all other members related to the reference person. If a family has a related subfamily among its members, the size of the family includes the members of the related subfamily.

Household, nonfamily. A nonfamily household consists of a householder living alone (a one-person household) or where the householder shares the home exclusively with people to whom he/she is not related.

Federal Regulatory Agency/Regulators - The federal agency with primary administrative enforcement authority with respect to mortgage lending discrimination, varies depending on the type of mortgage lending institution involved.

HMDA/HMDA Data (HMDA) (1975) - 12 U.S.C. S2801 et seq. - Home Mortgage Disclosure Act. Regulations that set forth the type and format of information that lenders must record about lending applications.

Home Improvement - Loan to finance rehabilitation of existing home such as new roof, new addition, etc. Also used for "credit lines" based on the equity in the home.

Home Purchase - Mortgage Loan application. Application for a loan to purchase a house using conventional financing, Federal Housing Administration (FHA), Veterans Administration (VA) or Farmers Home, Department of Agriculture (FmHA), NIFA, CDBG/HOME, or a combination of the above.

Households - A person or group of people who occupy a housing unit as their usual place of residence. The number of households equals the number of occupied housing units in a census

Largest Lenders - Most widely accepted basis for ordering lenders by size is the number of mortgage loan applications each lender reports receiving in a year's time, 2% or more of the mortgage market.

Lending Discrimination -Differential treatment regarding terms and conditions, making unavailable, and/or other actions by a mortgage lender based on an individual's race, color, sex, religion, national origin, handicap and/or familial status.

Loan Application - Application received from borrower by a lender for home purchase (mortgage), refinancing, or home improvement.

Loan Risk - Lenders liability in making a loan based on a pre-determine set of underwriting criteria.

MSA/Metropolitan Statical Area - Urban areas with a population of 50,000 people or more as determined by the U.S. Bureau of Census. Metropolitan statistical areas are relatively freestanding MA's and are not closely associated with other MA's. These areas are typically surrounded by non-metropolitan counties.

Market Rank - Numerical order of a lender determined by their Market Share.

Market Share - Percentage of a lenders market in a designated area. Determined by the lenders share of the total applications in a specific area. (Census Tract, MSA, State, County or City)

Median Income - Median income is the amount which divides the income distribution into two equal groups, half having incomes above the median, half having incomes below the median. The medians for households, families, and unrelated individuals are based on all households, families, and unrelated individuals, respectively. The medians for people are based on people 15 years old and over with income

> ***Median Household Income*** – The median income which includes the incomes of all household members, including extended family members (i.e. a grandparent) and non-related household members in its calculation.
>
> ***Median Family Income*** - the median income which includes all immediate family members, but not extended family or non-related household members in its calculation.

Missing Data - HMDA information not reported or reported as "Race Unknown".

Origination(s) - Loan applications that were approved by the lender.

Origination Index - The proportions of a lenders applications that resulted in loan originations.

Owner Occupied Housing - A housing unit is "owned" if the owner or co-owner lives in the unit, even if the mortgage is not fully paid. All other occupied units are classed as "rented", including those paid with "cash" rent or those where no rent is paid.

Poverty Definition - Following the Office of Management and Budget's (OMB's) Directive 14, the Census Bureau uses a set of money income thresholds that vary by family size and composition to detect who is poor. If a family's total income is less than that family's threshold, then that family, and every individual in it, is considered poor. The poverty thresholds do not vary geographically, but they are updated annually for inflation with the Consumer Price Index (CPI-U). The official poverty definition counts money income before taxes and excludes capital gains and noncash benefits (such as public housing, medicaid, and food stamps).

Race - The race of individuals was identified by a question that asked for self-identification of the person's race. The population is divided into five groups on the basis of race: White; Black; American Indian, Eskimo or Aleut; Asian or Pacific Islander; and Other races.

Redlining - Practice of lenders to eliminate neighborhoods from the mortgage loan process. Usually this determination is based on the racial or economic make-up of the neighborhood. It can refer to other housing industries as well, such as insurance, that eliminate neighborhoods from consideration.

Refinancing - Process of obtaining a new loan on a current mortgage. Usually at a better rate and or terms than the existing mortgage.

Zip Codes - United States Post Office address designation for delivery of local mail.

SOURCES

The following sources were used in completing this report:

1. The 2000 US Census
2. The 1990 US Census
3. American Fact Finder - US Census Bureau - www.factfinder.census.gov
4. Montgomery County Ohio FY2003-2007 Consolidated Plan

5. City of Kettering Comprehensive Plan - 2002
6. Maptitude 4.6 - Geographic Information System - Caliper Corporation - including US geographic files contained in the detailed 2000 and 1999 Census data from STF3A and STF3B
7. OSU Online - Community GIS Information - Results for Montgomery County Ohio
8. Ohio Data Users Center - County Profiles
9. Regulatory Barriers Clearinghouse - City of Dayton, City of Kettering, Montgomery County
10. Realtor.com - Find a Neighborhood
11. Peertrax HMDA Analysis Software- Centrax Group - HMDA Loan Application Register Aggregate Data files for 1996 - 2002 for Montgomery County, City of Kettering and City of Dayton Census Tracts.
12. SBC Dayton & Surrounding Area - White and Yellow Pages - 2004
13. SBC.Com White & Yellow Pages - Montgomery County Locations
14. SuperPages Online - www.superpages.com
15. Employment and Training Institute, School of Continuing Education, University of Wisconsin-Milwaukee - 2002
16. National Association of Home Builders- www.nagb.org
17. The Expanding Role of Sub Prime Lending - Ohio Community Reinvestment Project - 2003
18. An Overview of the Predatory Mortgage Lending Process, Elizabeth Renuart
19. Fannie Mae Foundation Research and Sources
20. Risk or Race? - Racial Disparities and the Sub Prime Market - Center for Community Change - May 2002

21. Dayton Area Chamber of Commerce
22. Dayton Area Board of Realtors
23. Lmi.state.oh.us -Labor Market Info Center - Office of Workforce Development
24. U.S. Census Bureau County Business Patterns
25. CARR.Com - Affordable Housing Crisis? Fact or Fiction?
25. Center for Urban and Regional Policy at Northeastern University
26. Meeting Our Nation's Housing Challenge's - Congress of the United States 2002
27. Children's Defense Fund July 2004 Report of Impact of Regulations on Housing
28. Fair Housing Planning Guide, Vol 1, DHUD, OFHEO

THE PROHIBITED USE OF DISCRIMINATORY WORDS, PHRASES AND SYMBOLS IN ADVERTISING

Although the following list of words and phrases may not be comprehensive, they indicate those that are considered discriminatory and those that should be used with caution.[1]

While federal law prohibits any form of discrimination based upon race, color, religion, sex, handicap, familial status and national origin, the use of word, phrases and symbols to convey either overt or tacit discriminatory preferences or limitations are also prohibited.

As a publisher or advertiser, it is important that you understand that the law prohibits not only advertisements that express a preference against certain homeseekers (e.g., no children, no blacks) but also those that express a preference for particular types of persons (e.g., Jewish tenants sought, ideal for female tenant). Both types of advertisements may indicate a "preference, limitation or discrimination based on" a protected class and thus violate the law.

Under the HUD regulations, and common sense, the following types of language in real estate advertising raise legal questions:

Words descriptive of the dwelling, landlord and tenants.

In general, advertisements which use explicit words which refer to protected classes under the law in connection with describing the dwelling, landlord, tenants or neighborhoods will be found to violate the law. Examples of such usage would include:

- White home
- Colored home
- Jewish home
- Hispanic home
- Adult building
- Singles complex
- Christian landlord
- Gay landlord
- Mixed neighborhood
- Latino neighborhood
- Male tenants

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[1] Fair Housing Advertising Manual, Prepared by Miller, Cassidy, Larroca & Lewin for the Fair Housing Council of Greater Washington

Words descriptive of a protected class

Advertisements which use words descriptive of a protected class should raise a red flag and call for further review for the legality of the advertisement. Examples of such language include:

Race:
Negro
Black
Caucasian
Oriental
American Indian

Color:
White
Black
Colored

Religion:
Protestant
Christian
Catholic
Jew

National:
Mexican-American

Origin:
Puerto Rican
Philippine
Polish
Hungarian
Irish
Italian
Chicano
African
Hispanic
Chinese
Indian
Latino

Sex:
Man
Male
Woman
Female

Handicap:
Crippled
Blind
Deaf
Mentally ill
Retarded
Handicapped
Physically fit

Familial Status:
Adults
Children
Families
Singles
Mature persons
Empty nesters

Catch Words

The HUD regulations emphasize that real estate advertising should also avoid certain "catch words." These are words and phrases that are frequently used in a discriminatory context. Examples would be:

- Restricted
- Exclusive
- Private
- Integrated
- Traditional
- Board approval
- Membership approval

Symbols or Logotypes

HUD emphasizes that real estate advertising should also avoid symbols or logotypes which might imply or suggest race, color, religion, sex, handicap, familial status or national origin. Some examples would be:

- Christian cross
- Jewish star
- Male or Female symbol
- National flag

Colloquialisms

HUD cations as well against advertising which uses words or phrases used regionally or locally which might imply or suggest race, color, religion, sex, familial status or national origin.

Directions to real estate for sale or rental

Another issue highlighted by HUD is the use in real estate advertising of directions which imply a discriminatory preference, limitation or discrimination. Examples would be directions which refer to landmarks which have racial or ethnic significance, such as directions relying on:

- Existing black development (signal to blacks)
- Existing development known for exclusion of minorities (signal to whites)
- Neighborhood known for racial make-up

- Neighborhood known for national origin of inhabitants
- Synagogue
- Church
- Congregation
- Parish

Area or location description

HUD cautions against advertising which refers to facilities which cater to a particular racial, national origin or religious group, such as:

- Country clubs
- Private school designations
- Names of facilities used by exclusively one sex

Source: Fair Housing Advertising Manual - Fair Housing Council of Greater Washington, 1996

INCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
Purpose: All Purpose Code selected
Loan Type: All Loan Type Codes
Action: All Action Codes
Owner Occupancy: All Owner Occupancy Codes
Applicant Race: All Applicant Races
Applicant Sex: All Applicant Genders
Applicant Income: All Applicant Income Levels
Tract Income: All Tract Levels
Tract Minority: All Minority levels
Criteria: ALL INSTITUTIONS

Year: 2002 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
1	31-0856949/1	NATIONAL CITY MORTGAGE COMPANY	3,054	6.0	6.0	370,249	6.8	6.8
2	36-3744610/1	ABN AMRO MORTGAGE GROUP, INC.	2,844	5.5	5.5	318,750	5.9	5.9
3	0000008109/4	UNION SAVINGS BANK	2,839	5.5	5.5	303,883	5.6	5.6
4	0000007621/1	BANK ONE, NA	2,771	5.4	5.4	257,289	4.7	4.7
5	0002712969/2	FIFTH THIRD MORTGAGE COMPANY	2,653	5.2	5.2	338,850	6.3	6.3
6	0001644643/2	COUNTRYWIDE HOME LOANS	2,073	4.0	4.0	230,686	4.2	4.2
7	51-0003820/7	BENEFICIAL CORPORATION	1,773	3.4	3.4	169,002	3.1	3.1
8	0000000786/1	NATIONAL CITY BANK	1,727	3.3	3.3	147,178	2.7	2.7
9	95-2318940/1	WELLS FARGO HOME MORTGAGE	1,663	3.2	3.2	199,164	3.7	3.7
10	0000008551/4	WASHINGTON MUTUAL BANK, FA	1,455	2.8	2.8	160,975	2.9	2.9
11	4216200005/7	GMAC MORTGAGE	1,284	2.5	2.5	130,336	2.4	2.4
12	36-1239445/7	HOUSEHOLD FINANCE CORPORATION	1,172	2.3	2.3	123,239	2.2	2.2
13	0000008412/4	FLAGSTAR BANK	1,108	2.1	2.1	128,611	2.3	2.3
14	0000000024/1	US BANK, N.A.	769	1.5	1.5	69,115	1.2	1.2
15	0000020001/3	REPUBLIC BANK	691	1.3	1.3	77,005	1.4	1.4
16	0341151450/4	LIBERTY LENDING SERVICES, INC.	690	1.3	1.3	77,563	1.4	1.4
17	0000008039/4	LIBERTY SAVINGS BANK, FSB	673	1.3	1.3	68,759	1.2	1.2
18	7756600001/7	AMERIQUEST MORTGAGE COMPANY	609	1.1	1.1	60,539	1.1	1.1
19	36-4114231/1	FIRST FRANKLIN FINANCIAL CORP.	517	1.0	1.0	38,774	0.7	0.7
20	95-2622032/7	AAMES FINANCIAL CORPORATION	482	0.9	0.9	37,287	0.6	0.6
21	3919409997/7	AEGIS MORTGAGE CORPORATION	480	0.9	0.9	46,829	0.8	0.8
22	1265700002/7	DECISION ONE MORTGAGE	466	0.9	0.9	49,860	0.9	0.9
23	2295609996/7	RESIDENTIAL FUNDING CORPORATIO	452	0.8	0.8	36,522	0.6	0.6
24	0000006069/4	LEHMAN BROTHERS BANK, FSB	412	0.8	0.8	40,853	0.7	0.7
25	1374500006/7	TRUSTCORP MORTGAGE COMPANY	405	0.7	0.7	49,598	0.9	0.9
26	0000022908/1	KEYBANK USA, N.A.	385	0.7	0.7	10,571	0.1	0.1
27	0001612400/2	CHASE MANHATTAN MORTGAGE CORP	375	0.7	0.7	44,506	0.8	0.8
28	0001999138/2	THE CIT GROUP/CONSUMER FINANCE	357	0.7	0.7	33,619	0.6	0.6
29	0002977151/2	CITIFINANCIAL MORTGAGE COMPANY	347	0.6	0.6	30,436	0.5	0.5
30	7604800006/7	OPTION ONE MORTGAGE CORP.	312	0.6	0.6	26,425	0.4	0.4
31	7731100009/7	LEGACY MORTGAGE	308	0.6	0.6	42,550	0.7	0.7
32	0000015642/4	GMAC BANK	308	0.6	0.6	39,851	0.7	0.7
33	31-1690008/5	WRIGHT-PATT FINANCIAL GROUP, L	308	0.6	0.6	34,090	0.6	0.6
34	0000723112/2	FIFTH THIRD BANK	302	0.5	0.5	16,620	0.3	0.3
35	75-2921540/7	CENTEX HOME EQUITY COMPANY LLC	294	0.5	0.5	27,705	0.5	0.5
36	0000004072/4	OHIO SAVINGS BANK	293	0.5	0.5	44,651	0.8	0.8

NOTE: Applications include Purchased Loans, Balances are in thousands.

INCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
Purpose: All Purpose Code selected
Loan Type: All Loan Type Codes
Action: All Action Codes
Owner Occupancy: All Owner Occupancy Codes
Applicant Race: All Applicant Races
Applicant Sex: All Applicant Genders
Applicant Income: All Applicant Income Levels
Tract Income: All Tract Levels
Tract Minority: All Minority levels
Criteria: ALL INSTITUTIONS

Year: 2002 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
37	3027509990/7	CENDANT MORTGAGE	279	0.5	0.5	36,577	0.6	0.6
38	59-3324910/7	HOMEGOLD, INC.	277	0.5	0.5	27,594	0.5	0.5
39	7069000008/7	DELTA FUNDING CORPORATION	268	0.5	0.5	24,740	0.4	0.4
40	0000006809/4	COLONIAL SAVINGS, F.A.	256	0.5	0.5	27,544	0.5	0.5
41	0000001156/4	FIRST PLACE BANK	243	0.4	0.4	42,883	0.7	0.7
42	13-2999081/1	CITIMORTGAGE, INC	227	0.4	0.4	32,902	0.6	0.6
43	41-1704421/1	WELLS FARGO FUNDING	222	0.4	0.4	31,405	0.5	0.5
44	0000860473/2	CITIFINANCIAL, INC.	222	0.4	0.4	13,534	0.2	0.2
45	52-2113031/1	HOMEOWNERS LOAN CORP.	215	0.4	0.4	18,770	0.3	0.3
46	0000013044/1	BANK OF AMERICA, N.A.	212	0.4	0.4	32,887	0.6	0.6
47	0000034536/3	CONSECO BANK, INC.	212	0.4	0.4	18,763	0.3	0.3
48	2294709990/7	CONSECO BANK, INC.	212	0.4	0.4	18,763	0.3	0.3
49	31-0881021/1	THE HUNTINGTON MORTGAGE CO.	211	0.4	0.4	27,988	0.5	0.5
50	3813209993/7	SCHMIDT MORTGAGE COMPANY	209	0.4	0.4	26,637	0.4	0.4
51	7185300006/7	ACCREDITED HOME LENDERS, INC.	208	0.4	0.4	19,940	0.3	0.3
52	0000023160/1	CHASE MANHATTAN BANK USA, NA	207	0.4	0.4	10,449	0.1	0.1
53	0000014761/1	KEYBANK NATIONAL ASSOCIATION	201	0.3	0.3	15,780	0.2	0.2
54	0000023446/1	US BANK NORTH DAKOTA	199	0.3	0.3	14,254	0.2	0.2
55	0000014501/1	UNIZAN BANK NATIONAL ASSOC.	189	0.3	0.3	19,401	0.3	0.3
56	7564000004/7	PRINCIPAL RESIDENTIAL MTG,INC.	180	0.3	0.3	20,482	0.3	0.3
57	0000007745/1	THE HUNTINGTON NATIONAL BANK	178	0.3	0.3	4,354	0.0	0.0
58	0000007975/4	USAA FEDERAL SAVINGS BANK	173	0.3	0.3	22,115	0.4	0.4
59	0232646780/7	AMERICAN BUSINESS FINANCIAL	166	0.3	0.3	10,791	0.2	0.2
60	7900200006/7	NEW CENTURY MORTGAGE CORP.	159	0.3	0.3	14,681	0.2	0.2
61	0001088890/2	IRWIN MORTGAGE	156	0.3	0.3	17,059	0.3	0.3
62	0000008529/4	UNION FEDERAL BNK OF INDPLS.	153	0.3	0.3	13,411	0.2	0.2
63	0000002630/4	M&I BANK FSB	151	0.2	0.2	17,127	0.3	0.3
64	7527300003/7	NVR MORTGAGE FINANCE, INC.	146	0.2	0.2	25,566	0.4	0.4
65	59-2645397/1	NATIONAL CITY HOME LOAN SERVIC	141	0.2	0.2	14,546	0.2	0.2
66	0001687453/2	WASHTENAW MORGAGE COMPANY	139	0.2	0.2	14,749	0.2	0.2
67	0000064970/5	UNIVERSAL 1 CREDIT UNION	131	0.2	0.2	5,372	0.1	0.1
68	7775100007/7	MILA, INC	130	0.2	0.2	13,122	0.2	0.2
69	3814209995/7	THE LEADER MORTGAGE COMPANY	129	0.2	0.2	10,529	0.1	0.1
70	0134027208/4	SIB MORTGAGE CORP.	126	0.2	0.2	14,812	0.2	0.2
71	0000014470/4	CITICORP TRUST BANK, FSB	122	0.2	0.2	11,543	0.2	0.2
72	7909100002/7	HOMECOMINGS FINANCIAL NETWORK	116	0.2	0.2	13,677	0.2	0.2

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Tract Minority: All Minority levels
Criteria: ALL INSTITUTIONS
Year: 2002 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
73	1248200000/7	AMERUS HOME LENDING, INC.	114	0.2	0.2	14,650	0.2	0.2
74	0000022559/1	WACHOVIA BANK OF DELAWARE	114	0.2	0.2	12,313	0.2	0.2
75	3833009998/7	AMERICAN MORTGAGE SERVICE COMP	114	0.2	0.2	11,726	0.2	0.2
76	0000024095/1	MBNA AMERICA (DELAWARE), N.A.	114	0.2	0.2	6,735	0.1	0.1
77	0000576710/2	SKY BANK	111	0.2	0.2	13,507	0.2	0.2
78	0002752527/2	EQUIFIRST CORPORATION	111	0.2	0.2	11,722	0.2	0.2
79	1851400008/7	SEBRING CAPITAL PARTNERS, LP	110	0.2	0.2	9,797	0.1	0.1
80	0000066328/5	WRIGHT-PATT CREDIT UNION, INC	105	0.2	0.2	2,273	0.0	0.0
81	0000612618/2	PROVIDENT BANK	104	0.2	0.2	7,321	0.1	0.1
82	7765600003/7	MAC-CLAIR MORTGAGE CORP	99	0.1	0.1	9,695	0.1	0.1
83	0481290145/4	GB HOME EQUITY	99	0.1	0.1	3,609	0.0	0.0
84	0000001235/4	CITIBANK, FSB	98	0.1	0.1	13,088	0.2	0.2
85	0000066835/5	DAY AIR CREDIT UNION	96	0.1	0.1	4,698	0.0	0.0
86	1375809998/7	CUNA MUTUAL MORTGAGE	94	0.1	0.1	9,329	0.1	0.1
87	7715400000/7	CROSSMANN MORTGAGE CORP.	88	0.1	0.1	10,825	0.2	0.2
88	0000003692/4	MONROE FEDERAL SAVINGS & LOAN	88	0.1	0.1	8,499	0.1	0.1
89	0627009996/7	MERRILL LYNCH CREDIT CORP.	87	0.1	0.1	18,773	0.3	0.3
90	0002971869/2	HOME EQUITY OF AMERICA, INC.	84	0.1	0.1	8,804	0.1	0.1
91	0000009462/3	FARMERS & MERCHANTS BANK	84	0.1	0.1	6,257	0.1	0.1
92	0000013349/1	UNION PLANTERS BANK, N.A.	83	0.1	0.1	9,234	0.1	0.1
93	0003032664/2	FULL SPECTRUM LENDING, INC.	83	0.1	0.1	7,744	0.1	0.1
94	0000014141/1	BROOKVILLE NATIONAL BANK	83	0.1	0.1	5,173	0.0	0.0
95	1611300007/7	EQUITY RESOURCES, INC.	82	0.1	0.1	7,064	0.1	0.1
96	0000001741/1	WELLS FARGO BANK, NA	79	0.1	0.1	1,960	0.0	0.0
97	0000023927/1	THE CITIZENS NATIONAL BANK OF	75	0.1	0.1	12,684	0.2	0.2
98	7699300007/7	AMERICAN HOME MORTGAGE CORP.	75	0.1	0.1	9,769	0.1	0.1
99	0752544166/4	FIRST NATIONWIDE MORTGAGE CORP	75	0.1	0.1	9,134	0.1	0.1
100	0000006194/4	HOUSEHOLD BANK, F.S.B.	73	0.1	0.1	6,102	0.1	0.1
101	0000027642/3	ADVANTAGE BANK	71	0.1	0.1	6,612	0.1	0.1
102	0000006381/4	METROPOLITAN BANK AND TRUST CO	70	0.1	0.1	9,551	0.1	0.1
103	0000034153/3	FIRST BANK INC	70	0.1	0.1	6,250	0.1	0.1
104	1411700003/7	EQUITABLE MORTGAGE CORPORATION	69	0.1	0.1	19,388	0.3	0.3
105	7979400002/7	FIRST MAGNUS FINANCIAL CORP.	68	0.1	0.1	8,257	0.1	0.1
106	0741878850/4	GUARANTY RESIDENTIAL LENDING	65	0.1	0.1	7,509	0.1	0.1
107	0001073560/2	WACHOVIA MORTGAGE	64	0.1	0.1	8,145	0.1	0.1
108	0000014191/4	MIDFIRST BANK	64	0.1	0.1	3,890	0.0	0.0

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Criteria: ALL INSTITUTIONS
Year: 2002 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
109	3802909995/7	MORTGAGE INVESTORS CORPORATION	62	0.1	0.1	6,124	0.1	0.1
110	3842009994/7	COLONY MORTGAGE CORPORATION	61	0.1	0.1	7,002	0.1	0.1
111	34-1225701/1	CHARTER ONE CREDIT CORPORATION	60	0.1	0.1	7,141	0.1	0.1
112	0000060885/5	DAY MET CREDIT UNION	60	0.1	0.1	2,262	0.0	0.0
113	0000068475/5	RIVER VALLEY CREDIT UNION	59	0.1	0.1	3,044	0.0	0.0
114	7493900007/7	DAVID MORTGAGE, INC.	58	0.1	0.1	8,326	0.1	0.1
115	48-0875093/1	FIRST HORIZON HOME LOAN CORP.	57	0.1	0.1	6,517	0.1	0.1
116	7943800003/7	SAXON MORTGAGE, INC.	57	0.1	0.1	6,299	0.1	0.1
117	0000003970/4	INDYMAC BANK F.S.B.	57	0.1	0.1	5,191	0.0	0.0
118	2179909994/7	TOWNE MORTGAGE COMPANY	56	0.1	0.1	5,410	0.1	0.1
119	0000000124/4	CORNERSTONE BANK	55	0.1	0.1	8,758	0.1	0.1
120	7810600004/7	PROVIDENT FUNDING ASSOCIATES.	54	0.1	0.1	8,291	0.1	0.1
121	0000002076/4	BROOKVILLE BUILDING & SAVINGS	54	0.1	0.1	5,397	0.1	0.1
122	0000005848/4	E*TRADE BANK	51	0.1	0.1	8,883	0.1	0.1
123	6480209999/7	MASTER FINANCIAL, INC.	51	0.1	0.1	4,127	0.0	0.0
124	0000017595/1	COMMUNITY NATIONAL BANK	50	0.0	0.0	4,318	0.0	0.0
125	3831400006/7	RYLAND MORTGAGE COMPANY	49	0.0	0.0	7,503	0.1	0.1
126	7840600009/7	BNC MORTGAGE, INC	49	0.0	0.0	4,770	0.0	0.0
127	1003800004/7	LONG BEACH MORTGAGE CO	49	0.0	0.0	4,535	0.0	0.0
128	0002039488/2	WELLS FARGO FIN'L AMERICA, INC	48	0.0	0.0	3,668	0.0	0.0
129	0510356097/4	WILMINGTON FINANCE, INC.	47	0.0	0.0	4,650	0.0	0.0
130	0000003043/4	NEW CARLISLE FEDERAL S.B.	47	0.0	0.0	4,487	0.0	0.0
131	1557900001/7	PEOPLE'S CHOICE HOME LOAN, INC	47	0.0	0.0	4,480	0.0	0.0
132	7362200006/7	BROADVIEW MORTGAGE COMPANY	46	0.0	0.0	4,724	0.0	0.0
133	7177000002/7	MERITAGE MORTGAGE CORPORATION	46	0.0	0.0	2,930	0.0	0.0
134	0001078369/2	REGIONS MORTGAGE, INC.	44	0.0	0.0	6,560	0.1	0.1
135	41-1902229/7	AMERICAN SUMMIT LENDING CORP	44	0.0	0.0	4,434	0.0	0.0
136	1126000006/7	SEBRING CAPITAL CORPORATION	44	0.0	0.0	3,439	0.0	0.0
137	7506600003/7	OAKWOOD ACCEPTANCE CORPORATION	44	0.0	0.0	2,600	0.0	0.0
138	1512400000/7	NOVASTAR MORTGAGE INC.	43	0.0	0.0	5,707	0.1	0.1
139	0000004544/4	THIRD FEDERAL SAVINGS AND LOAN	42	0.0	0.0	6,196	0.1	0.1
140	0001942602/2	EQUITY ONE, INC	41	0.0	0.0	3,705	0.0	0.0
141	1437800009/7	E-LOAN, INC.	40	0.0	0.0	4,657	0.0	0.0
142	05-0402708/7	ADVANCED FINANCIAL SERVICES, I	39	0.0	0.0	2,828	0.0	0.0
143	0000017936/4	GUARANTY BANK, FSB	39	0.0	0.0	1,059	0.0	0.0
144	13-3210378/3	GREENPOINT MORTGAGE FUNDING, I	37	0.0	0.0	6,482	0.1	0.1

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Criteria: ALL INSTITUTIONS
Year: 2002 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
145	0000000056/1	FIRST SOUTHWESTERN	37	0.0	0.0	3,753	0.0	0.0
146	7927200007/7	NEW FREEDOM MORTGAGE CORP	37	0.0	0.0	3,318	0.0	0.0
147	54-1779092/7	ORIGEN FINANCIAL, INC	37	0.0	0.0	1,397	0.0	0.0
148	0001382226/2	HSBC MORTGAGE CORPORATION	36	0.0	0.0	6,378	0.1	0.1
149	7632300003/7	UNIVERSAL MORTGAGE CORPORATION	36	0.0	0.0	4,678	0.0	0.0
150	0351560092/4	MATRIX FINANCIAL SERVICES CORP	36	0.0	0.0	4,492	0.0	0.0
151	1200100006/7	MORTGAGE AMENITIES CORP.	36	0.0	0.0	3,619	0.0	0.0
152	1118100001/7	MORTGAGE LENDERS NETWORK USA	35	0.0	0.0	3,139	0.0	0.0
153	0593606823/4	EVERBANC MORTGAGE COMPANY LLC	32	0.0	0.0	4,568	0.0	0.0
154	3733609993/7	THE BANKERS G T & T CO.	32	0.0	0.0	3,810	0.0	0.0
155	0000014362/1	LASALLE BANK NA	32	0.0	0.0	3,371	0.0	0.0
156	0000025653/3	FREMONT INVESTMENT & LOAN	31	0.0	0.0	3,678	0.0	0.0
157	7140500002/7	SIBCY CLINE MORTGAGE SERVICES	31	0.0	0.0	3,349	0.0	0.0
158	0000005536/5	NAVY FEDERAL CREDIT UNION	31	0.0	0.0	3,306	0.0	0.0
159	0000000001/1	WACHOVIA BANK	30	0.0	0.0	8,872	0.1	0.1
160	0002943147/2	FIRST BANC MORTGAGE INC	30	0.0	0.0	4,200	0.0	0.0
161	0000009576/3	WASHINGTON MUTUAL BANK	30	0.0	0.0	3,620	0.0	0.0
162	0000000264/5	HEARTLAND FEDERAL C.U.	30	0.0	0.0	2,967	0.0	0.0
163	0000004410/4	SOVEREIGN BANK	30	0.0	0.0	1,801	0.0	0.0
164	0001216291/2	RESOURCE BANK	30	0.0	0.0	1,628	0.0	0.0
165	1259600009/7	SOUTH STAR FUNDING, LLC	29	0.0	0.0	3,485	0.0	0.0
166	1289800005/7	MORTGAGE EXPRESS, INC.	29	0.0	0.0	3,091	0.0	0.0
167	0000012642/4	WORLD SAVINGS BANK	28	0.0	0.0	3,672	0.0	0.0
168	2467100004/7	JAMES B. NUTTER AND COMPANY	28	0.0	0.0	3,240	0.0	0.0
169	7592700002/7	H & R BLOCK MORTGAGE CORP.	28	0.0	0.0	2,808	0.0	0.0
170	1458900002/7	NEXSTAR FINANCIAL CORPORATION	27	0.0	0.0	3,415	0.0	0.0
171	0000002479/1	SECOND NATIONAL BANK	27	0.0	0.0	2,628	0.0	0.0
172	1463300003/7	MOORE FINANCIAL ENTERPRISES, I	27	0.0	0.0	2,324	0.0	0.0
173	0000130943/2	IRWIN UNION BANK AND TRUST CO	27	0.0	0.0	1,703	0.0	0.0
174	0000001316/1	PNC BANK NA	27	0.0	0.0	1,410	0.0	0.0
175	0000017283/4	WAYPOINT BANK	27	0.0	0.0	280	0.0	0.0
176	0000000993/4	PEOPLES SAVINGS BANK	26	0.0	0.0	3,283	0.0	0.0
177	7197000003/7	QUICKEN LOANS, INC	26	0.0	0.0	2,604	0.0	0.0
178	7162800002/7	21ST CENTURY MORTGAGE	26	0.0	0.0	835	0.0	0.0
179	0000000200/1	FLEET NATIONAL BANK	25	0.0	0.0	4,986	0.0	0.0
180	0000009859/1	SOMERVILLE NATIONAL BANK	25	0.0	0.0	1,391	0.0	0.0

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181	0000024256/1	FIRST INDIANA BANK / GTC942	25	0.0	0.0	1,300	0.0	0.0
182	3837309996/7	FIRST EQUITY MORTGAGEWARE	24	0.0	0.0	5,020	0.0	0.0
183	0000013681/1	NATIONAL BANK OF COMMERCE	24	0.0	0.0	4,142	0.0	0.0
184	1665100001/7	PINNACLE DIRECT FUNDING CORPOR	24	0.0	0.0	2,466	0.0	0.0
185	4856500006/7	VANDERBILT MORTGAGE	24	0.0	0.0	946	0.0	0.0
186	0001966578/2	M AND T MORTGAGE CORP	23	0.0	0.0	2,800	0.0	0.0
187	0001072246/2	SUNTRUST MORTGAGE, INC	23	0.0	0.0	2,516	0.0	0.0
188	7875200001/7	FIRST GREENSBORO HOME EQUITY	23	0.0	0.0	2,079	0.0	0.0
189	0000000336/1	FIRST TENNESSEE BANK N A	23	0.0	0.0	932	0.0	0.0
190	0000009846/3	BRANCH BANKING AND TRUST CO	22	0.0	0.0	3,641	0.0	0.0
191	1261700007/7	PRIMARY RESIDENTIAL MORTGAGE	21	0.0	0.0	3,014	0.0	0.0
192	0000008534/4	GUARANTY BANK	21	0.0	0.0	2,237	0.0	0.0
193	7218600003/7	BIRMINGHAM BANCORP MORTGAGE	21	0.0	0.0	2,063	0.0	0.0
194	0000008145/4	CHEVY CHASE BANK, F.S.B	21	0.0	0.0	1,969	0.0	0.0
195	0000000086/1	FIRST NAT'L BANK GERMANTOWN	21	0.0	0.0	1,439	0.0	0.0
196	0000014912/4	EBANK	20	0.0	0.0	3,075	0.0	0.0
197	0000024340/1	CHARTER ONE BANK	20	0.0	0.0	2,097	0.0	0.0
198	0000000109/1	NATIONAL CITY BANK, KENTUCKY	19	0.0	0.0	3,125	0.0	0.0
199	7464900009/7	EMC MORTGAGE CORPORATION	18	0.0	0.0	2,081	0.0	0.0
200	0000024189/1	FIRST NATIONAL BANK OF ARIZONA	18	0.0	0.0	1,907	0.0	0.0
201	0000000709/4	GUARDIAN SAVINGS BANK, FSB	17	0.0	0.0	2,215	0.0	0.0
202	16-1146859/1	CHARTER ONE MORTGAGE CORP	17	0.0	0.0	1,861	0.0	0.0
203	0000019536/3	SOUTH CENTRAL BANK	17	0.0	0.0	161	0.0	0.0
204	0000005198/4	COMMERCIAL FEDERAL BANK	16	0.0	0.0	5,081	0.0	0.0
205	0000009179/1	PARK NATIONAL BANK	16	0.0	0.0	2,348	0.0	0.0
206	1549600001/7	CONCORDE ACCEPTANCE CORPORATIO	16	0.0	0.0	1,476	0.0	0.0
207	1463600006/7	MORTGAGEIT, INC.	15	0.0	0.0	1,983	0.0	0.0
208	1336300004/7	IVANHOE FINANCIAL, INC	15	0.0	0.0	1,863	0.0	0.0
209	0470659799/4	COMMERCIAL FEDERAL MORTGAGE CO	14	0.0	0.0	4,049	0.0	0.0
210	7343000001/7	IMPAC FUNDING CORP	14	0.0	0.0	2,571	0.0	0.0
211	0001421161/2	BANK OF BLUE VALLEY	14	0.0	0.0	2,202	0.0	0.0
212	0458600405/7	WMC MORTGAGE CORP.	14	0.0	0.0	2,081	0.0	0.0
213	0000008043/4	DOLLAR BANK, FSB	14	0.0	0.0	1,644	0.0	0.0
214	0000008183/4	EASTERN SAVINGS BANK, FSB	13	0.0	0.0	2,092	0.0	0.0
215	1096000004/7	WATERMARK FINANCIAL PARTNERS	13	0.0	0.0	1,432	0.0	0.0
216	1085800002/7	SPECIALTY MORTGAGE CORPORATION	13	0.0	0.0	1,320	0.0	0.0

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Applicant Income: All Applicant Income Levels
Tract Income: All Tract Levels
Tract Minority: All Minority levels
Criteria: ALL INSTITUTIONS

Year: 2002 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
217	0000032574/3	BEAL BANK	13	0.0	0.0	1,152	0.0	0.0
218	1438500002/7	MICHIGAN FIDELITY ACCEPTANCE	12	0.0	0.0	1,278	0.0	0.0
219	0841100002/7	ALLIANCE MORTGAGE COMPANY	12	0.0	0.0	1,222	0.0	0.0
220	1483300003/7	FINANCE AMERICA, LLC	12	0.0	0.0	1,204	0.0	0.0
221	7673400003/7	INVESTAID CORP	12	0.0	0.0	1,129	0.0	0.0
222	0000006594/1	SECURITY NATIONAL BANK & TRUST	12	0.0	0.0	735	0.0	0.0
223	0000060143/2	COMERICA BANK	12	0.0	0.0	476	0.0	0.0
224	7323800008/7	EXPRESS CAPITAL LENDING	11	0.0	0.0	2,678	0.0	0.0
225	36-2677063/7	MSDW CREDIT CORPORATION	11	0.0	0.0	1,951	0.0	0.0
226	61-1355156/7	FARM CREDIT SERVICES OF MID-AM	11	0.0	0.0	1,486	0.0	0.0
227	7515900008/7	FREEDOM MORTGAGE CORPORATION	11	0.0	0.0	1,215	0.0	0.0
228	0000021699/1	GOLETA NATIONAL BANK	11	0.0	0.0	927	0.0	0.0
229	7516800003/7	FIRST GUARANTY MORTGAGE CORP	11	0.0	0.0	861	0.0	0.0
230	1534900004/7	FIRST NLC FINANCIAL SERVICES	11	0.0	0.0	785	0.0	0.0
231	0000008159/4	CROWN BANK, FSB	11	0.0	0.0	454	0.0	0.0
232	5135809997/7	CTX MORTGAGE COMPANY, LLC	10	0.0	0.0	1,567	0.0	0.0
233	0640713034/4	CORINTHIAN MORTGAGE CORPORATIO	10	0.0	0.0	963	0.0	0.0
234	1728700007/7	PARAGON HOME LENDING, LLC	10	0.0	0.0	921	0.0	0.0
235	0000003269/1	WELLS FARGO BANK WEST, NA	10	0.0	0.0	268	0.0	0.0
236	0042590778/4	FORWARD FINANCIAL	10	0.0	0.0	266	0.0	0.0
237	7479800008/7	CHAPEL MORTGAGE CO	9	0.0	0.0	1,265	0.0	0.0
238	7060700007/7	COMMUNITY MORTGAGE SERVICES, I	9	0.0	0.0	968	0.0	0.0
239	0000615217/2	THE NORTH SIDE BANK & TRUST CO	9	0.0	0.0	223	0.0	0.0
240	7650700000/7	AMERICA'S MONEYLINE	8	0.0	0.0	1,046	0.0	0.0
241	7281500005/7	REAL ESTATE MORTGAGE CORP	8	0.0	0.0	931	0.0	0.0
242	1718800007/7	UNIMORTGAGE LLC	8	0.0	0.0	878	0.0	0.0
243	0330756645/7	GREATER ACCEPTANCE MORTGAGE CO	8	0.0	0.0	864	0.0	0.0
244	0000013679/1	BANK OF OKLAHOMA, N.A.	8	0.0	0.0	826	0.0	0.0
245	1830200003/7	OAK STREET MORTGAGE	8	0.0	0.0	806	0.0	0.0
246	7892800004/7	FIELDSTONE MORTGAGE COMPANY	8	0.0	0.0	724	0.0	0.0
247	0000015115/4	FIRST ALLIANCE BANK, FSB	7	0.0	0.0	1,094	0.0	0.0
248	0000013230/4	WEBSTER BANK	7	0.0	0.0	866	0.0	0.0
249	7772300000/7	FRANKLIN FINANCIAL	7	0.0	0.0	734	0.0	0.0
250	0000014529/1	MERCANTILE NATIONAL BANK OF IN	7	0.0	0.0	678	0.0	0.0
251	0000027471/3	AMERICAN EXPRESS CENTURION BNK	7	0.0	0.0	233	0.0	0.0
252	0000413208/2	HSBC BANK, USA	6	0.0	0.0	1,449	0.0	0.0

NOTE: Applications include Purchased Loans, Balances are in thousands.

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Applicant Income: All Applicant Income Levels
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Tract Minority: All Minority levels
Criteria: ALL INSTITUTIONS
Year: 2002 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
253	0541900445/4	GREATER ATLANTIC MORTGAGE CORP	6	0.0	0.0	797	0.0	0.0
254	0000014640/4	STATE FARM BANK, FSB	6	0.0	0.0	742	0.0	0.0
255	1077600005/7	TRIBECA LENDING CORPORATION	6	0.0	0.0	725	0.0	0.0
256	0000061744/5	INT'L HARVESTER EMPL. CR. UN.	6	0.0	0.0	624	0.0	0.0
257	1486300009/7	SUNSET MORTGAGE COMPANY, LP	6	0.0	0.0	582	0.0	0.0
258	0000096755/5	MIDFIRST CREDIT UNION	6	0.0	0.0	571	0.0	0.0
259	0000017623/5	HONDA FEDERAL CREDIT UNION	6	0.0	0.0	273	0.0	0.0
260	0001035401/2	THE CIT GROUP/SALES FINANCING,	6	0.0	0.0	172	0.0	0.0
261	0000802129/2	FARMERS & MECHANICS BANK	6	0.0	0.0	162	0.0	0.0
262	0000008337/4	CHARTER BANK	5	0.0	0.0	640	0.0	0.0
263	0000008569/4	APPROVED FEDERAL SAVINGS BANK	5	0.0	0.0	614	0.0	0.0
264	0000008186/4	PRESIDENTIAL BANK, F.S.B.	5	0.0	0.0	585	0.0	0.0
265	0002576572/2	RBC MORTGAGE COMPANY	5	0.0	0.0	433	0.0	0.0
266	0000023570/1	FIRST BANK RICHMOND	5	0.0	0.0	409	0.0	0.0
267	41-1810165/7	LENDSOURCE, INC.	5	0.0	0.0	404	0.0	0.0
268	7499100008/7	TAYLOR, BEAN & WHITAKER MTG	5	0.0	0.0	368	0.0	0.0
269	1553400000/7	HOMESOURCE CAPITAL MORTGAGE CO	5	0.0	0.0	353	0.0	0.0
270	7109700009/7	FINET.COM	5	0.0	0.0	247	0.0	0.0
271	0000022469/1	SYCAMORE NATIONAL BANK	5	0.0	0.0	119	0.0	0.0
272	0000013074/3	HUDSON CITY SAVINGS BANK	4	0.0	0.0	1,757	0.0	0.0
273	1539100009/7	PREMIER MORTGAGE GROUP, LTD	4	0.0	0.0	1,612	0.0	0.0
274	0000005099/4	CALIFORNIA FEDERAL BANK	4	0.0	0.0	847	0.0	0.0
275	1837800003/7	NOVELLE FINANCIAL SERVICES	4	0.0	0.0	715	0.0	0.0
276	0000501105/2	M AND T BANK	4	0.0	0.0	552	0.0	0.0
277	0000002360/1	LEBANON CITIZENS NATIONAL BANK	4	0.0	0.0	516	0.0	0.0
278	36-4312329/1	AMERICAN MORTGAGE LLC	4	0.0	0.0	444	0.0	0.0
279	1098000002/7	MORTGAGE NOW, INC,	4	0.0	0.0	442	0.0	0.0
280	34-1812174/1	FIRSTMERIT MORTGAGE CORP.	4	0.0	0.0	441	0.0	0.0
281	0000008846/1	OLD NATIONAL BANK	4	0.0	0.0	420	0.0	0.0
282	1390800005/7	THE MORTGAGE OUTLET, INC.	4	0.0	0.0	383	0.0	0.0
283	75-2585326/7	COUNTRYPLACE MORTGAGE, LTD	4	0.0	0.0	344	0.0	0.0
284	0000018962/3	ROYAL BANK OF PENNSYLVANIA	4	0.0	0.0	261	0.0	0.0
285	7431100008/7	OAKMONT MORTGAGE	4	0.0	0.0	206	0.0	0.0
286	0000061810/5	KEMBA CREDIT UNION INC	4	0.0	0.0	101	0.0	0.0
287	0000008097/4	PEOPLES COMMUNITY BANK	3	0.0	0.0	2,676	0.0	0.0
288	0113399725/4	ASTORIA FEDERAL MORTGAGE CORP	3	0.0	0.0	1,796	0.0	0.0

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INCLUDED IN THIS ANALYSIS

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Tract Minority: All Minority levels
Criteria: ALL INSTITUTIONS
Year: 2002 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
289	0000016406/4	VIRTUALBANK	3	0.0	0.0	1,184	0.0	0.0
290	0000002007/1	UNION COUNTY NAT'L BANK C/O FM	3	0.0	0.0	764	0.0	0.0
291	0000015100/4	ALLSTATE BANK	3	0.0	0.0	655	0.0	0.0
292	7784800005/7	FRANKLIN AMERICAN MORTGAGE CO	3	0.0	0.0	502	0.0	0.0
293	0000024141/1	TREASURY BANK NATIONAL ASSOC.	3	0.0	0.0	464	0.0	0.0
294	7042100008/7	DOLLAR MORTGAGE CORPORATION	3	0.0	0.0	419	0.0	0.0
295	7774500004/7	GATEWAY FUNDING DIV MTG SVCS	3	0.0	0.0	412	0.0	0.0
296	0000008709/1	1ST NATIONAL BANK	3	0.0	0.0	383	0.0	0.0
297	7071400009/7	NATIONWIDE ADVANTAGE MTG CO	3	0.0	0.0	368	0.0	0.0
298	7729200002/7	ACCESS NATIONAL MORTGAGE CORP	3	0.0	0.0	365	0.0	0.0
299	7015500006/7	HOWARD HANNA FINANCIAL SERVICE	3	0.0	0.0	350	0.0	0.0
300	0000017953/3	SANDHILLS BANK	3	0.0	0.0	329	0.0	0.0
301	0000029031/3	AMERIANA BANK AND TRUST SB	3	0.0	0.0	315	0.0	0.0
302	1424400008/7	INTERBAY FUNDING, LLC	3	0.0	0.0	285	0.0	0.0
303	0000010666/3	OAK HILL BANKS	3	0.0	0.0	270	0.0	0.0
304	74-2585982/1	EXTRACO MORTGAGE CORPORATION	3	0.0	0.0	267	0.0	0.0
305	0002267179/2	CRESCENT MORTGAGE SVC, INC	3	0.0	0.0	266	0.0	0.0
306	1075700003/7	AURORA LOAN SERVICES INC	3	0.0	0.0	238	0.0	0.0
307	0219309999/7	SUN AMERICAN MORTGAGE	3	0.0	0.0	222	0.0	0.0
308	38-3233494/1	NATIONAL CITY MORTGAGE SERVICE	3	0.0	0.0	192	0.0	0.0
309	0002751801/2	CITIFINANCIAL SERVICES, INC.	3	0.0	0.0	172	0.0	0.0
310	0000008266/4	UNITED MIDWEST SAVINGS BANK	3	0.0	0.0	155	0.0	0.0
311	0000005649/3	DISCOVER BANK	3	0.0	0.0	141	0.0	0.0
312	0000000827/4	COVINGTON SAVINGS & LOAN ASSN	3	0.0	0.0	135	0.0	0.0
313	0000004142/5	KINECTA FEDERAL CREDIT UNION	3	0.0	0.0	118	0.0	0.0
314	0000000293/5	DP&L EMPLOYEES PLUS FED CR UN	3	0.0	0.0	97	0.0	0.0
315	0001010930/2	UNITED BANK INC	3	0.0	0.0	40	0.0	0.0
316	0000019835/3	FIRST MUTUAL BANK	3	0.0	0.0	24	0.0	0.0
317	0000006189/4	DOWNEY SAVINGS AND LOAN ASSOC.	2	0.0	0.0	531	0.0	0.0
318	3827009995/7	UNION NATIONAL MORTGAGE CO.	2	0.0	0.0	469	0.0	0.0
319	7605000005/7	SIRVA MORTGAGE INC	2	0.0	0.0	423	0.0	0.0
320	1292000001/7	HARTLAND MORTGAGE CENTERS INC.	2	0.0	0.0	324	0.0	0.0
321	0000005552/1	PEOPLES BANK, NATIONAL ASSOCIA	2	0.0	0.0	235	0.0	0.0
322	7404800009/7	OCEAN WEST FUNDING	2	0.0	0.0	235	0.0	0.0
323	7634000003/7	CAPITAL MORTGAGE FUNDING LLC	2	0.0	0.0	233	0.0	0.0
324	0000016782/4	ING BANK, FSB	2	0.0	0.0	214	0.0	0.0

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Applicant Income: All Applicant Income Levels
Tract Income: All Tract Levels
Tract Minority: All Minority levels
Criteria: ALL INSTITUTIONS
Year: 2002 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
325	0481290152/4	GN MORTGAGE, LLC	2	0.0	0.0	213	0.0	0.0
326	7568500004/7	CUSTOM MORTGAGE , INC	2	0.0	0.0	198	0.0	0.0
327	0000027330/3	SILVERGATE BANK	2	0.0	0.0	192	0.0	0.0
328	7718200008/7	AMERICAN HOME LOANS	2	0.0	0.0	192	0.0	0.0
329	7542800002/7	MLSG, INC.	2	0.0	0.0	186	0.0	0.0
330	7233200004/7	PINNACLE FINANCIAL CORPORATION	2	0.0	0.0	172	0.0	0.0
331	7152500000/7	PLATINUM CAPITAL GROUP	2	0.0	0.0	156	0.0	0.0
332	0000000384/3	THE OHIO VALLEY BANK COMPANY	2	0.0	0.0	151	0.0	0.0
333	0000066840/5	CODE CREDIT UNION	2	0.0	0.0	137	0.0	0.0
334	0000006081/4	FIDELITY BANK	2	0.0	0.0	117	0.0	0.0
335	0000014579/1	FIRSTMERIT BANK, N.A.	2	0.0	0.0	112	0.0	0.0
336	0002418980/2	WELLS FARGO FINL ACCPTCE AMER	2	0.0	0.0	88	0.0	0.0
337	0000014740/1	FIRST NATIONAL BANK OF AMERICA	2	0.0	0.0	23	0.0	0.0
338	0000030757/3	COASTAL BANC SSB	1	0.0	0.0	450	0.0	0.0
339	0000003309/4	TIERONE BANK	1	0.0	0.0	398	0.0	0.0
340	0000005551/4	BANKATLANTIC	1	0.0	0.0	392	0.0	0.0
341	0000009541/1	HARLEYSVILLE NATIONAL BANK	1	0.0	0.0	357	0.0	0.0
342	0000675332/2	SUNTRUST BANK	1	0.0	0.0	347	0.0	0.0
343	0000029973/3	SUSQUEHANNA BANK	1	0.0	0.0	342	0.0	0.0
344	0000023748/1	HORIZON NATIONAL BANK	1	0.0	0.0	320	0.0	0.0
345	0000026870/3	FRANKLIN BANK, SSB	1	0.0	0.0	317	0.0	0.0
346	0000001997/1	NATIONAL BANK & TRUST COMPANY	1	0.0	0.0	250	0.0	0.0
347	0000004192/4	FIRST FEDERAL BANK OF THE MIDW	1	0.0	0.0	212	0.0	0.0
348	0000000008/1	BANK ONE, NA	1	0.0	0.0	180	0.0	0.0
349	3807209990/7	YERKE MORTGAGE CO.	1	0.0	0.0	171	0.0	0.0
350	58-0692236/3	LIBERTY MORTGAGE CORPORATION	1	0.0	0.0	169	0.0	0.0
351	35-2037032/7	NEW STATE MORTGAGE COMPANY	1	0.0	0.0	169	0.0	0.0
352	0000001999/5	LOCKHEED FEDERAL CREDIT UNION	1	0.0	0.0	167	0.0	0.0
353	0002343082/2	MORTGAGE SERVICES, INC	1	0.0	0.0	160	0.0	0.0
354	0000008475/4	NETBANK	1	0.0	0.0	159	0.0	0.0
355	1052000001/7	MARKET MORTGAGE CO., LTD	1	0.0	0.0	149	0.0	0.0
356	1152600000/7	ONE SOURCE MORTGAGE, L.L.C.	1	0.0	0.0	147	0.0	0.0
357	0000075633/2	HARRIS TRUST AND SAVINGS BANK	1	0.0	0.0	147	0.0	0.0
358	0000000916/1	CHAMPAIGN NATIONAL BANK/TRUST	1	0.0	0.0	144	0.0	0.0
359	1130300009/7	DOVENMUEHLE MORTGAGE, INC.	1	0.0	0.0	139	0.0	0.0
360	0000014225/4	PRINCIPAL BANK	1	0.0	0.0	137	0.0	0.0

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Criteria: ALL INSTITUTIONS
Year: 2002 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
361	0000820310/2	COMMUNITY FIRST BANK & TRUST	1	0.0	0.0	137	0.0	0.0
362	1345700002/7	BRIDGE CAPITAL	1	0.0	0.0	133	0.0	0.0
363	75-1744262/3	PRIMEWEST MORTGAGE CORP	1	0.0	0.0	132	0.0	0.0
364	3028209994/7	WEICHERT FINANCIAL SERVICES	1	0.0	0.0	131	0.0	0.0
365	0000002092/4	FRANKLIN SAVINGS AND LOAN CO	1	0.0	0.0	131	0.0	0.0
366	75-2257846/3	JEFFERSON MORTGAGE SERVICES, I	1	0.0	0.0	130	0.0	0.0
367	0000034955/1	AMERICAN BANK & TRUST COMPANY	1	0.0	0.0	123	0.0	0.0
368	7794500000/7	AMTRUST MORTGAGE CORPORATION	1	0.0	0.0	120	0.0	0.0
369	0000012002/4	RAYMOND JAMES BANK, FSB	1	0.0	0.0	115	0.0	0.0
370	3804009998/7	THE NORTHERN OHIO INVESTMENT C	1	0.0	0.0	114	0.0	0.0
371	0000009845/5	LIMA SUPERIOR COMMUNITY FCU	1	0.0	0.0	112	0.0	0.0
372	7348200002/7	AMERICAN PIONEER FINANCIAL SER	1	0.0	0.0	110	0.0	0.0
373	1577600003/7	THORNBURG MORTGAGE HOME LOAN	1	0.0	0.0	110	0.0	0.0
374	00000011813/3	BANCORPSOUTH BANK	1	0.0	0.0	110	0.0	0.0
375	05369001247/7	PULTE MORTGAGE CORPORATION	1	0.0	0.0	107	0.0	0.0
376	0000000919/4	THE HOME SAVINGS AND LOAN COMP	1	0.0	0.0	107	0.0	0.0
377	0000005938/4	WINTON SAVINGS AND LOAN	1	0.0	0.0	105	0.0	0.0
378	0000008857/4	GATEWAY BANK, FSB	1	0.0	0.0	105	0.0	0.0
379	0000222147/2	CITIZENS BANK	1	0.0	0.0	105	0.0	0.0
380	0000844820/2	BANK OF TAZEWELL COUNTY	1	0.0	0.0	103	0.0	0.0
381	0000000869/1	NATIONAL CITY BANK, INDIANA	1	0.0	0.0	102	0.0	0.0
382	0000008333/5	TOWER FEDERAL CREDIT UNION	1	0.0	0.0	101	0.0	0.0
383	0000023695/1	ASSOCIATED BANK, N.A.	1	0.0	0.0	100	0.0	0.0
384	1508300007/7	WOODLAND CAPITAL CORPORATION	1	0.0	0.0	100	0.0	0.0
385	7871500009/7	MARATHON FINANCIAL CORPORATION	1	0.0	0.0	99	0.0	0.0
386	72893000047	REALTY MORTGAGE CORPORATION	1	0.0	0.0	99	0.0	0.0
387	7555300005/7	CIMARRON MORTGAGE COMPANY	1	0.0	0.0	94	0.0	0.0
388	1923400005/7	COLUMBIA NATIONAL, INC	1	0.0	0.0	91	0.0	0.0
389	0000021930/5	CINFED EMPLOYEES FEDERAL CU	1	0.0	0.0	89	0.0	0.0
390	0000014066/5	FIRESTONE OFFICE FCU	1	0.0	0.0	85	0.0	0.0
391	7185000002/7	FREEDOM MORTGAGE CORPORATION	1	0.0	0.0	82	0.0	0.0
392	0000023178/1	PELICAN NATIONAL BANK	1	0.0	0.0	81	0.0	0.0
393	0000063307/5	NEW HORIZONS CREDIT UNION	1	0.0	0.0	80	0.0	0.0
394	0000017587/5	USALLIANCE FEDERAL CREDIT UNIO	1	0.0	0.0	80	0.0	0.0
395	0000005766/3	MAINSOURCE BANK	1	0.0	0.0	78	0.0	0.0
396	0000015318/4	HORIZON BANK FSB	1	0.0	0.0	75	0.0	0.0

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Criteria: ALL INSTITUTIONS
Year: 2002 **Analysis Perspective:** HMDA

Segment	Total Applications Denied		Debt-to-Income Ratio		Employment History		Credit History		Collateral		Cash, PMI, or Bad Data (6, 7 & 8)		Other	
	Number	%Total	Number	%Apps	Number	%Apps	Number	%Apps	Number	%Apps	Number	%Apps	Number	
RACE														
Native	35	0.6	5	14.3	0	0.0	13	37.1	7	20.0	5	14.3	7	20.0
Asian	43	0.7	12	27.9	2	4.7	15	34.9	5	11.6	4	9.3	9	20.9
Black	711	12.2	182	25.6	4	0.6	361	50.8	92	12.9	57	8.0	112	15.8
Hispanic	26	0.4	6	23.1	1	3.8	14	53.8	5	19.2	2	7.7	6	23.1
White	2,923	50.0	671	23.0	61	2.1	1,288	44.1	530	18.1	285	9.8	511	17.5
Joint	55	0.9	14	25.5	2	3.6	30	54.5	7	12.7	8	14.5	7	12.7
Other	164	2.8	12	7.3	2	1.2	88	53.7	58	35.4	10	6.1	14	8.5
Not Available	3,857	65.9	457	11.8	21	0.5	1,127	29.2	456	11.8	167	4.3	468	12.1
GENDER														
Joint	1,839	31.4	360	19.6	29	1.6	823	44.8	373	20.3	169	9.2	282	15.3
Male	1,355	23.2	301	22.2	29	2.1	598	44.1	194	14.3	144	10.6	261	19.3
Female	1,218	20.8	289	23.7	21	1.7	541	44.4	187	15.4	108	8.9	185	15.2
Not Available	3,402	58.1	409	12.0	14	0.4	974	28.6	406	11.9	117	3.4	406	11.9
APPLICANT INCOME														
50%	1,851	31.6	435	23.5	29	1.6	680	36.7	195	10.5	113	6.1	253	13.7
1% to < 80%	2,298	39.3	443	19.3	24	1.0	892	38.8	310	13.5	132	5.7	333	14.5
80% to < 100%	1,164	19.9	189	16.2	15	1.3	443	38.1	177	15.2	77	6.6	170	14.6
100% to < 120%	786	13.4	106	13.5	8	1.0	318	40.5	142	18.1	37	4.7	104	13.2
>=120%	1,394	23.8	167	12.0	9	0.6	516	37.0	266	19.1	134	9.6	217	15.6
Not Available	321	5.5	19	5.9	8	2.5	87	27.1	70	21.8	45	14.0	57	17.8
TRACT INCOME														
Low	92	1.6	12	13.0	0	0.0	35	38.0	12	13.0	2	2.2	15	16.3
Moderate	1,226	21.0	167	13.6	11	0.9	486	39.6	149	12.2	63	5.1	178	14.5
Middle	4,458	76.2	757	17.0	48	1.1	1,716	38.5	675	15.1	290	6.5	623	14.0
Upper	2,038	34.8	423	20.8	34	1.7	699	34.3	324	15.9	183	9.0	318	15.6
Not Available	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
TRACT MINORITY														
< 10%	5,136	87.8	955	18.6	69	1.3	1,924	37.5	801	15.6	383	7.5	752	14.6
>= 10% to < 20%	831	14.2	116	14.0	7	0.8	301	36.2	134	16.1	62	7.5	133	16.0
>= 20% to < 50%	1,027	17.6	161	15.7	11	1.1	416	40.5	134	13.0	53	5.2	150	14.6
>= 50% to < 80%	674	11.5	108	16.0	5	0.7	242	35.9	76	11.3	30	4.5	74	11.0
>= 80%	146	2.5	19	13.0	1	0.7	53	36.3	15	10.3	10	6.8	25	17.1
Not Available	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
TOTALS	7,814	133.5	1,359	17.4	93	1.2	2,936	37.6	1,160	14.8	538	6.9	1,134	14.5

ential reasons were selected

ere were also 1963 Declined Applications with no reason given

'NCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
Purpose: Refinancing (3)
Loan Type: Conventional (1)
Owner Occupancy: All Owner Occupancy Codes
Criteria: ALL INSTITUTIONS
Year: 2002 **Analysis Perspective:** HMDA

Segment	Total Applications		Loans Originated		Applications Approved but not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness		Loans Purchased
	Number	%Total	Number	%Apps	Number	%Apps	Number	%Apps	Number	%Apps	Number	%Apps	Number
RACE:													
Native	91	0.3	34	37.4	14	15.4	27	29.7	13	14.3	3	3.3	4
Asian	239	0.8	181	75.7	22	9.2	28	11.7	8	3.3	0	0.0	24
Black	1,529	5.1	682	44.6	242	15.8	413	27.0	134	8.8	58	3.8	59
Hispanic	127	0.4	85	66.9	18	14.2	16	12.6	6	4.7	2	1.6	4
White	17,337	57.7	12,506	72.1	1,593	9.2	1,879	10.8	956	5.5	403	2.3	1,147
Joint	218	0.7	159	72.9	16	7.3	25	11.5	12	5.5	6	2.8	12
Other	560	1.9	277	49.5	15	2.7	143	25.5	55	9.8	70	12.5	43
Not Available	9,953	33.1	2,715	27.3	1,049	10.5	3,223	32.4	2,653	26.7	313	3.1	1,631
GENDER:													
Joint	11,975	39.8	8,725	72.9	1,056	8.8	1,270	10.6	662	5.5	262	2.2	880
Male	5,122	17.0	3,108	60.7	567	11.1	867	16.9	347	6.8	233	4.5	261
Female	4,360	14.5	2,683	61.5	469	10.8	761	17.5	302	6.9	145	3.3	235
Not Available	8,597	28.6	2,123	24.7	877	10.2	2,856	33.2	2,526	29.4	215	2.5	1,548
APPLICANT INCOME:													
50%	3,859	12.8	1,376	35.7	448	11.6	1,305	33.8	607	15.7	123	3.2	124
)% to < 80%	6,815	22.7	3,185	46.7	734	10.8	1,627	23.9	1,056	15.5	213	3.1	285
80% to < 100%	4,370	14.5	2,308	52.8	435	10.0	866	19.8	619	14.2	142	3.2	210
100% to < 120%	3,362	11.2	1,878	55.9	339	10.1	604	18.0	435	12.9	106	3.2	170
>=120%	9,533	31.7	6,424	67.4	833	8.7	1,126	11.8	923	9.7	227	2.4	679
Not Available	2,115	7.0	1,468	69.4	180	8.5	226	10.7	197	9.3	44	2.1	1,456
TRACT INCOME:													
Low	187	0.6	49	26.2	27	14.4	73	39.0	33	17.6	5	2.7	14
Moderate	2,761	9.2	920	33.3	367	13.3	879	31.8	497	18.0	98	3.5	198
Middle	14,549	48.4	7,047	48.4	1,526	10.5	3,277	22.5	2,231	15.3	468	3.2	1,198
Upper	12,557	41.8	8,623	68.7	1,049	8.4	1,525	12.1	1,076	8.6	284	2.3	1,514
Not Available	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0
TRACT MINORITY:													
< 10%	23,428	78.0	14,113	60.2	2,200	9.4	3,787	16.2	2,719	11.6	609	2.6	2,467
>= 10% to < 20%	2,736	9.1	1,372	50.1	275	10.1	622	22.7	373	13.6	94	3.4	222
>= 20% to < 50%	2,320	7.7	750	32.3	294	12.7	732	31.6	459	19.8	85	3.7	143
>= 50% to < 80%	1,266	4.2	329	26.0	145	11.5	499	39.4	233	18.4	60	4.7	75
>= 80%	304	1.0	75	24.7	55	18.1	114	37.5	53	17.4	7	2.3	17
Not Available	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0
TOTALS:	30,054	100.0	16,639	55.4	2,969	9.9	5,754	19.1	3,837	12.8	855	2.8	2,924

INCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
Purpose: All Purpose Code selected
Loan Type: All Loan Type Codes
Action: All Action Codes
Owner Occupancy: All Owner Occupancy Codes
Applicant Race: All Applicant Races
Applicant Sex: All Applicant Genders
Applicant Income: All Applicant Income Levels
Tract Income: All Tract Levels
Tract Minority: All Minority levels
Criteria: ALL INSTITUTIONS
Year: 2002 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
397	5219909990/7	MOUNTAIN STATES MORTGAGE CTRS	1	0.0	0.0	74	0.0	0.0
398	0000034127/3	SELECT BANK	1	0.0	0.0	67	0.0	0.0
399	1000200007/7	DIVERSIFIED CAPITAL CORP OF TN	1	0.0	0.0	67	0.0	0.0
400	0000002597/1	WELLS FARGO BANK NORTHWEST, NA	1	0.0	0.0	67	0.0	0.0
401	1141000000/7	CHALLENGE FINANCIAL INVESTORS	1	0.0	0.0	66	0.0	0.0
402	7929000008/7	HOME MORTGAGE ASSURED CORP.	1	0.0	0.0	65	0.0	0.0
403	7569700002/7	SUMMIT MORTGAGE CORPORATION	1	0.0	0.0	64	0.0	0.0
404	7399100004/7	MVB MORTGAGE CORPORATION	1	0.0	0.0	63	0.0	0.0
405	0000007938/4	WILMINGTON SAVINGS FUNDS SOCIE	1	0.0	0.0	55	0.0	0.0
406	1781500002/7	INSTAFI.COM	1	0.0	0.0	50	0.0	0.0
407	1538600007/7	HOMEPRIDE FINANCE CORP	1	0.0	0.0	45	0.0	0.0
408	1499700000/7	HOMETOWN MORTGAGE SERVICES	1	0.0	0.0	40	0.0	0.0
409	1474600000/7	HOMESTAR MORTGAGE SERVICES	1	0.0	0.0	39	0.0	0.0
410	0000004715/4	MERCER SAVINGS BANK	1	0.0	0.0	32	0.0	0.0
411	38-1620418/1	FIRST NATIONAL ACCEPTANCE CO.	1	0.0	0.0	31	0.0	0.0
412	0000023801/1	SOUTH COUNTY BANK	1	0.0	0.0	25	0.0	0.0
413	0000000209/1	FIRST NATIONAL BANK OF OMAHA	1	0.0	0.0	25	0.0	0.0
414	0002591847/2	UNIZAN BANC FINANCIAL SERVICES	1	0.0	0.0	23	0.0	0.0
415	0000138510/2	FIFTH THIRD BANK, NORTHERN KY	1	0.0	0.0	23	0.0	0.0
416	0000061623/5	KEMBA FINANCIAL CREDIT UNION	1	0.0	0.0	20	0.0	0.0
417	0000002449/1	MERCHANTS NATIONAL BANK	1	0.0	0.0	19	0.0	0.0
418	0000026647/3	FIRSTRUST BANK	1	0.0	0.0	16	0.0	0.0
419	33-0862379/3	GREENPOINT CREDIT, LLC	1	0.0	0.0	13	0.0	0.0
420	0000006288/5	FIRST RESOURCE FCU	1	0.0	0.0	11	0.0	0.0
421	0000023716/1	ASSOCIATED BANK ILLINOIS, N A	1	0.0	0.0	7	0.0	0.0
422	0000023444/1	WELLS FARGO BANK NEVADA, NA	1	0.0	0.0	4	0.0	0.0
GROUP TOTALS			50,858	100.0	100.0	5,377,004	100.0	100.0
OTHER INSTTUTIONS			0		0.0	0		0.0
MARKET TOTALS			50,858		100.0	5,377,004		100.0

TE: Applications include Purchased Loans, Balances are in thousands

INCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
Purpose: All Purpose Codes selected
Loan Type: All Loan Type Codes
Owner Occupancy: All Owner Occupancy Codes
Criteria: ALL INSTITUTIONS
Year: 2002 **Analysis Perspective:** HMDA

Segment	Total Applications		Conventional		FHA		VA		FSA/RHS	
	Number	%Total	Number	%Apps	Number	%Apps	Number	%Apps	Number	%Apps
RACE:										
Native	206	0.5	125	60.7	70	34.0	11	5.3	0	0.0
Asian	437	1.0	409	93.6	27	6.2	1	0.2	0	0.0
Black	3,038	6.8	2,463	81.1	419	13.8	155	5.1	1	0.0
Hispanic	235	0.5	197	83.8	27	11.5	11	4.7	0	0.0
White	29,869	66.7	26,082	87.3	2,889	9.7	896	3.0	2	0.0
Joint	459	1.0	354	77.1	62	13.5	43	9.4	0	0.0
Other	750	1.7	682	90.9	57	7.6	11	1.5	0	0.0
Not Available	15,864	35.4	14,547	91.7	986	6.2	330	2.1	1	0.0
GENDER:										
Joint	19,604	43.8	17,238	87.9	1,608	8.2	757	3.9	1	0.0
Male	9,464	21.1	7,993	84.5	1,130	11.9	339	3.6	2	0.0
Female	8,066	18.0	6,924	85.8	1,061	13.2	81	1.0	0	0.0
Not Available	13,724	30.6	12,704	92.6	738	5.4	281	2.0	1	0.0
APPLICANT INCOME:										
50%	6,202	13.8	5,583	90.0	569	9.2	50	0.8	0	0.0
J% to < 80%	11,433	25.5	9,918	86.7	1,272	11.1	242	2.1	1	0.0
80% to < 100%	6,987	15.6	6,235	89.2	557	8.0	195	2.8	0	0.0
100% to < 120%	5,224	11.7	4,773	91.4	327	6.3	124	2.4	0	0.0
>=120%	14,026	31.3	13,497	96.2	329	2.3	198	1.4	2	0.0
Not Available	6,986	15.6	4,853	69.5	1,483	21.2	649	9.3	1	0.0
TRACT INCOME:										
Low	273	0.6	253	92.7	19	7.0	1	0.4	0	0.0
Moderate	4,530	10.1	3,930	86.8	497	11.0	102	2.3	1	0.0
Middle	24,758	55.3	21,374	86.3	2,693	10.9	689	2.8	2	0.0
Upper	21,297	47.5	19,302	90.6	1,328	6.2	666	3.1	1	0.0
Not Available	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
TRACT MINORITY:										
< 10%	39,899	89.1	35,365	88.6	3,505	8.8	1,026	2.6	3	0.0
>= 10% to < 20%	4,803	10.7	3,950	82.2	507	10.6	346	7.2	0	0.0
>= 20% to < 50%	3,806	8.5	3,375	88.7	374	9.8	57	1.5	0	0.0
>= 50% to < 80%	1,924	4.3	1,773	92.2	123	6.4	27	1.4	1	0.1
>= 80%	426	1.0	396	93.0	28	6.6	2	0.5	0	0.0
Not Available	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
TOTALS:	50,858	113.5	44,859	88.2	4,537	8.9	1,458	2.9	4	0.0

'NCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
Purpose: Home Purchase (1)
Loan Type: Conventional (1)
Owner Occupancy: All Owner Occupancy Codes
Criteria: ALL INSTITUTIONS
Year: 2002 **Analysis Perspective:** HMDA

Segment	Total Applications (Including Purchases)		Loans Originated (Including Purchases)		Applications Approved but not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness		Loans Purchased	
	Number	%Total	Number	%Apps	Number	%Apps	Number	%Apps	Number	%Apps	Number	%Apps	Number	%Apps
RACE:														
Native	22	0.2	12	54.5	4	18.2	3	13.6	1	4.5	2	9.1	0	0.0
Asian	140	1.5	108	77.1	14	10.0	11	7.9	4	2.9	3	2.1	13	9.3
Black	651	6.9	405	62.2	72	11.1	100	15.4	39	6.0	35	5.4	33	5.1
Hispanic	58	0.6	48	82.8	3	5.2	5	8.6	2	3.4	0	0.0	6	10.3
White	6,261	66.6	5,105	81.5	391	6.2	456	7.3	226	3.6	83	1.3	559	8.9
Joint	98	1.0	81	82.7	5	5.1	10	10.2	2	2.0	0	0.0	11	11.2
Other	69	0.7	53	76.8	1	1.4	7	10.1	4	5.8	4	5.8	1	1.4
Not Available	2,103	22.4	1,513	71.9	147	7.0	255	12.1	127	6.0	61	2.9	905	43.0
GENDER:														
Joint	3,622	38.5	2,980	82.3	233	6.4	226	6.2	133	3.7	50	1.4	314	8.7
Male	2,110	22.4	1,574	74.6	154	7.3	223	10.6	96	4.5	63	3.0	167	7.9
Female	1,912	20.3	1,464	76.6	139	7.3	202	10.6	72	3.8	35	1.8	164	8.6
Not Available	1,758	18.7	1,307	74.3	111	6.3	196	11.1	104	5.9	40	2.3	883	50.2
APPLICANT INCOME:														
50%	1,182	12.6	713	60.3	106	9.0	260	22.0	69	5.8	34	2.9	81	6.9
)% to < 80%	2,125	22.6	1,532	72.1	184	8.7	259	12.2	100	4.7	50	2.4	164	7.7
80% to < 100%	1,261	13.4	969	76.8	90	7.1	122	9.7	50	4.0	30	2.4	127	10.1
100% to < 120%	957	10.2	773	80.8	59	6.2	64	6.7	42	4.4	19	2.0	80	8.4
>=120%	2,744	29.2	2,302	83.9	165	6.0	118	4.3	110	4.0	49	1.8	255	9.3
Not Available	1,133	12.1	1,036	91.4	33	2.9	24	2.1	34	3.0	6	0.5	821	72.5
TRACT INCOME:														
Low	30	0.3	21	70.0	2	6.7	5	16.7	1	3.3	1	3.3	4	13.3
Moderate	658	7.0	392	59.6	67	10.2	141	21.4	34	5.2	24	3.6	87	13.2
Middle	4,227	45.0	3,127	74.0	320	7.6	469	11.1	202	4.8	109	2.6	681	16.1
Upper	4,487	47.7	3,785	84.4	248	5.5	232	5.2	168	3.7	54	1.2	756	16.8
Not Available	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
TRACT MINORITY:														
< 10%	7,676	81.6	6,186	80.6	481	6.3	571	7.4	306	4.0	132	1.7	1,254	16.3
>= 10% to < 20%	764	8.1	572	74.9	55	7.2	85	11.1	37	4.8	15	2.0	128	16.8
>= 20% to < 50%	649	6.9	403	62.1	72	11.1	120	18.5	35	5.4	19	2.9	103	15.9
>= 50% to < 80%	274	2.9	146	53.3	28	10.2	61	22.3	21	7.7	18	6.6	38	13.9
>= 80%	39	0.4	18	46.2	1	2.6	10	25.6	6	15.4	4	10.3	5	12.8
Not Available	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
TOTALS:	9,402	100.0	7,325	77.9	637	6.8	847	9.0	405	4.3	188	2.0	1,528	16.3

'NCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
Purpose: All Purpose Codes selected
Loan Type: All Loan Type Codes
Owner Occupancy: All Owner Occupancy Codes
Criteria: ALL INSTITUTIONS
Year: 2002 **Analysis Perspective:** HMDA

Segment	Total Applications (Including Purchases)		Loans Originated (Including Purchases)		Applications Approved but not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness		Loans Purchased	
	Number	%Total	Number	%Apps	Number	%Apps	Number	%Apps	Number	%Apps	Number	%Apps	Number	%Apps
RACE:														
Native	206	0.4	123	59.7	23	11.2	35	17.0	18	8.7	7	3.4	6	2.9
Asian	437	0.9	342	78.3	37	8.5	43	9.8	12	2.7	3	0.7	44	10.1
Black	3,038	6.0	1,644	54.1	373	12.3	711	23.4	208	6.8	102	3.4	185	6.1
Hispanic	235	0.5	173	73.6	23	9.8	26	11.1	11	4.7	2	0.9	15	6.4
White	29,869	58.7	22,746	76.2	2,288	7.7	2,923	9.8	1,363	4.6	549	1.8	2,358	7.9
Joint	459	0.9	353	76.9	24	5.2	55	12.0	20	4.4	7	1.5	39	8.5
Other	750	1.5	427	56.9	16	2.1	164	21.9	62	8.3	81	10.8	46	6.1
Not Available	15,864	31.2	7,313	46.1	1,351	8.5	3,857	24.3	2,938	18.5	405	2.6	3,360	21.2
GENDER:														
Joint	19,604	38.5	15,030	76.7	1,468	7.5	1,839	9.4	913	4.7	354	1.8	1,597	8.1
Male	9,464	18.6	6,436	68.0	829	8.8	1,355	14.3	522	5.5	322	3.4	672	7.1
Female	8,066	15.9	5,491	68.1	717	8.9	1,218	15.1	437	5.4	203	2.5	596	7.4
Not Available	13,724	27.0	6,164	44.9	1,121	8.2	3,402	24.8	2,760	20.1	277	2.0	3,188	23.2
APPLICANT INCOME:														
50%	6,202	12.2	2,824	45.5	641	10.3	1,851	29.8	720	11.6	166	2.7	271	4.4
/% to < 80%	11,433	22.5	6,538	57.2	1,052	9.2	2,298	20.1	1,255	11.0	290	2.5	707	6.2
80% to < 100%	6,987	13.7	4,320	61.8	599	8.6	1,164	16.7	722	10.3	182	2.6	464	6.6
100% to < 120%	5,224	10.3	3,335	63.8	453	8.7	786	15.0	512	9.8	138	2.6	335	6.4
>=120%	14,026	27.6	10,132	72.2	1,111	7.9	1,394	9.9	1,094	7.8	295	2.1	1,012	7.2
Not Available	6,986	13.7	5,972	85.5	279	4.0	321	4.6	329	4.7	85	1.2	3,264	46.7
TRACT INCOME:														
Low	273	0.5	107	39.2	34	12.5	92	33.7	34	12.5	6	2.2	25	9.2
Moderate	4,530	8.9	2,107	46.5	485	10.7	1,226	27.1	574	12.7	138	3.0	463	10.2
Middle	24,758	48.7	14,859	60.0	2,130	8.6	4,458	18.0	2,672	10.8	639	2.6	2,785	11.2
Upper	21,297	41.9	16,048	75.4	1,486	7.0	2,038	9.6	1,352	6.3	373	1.8	2,780	13.1
Not Available	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
TRACT MINORITY:														
< 10%	39,899	78.5	27,571	69.1	3,079	7.7	5,136	12.9	3,292	8.3	821	2.1	4,968	12.5
>= 10% to < 20%	4,803	9.4	3,004	62.5	381	7.9	831	17.3	463	9.6	124	2.6	558	11.6
>= 20% to < 50%	3,806	7.5	1,705	44.8	412	10.8	1,027	27.0	547	14.4	115	3.0	346	9.1
>= 50% to < 80%	1,924	3.8	701	36.4	200	10.4	674	35.0	266	13.8	83	4.3	148	7.7
>= 80%	426	0.8	140	32.9	63	14.8	146	34.3	64	15.0	13	3.1	33	7.7
Not Available	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
TOTALS:	50,858	100.0	33,121	65.1	4,135	8.1	7,814	15.4	4,632	9.1	1,156	2.3	6,053	11.9

INCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
Purpose: Home Purchase (1)
Loan Type: Conventional (1)
Action: All Action Codes
Owner Occupancy: All Owner Occupancy Codes
Applicant Race: All Applicant Races
Applicant Sex: All Applicant Genders
Applicant Income: All Applicant Income Levels
Tract Income: All Tract Levels
Tract Minority: All Minority levels
Criteria: ALL INSTITUTIONS
Year: 2002 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
1	0002712969/2	FIFTH THIRD MORTGAGE COMPANY	720	7.6	7.6	98,012	9.2	9.2
2	31-0856949/1	NATIONAL CITY MORTGAGE COMPANY	598	6.3	6.3	73,576	6.9	6.9
3	0001644643/2	COUNTRYWIDE HOME LOANS	508	5.4	5.4	59,390	5.6	5.6
4	95-2318940/1	WELLS FARGO HOME MORTGAGE	428	4.5	4.5	55,917	5.2	5.2
5	0000000786/1	NATIONAL CITY BANK	369	3.9	3.9	32,574	3.0	3.0
6	0000008109/4	UNION SAVINGS BANK	357	3.7	3.7	40,435	3.8	3.8
7	36-4114231/1	FIRST FRANKLIN FINANCIAL CORP.	309	3.2	3.2	19,890	1.8	1.8
8	36-3744610/1	ABN AMRO MORTGAGE GROUP, INC	307	3.2	3.2	34,746	3.2	3.2
9	0000008551/4	WASHINGTON MUTUAL BANK, FA	255	2.7	2.7	29,160	2.7	2.7
10	0000020001/3	REPUBLIC BANK	223	2.3	2.3	23,310	2.2	2.2
11	4216200005/7	GMAC MORTGAGE	181	1.9	1.9	21,237	2.0	2.0
12	7731100009/7	LEGACY MORTGAGE	167	1.7	1.7	21,914	2.0	2.0
13	0341151450/4	LIBERTY LENDING SERVICES, INC	165	1.7	1.7	17,518	1.6	1.6
14	3813209993/7	SCHMIDT MORTGAGE COMPANY	160	1.7	1.7	21,379	2.0	2.0
15	0000008412/4	FLAGSTAR BANK	160	1.7	1.7	19,522	1.8	1.8
16	0000000024/1	US BANK, N.A.	157	1.6	1.6	18,156	1.7	1.7
17	0000008039/4	LIBERTY SAVINGS BANK, FSB	147	1.5	1.5	14,756	1.3	1.3
18	0000004072/4	OHIO SAVINGS BANK	136	1.4	1.4	22,158	2.0	2.0
19	2295609996/7	RESIDENTIAL FUNDING CORPORATIO	126	1.3	1.3	11,450	1.0	1.0
20	1265700002/7	DECISION ONE MORTGAGE	122	1.2	1.2	11,494	1.0	1.0
21	3027509990/7	CENDANT MORTGAGE	118	1.2	1.2	15,813	1.4	1.4
22	0000001156/4	FIRST PLACE BANK	117	1.2	1.2	19,687	1.8	1.8
23	7527300003/7	NVR MORTGAGE FINANCE, INC.	116	1.2	1.2	20,742	1.9	1.9
24	1374500006/7	TRUSTCORP MORTGAGE COMPANY	97	1.0	1.0	11,709	1.1	1.1
25	7775100007/7	MILA, INC	92	0.9	0.9	9,203	0.8	0.8
26	0000006069/4	LEHMAN BROTHERS BANK, FSB	89	0.9	0.9	8,975	0.8	0.8
27	7604800006/7	OPTION ONE MORTGAGE CORP.	87	0.9	0.9	7,649	0.7	0.7
28	59-2645397/1	NATIONAL CITY HOME LOAN SERVIC	86	0.9	0.9	8,349	0.7	0.7
29	0000007621/1	BANK ONE, NA	81	0.8	0.8	9,520	0.8	0.8
30	0000013044/1	BANK OF AMERICA, N.A.	80	0.8	0.8	11,275	1.0	1.0
31	31-1690008/5	WRIGHT-PATT FINANCIAL GROUP, L	67	0.7	0.7	7,049	0.6	0.6
32	0000015642/4	GMAC BANK	64	0.6	0.6	6,948	0.6	0.6
33	7185300006/7	ACCREDITED HOME LENDERS, INC.	64	0.6	0.6	4,913	0.4	0.4
34	0000007975/4	USAA FEDERAL SAVINGS BANK	60	0.6	0.6	7,647	0.7	0.7
35	0000014761/1	KEYBANK NATIONAL ASSOCIATION	55	0.5	0.5	6,143	0.5	0.5
36	0001612400/2	CHASE MANHATTAN MORTGAGE CORP	53	0.5	0.5	6,580	0.6	0.6

NOTE: Applications include Purchased Loans, Balances are in thousands

INCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
Purpose: Home Purchase (1)
Loan Type: Conventional (1)
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Applicant Race: All Applicant Races
Applicant Sex: All Applicant Genders
Applicant Income: All Applicant Income Levels
Tract Income: All Tract Levels
Tract Minority: All Minority levels
Criteria: ALL INSTITUTIONS
Year: 2002 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
37	0002977151/2	CITIFINANCIAL MORTGAGE COMPANY	52	0.5	0.5	5,078	0.4	0.4
38	0000023446/1	US BANK NORTH DAKOTA	52	0.5	0.5	4,896	0.4	0.4
39	0001999138/2	THE CIT GROUP/CONSUMER FINANCE	52	0.5	0.5	4,369	0.4	0.4
40	95-2622032/7	AAMES FINANCIAL CORPORATION	52	0.5	0.5	3,350	0.3	0.3
41	31-0881021/1	THE HUNTINGTON MORTGAGE CO.	46	0.4	0.4	6,175	0.5	0.5
42	7564000004/7	PRINCIPAL RESIDENTIAL MTG,INC.	44	0.4	0.4	4,913	0.4	0.4
43	36-1239445/7	HOUSEHOLD FINANCE CORPORATION	44	0.4	0.4	4,101	0.3	0.3
44	7506600003/7	OAKWOOD ACCEPTANCE CORPORATION	44	0.4	0.4	2,600	0.2	0.2
45	0000007745/1	THE HUNTINGTON NATIONAL BANK	44	0.4	0.4	1,118	0.1	0.1
46	0002752527/2	EQUIFIRST CORPORATION	43	0.4	0.4	4,061	0.3	0.3
47	3919409997/7	AEGIS MORTGAGE CORPORATION	43	0.4	0.4	3,619	0.3	0.3
48	0000576710/2	SKY BANK	42	0.4	0.4	4,611	0.4	0.4
49	1851400008/7	SEBRING CAPITAL PARTNERS, LP	42	0.4	0.4	3,679	0.3	0.3
50	7909100002/7	HOMECOMINGS FINANCIAL NETWORK	40	0.4	0.4	4,033	0.3	0.3
51	54-1779092/7	ORIGEN FINANCIAL, INC	37	0.3	0.3	1,397	0.1	0.1
52	0000023160/1	CHASE MANHATTAN BANK USA, NA	33	0.3	0.3	1,166	0.1	0.1
53	7177000002/7	MERITAGE MORTGAGE CORPORATION	32	0.3	0.3	1,884	0.1	0.1
54	41-1704421/1	WELLS FARGO FUNDING	31	0.3	0.3	5,727	0.5	0.5
55	7900200006/7	NEW CENTURY MORTGAGE CORP.	31	0.3	0.3	2,675	0.2	0.2
56	3831400006/7	RYLAND MORTGAGE COMPANY	30	0.3	0.3	4,453	0.4	0.4
57	6480209999/7	MASTER FINANCIAL, INC	29	0.3	0.3	2,376	0.2	0.2
58	7493900007/7	DAVID MORTGAGE, INC.	28	0.2	0.2	3,794	0.3	0.3
59	0000001741/1	WELLS FARGO BANK, NA	27	0.2	0.2	710	0.0	0.0
60	13-2999081/1	CITIMORTGAGE, INC.	26	0.2	0.2	4,182	0.3	0.3
61	1375809998/7	CUNA MUTUAL MORTGAGE	26	0.2	0.2	3,010	0.2	0.2
62	0000014501/1	UNIZAN BANK NATIONAL ASSOC.	26	0.2	0.2	2,447	0.2	0.2
63	0000023927/1	THE CITIZENS NATIONAL BANK OF	25	0.2	0.2	5,329	0.5	0.5
64	0000006381/4	METROPOLITAN BANK AND TRUST CO	24	0.2	0.2	3,896	0.3	0.3
65	1289800005/7	MORTGAGE EXPRESS, INC.	23	0.2	0.2	2,554	0.2	0.2
66	0001088890/2	IRWIN MORTGAGE	23	0.2	0.2	2,445	0.2	0.2
67	0000017595/1	COMMUNITY NATIONAL BANK	23	0.2	0.2	1,692	0.1	0.1
68	0000723112/2	FIFTH THIRD BANK	23	0.2	0.2	1,040	0.0	0.0
69	0000009462/3	FARMERS & MERCHANTS BANK	22	0.2	0.2	2,423	0.2	0.2
70	3837309996/7	FIRST EQUITY MORTGAGEWARE	21	0.2	0.2	4,581	0.4	0.4
71	3842009994/7	COLONY MORTGAGE CORPORATION	21	0.2	0.2	2,071	0.1	0.1
72	0000027642/3	ADVANTAGE BANK	21	0.2	0.2	2,053	0.1	0.1

NOTE: Applications include Purchased Loans, Balances are in thousands

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Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
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Applicant Income: All Applicant Income Levels
Tract Income: All Tract Levels
Tract Minority: All Minority levels
Criteria: ALL INSTITUTIONS

Year: 2001 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
1	0000000786/1	NATIONAL CITY BANK	3,154	6.5	6.5	217,332	4.6	4.6
2	31-0856949/1	NATIONAL CITY MORTGAGE COMPANY	2,937	6.1	6.1	352,143	7.6	7.6
3	0000007621/1	BANK ONE, NA	2,612	5.4	5.4	194,464	4.2	4.2
4	0002712969/2	FIFTH THIRD MORTGAGE COMPANY	2,195	4.5	4.5	273,683	5.9	5.9
5	36-3744610/1	ABN AMRO MORTGAGE GROUP, INC.	1,778	3.7	3.7	193,113	4.1	4.1
6	6414109995/7	COUNTRYWIDE HOME LOANS	1,663	3.4	3.4	178,601	3.8	3.8
7	0000008109/4	UNION SAVINGS BANK	1,518	3.1	3.1	158,675	3.4	3.4
8	51-0003820/7	BENEFICIAL CORPORATION	1,395	2.9	2.9	121,257	2.6	2.6
9	95-2318940/1	WELLS FARGO HOME MORTGAGE	1,316	2.7	2.7	152,291	3.2	3.2
10	36-1239445/7	HOUSEHOLD FINANCE CORPORATION	1,221	2.5	2.5	123,163	2.6	2.6
11	0000008412/4	FLAGSTAR BANK, FSB	1,180	2.4	2.4	128,751	2.7	2.7
12	4216200005/7	GMAC MORTGAGE	1,092	2.2	2.2	96,743	2.0	2.0
13	0000000024/1	US BANK, N.A.	961	2.0	2.0	69,307	1.4	1.4
14	0000020001/3	REPUBLIC BANK	753	1.5	1.5	86,776	1.8	1.8
15	0000023160/1	CHASE MANHATTAN BANK USA, NA	686	1.4	1.4	30,496	0.6	0.6
16	0341151450/4	LIBERTY LENDING SERVICES, INC.	666	1.3	1.3	76,723	1.6	1.6
17	0000008039/4	LIBERTY SAVINGS BANK, FSB	655	1.3	1.3	66,886	1.4	1.4
18	0680267088/4	NORTH AMERICAN MORTGAGE CO	636	1.3	1.3	68,564	1.4	1.4
19	3919409997/7	AEGIS MORTGAGE CORPORATION	612	1.2	1.2	53,534	1.1	1.1
20	0000008551/4	WASHINGTON MUTUAL BANK, FA	562	1.1	1.1	61,878	1.3	1.3
21	0002977151/2	CITIFINANCIAL MORTGAGE COMPANY	533	1.1	1.1	39,945	0.8	0.8
22	2295609996/7	RESIDENTIAL FUNDING CORPORATIO	512	1.0	1.0	39,741	0.8	0.8
23	7756600001/7	AMERIQUEST MORTGAGE COMPANY	467	0.9	0.9	46,001	0.9	0.9
24	1374500006/7	TRUSTCORP MORTGAGE COMPANY	420	0.8	0.8	52,352	1.1	1.1
25	0001999138/2	THE CIT GROUP/CONSUMER FINANCE	413	0.8	0.8	35,481	0.7	0.7
26	56-1796719/1	NATIONSCREDIT FINANCIAL SERVIC	402	0.8	0.8	41,664	0.9	0.9
27	0000723112/2	FIFTH THIRD BANK	376	0.7	0.7	13,137	0.2	0.2
28	0000022908/1	KEY BANK USA, N.A.	365	0.7	0.7	15,076	0.3	0.3
29	36-4114231/1	FIRST FRANKLIN FINANCIAL CORP.	353	0.7	0.7	26,135	0.5	0.5
30	95-2622032/7	AAMES FUNDING CORPORATION	348	0.7	0.7	22,491	0.4	0.4
31	22-1092200/1	CHASE MANHATTAN MORTGAGE CORP	317	0.6	0.6	34,152	0.7	0.7
32	0000006809/4	COLONIAL SAVINGS, F.A.	313	0.6	0.6	32,118	0.6	0.6
33	1265700002/7	DECISION ONE MORTGAGE COMPANY	306	0.6	0.6	30,743	0.6	0.6
34	7731100009/7	LEGACY MORTGAGE	293	0.6	0.6	38,819	0.8	0.8
35	0001078369/2	REGIONS MORTGAGE, INC.	293	0.6	0.6	31,703	0.6	0.6
36	0000022559/1	FIRST UNION NATIONAL BANK - DE	286	0.5	0.5	24,284	0.5	0.5

TE Applications include Purchased Loans, Balances are in thousands

MARKET SHARE ANALYSIS
INSTITUTION LEVEL

INCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
Purpose: All Purpose Code selected
Loan Type: All Loan Type Codes
Action: All Action Codes
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Applicant Race: All Applicant Races
Applicant Sex: All Applicant Genders
Applicant Income: All Applicant Income Levels
Tract Income: All Tract Levels
Tract Minority: All Minority levels
Criteria: ALL INSTITUTIONS

Year: 2001 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
37	0000014761/1	KEYBANK NATIONAL ASSOCIATION	284	0.5	0.5	18,117	0.3	0.3
38	7604800006/7	OPTION ONE MORTGAGE CORP.	280	0.5	0.5	24,699	0.5	0.5
39	0132729067/4	NAMCO ASSET MANAGEMENT, INC	276	0.5	0.5	29,084	0.6	0.6
40	0000034536/3	CONSECO BANK, INC.	275	0.5	0.5	22,418	0.4	0.4
41	0000860473/2	CITIFINANCIAL, INC.	269	0.5	0.5	16,509	0.3	0.3
42	0000066328/5	WRIGHT-PATT CREDIT UNION, INC	256	0.5	0.5	7,120	0.1	0.1
43	7069000008/7	DELTA FUNDING CORP	249	0.5	0.5	20,590	0.4	0.4
44	75-2921540/7	CENTEX HOME EQUITY COMPANY LLC	244	0.5	0.5	20,755	0.4	0.4
45	3027509990/7	CENDANT MORTGAGE	241	0.5	0.5	28,384	0.6	0.6
46	7185300006/7	ACCREDITED HOME LENDERS, INC.	224	0.4	0.4	18,563	0.4	0.4
47	31-1690008/5	WRIGHT-PATT FINANCIAL GROUP, L	211	0.4	0.4	21,742	0.4	0.4
48	0000000200/1	FLEET NATIONAL BANK	206	0.4	0.4	21,383	0.4	0.4
49	0000002630/4	M&I BANK FSB	203	0.4	0.4	21,316	0.4	0.4
50	7606200003/7	RBMG, INC.	200	0.4	0.4	20,911	0.4	0.4
51	13-2999081/1	CITIMORTGAGE INC.	196	0.4	0.4	24,356	0.5	0.5
52	3813209993/7	SCHMIDT MORTGAGE COMPANY	195	0.4	0.4	22,095	0.4	0.4
53	2294709990/7	CONSECO FINANCE SERVICING CORP	193	0.4	0.4	31,583	0.6	0.6
54	31-0881021/1	THE HUNTINGTON MORTGAGE CO.	188	0.3	0.3	22,071	0.4	0.4
55	0000008566/4	SUPERIOR BANK FSB	188	0.3	0.3	16,213	0.3	0.3
56	0000004072/4	OHIO SAVINGS BANK	187	0.3	0.3	27,100	0.5	0.5
57	3833009998/7	AMERICAN MORTGAGE SERVICE COMP	183	0.3	0.3	17,338	0.3	0.3
58	0000013044/1	BANK OF AMERICA, N.A.	179	0.3	0.3	20,018	0.4	0.4
59	0001478802/2	HOMESIDE MORTGAGE, INC.	179	0.3	0.3	19,585	0.4	0.4
60	1611300007/7	EQUITY RESOURCES, INC.	174	0.3	0.3	13,580	0.2	0.2
61	52-2113031/1	HOMEOWNERS LOAN CORP	170	0.3	0.3	12,979	0.2	0.2
62	2182009998/7	WASHTENAW MORTGAGE COMPANY	162	0.3	0.3	16,689	0.3	0.3
63	41-1704421/1	WELLS FARGO FUNDING	161	0.3	0.3	24,272	0.5	0.5
64	7564000004/7	PRINCIPAL RESIDENTIAL MTG,INC.	157	0.3	0.3	17,519	0.3	0.3
65	0232646780/7	AMERICAN BUSINESS FINANCIAL	157	0.3	0.3	9,821	0.2	0.2
66	0000006069/4	LEHMAN BROTHERS BANK, FSB	150	0.3	0.3	14,697	0.3	0.3
67	59-2645397/1	ALTEGRA CREDIT COMPANY	134	0.2	0.2	11,682	0.2	0.2
68	0000612618/2	PROVIDENT BANK	134	0.2	0.2	7,917	0.1	0.1
69	0000006194/4	HOUSEHOLD BANK, F.S.B.	133	0.2	0.2	12,315	0.2	0.2
70	0000064970/5	UNIVERSAL CREDIT UNION, INC.	129	0.2	0.2	4,135	0.0	0.0
71	0000001156/4	FIRST PLACE BANK	128	0.2	0.2	19,944	0.4	0.4
72	0000000164/1	FIRST NATIONAL BANK	120	0.2	0.2	12,792	0.2	0.2

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MARKET SHARE ANALYSIS
INSTITUTION LEVEL

INCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
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Applicant Income: All Applicant Income Levels
Tract Income: All Tract Levels
Tract Minority: All Minority levels
Criteria: ALL INSTITUTIONS

Year: 2001 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
73	0000024095/1	MBNA AMERICA (DELAWARE), N.A.	119	0.2	0.2	9,362	0.2	0.2
74	59-3324910/7	HOMEGOLD INC.	117	0.2	0.2	11,511	0.2	0.2
75	0001073560/2	FIRST UNION MORTGAGE CORP.	113	0.2	0.2	12,797	0.2	0.2
76	0000014470/4	TRAVELERS BANK & TRUST, FSB	113	0.2	0.2	10,356	0.2	0.2
77	0002752527/2	EQUIFIRST CORPORATION	112	0.2	0.2	13,318	0.2	0.2
78	0000066835/5	DAY AIR CREDIT UNION	112	0.2	0.2	6,093	0.1	0.1
79	0000060885/5	DAYMET CREDIT UNION	112	0.2	0.2	4,483	0.0	0.0
80	7909100002/7	HOMECOMINGS FINANCIAL NETWORK	110	0.2	0.2	12,093	0.2	0.2
81	0001088890/2	IRWIN MORTGAGE CORPORATION	109	0.2	0.2	12,114	0.2	0.2
82	0341225701/4	CHARTER ONE CREDIT CORPORATION	107	0.2	0.2	8,556	0.1	0.1
83	0000007975/4	USAA FEDERAL SAVINGS BANK	106	0.2	0.2	12,906	0.2	0.2
84	0000014141/1	BROOKVILLE NATIONAL BANK	106	0.2	0.2	7,090	0.1	0.1
85	35-2088209/7	CRESLEIGH FINANCIAL SERVICES	105	0.2	0.2	8,862	0.1	0.1
86	7765600003/7	MAC-CLAIR MORTGAGE CORP	101	0.2	0.2	9,709	0.2	0.2
87	1126000006/7	SEBRING CAPITAL CORPORATION	100	0.2	0.2	7,874	0.1	0.1
88	7527300003/7	NVR MORTGAGE FINANCE, INC.	98	0.2	0.2	15,524	0.3	0.3
89	10141000002/7	FULL SPECTRUM LENDING, INC.	98	0.2	0.2	8,545	0.1	0.1
90	7900200006/7	NEW CENTURY MORTGAGE CORP.	96	0.2	0.2	8,999	0.1	0.1
91	0000008529/4	UNION FEDERAL BANK OF INDPLS.	90	0.1	0.1	9,526	0.2	0.2
92	7715400000/7	CROSSMANN MORTGAGE CORPORATION	87	0.1	0.1	11,163	0.2	0.2
93	0000023446/1	US BANK NORTH DAKOTA	83	0.1	0.1	7,167	0.1	0.1
94	0000013349/1	UNION PLANTERS BANK, N.A.	81	0.1	0.1	8,199	0.1	0.1
95	0000017925/4	SUPERIOR FEDERAL BANK FSB	81	0.1	0.1	6,898	0.1	0.1
96	7810600004/7	PROVIDENT FUNDING ASSOCIATES,	79	0.1	0.1	10,821	0.2	0.2
97	0000003269/1	WELLS FARGO BANK WEST, NA	78	0.1	0.1	2,270	0.0	0.0
98	0000001316/1	PNC BANK NA	77	0.1	0.1	2,957	0.0	0.0
99	0000576710/2	SKY BANK - OHIO BANK REGION	76	0.1	0.1	9,167	0.1	0.1
100	0000015033/1	ADVANTA NATIONAL BANK	76	0.1	0.1	3,890	0.0	0.0
101	0000005848/4	E*TRADE BANK	71	0.1	0.1	13,460	0.2	0.2
102	0000007745/1	THE HUNTINGTON NATIONAL BANK	70	0.1	0.1	1,756	0.0	0.0
103	0000000711/4	FIRST SAVINGS BANK	69	0.1	0.1	6,448	0.1	0.1
104	3831400006/7	RYLAND MORTGAGE COMPANY	68	0.1	0.1	10,393	0.2	0.2
105	0741878850/4	GUARANTY RESIDENTIAL LENDING	66	0.1	0.1	7,046	0.1	0.1
106	0000002076/4	BROOKVILLE BUILDING & SAV ASSN	66	0.1	0.1	6,257	0.1	0.1
107	0134027208/4	SIB MORTGAGE CORP.	64	0.1	0.1	6,470	0.1	0.1
108	384200994/7	COLONY MORTGAGE CORPORATION	61	0.1	0.1	6,571	0.1	0.1

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Criteria: ALL INSTITUTIONS
Year: 2001 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
109	0002039488/2	WELLS FARGO FIN'L AMERICA, INC	61	0.1	0.1	5,826	0.1	0.1
110	39-1801203/3	GB HOME EQUITY	61	0.1	0.1	1,735	0.0	0.0
111	0000014362/1	LASALLE BANK NA	59	0.1	0.1	7,471	0.1	0.1
112	7775100007/7	MILA, INC.	59	0.1	0.1	4,103	0.0	0.0
113	0000006381/4	METROPOLITAN BANK AND TRUST	57	0.1	0.1	7,423	0.1	0.1
114	1003800004/7	LONG BEACH MORTGAGE COMPANY	57	0.1	0.1	5,275	0.1	0.1
115	0000000086/1	FIRST NAT'L BANK GERMANTOWN	57	0.1	0.1	2,604	0.0	0.0
116	0000025653/3	FREMONT INVESTMENT AND LOAN	56	0.1	0.1	4,948	0.1	0.1
117	7943800003/7	SAXON MORTGAGE, INC.	56	0.1	0.1	4,284	0.0	0.0
118	7840600009/7	BNC MORTGAGE INC	56	0.1	0.1	4,262	0.0	0.0
119	48-0875093/1	FIRST HORIZON HOME LOAN CORP.	55	0.1	0.1	5,635	0.1	0.1
120	0002971869/2	HOME EQUITY OF AMERICA, INC	54	0.1	0.1	3,674	0.0	0.0
121	0627009996/7	MERRILL LYNCH CREDIT CORP.	53	0.1	0.1	13,756	0.2	0.2
122	7506000003/7	OAKWOOD ACCEPTANCE CORPORATION	53	0.1	0.1	2,617	0.0	0.0
123	0000060143/2	COMERICA BANK	53	0.1	0.1	1,649	0.0	0.0
124	1248200000/7	AMERUS HOME EQUITY, INC	52	0.1	0.1	5,844	0.1	0.1
125	0000009462/3	FARMERS & MERCHANTS BANK	52	0.1	0.1	2,676	0.0	0.0
126	0000000336/1	FIRST TENNESSEE BANK N A	52	0.1	0.1	2,144	0.0	0.0
127	0000003692/4	MONROE FEDERAL SAVINS & LOAN	51	0.1	0.1	4,362	0.0	0.0
128	33-0862379/3	GREENPOINT CREDIT, LLC	49	0.1	0.1	1,725	0.0	0.0
129	1411700003/7	EQUITABLE MORTGAGE CORP	45	0.0	0.0	13,626	0.2	0.2
130	1118100001/7	MORTGAGE LENDERS NETWORK USA	45	0.0	0.0	4,539	0.0	0.0
131	0000004410/4	SOVEREIGN BANK	45	0.0	0.0	2,632	0.0	0.0
132	0000024256/1	FIRST INDIANA BANK / GTC942	45	0.0	0.0	2,626	0.0	0.0
133	0000004544/4	THIRD FEDERAL SAVINGS AND LOAN	44	0.0	0.0	7,328	0.1	0.1
134	05-0402708/7	ADVANCED FINANCIAL SERVICES, I	44	0.0	0.0	2,569	0.0	0.0
135	1437800009/7	E-LOAN, INC.	43	0.0	0.0	5,444	0.1	0.1
136	13-3210378/3	GREENPOINT MORTGAGE FUNDING, I	43	0.0	0.0	4,795	0.1	0.1
137	1463300003/7	MOORE FINANCIAL ENTERPRISES, I	43	0.0	0.0	3,164	0.0	0.0
138	3733609993/7	THE BANKERS G T & T CO.	42	0.0	0.0	4,625	0.1	0.1
139	0000003970/4	INDYMAC BK FSB	41	0.0	0.0	5,698	0.1	0.1
140	1458900002/7	NEXSTAR FINANCIAL CORPORATION	41	0.0	0.0	4,136	0.0	0.0
141	1200100006/7	MORTGAGE AMENITIES CORP.	40	0.0	0.0	3,439	0.0	0.0
142	0000017283/4	WAYPOINT BANK	40	0.0	0.0	317	0.0	0.0
143	0161146859/4	CHARTER ONE MORTGAGE CORP	39	0.0	0.0	6,072	0.1	0.1
144	7632300003/7	UNIVERSAL MORTAGE CORP	39	0.0	0.0	4,020	0.0	0.0

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MARKET SHARE ANALYSIS
INSTITUTION LEVEL

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Criteria: ALL INSTITUTIONS

Year: 2001 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
145	0000001235/4	CITIBANK, F.S.B.	38	0.0	0.0	5,183	0.1	0.1
146	0002914969/2	NCS MORTGAGE LENDING COMPANY	38	0.0	0.0	3,522	0.0	0.0
147	2467100004/7	JAMES B. NUTTER AND COMPANY	37	0.0	0.0	3,513	0.0	0.0
148	54-1779092/7	ORIGEN FINANCIAL, INC	34	0.0	0.0	1,401	0.0	0.0
149	3837309996/7	FIRST EQUITY MORTGAGE INC.	32	0.0	0.0	6,044	0.1	0.1
150	0510356097/4	WILMINGTON NATIONAL FINANCE	32	0.0	0.0	3,960	0.0	0.0
151	1512400000/7	NOVASTAR MORTGAGE INC.	32	0.0	0.0	3,912	0.0	0.0
152	0000005536/5	NAVY FEDERAL CREDIT UNION	32	0.0	0.0	2,847	0.0	0.0
153	4856500006/7	VANDERBILT MORTGAGE	32	0.0	0.0	1,286	0.0	0.0
154	0000014191/4	MIDFIRST BANK	32	0.0	0.0	1,090	0.0	0.0
155	0000002641/4	CHARTER ONE BANK	30	0.0	0.0	4,957	0.1	0.1
156	0001966578/2	M&T MORTGAGE CORPORATION	30	0.0	0.0	3,416	0.0	0.0
157	0000000993/4	PEOPLES SAVINGS BANK	30	0.0	0.0	3,210	0.0	0.0
158	0000021699/1	GOLETA NATIONAL BANK	30	0.0	0.0	1,635	0.0	0.0
159	0593606823/4	NATIONAL MORTGAGE CENTER DBA	29	0.0	0.0	3,333	0.0	0.0
160	0000000056/1	FIRST SOUTHWESTERN	29	0.0	0.0	2,458	0.0	0.0
161	0000006199/5	RIVER VALLEY CREDIT UNION	29	0.0	0.0	1,088	0.0	0.0
162	0001072246/2	SUNTRUST MORTGAGE, INC	28	0.0	0.0	3,074	0.0	0.0
163	7362200006/7	BROADVIEW MORTGAGE COMPANY	28	0.0	0.0	2,830	0.0	0.0
164	7464900009/7	EMC MORTGAGE CORPORATION	28	0.0	0.0	2,351	0.0	0.0
165	0000003043/4	NEW CARLISLE FEDERAL S.B.	27	0.0	0.0	2,677	0.0	0.0
166	36-2677063/7	MSDW CREDIT CORPORATION	26	0.0	0.0	2,875	0.0	0.0
167	0458600405/7	WMC MORTGAGE CORP.	26	0.0	0.0	2,231	0.0	0.0
168	1375809998/7	CUNA MUTUAL MORTGAGE	25	0.0	0.0	2,691	0.0	0.0
169	0000130943/2	IRWIN UNION BANK AND TRUST COM	25	0.0	0.0	1,085	0.0	0.0
170	0000005099/4	CALIFORNIA FEDERAL BANK	24	0.0	0.0	8,127	0.1	0.1
171	0752544166/4	FIRST NATIONWIDE MORTGAGE CORP	24	0.0	0.0	2,992	0.0	0.0
172	7177000002/7	MERITAGE MORTGAGE CORPORATION	24	0.0	0.0	2,420	0.0	0.0
173	1289800005/7	MORTGAGE EXPRESS, INC.	23	0.0	0.0	2,418	0.0	0.0
174	0000030757/3	COASTAL BANC SSB	23	0.0	0.0	1,467	0.0	0.0
175	0001035401/2	THE CIT GROUP/SALES FINANCING,	23	0.0	0.0	631	0.0	0.0
176	0000030003/3	GUARANTY BANK, SSB	23	0.0	0.0	608	0.0	0.0
177	0000017595/1	COMMUNITY NATIONAL BANK	22	0.0	0.0	1,563	0.0	0.0
178	0000009846/3	BRANCH BANKING AND TRUST CO	21	0.0	0.0	4,263	0.0	0.0
179	0000000124/4	CORNERSTONE BANK	20	0.0	0.0	2,287	0.0	0.0
180	2179909994/7	TOWNE MORTGAGE COMPANY	20	0.0	0.0	2,130	0.0	0.0

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Year: 2001 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
181	7162800002/7	21ST MORTGAGE CORP.	20	0.0	0.0	539	0.0	0.0
182	0841100002/7	ALLIANCE MORTGAGE COMPANY	19	0.0	0.0	2,324	0.0	0.0
183	0000018962/3	ROYAL BANK OF PENNSYLVANIA	19	0.0	0.0	1,875	0.0	0.0
184	0001942602/2	EQUITY ONE, INC.	19	0.0	0.0	1,677	0.0	0.0
185	0000009859/1	SOMERVILLE NATIONAL BANK	19	0.0	0.0	1,133	0.0	0.0
186	7493900007/7	DAVID MORTGAGE, INC.	18	0.0	0.0	2,378	0.0	0.0
187	7071400009/7	NATIONWIDE HOME MORTGAGE COMPA	18	0.0	0.0	2,008	0.0	0.0
188	7592700002/7	H&R BLOCK MORTGAGE CORP.	18	0.0	0.0	1,343	0.0	0.0
189	1557900001/7	PEOPLE'S CHOICE HOME LOAN, INC	17	0.0	0.0	1,942	0.0	0.0
190	7499100008/7	TAYLOR, BEAN & WHITAKER	17	0.0	0.0	1,587	0.0	0.0
191	7218600003/7	BIRMINGHAM BANCORP MORTGAGE CO	17	0.0	0.0	1,456	0.0	0.0
192	0000001741/1	WELLS FARGO BANK, NA	17	0.0	0.0	468	0.0	0.0
193	7197000003/7	QUICKEN LOANS INC.	16	0.0	0.0	2,119	0.0	0.0
194	7979400002/7	FIRST MAGNUS FINANCIAL CORP.	16	0.0	0.0	1,693	0.0	0.0
195	0000008569/4	APPROVED FEDERAL SAVINGS BANK	16	0.0	0.0	1,496	0.0	0.0
196	0640713034/4	CORINTHIAN MORTGAGE CORPORATIO	15	0.0	0.0	1,890	0.0	0.0
197	7060700007/7	COMMUNITY MORTGAGE SERVICES, I	15	0.0	0.0	1,697	0.0	0.0
198	1261700007/7	PRIMARY RESIDENTIAL MORTGAGE C	15	0.0	0.0	1,392	0.0	0.0
199	63-1011414/3	FIRST BANK MORTGAGE CORP	15	0.0	0.0	1,331	0.0	0.0
200	3839809993/7	LIBERTY MORTGAGE COMPANY	15	0.0	0.0	1,236	0.0	0.0
201	1665100001/7	PINNACLE DIRECT FUNDING CORP	14	0.0	0.0	1,893	0.0	0.0
202	0000012642/4	WORLD SAVINGS BANK	14	0.0	0.0	1,748	0.0	0.0
203	7151500007/7	VILLA MORTGAGE INC.	14	0.0	0.0	1,618	0.0	0.0
204	75-2712433/7	CONCORDE ACCEPTANCE CORPORATIO	14	0.0	0.0	1,395	0.0	0.0
205	0000000109/1	NATIONAL CITY BANK, KENTUCKY	14	0.0	0.0	1,221	0.0	0.0
206	0000008159/4	CROWN BANK, FSB	14	0.0	0.0	111	0.0	0.0
207	7323800008/7	EXPRESS CAPITAL LENDING	13	0.0	0.0	1,587	0.0	0.0
208	23-2778991/7	ADVANTA FINANCE CORP	13	0.0	0.0	1,068	0.0	0.0
209	0042590778/4	FORWARD FINANCIAL	13	0.0	0.0	356	0.0	0.0
210	0000006189/4	DOWNEY SAVINGS AND LOAN ASSOC.	12	0.0	0.0	1,771	0.0	0.0
211	0002576572/2	PRISM MORTGAGE COMPANY	12	0.0	0.0	1,712	0.0	0.0
212	1463600006/7	MORTGAGEIT, INC.	12	0.0	0.0	1,393	0.0	0.0
213	0351560092/4	MATRIX FINANCIAL SERVICES CORP	12	0.0	0.0	1,127	0.0	0.0
214	7673400003/7	INVESTAID CORPORATION	12	0.0	0.0	885	0.0	0.0
215	1000200007/7	DIVERSIFIED CAPITAL CORP OF TN	12	0.0	0.0	804	0.0	0.0
216	0000008846/1	OLD NATIONAL BANK	12	0.0	0.0	137	0.0	0.0

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217	0001382226/2	HSBC MORTGAGE CORPORATION	11	0.0	0.0	3,103	0.0	0.0
218	0000008183/4	EASTERN SAVINGS BANK, FSB	11	0.0	0.0	2,063	0.0	0.0
219	7343000001/7	IMPAC FUNDING CORP	11	0.0	0.0	1,501	0.0	0.0
220	7927200007/7	NEW FREEDOM MORTGAGE CORP	11	0.0	0.0	1,021	0.0	0.0
221	1483300003/7	FINANCE AMERICA, LLC	11	0.0	0.0	926	0.0	0.0
222	0000008145/4	CHEVY CHASE BANK, F.S.B.	11	0.0	0.0	265	0.0	0.0
223	1534900004/7	FIRST NLC FINANCIAL SERVICES	10	0.0	0.0	1,235	0.0	0.0
224	0000913940/2	FIFTH THIRD BANK	10	0.0	0.0	1,066	0.0	0.0
225	0000000709/4	GUARDIAN SAVINGS BANK, FSB	10	0.0	0.0	999	0.0	0.0
226	7140500002/7	SIBCY CLINE MORTGAGE SERVICES	10	0.0	0.0	963	0.0	0.0
227	0000002479/1	SECOND NATIONAL BANK	10	0.0	0.0	854	0.0	0.0
228	0000001701/4	THE GUERNSEY BANK	10	0.0	0.0	737	0.0	0.0
229	0000009179/1	PARK NATIONAL BANK	10	0.0	0.0	693	0.0	0.0
230	0113399725/4	ASTORIA FEDERAL MORTGAGE CORP	9	0.0	0.0	3,382	0.0	0.0
231	7699300007/7	AMERICAN HOME MORTGAGE CORP.	9	0.0	0.0	1,597	0.0	0.0
232	7404800009/7	OCEAN WEST FUNDING	9	0.0	0.0	971	0.0	0.0
233	0000096755/5	MIDFIRST CREDIT UNION	9	0.0	0.0	959	0.0	0.0
234	1061700007/7	TOWN & COUNTRY CREDIT CORP.	9	0.0	0.0	924	0.0	0.0
235	0000023063/3	BANK OF YORBA LINDA	9	0.0	0.0	754	0.0	0.0
236	1059700002/7	FIRST CONSOLIDATED MORTGAGE	9	0.0	0.0	700	0.0	0.0
237	0000000001/1	FIRST UNION NATIONAL BANK	8	0.0	0.0	2,886	0.0	0.0
238	5135809997/7	CTX MORTGAGE COMPANY, LLC	8	0.0	0.0	1,128	0.0	0.0
239	0000008043/4	DOLLAR BANK, FSB	8	0.0	0.0	921	0.0	0.0
240	7515900008/7	FREEDOM MORTGAGE CORP.	8	0.0	0.0	687	0.0	0.0
241	99-0003680/1	UNITY NATIONAL BANK	8	0.0	0.0	580	0.0	0.0
242	0470659799/4	COMMERCIAL FEDERAL MORTGAGE CO	7	0.0	0.0	3,429	0.0	0.0
243	7952900006/7	TRANSLAND FINANCIAL SERVICES	7	0.0	0.0	1,600	0.0	0.0
244	1259600009/7	SOUTH STAR FUNDING, LLC	7	0.0	0.0	920	0.0	0.0
245	0000501105/2	M&T BANK	7	0.0	0.0	810	0.0	0.0
246	0000008186/4	PRESIDENTIAL BANK, F.S.B.	7	0.0	0.0	625	0.0	0.0
247	0000005128/4	ENCORE BANK	7	0.0	0.0	558	0.0	0.0
248	7542800002/7	MLSG, INC.	7	0.0	0.0	502	0.0	0.0
249	0000014529/1	MERCANTILE NATIONAL BANK OF IN	7	0.0	0.0	417	0.0	0.0
250	0000015642/4	GMAC BANK	7	0.0	0.0	231	0.0	0.0
251	0000006594/1	SECURITY NATIONAL BANK	7	0.0	0.0	103	0.0	0.0
252	0000000827/4	COVINGTON SAVINGS & LOAN ASSOC	6	0.0	0.0	690	0.0	0.0

NOTE: Applications include Purchased Loans, Balances are in thousands.

MARKET SHARE ANALYSIS

INSTITUTION LEVEL

INCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
Purpose: All Purpose Code selected
Loan Type: All Loan Type Codes
Action: All Action Codes
Owner Occupancy: All Owner Occupancy Codes
Applicant Race: All Applicant Races
Applicant Sex: All Applicant Genders
Applicant Income: All Applicant Income Levels
Tract Income: All Tract Levels
Tract Minority: All Minority levels
Criteria: ALL INSTITUTIONS

Year: 2001 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
253	0001216291/2	RESOURCE BANK	6	0.0	0.0	639	0.0	0.0
254	7479800008/7	CHAPEL MORTGAGE CORPORATION	6	0.0	0.0	602	0.0	0.0
255	0000000264/5	HEARTLAND FEDERAL CU	6	0.0	0.0	597	0.0	0.0
256	7152500000/7	PLATINUM CAPITAL GROUP	6	0.0	0.0	544	0.0	0.0
257	1596200005/7	GMFS, LLC	6	0.0	0.0	390	0.0	0.0
258	0000017623/5	HONDA FEDERAL CREDIT UNION	6	0.0	0.0	278	0.0	0.0
259	0000014939/4	AIG FEDERAL SAVINGS BANK	6	0.0	0.0	277	0.0	0.0
260	0000001427/1	UNITED NATIONAL BANK	6	0.0	0.0	27	0.0	0.0
261	0000008097/4	PEOPLES COMMUNITY BANK	5	0.0	0.0	12,080	0.2	0.2
262	0000004115/4	ASTORIA FEDERAL SAVINGS	5	0.0	0.0	2,444	0.0	0.0
263	0000007837/4	DIME SAVINGS BANK OF NY,FSB	5	0.0	0.0	685	0.0	0.0
264	7177900003/7	CHADWICK MORTGAGE, INC.	5	0.0	0.0	457	0.0	0.0
265	0000002360/1	LEBANON CITIZENS NATIONAL BANK	5	0.0	0.0	441	0.0	0.0
266	0000021162/1	GUARANTY NATIONAL BANK OF TALL	5	0.0	0.0	427	0.0	0.0
267	0002418980/2	WELLS FARGO FIN'L ACCPTCE AMER	5	0.0	0.0	396	0.0	0.0
268	0000006081/4	FIDELITY BANK	5	0.0	0.0	369	0.0	0.0
269	1075700003/7	AURORA LOAN SERVICES	5	0.0	0.0	316	0.0	0.0
270	0000138510/2	FIFTH THIRD BANK, NORTHERN KY	5	0.0	0.0	256	0.0	0.0
271	0000006301/1	MELLON BANK, N.A.	5	0.0	0.0	170	0.0	0.0
272	0000013216/1	AMERICAN NATIONAL BANK & TRUST	4	0.0	0.0	2,394	0.0	0.0
273	74-2585982/1	EXTRACO MORTGAGE CORPORATION	4	0.0	0.0	465	0.0	0.0
274	36-3913158/3	GN MORTGAGE	4	0.0	0.0	462	0.0	0.0
275	7233200004/7	PINNACLE FINANCIAL CORPORATION	4	0.0	0.0	427	0.0	0.0
276	7469500007/7	ALLIED MORTGAGE CORPORATION	4	0.0	0.0	407	0.0	0.0
277	0000013681/1	NATIONAL BANK OF COMMERCE	4	0.0	0.0	347	0.0	0.0
278	7009900007/7	WENDOVER FINANCIAL SVCS CORP	4	0.0	0.0	318	0.0	0.0
279	7652800004/7	NATION ONE MORTGAGE CO., INC.	4	0.0	0.0	289	0.0	0.0
280	0000014177/4	AMERIBANK	4	0.0	0.0	223	0.0	0.0
281	7431100008/7	OAKMONT MORTGAGE	4	0.0	0.0	206	0.0	0.0
282	0000004142/5	KINECTA FEDERAL CREDIT UNION	4	0.0	0.0	138	0.0	0.0
283	0000005198/4	COMMERCIAL FEDERAL BANK	3	0.0	0.0	1,452	0.0	0.0
284	0000027374/3	MERRILL LYNCH BANK USA	3	0.0	0.0	1,448	0.0	0.0
285	0000016782/4	ING BANK, FSB	3	0.0	0.0	580	0.0	0.0
286	1424400008/7	INTERBAY FUNDING, LLC	3	0.0	0.0	579	0.0	0.0
287	0391428741/4	M&I MORTGAGE CORP	3	0.0	0.0	555	0.0	0.0
288	7605000005/7	COOPERATIVE MORTGAGE SERVICES	3	0.0	0.0	434	0.0	0.0

NOTE: Applications include Purchased Loans, Balances are in thousands.

MARKET SHARE ANALYSIS

INSTITUTION LEVEL

INCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
Purpose: All Purpose Code selected
Loan Type: All Loan Type Codes
Action: All Action Codes
Owner Occupancy: All Owner Occupancy Codes
Applicant Race: All Applicant Races
Applicant Sex: All Applicant Genders
Applicant Income: All Applicant Income Levels
Tract Income: All Tract Levels
Tract Minority: All Minority levels
Criteria: ALL INSTITUTIONS

Year: 2001 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
289	1130300009/7	DOVENMUEHLE FUNDING INC.	3	0.0	0.0	413	0.0	0.0
290	0536900124/7	PULTE MORTGAGE CORPORATION	3	0.0	0.0	355	0.0	0.0
291	7770700000/7	HARBORSIDE FINANCIAL NETWORK	3	0.0	0.0	353	0.0	0.0
292	0000024189/1	FIRST NATIONAL BANK OF ARIZONA	3	0.0	0.0	327	0.0	0.0
293	1352300005/7	BBC FUNDING	3	0.0	0.0	294	0.0	0.0
294	7772300000/7	FRANKLIN FINANCIAL	3	0.0	0.0	272	0.0	0.0
295	7768100008/7	AMERICAN MORTGAGE EXPRESS CORP	3	0.0	0.0	249	0.0	0.0
296	38-3233494/1	NATIONAL CITY MORTAGE SERVICES	3	0.0	0.0	224	0.0	0.0
297	7875200001/7	FIRST GREENSBORO HOME EQUITY	3	0.0	0.0	222	0.0	0.0
298	75-2585326/7	COUNTRYPLACE MORTGAGE, LTD.	3	0.0	0.0	198	0.0	0.0
299	0000008534/4	GUARANTY BANK	3	0.0	0.0	139	0.0	0.0
300	0000006288/5	FIRST RESOURCE FEDERAL CREDIT	3	0.0	0.0	127	0.0	0.0
301	54-1943828/1	MILLENNIUM CAPITAL	3	0.0	0.0	106	0.0	0.0
302	0000022051/3	ABINGTON SAVINGS BANK	2	0.0	0.0	935	0.0	0.0
303	0000413208/2	HSBC BANK, USA	2	0.0	0.0	878	0.0	0.0
304	0000030237/3	PARKVALE BANK	2	0.0	0.0	480	0.0	0.0
305	0000008045/4	BANKUNITED, FSB	2	0.0	0.0	386	0.0	0.0
306	1085800002/7	SPECIALTY MORTGAGE CORPORATION	2	0.0	0.0	383	0.0	0.0
307	59-3679259/7	HOMEALLIANCE MORTGAGE COMPANY	2	0.0	0.0	356	0.0	0.0
308	7621700002/7	WORLD WIDE FINANCIAL SERVICES	2	0.0	0.0	348	0.0	0.0
309	0000061810/5	KEMBA CREDIT UNION, INC	2	0.0	0.0	334	0.0	0.0
310	0000023748/1	HORIZON NATIONAL BANK	2	0.0	0.0	316	0.0	0.0
311	7015500006/7	HOWARD HANNA FINANCIAL SERV	2	0.0	0.0	313	0.0	0.0
312	0000028178/3	NORTHWEST SAVINGS BANK	2	0.0	0.0	313	0.0	0.0
313	7516800003/7	FIRST GUARANTY MORTGAGE	2	0.0	0.0	288	0.0	0.0
314	1923400005/7	COLUMBIA NATIONAL, INC.	2	0.0	0.0	288	0.0	0.0
315	7871500009/7	MARATHON FINANCIAL CORPORATION	2	0.0	0.0	286	0.0	0.0
316	0000604024/2	MINSTER BANK	2	0.0	0.0	274	0.0	0.0
317	3827009995/7	UNION NATIONAL MORTGAGE CO.	2	0.0	0.0	269	0.0	0.0
318	0541900445/4	GREATER ATLANTIC MORTGAGE CORP	2	0.0	0.0	251	0.0	0.0
319	1474600000/7	HOMESTAR MORTGAGE SERVICES	2	0.0	0.0	249	0.0	0.0
320	58-0692236/3	LIBERTY MORTGAGE CORPORATION	2	0.0	0.0	232	0.0	0.0
321	0000005500/5	NORTHWEST FEDERAL CREDIT UNION	2	0.0	0.0	220	0.0	0.0
322	7650700000/7	AMERICA'S MONEYLINE	2	0.0	0.0	199	0.0	0.0
323	0000023570/1	FIRST BANK RICHMOND	2	0.0	0.0	181	0.0	0.0
324	0000029031/3	AMERIANA BANK AND TRUST	2	0.0	0.0	174	0.0	0.0

NOTE: Applications include Purchased Loans, Balances are in thousands.

INCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
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Applicant Sex: All Applicant Genders
Applicant Income: All Applicant Income Levels
Tract Income: All Tract Levels
Tract Minority: All Minority levels
Criteria: ALL INSTITUTIONS
Year: 2001 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
325	0000002597/1	WELLS FARGO BANK NORTHWEST, NA	2	0.0	0.0	147	0.0	0.0
326	3814209995/7	THE LEADER MORTGAGE COMPANY	2	0.0	0.0	136	0.0	0.0
327	0000026348/3	IMPERIAL CAPITAL BANK	2	0.0	0.0	136	0.0	0.0
328	7865700008/7	MORTGAGE BANKERS SERVICE CORP.	2	0.0	0.0	114	0.0	0.0
329	35-2037032/7	NEWSTATE MORTGAGE COMPANY	2	0.0	0.0	108	0.0	0.0
330	7718200008/7	AMERICAN HOME LOANS	2	0.0	0.0	90	0.0	0.0
331	0000817833/2	SOUTHTRUST BANK	2	0.0	0.0	83	0.0	0.0
332	0219309999/7	SUN AMERICAN MORTGAGE	2	0.0	0.0	55	0.0	0.0
333	0000013987/1	WELLS FARGO BANK INDIANA, NA	2	0.0	0.0	31	0.0	0.0
334	0000001275/4	QUAKER CITY FEDERAL SAVINGS	2	0.0	0.0	22	0.0	0.0
335	0000019536/3	SOUTH CENTRAL BANK	2	0.0	0.0	19	0.0	0.0
336	0000852218/2	JPMORGAN CHASE BANK	1	0.0	0.0	3,100	0.0	0.0
337	0117400000/7	COLLATERAL MORTGAGE LTD	1	0.0	0.0	2,325	0.0	0.0
338	0000005938/4	THE WINTON SAVINGS AND LOAN CO	1	0.0	0.0	1,400	0.0	0.0
339	0000027094/3	SOUTHERN PACIFIC BANK	1	0.0	0.0	850	0.0	0.0
340	0000004192/4	FIRST FEDERAL BANK OF THE MIDW	1	0.0	0.0	500	0.0	0.0
341	0000019976/5	HPEFCU	1	0.0	0.0	420	0.0	0.0
342	0001079544/2	SOUTHTRUST MORTGAGE CORP	1	0.0	0.0	372	0.0	0.0
343	0000013074/3	HUDSON CITY SAVINGS BANK	1	0.0	0.0	342	0.0	0.0
344	0000008337/4	CHARTER BANK	1	0.0	0.0	261	0.0	0.0
345	0000034127/3	SELECT BANK	1	0.0	0.0	240	0.0	0.0
346	3807209990/7	YERKE MORTGAGE CO.	1	0.0	0.0	212	0.0	0.0
347	2148900000/7	ROSS MORTGAGE CORPORATION	1	0.0	0.0	212	0.0	0.0
348	0000014640/4	STATE FARM FS FSB	1	0.0	0.0	210	0.0	0.0
349	7187700001/7	CENTRAL PACIFIC MORTGAGE	1	0.0	0.0	209	0.0	0.0
350	0000004499/4	FIRST CLERMONT BANK	1	0.0	0.0	208	0.0	0.0
351	7281500005/7	REAL ESTATE MORTGAGE CORP.	1	0.0	0.0	202	0.0	0.0
352	0593151342/4	MARKET STREET MORTGAGE CORP	1	0.0	0.0	191	0.0	0.0
353	0001421161/2	BANK OF BLUE VALLEY	1	0.0	0.0	184	0.0	0.0
354	0000016406/4	VIRTUALBANK	1	0.0	0.0	182	0.0	0.0
355	1195900005/7	LOAN FUNDING CORP. OF AMERICA	1	0.0	0.0	175	0.0	0.0
356	1728700007/7	PARAGON HOME LENDING LLC	1	0.0	0.0	173	0.0	0.0
357	0000000869/1	NATIONAL CITY BANK, INDIANA	1	0.0	0.0	168	0.0	0.0
358	0000002092/4	FRANKLIN SAVINGS AND LOAN CO.	1	0.0	0.0	166	0.0	0.0
359	0000008709/1	1ST NATIONAL BANK	1	0.0	0.0	154	0.0	0.0
360	7385000001/7	PRIME MORTGAGE USA, INC	1	0.0	0.0	152	0.0	0.0

NOTE: Applications include Purchased Loans, Balances are in thousands

INCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
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Loan Type: All Loan Type Codes
Owner Occupancy: All Owner Occupancy Codes
Criteria: ALL INSTITUTIONS
Year: 2001 **Analysis Perspective:** HMDA

Segment	Total Applications (Including Purchases)		Loans Originated (Including Purchases)		Applications Approved but not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness		Loans Purchased	
	Number	%Total	Number	%Apps	Number	%Apps	Number	%Apps	Number	%Apps	Number	%Apps	Number	%Apps
RACE														
Native	67	0.1	34	50.7	2	3.0	19	28.4	8	11.9	4	6.0	3	4.5
Asian	337	0.7	237	70.3	32	9.5	47	13.9	15	4.5	6	1.8	25	7.4
Black	2,917	6.1	1,514	51.9	342	11.7	792	27.2	182	6.2	87	3.0	130	4.5
Hispanic	182	0.4	88	48.4	37	20.3	36	19.8	6	3.3	15	8.2	6	3.3
White	26,311	54.9	19,493	74.1	2,095	8.0	3,258	12.4	1,031	3.9	434	1.6	1,799	6.8
Joint	351	0.7	244	69.5	27	7.7	56	16.0	20	5.7	4	1.1	17	4.8
Other	742	1.5	167	22.5	35	4.7	262	35.3	269	36.3	9	1.2	9	1.2
Not Available	16,976	35.5	7,979	47.0	1,648	9.7	4,111	24.2	2,845	16.8	393	2.3	3,431	20.2
GENDER														
Joint	17,529	36.6	12,684	72.4	1,396	8.0	2,274	13.0	872	5.0	303	1.7	1,185	6.8
Male	8,376	17.5	5,447	65.0	764	9.1	1,473	17.6	505	6.0	187	2.2	459	5.5
Female	7,155	14.9	4,607	64.4	659	9.2	1,327	18.5	427	6.0	135	1.9	418	5.8
Not Available	14,823	31.0	7,018	47.3	1,399	9.4	3,507	23.7	2,572	17.4	327	2.2	3,358	22.7
APPLICANT INCOME														
< 50%	5,066	10.6	2,317	45.7	476	9.4	1,624	32.1	549	10.8	100	2.0	224	4.4
50% to < 80%	10,681	22.3	5,850	54.8	1,009	9.4	2,428	22.7	1,120	10.5	274	2.6	508	4.8
80% to < 100%	6,507	13.6	3,811	58.6	631	9.7	1,215	18.7	698	10.7	152	2.3	349	5.4
100% to < 120%	5,431	11.3	3,295	60.7	511	9.4	968	17.8	540	9.9	117	2.2	303	5.6
>=120%	13,785	28.8	9,473	68.7	1,305	9.5	1,649	12.0	1,102	8.0	256	1.9	1,012	7.3
Not Available	6,413	13.4	5,010	78.1	285	4.5	697	10.9	367	5.7	53	0.8	3,024	47.2
TRACT INCOME														
Low	306	0.6	121	39.5	37	12.1	101	33.0	42	13.7	5	1.6	21	6.9
Moderate	4,568	9.5	2,061	45.1	465	10.2	1,363	29.8	551	12.1	128	2.8	408	8.9
Middle	24,363	50.9	14,032	57.6	2,272	9.3	5,020	20.6	2,494	10.2	545	2.2	2,562	10.5
Upper	18,646	38.9	13,542	72.6	1,444	7.7	2,097	11.2	1,289	6.9	274	1.5	2,429	13.0
Not Available	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
TRACT MINORITY														
< 10%	36,692	76.6	24,242	66.1	3,099	8.4	5,651	15.4	3,031	8.3	669	1.8	4,343	11.8
>= 10% to < 20%	4,554	9.5	2,735	60.1	409	9.0	827	18.2	485	10.6	98	2.2	501	11.0
>= 20% to < 50%	3,958	8.3	1,769	44.7	406	10.3	1,193	30.1	473	12.0	117	3.0	363	9.2
>= 50% to < 80%	2,224	4.6	857	38.5	247	11.1	746	33.5	322	14.5	52	2.3	177	8.0
>= 80%	455	1.0	153	33.6	57	12.5	164	36.0	65	14.3	16	3.5	36	7.9
Not Available	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
TOTALS	47,883	100.0	29,756	62.1	4,218	8.8	8,581	17.9	4,376	9.1	952	2.0	5,420	11.3

INCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
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Applicant Race: All Applicant Races
Applicant Sex: All Applicant Genders
Applicant Income: All Applicant Income Levels
Tract Income: All Tract Levels
Tract Minority: All Minority levels
Criteria: ALL INSTITUTIONS
Year: 2001 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
397	0002751801/2	CITIFINANCIAL SERVICES, INC.	1	0.0	0.0	42	0.0	0.0
398	0000066840/5	CODE CREDIT UNION	1	0.0	0.0	40	0.0	0.0
399	0000004715/4	MERCER SAVINGS BANK	1	0.0	0.0	40	0.0	0.0
400	0000010592/1	WELLS FARGO BANK SOUTH DAKOTA	1	0.0	0.0	34	0.0	0.0
401	0000015057/1	WELLS FARGO BANK WISCONSIN, NA	1	0.0	0.0	29	0.0	0.0
402	0000002966/4	THIRD FEDERAL SAVINGS BANK	1	0.0	0.0	27	0.0	0.0
403	0000063307/5	NEW HORIZONS CREDIT UNION	1	0.0	0.0	26	0.0	0.0
404	0000032574/3	BEAL BANK	1	0.0	0.0	26	0.0	0.0
405	7265100003/7	LONDON FINANCIAL GROUP	1	0.0	0.0	25	0.0	0.0
406	0000312244/2	FIRST BANK OF BERNE	1	0.0	0.0	25	0.0	0.0
407	0001385722/2	F&M MORTGAGE SERVICES, INC.	1	0.0	0.0	23	0.0	0.0
408	0000006679/4	MATRIX CAPITAL BANK	1	0.0	0.0	22	0.0	0.0
409	0000017022/4	ATLANTIC COAST FEDERAL	1	0.0	0.0	15	0.0	0.0
410	0000499613/2	FIFTH THIRD BK, KENTUCKY, INC.	1	0.0	0.0	15	0.0	0.0
411	0000675332/2	SUNTRUST BANK	1	0.0	0.0	14	0.0	0.0
412	0000020484/1	CITIBANK NEVADA, N.A.	1	0.0	0.0	8	0.0	0.0
413	0000000293/5	DP&L EMPLOYEES PLU FED CR UN	1	0.0	0.0	6	0.0	0.0
414	0000014225/4	PRINCIPAL BANK	1	0.0	0.0	5	0.0	0.0
GROUP TOTALS:			47,883	100.0	100.0	4,629,612	100.0	100.0
OTHER INSTTUTIONS:			0		0.0	0		0.0
MARKET TOTALS:			47,883		100.0	4,629,612		100.0

NOTE: Applications include Purchased Loans, Balances are in thousands.

INSTITUTION LEVEL

INCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
Purpose: All Purpose Code selected
Loan Type: All Loan Type Codes
Action: All Action Codes
Owner Occupancy: All Owner Occupancy Codes
Applicant Race: All Applicant Races
Applicant Sex: All Applicant Genders
Applicant Income: All Applicant Income Levels
Tract Income: All Tract Levels
Tract Minority: All Minority levels
Criteria: ALL INSTITUTIONS

Year: 2001 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
361	38361099987	DEVELOPER'S MORTGAGE COMPANY	1	0.0	0.0	146	0.0	0.0
362	0000222147/2	CITIZENS BANK	1	0.0	0.0	138	0.0	0.0
363	0000014740/1	FIRST NATIONAL BANK OF AMERICA	1	0.0	0.0	128	0.0	0.0
364	0000008308/4	FEDERAL MEDICAL BANK	1	0.0	0.0	123	0.0	0.0
365	38-3075078/7	FRANKLIN MORTGAGE FUNDING	1	0.0	0.0	120	0.0	0.0
366	1323400008/7	SECURITY LENDING WHOLESALE LC	1	0.0	0.0	119	0.0	0.0
367	7289300004/7	REALTY MORTGAGE CORPORATION	1	0.0	0.0	117	0.0	0.0
368	0000614313/2	THE STATE BANK & TRUST CO	1	0.0	0.0	117	0.0	0.0
369	0000009071/5	DIRECT FEDERAL CREDIT UNION	1	0.0	0.0	108	0.0	0.0
370	7042100008/7	DOLLAR MORTGAGE CORPORATION	1	0.0	0.0	107	0.0	0.0
371	0002343082/2	MORTGAGE SERVICES, INC	1	0.0	0.0	106	0.0	0.0
372	36-3920095/5	CU/AMERICA FINAN SVCS	1	0.0	0.0	106	0.0	0.0
373	1362200002/7	MOLTON, ALLEN & WILLIAMS MTG	1	0.0	0.0	104	0.0	0.0
374	34-1812174/1	FIRSTMERIT MORTGAGE CORP.	1	0.0	0.0	102	0.0	0.0
375	2179209998/7	EXCHANGE FINANCIAL CORPORATION	1	0.0	0.0	102	0.0	0.0
376	7285600001/7	WESTAMERICA MORTGAGE COMPANY	1	0.0	0.0	101	0.0	0.0
377	11-2815564/7	EHOMECREDIT CORP.	1	0.0	0.0	98	0.0	0.0
378	0000061744/5	INT'L HARVESTER EMPL. C. U.	1	0.0	0.0	95	0.0	0.0
379	0000010666/3	OAK HILL BANKS	1	0.0	0.0	87	0.0	0.0
380	7428900001/7	LOANCITY.COM	1	0.0	0.0	86	0.0	0.0
381	0000820310/2	COMMUNITY FIRST BANK & TRUST	1	0.0	0.0	86	0.0	0.0
382	0000033503/3	UNITY BANK	1	0.0	0.0	83	0.0	0.0
383	7109700009/7	MONUMENT MORTGAGE	1	0.0	0.0	82	0.0	0.0
384	0000012504/4	HOME LOAN AND INVESTMENT BANK	1	0.0	0.0	82	0.0	0.0
385	0000001830/4	HOME CITY FEDERAL SAVINGS BANK	1	0.0	0.0	82	0.0	0.0
386	3833409991/7	SWAIN MORTGAGE COMPANY	1	0.0	0.0	81	0.0	0.0
387	0000008266/4	UNITED MIDWEST SAVINGS BANK	1	0.0	0.0	74	0.0	0.0
388	1462200006/7	COMMUNITY BANC MORTGAGE LLC	1	0.0	0.0	71	0.0	0.0
389	0000007030/1	COMMUNITY TRUST BANK, N. A.	1	0.0	0.0	70	0.0	0.0
390	0000062848/5	TELHIO CREDIT UNION, INC	1	0.0	0.0	64	0.0	0.0
391	0000001997/1	NATIONAL BANK & TRUST COMPANY	1	0.0	0.0	61	0.0	0.0
392	0000013679/1	BANK OF OKLAHOMA, N.A.	1	0.0	0.0	58	0.0	0.0
393	7240500003/7	ENTRUST MORTGAGE	1	0.0	0.0	55	0.0	0.0
394	0000008399/4	UNIVERSAL SAVINGS BANK F.A.	1	0.0	0.0	48	0.0	0.0
395	7876500000/7	JUPITER MORTGAGE CORP.	1	0.0	0.0	45	0.0	0.0
396	0000007938/4	WILMINGTON SAVINGS FUNDS SOCIE	1	0.0	0.0	45	0.0	0.0

NOTE: Applications include Purchased Loans, Balances are in thousands.

INCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
Purpose: Refinancing (3)
Loan Type: Conventional (1)
Owner Occupancy: All Owner Occupancy Codes
Criteria: ALL INSTITUTIONS
Year: 2001 **Analysis Perspective:** HMDA

Segment	Total Applications		Loans Originated		Applications Approved but not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness		Loans Purchased
	Number	%Total	Number	%Apps	Number	%Apps	Number	%Apps	Number	%Apps	Number	%Apps	Number
RACE:													
Native	39	0.1	18	46.2	2	5.1	9	23.1	7	17.9	3	7.7	0
Asian	177	0.7	120	67.8	17	9.6	24	13.6	13	7.3	3	1.7	12
Black	1,337	5.1	568	42.5	197	14.7	420	31.4	88	6.6	64	4.8	45
Hispanic	111	0.4	41	36.9	28	25.2	24	21.6	4	3.6	14	12.6	4
White	13,819	52.4	9,567	69.2	1,297	9.4	1,983	14.3	618	4.5	354	2.6	830
Joint	177	0.7	110	62.1	17	9.6	35	19.8	14	7.9	1	0.6	4
Other	633	2.4	113	17.9	27	4.3	240	37.9	246	38.9	7	1.1	5
Not Available	10,100	38.3	2,883	28.5	1,190	11.8	3,189	31.6	2,514	24.9	324	3.2	1,599
GENDER:													
Joint	9,859	37.4	6,548	66.4	893	9.1	1,554	15.8	615	6.2	249	2.5	594
Male	4,214	16.0	2,395	56.8	470	11.2	893	21.2	313	7.4	143	3.4	179
Female	3,701	14.0	2,111	57.0	427	11.5	779	21.0	277	7.5	107	2.9	153
Not Available	8,619	32.7	2,366	27.5	985	11.4	2,698	31.3	2,299	26.7	271	3.1	1,573
APPLICANT INCOME:													
< 50%	3,034	11.5	1,137	37.5	328	10.8	1,037	34.2	452	14.9	80	2.6	97
50% to < 80%	6,071	23.0	2,681	44.2	669	11.0	1,606	26.5	889	14.6	226	3.7	167
80% to < 100%	3,715	14.1	1,788	48.1	422	11.4	825	22.2	565	15.2	115	3.1	136
100% to < 120%	3,249	12.3	1,686	51.9	337	10.4	682	21.0	448	13.8	96	3.0	136
>=120%	8,495	32.2	5,327	62.7	848	10.0	1,209	14.2	895	10.5	216	2.5	606
Not Available	1,829	6.9	801	43.8	171	9.3	565	30.9	255	13.9	37	2.0	1,357
TRACT INCOME:													
Low	207	0.8	69	33.3	29	14.0	69	33.3	37	17.9	3	1.4	10
Moderate	2,701	10.2	892	33.0	313	11.6	940	34.8	456	16.9	100	3.7	202
Middle	13,636	51.7	6,205	45.5	1,551	11.4	3,430	25.2	2,006	14.7	444	3.3	1,122
Upper	9,849	37.3	6,254	63.5	882	9.0	1,485	15.1	1,005	10.2	223	2.3	1,165
Not Available	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0
TRACT MINORITY:													
< 10%	19,937	75.5	11,109	55.7	2,006	10.1	3,866	19.4	2,411	12.1	545	2.7	2,025
>= 10% to < 20%	2,431	9.2	1,093	45.0	270	11.1	600	24.7	387	15.9	81	3.3	192
>= 20% to < 50%	2,336	8.9	768	32.9	286	12.2	799	34.2	392	16.8	91	3.9	175
>= 50% to < 80%	1,422	5.4	384	27.0	180	12.7	559	39.3	257	18.1	42	3.0	85
>= 80%	267	1.0	66	24.7	33	12.4	100	37.5	57	21.3	11	4.1	22
Not Available	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0
TOTALS:	26,393	100.0	13,420	50.8	2,775	10.5	5,924	22.4	3,504	13.3	770	2.9	2,499

INCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
Purpose: All Purpose Codes selected
Loan Type: All Loan Type Codes
Owner Occupancy: All Owner Occupancy Codes
Criteria: ALL INSTITUTIONS
Year: 2001 **Analysis Perspective:** HMDA

Segment	Total Applications Denied		Debt-to-Income Ratio		Employment History		Credit History		Collateral		Cash, PMI, or Bad Data (6, 7 & 8)		Other	
	Number	%Total	Number	%Apps	Number	%Apps	Number	%Apps	Number	%Apps	Number	%Apps	Number	
RACE														
Native	19	0.3	5	26.3	1	5.3	7	36.8	2	10.5	1	5.3	3	15.8
Asian	47	0.7	17	36.2	2	4.3	20	42.6	4	8.5	4	8.5	7	14.9
Black	792	11.3	157	19.8	15	1.9	380	48.0	114	14.4	75	9.5	109	13.8
Hispanic	36	0.5	9	25.0	1	2.8	16	44.4	5	13.9	3	8.3	5	13.9
White	3,258	46.5	802	24.6	74	2.3	1,441	44.2	529	16.2	408	12.5	508	15.6
Joint	56	0.8	10	17.9	0	0.0	25	44.6	11	19.6	6	10.7	3	5.4
Other	262	3.7	22	8.4	2	0.8	132	50.4	110	42.0	4	1.5	9	3.4
Not Available	4,111	58.6	568	13.8	36	0.9	1,408	34.2	964	23.4	260	6.3	525	12.8
GENDER														
Joint	2,274	32.4	436	19.2	27	1.2	992	43.6	485	21.3	250	11.0	273	12.0
Male	1,473	21.0	314	21.3	33	2.2	635	43.1	204	13.8	200	13.6	235	16.0
Female	1,327	18.9	331	24.9	37	2.8	581	43.8	204	15.4	128	9.6	181	13.6
Not Available	3,507	50.0	509	14.5	34	1.0	1,221	34.8	846	24.1	183	5.2	480	13.7
APPLICANT INCOME														
< 50%	1,624	23.2	447	27.5	54	3.3	648	39.9	196	12.1	119	7.3	205	12.6
50% to < 80%	2,428	34.6	540	22.2	38	1.6	1,045	43.0	380	15.7	205	8.4	337	13.9
80% to < 100%	1,215	17.3	225	18.5	13	1.1	498	41.0	210	17.3	114	9.4	164	13.5
100% to < 120%	968	13.8	131	13.5	7	0.7	417	43.1	205	21.2	96	9.9	146	15.1
>=120%	1,649	23.5	218	13.2	15	0.9	672	40.8	377	22.9	160	9.7	262	15.9
Not Available	697	9.9	29	4.2	4	0.6	149	21.4	371	53.2	67	9.6	55	7.9
TRACT INCOME														
Low	101	1.4	12	11.9	1	1.0	48	47.5	17	16.8	5	5.0	13	12.9
Moderate	1,363	19.4	225	16.5	22	1.6	550	40.4	282	20.7	95	7.0	164	12.0
Middle	5,020	71.6	911	18.1	74	1.5	2,045	40.7	1,031	20.5	436	8.7	684	13.6
Upper	2,097	29.9	442	21.1	34	1.6	786	37.5	409	19.5	225	10.7	308	14.7
Not Available	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
TRACT MINORITY														
< 10%	5,651	80.6	1,121	19.8	91	1.6	2,254	39.9	1,111	19.7	538	9.5	800	14.2
>= 10% to < 20%	827	11.8	146	17.7	16	1.9	314	38.0	183	22.1	74	8.9	116	14.0
>= 20% to < 50%	1,193	17.0	180	15.1	15	1.3	484	40.6	270	22.6	83	7.0	147	12.3
>= 50% to < 80%	745	10.6	119	16.0	8	1.1	310	41.6	149	20.0	54	7.2	92	12.3
>= 80%	164	2.3	24	14.6	1	0.6	67	40.9	26	15.9	12	7.3	14	8.5
Not Available	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
TOTALS	8,581	122.4	1,590	18.5	131	1.5	3,429	40.0	1,739	20.3	761	8.9	1,169	13.6

Denial reasons were selected
ere were also 1567 Declined Applications with no reason given

INCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
Purpose: All Purpose Codes selected
Loan Type: All Loan Type Codes
Owner Occupancy: All Owner Occupancy Codes
Criteria: ALL INSTITUTIONS
Year: 2001 **Analysis Perspective:** HMDA

Segment	Total Applications		Home Purchase		Home Improvement		Refinancing		Multi-family		
	Number	%Total	Number	%Apps	Number	%Apps	Number	%Apps	Number	%Apps	
RACE											
Native	67	0.2	19	28.4	6	9.0	42	62.7	0	0.0	
Asian	337	0.8	125	37.1	17	5.0	194	57.6	1	0.3	
Black	2,917	6.9	1,004	34.4	334	11.5	1,579	54.1	0	0.0	
Hispanic	182	0.4	47	25.8	9	4.9	126	69.2	0	0.0	
White	26,311	62.0	8,298	31.5	1,895	7.2	16,104	61.2	14	0.1	
Joint	351	0.8	120	34.2	23	6.6	208	59.3	0	0.0	
Other	742	1.7	66	8.9	33	4.4	643	86.7	0	0.0	
Not Available	16,976	40.0	3,151	18.6	1,388	8.2	12,422	73.2	15	0.1	
GENDER											
Joint	17,529	41.3	4,951	28.2	1,121	6.4	11,443	65.3	14	0.1	
Male	8,376	19.7	2,791	33.3	666	8.0	4,916	58.7	3	0.0	
Female	7,155	16.8	2,370	33.1	592	8.3	4,192	58.6	1	0.0	
Not Available	14,823	34.9	2,718	18.3	1,326	8.9	10,767	72.6	12	0.1	
APPLICANT INCOME											
< 50%	5,066	11.9	1,296	25.6	539	10.6	3,231	63.8	0	0.0	
.0% to < 80%	10,681	25.2	3,235	30.3	931	8.7	6,515	61.0	0	0.0	
80% to < 100%	6,507	15.3	1,870	28.7	592	9.1	4,045	62.2	0	0.0	
100% to < 120%	5,431	12.8	1,440	26.5	490	9.0	3,501	64.5	0	0.0	
>=120%	13,785	32.5	3,480	25.2	1,044	7.6	9,261	67.2	0	0.0	
Not Available	6,413	15.1	1,509	23.5	109	1.7	4,765	74.3	30	0.5	
TRACT INCOME											
Low	306	0.7	50	16.3	35	11.4	221	72.2	0	0.0	
Moderate	4,568	10.8	1,025	22.4	440	9.6	3,100	67.9	3	0.1	
Middle	24,363	57.4	6,082	25.0	2,109	8.7	16,155	66.3	17	0.1	
Upper	18,646	43.9	5,673	30.4	1,121	6.0	11,842	63.5	10	0.1	
Not Available	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	
TRACT MINORITY											
< 10%	36,692	86.4	10,195	27.8	2,676	7.3	23,799	64.9	22	0.1	
>= 10% to < 20%	4,554	10.7	1,245	27.3	332	7.3	2,976	65.3	1	0.0	
>= 20% to < 50%	3,958	9.3	890	22.5	388	9.8	2,674	67.6	6	0.2	
>= 50% to < 80%	2,224	5.2	412	18.5	234	10.5	1,577	70.9	1	0.0	
>= 80%	455	1.1	88	19.3	75	16.5	292	64.2	0	0.0	
Not Available	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	
TOTALS	47,883	112.8	12,830	26.8	3,705	7.7	31,318	65.4	30	0.1	

INCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
Purpose: All Purpose Codes selected
Loan Type: All Loan Type Codes
Owner Occupancy: All Owner Occupancy Codes
Criteria: ALL INSTITUTIONS
Year: 2001 **Analysis Perspective:** HMDA

Segment	Total Applications		Conventional		FHA		VA		FSA/RHS	
	Number	%Total	Number	%Apps	Number	%Apps	Number	%Apps	Number	%Apps
RACE:										
Native	67	0.2	56	83.6	9	13.4	2	3.0	0	0.0
Asian	337	0.8	312	92.6	21	6.2	4	1.2	0	0.0
Black	2,917	6.9	2,338	80.2	440	15.1	139	4.8	0	0.0
Hispanic	182	0.4	153	84.1	21	11.5	8	4.4	0	0.0
White	26,311	62.0	22,418	85.2	3,052	11.6	837	3.2	4	0.0
Joint	351	0.8	284	80.9	45	12.8	22	6.3	0	0.0
Other	742	1.7	727	98.0	12	1.6	3	0.4	0	0.0
Not Available	16,976	40.0	15,386	90.6	1,196	7.0	394	2.3	0	0.0
GENDER:										
Joint	17,529	41.3	15,118	86.2	1,716	9.8	693	4.0	2	0.0
Male	8,376	19.7	6,970	83.2	1,101	13.1	304	3.6	1	0.0
Female	7,155	16.8	6,088	85.1	999	14.0	67	0.9	1	0.0
Not Available	14,823	34.9	13,498	91.1	980	6.6	345	2.3	0	0.0
APPLICANT INCOME:										
< 50%	5,066	11.9	4,540	89.6	475	9.4	50	1.0	1	0.0
50% to < 80%	10,681	25.2	9,134	85.5	1,312	12.3	234	2.2	1	0.0
80% to < 100%	6,507	15.3	5,645	86.8	663	10.2	197	3.0	2	0.0
100% to < 120%	5,431	12.8	4,851	89.3	437	8.0	143	2.6	0	0.0
>=120%	13,785	32.5	13,117	95.2	444	3.2	224	1.6	0	0.0
Not Available	6,413	15.1	4,387	68.4	1,465	22.8	561	8.7	0	0.0
TRACT INCOME:										
Low	306	0.7	295	96.4	11	3.6	0	0.0	0	0.0
Moderate	4,568	10.8	4,019	88.0	468	10.2	81	1.8	0	0.0
Middle	24,363	57.4	20,855	85.6	2,852	11.7	653	2.7	3	0.0
Upper	18,646	43.9	16,505	88.5	1,465	7.9	675	3.6	1	0.0
Not Available	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
TRACT MINORITY:										
< 10%	36,692	86.4	32,034	87.3	3,682	10.0	972	2.6	4	0.0
>= 10% to < 20%	4,554	10.7	3,632	79.8	572	12.6	350	7.7	0	0.0
>= 20% to < 50%	3,958	9.3	3,558	89.9	352	8.9	48	1.2	0	0.0
>= 50% to < 80%	2,224	5.2	2,021	90.9	167	7.5	36	1.6	0	0.0
>= 80%	455	1.1	429	94.3	23	5.1	3	0.7	0	0.0
Not Available	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
TOTALS:	47,883	112.8	41,674	87.0	4,796	10.0	1,409	2.9	4	0.0

INSTITUTION LEVEL

INCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
Purpose: Home Purchase (1)
Loan Type: Conventional (1)
Action: All Action Codes
Owner Occupancy: All Owner Occupancy Codes
Applicant Race: All Applicant Races
Applicant Sex: All Applicant Genders
Applicant Income: All Applicant Income Levels
Tract Income: All Tract Levels
Tract Minority: All Minority levels
Criteria: ALL INSTITUTIONS
Year: 2001 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
1	0002712969/2	FIFTH THIRD MORTGAGE COMPANY	639	7.0	7.0	85,834	8.7	8.7
2	31-0856949/1	NATIONAL CITY MORTGAGE COMPANY	635	6.9	6.9	81,504	8.2	8.2
3	0000000786/1	NATIONAL CITY BANK	498	5.4	5.4	43,228	4.3	4.3
4	95-2318940/1	WELLS FARGO HOME MORTGAGE	403	4.4	4.4	49,768	5.0	5.0
5	6414109996/7	COUNTRYWIDE HOME LOANS	335	3.6	3.6	37,969	3.8	3.8
6	0000020001/3	REPUBLIC BANK	269	2.9	2.9	31,709	3.2	3.2
7	0000008109/4	UNION SAVINGS BANK	251	2.7	2.7	29,295	2.9	2.9
8	0341151450/4	LIBERTY LENDING SERVICES, INC	220	2.4	2.4	25,336	2.5	2.5
9	36-4114231/1	FIRST FRANKLIN FINANCIAL CORP	217	2.3	2.3	14,125	1.4	1.4
10	0000008039/4	LIBERTY SAVINGS BANK, FSB	194	2.1	2.1	21,826	2.2	2.2
11	4216200005/7	GMAC MORTGAGE	185	2.0	2.0	21,764	2.2	2.2
12	0000000024/1	US BANK, N.A.	170	1.8	1.8	21,181	2.1	2.1
13	36-3744610/1	ABN AMRO MORTGAGE GROUP, INC.	167	1.8	1.8	18,932	1.9	1.9
14	7731100009/7	LEGACY MORTGAGE	166	1.8	1.8	20,663	2.0	2.0
15	0002977151/2	CITIFINANCIAL MORTGAGE COMPANY	157	1.7	1.7	12,288	1.2	1.2
16	3813209993/7	SCHMIDT MORTGAGE COMPANY	143	1.5	1.5	16,657	1.6	1.6
17	2295609996/7	RESIDENTIAL FUNDING CORPORATIO	141	1.5	1.5	13,965	1.4	1.4
18	0000008551/4	WASHINGTON MUTUAL BANK, FA	137	1.5	1.5	16,747	1.7	1.7
19	0000008412/4	FLAGSTAR BANK, FSB	137	1.5	1.5	15,739	1.5	1.5
20	0000007621/1	BANK ONE, NA	133	1.4	1.4	12,561	1.2	1.2
21	0680267088/4	NORTH AMERICAN MORTGAGE CO	110	1.2	1.2	10,672	1.0	1.0
22	1374500006/7	TRUSTCORP MORTGAGE COMPANY	104	1.1	1.1	13,336	1.3	1.3
23	7604800006/7	OPTION ONE MORTGAGE CORP.	94	1.0	1.0	8,482	0.8	0.8
24	7185300006/7	ACCREDITED HOME LENDERS, INC	92	1.0	1.0	5,738	0.5	0.5
25	0000004072/4	OHIO SAVINGS BANK	83	0.9	0.9	12,425	1.2	1.2
26	0000008566/4	SUPERIOR BANK FSB	83	0.9	0.9	6,507	0.6	0.6
27	3027509990/7	CENDANT MORTGAGE	82	0.9	0.9	9,964	1.0	1.0
28	0000013044/1	BANK OF AMERICA, N A	75	0.8	0.8	7,431	0.7	0.7
29	0000014761/1	KEYBANK NATIONAL ASSOCIATION	74	0.8	0.8	8,690	0.8	0.8
30	7527300003/7	NVR MORTGAGE FINANCE, INC.	71	0.7	0.7	11,523	1.1	1.1
31	0000023160/1	CHASE MANHATTAN BANK USA, NA	69	0.7	0.7	2,533	0.2	0.2
32	56-1796719/1	NATIONSCREDIT FINANCIAL SERVIC	68	0.7	0.7	6,138	0.6	0.6
33	31-1690008/5	WRIGHT-PATT FINANCIAL GROUP, L	66	0.7	0.7	7,147	0.7	0.7
34	59-2645397/1	ALTEGRA CREDIT COMPANY	62	0.6	0.6	5,317	0.5	0.5
35	0132729067/4	NAMCO ASSET MANAGEMENT, INC	57	0.6	0.6	5,449	0.5	0.5
36	0001999138/2	THE CIT GROUP/CONSUMER FINANCE	57	0.6	0.6	5,274	0.5	0.5

NOTE: Applications include Purchased Loans. Balances are in thousands

INCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
Purpose: Home Purchase (1)
Loan Type: Conventional (1)
Action: All Action Codes
Owner Occupancy: All Owner Occupancy Codes
Applicant Race: All Applicant Races
Applicant Sex: All Applicant Genders
Applicant Income: All Applicant Income Levels
Tract Income: All Tract Levels
Tract Minority: All Minority levels
Criteria: ALL INSTITUTIONS
Year: 2001 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
37	2294709990/7	CONSECO FINANCE SERVICING CORP	54	0.5	0.5	1,623	0.1	0.1
38	0000006809/4	COLONIAL SAVINGS, F.A.	53	0.5	0.5	6,250	0.6	0.6
39	7506600003/7	OAKWOOD ACCEPTANCE CORPORATION	53	0.5	0.5	2,617	0.2	0.2
40	0000001156/4	FIRST PLACE BANK	51	0.5	0.5	8,511	0.8	0.8
41	0000060143/2	COMERICA BANK	51	0.5	0.5	1,531	0.1	0.1
42	33-0862379/3	GREENPOINT CREDIT, LLC	49	0.5	0.5	1,725	0.1	0.1
43	0000000200/1	FLEET NATIONAL BANK	48	0.5	0.5	5,966	0.6	0.6
44	13-2999081/1	CITIMORTGAGE INC	47	0.5	0.5	6,444	0.6	0.6
45	0002752527/2	EQUIFIRST CORPORATION	47	0.5	0.5	5,049	0.5	0.5
46	36-1239445/7	HOUSEHOLD FINANCE CORPORATION	46	0.5	0.5	2,858	0.2	0.2
47	1265700002/7	DECISION ONE MORTGAGE COMPANY	43	0.4	0.4	3,481	0.3	0.3
48	1126000006/7	SEBRING CAPITAL CORPORATION	43	0.4	0.4	3,206	0.3	0.3
49	31-0881021/1	THE HUNTINGTON MORTGAGE CO	40	0.4	0.4	5,086	0.5	0.5
50	22-1092200/1	CHASE MANHATTAN MORTGAGE CORP	40	0.4	0.4	4,446	0.4	0.4
51	0000007975/4	USAA FEDERAL SAVINGS BANK	37	0.4	0.4	5,232	0.5	0.5
52	0000000164/1	FIRST NATIONAL BANK	36	0.3	0.3	3,517	0.3	0.3
53	7909100002/7	HOMECOMINGS FINANCIAL NETWORK	34	0.3	0.3	3,281	0.3	0.3
54	0000006194/4	HOUSEHOLD BANK, F S B	34	0.3	0.3	2,860	0.2	0.2
55	54-1779092/7	ORIGEN FINANCIAL, INC	34	0.3	0.3	1,401	0.1	0.1
56	0000034536/3	CONSECO BANK, INC	34	0.3	0.3	900	0.0	0.0
57	0000576710/2	SKY BANK - OHIO BANK REGION	33	0.3	0.3	4,149	0.4	0.4
58	7564000004/7	PRINCIPAL RESIDENTIAL MTG,INC.	32	0.3	0.3	3,815	0.3	0.3
59	13-3210378/3	GREENPOINT MORTGAGE FUNDING, I	32	0.3	0.3	3,366	0.3	0.3
60	95-2622032/7	AAMES FUNDING CORPORATION	32	0.3	0.3	2,094	0.2	0.2
61	7775100007/7	MILA, INC	31	0.3	0.3	1,960	0.1	0.1
62	3837309996/7	FIRST EQUITY MORTGAGE INC	30	0.3	0.3	5,863	0.5	0.5
63	0001078369/2	REGIONS MORTGAGE, INC.	30	0.3	0.3	4,548	0.4	0.4
64	0001088890/2	IRWIN MORTGAGE CORPORATION	30	0.3	0.3	3,321	0.3	0.3
65	0000017925/4	SUPERIOR FEDERAL BANK FSB	30	0.3	0.3	2,308	0.2	0.2
66	1003800004/7	LONG BEACH MORTGAGE COMPANY	28	0.3	0.3	2,241	0.2	0.2
67	0000000711/4	FIRST SAVINGS BANK	27	0.2	0.2	2,392	0.2	0.2
68	0000003269/1	WELLS FARGO BANK WEST, NA	26	0.2	0.2	1,094	0.1	0.1
69	0001478802/2	HOMESIDE MORTGAGE, INC.	25	0.2	0.2	3,067	0.3	0.3
70	7606200003/7	RBMG, INC	25	0.2	0.2	2,831	0.2	0.2
71	3842009994/7	COLONY MORTGAGE CORPORATION	25	0.2	0.2	2,540	0.2	0.2
72	3831400006/7	RYLAND MORTGAGE COMPANY	24	0.2	0.2	3,473	0.3	0.3

NOTE: Applications include Purchased Loans, Balances are in thousands

INCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
Purpose: All Purpose Code selected
Loan Type: All Loan Type Codes
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Applicant Race: All Applicant Races
Applicant Sex: All Applicant Genders
Applicant Income: All Applicant Income Levels
Tract Income: All Tract Levels
Tract Minority: All Minority levels
Criteria: ALL INSTITUTIONS

Year: 2000 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
37	0000014761/1	KEYBANK NATIONAL ASSOCIATION	211	0.6	0.6	11,471	0.4	0.4
38	0341225701/4	CHARTER ONE CREDIT CORP	204	0.6	0.6	16,575	0.6	0.6
39	3027509990/7	CENDANT MORTGAGE	203	0.6	0.6	24,325	0.9	0.9
40	7185300006/7	ACCREDITED HOME LENDERS, INC.	196	0.6	0.6	15,926	0.6	0.6
41	13-2999081/1	CITIMORTGAGE INC.	195	0.6	0.6	15,246	0.5	0.5
42	0000004072/4	OHIO SAVINGS BANK	193	0.6	0.6	26,079	1.0	1.0
43	1611300007/7	EQUITY RESOURCES, INC.	192	0.6	0.6	16,820	0.6	0.6
44	3833009998/7	AMERICAN MORTGAGE SERVICE COMP	183	0.5	0.5	17,034	0.6	0.6
45	0000612618/2	PROVIDENT BANK	156	0.4	0.4	8,267	0.3	0.3
46	0132729067/4	NAMCO ASSET MANAGEMENT, INC.	146	0.4	0.4	13,969	0.5	0.5
47	59-2645397/1	ALTEGRA CREDIT COMPANY	143	0.4	0.4	11,524	0.4	0.4
48	3813209993/7	SCHMIDT MORTGAGE COMPANY	139	0.4	0.4	17,023	0.6	0.6
49	41-1704421/1	WELLS FARGO FUNDING	139	0.4	0.4	14,644	0.5	0.5
50	7731100009/7	LEGACY MORTGAGE	138	0.4	0.4	16,559	0.6	0.6
51	0000002630/4	M&I BANK FSB	132	0.4	0.4	11,029	0.4	0.4
52	0232646780/7	AMERICAN BUSINESS FINANCIAL	128	0.4	0.4	8,307	0.3	0.3
53	0002828310/2	REGIONAL HOLDING COMPANY	125	0.3	0.3	10,474	0.4	0.4
54	52-2113031/1	HOMEOWNERS LOAN CORPORATION	123	0.3	0.3	8,611	0.3	0.3
55	0002975027/2	ASSOCIATES FINANCIAL SERVICES	123	0.3	0.3	7,207	0.2	0.2
56	2182009998/7	WASHTENAW MORTGAGE COMPANY	122	0.3	0.3	11,791	0.4	0.4
57	0000765578/2	BANC ONE FINANCIAL SERVICES	119	0.3	0.3	8,392	0.3	0.3
58	0000013044/1	BANK OF AMERICA, N.A.	113	0.3	0.3	11,551	0.4	0.4
59	0000064970/5	UNIVERSAL 1 CREDIT UNION, INC	113	0.3	0.3	1,934	0.0	0.0
60	22-1092200/1	CHASE MANHATTAN MORTGAGE CORP	106	0.3	0.3	10,437	0.4	0.4
61	0000013349/1	UNION PLANTERS BANK, N.A.	105	0.3	0.3	8,306	0.3	0.3
62	0000066835/5	DAY AIR CREDIT UNION	104	0.3	0.3	1,276	0.0	0.0
63	95-2622032/7	AAMES FUNDING CORPORATION	100	0.3	0.3	7,732	0.3	0.3
64	0000001316/1	PNC BANK NA	100	0.3	0.3	3,335	0.1	0.1
65	0000025653/3	FREMONT INVESTMENT & LOAN	98	0.3	0.3	7,823	0.3	0.3
66	0000006069/4	LEHMAN BROTHERS BANK, FSB	95	0.2	0.2	7,097	0.2	0.2
67	7069000008/7	DELTA FUNDING CORP	92	0.2	0.2	6,683	0.2	0.2
68	1125400003/7	EQUIFIRST CORPORATION	90	0.2	0.2	9,298	0.3	0.3
69	0001088890/2	IRWIN MORTGAGE CORPORATION	88	0.2	0.2	8,711	0.3	0.3
70	33-0862379/3	GREENPOINT CREDIT, LLC	88	0.2	0.2	3,055	0.1	0.1
71	0000003269/1	WELLS FARGO BANK WEST, NA	88	0.2	0.2	2,294	0.0	0.0
72	59-3324910/7	HOMEGOLD, INC.	84	0.2	0.2	6,202	0.2	0.2

NOTE: Applications include Purchased Loans, Balances are in thousands.

INSTITUTION LEVEL

INCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
Purpose: All Purpose Code selected
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Applicant Income: All Applicant Income Levels
Tract Income: All Tract Levels
Tract Minority: All Minority levels
Criteria: ALL INSTITUTIONS

Year: 2000 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
73	0000008569/4	APPROVED FEDERAL SAVINGS BANK	84	0.2	0.2	5,837	0.2	0.2
74	1374500006/7	TRUSTCORP MORTGAGE COMPANY	82	0.2	0.2	7,602	0.2	0.2
75	1512400000/7	NOVASTAR	81	0.2	0.2	8,433	0.3	0.3
76	1126000006/7	SEBRING CAPITAL CORPORATION	81	0.2	0.2	7,417	0.2	0.2
77	0000007745/1	THE HUTINGTON NATIONAL BANK	78	0.2	0.2	1,944	0.0	0.0
78	1014100002/7	FULL SPECTRUM LENDING, INC.	77	0.2	0.2	5,792	0.2	0.2
79	0000008551/4	WASHINGTON MUTUAL BANK, FA	76	0.2	0.2	6,750	0.2	0.2
80	7900200006/7	NEW CENTURY MORTGAGE CORP	75	0.2	0.2	6,906	0.2	0.2
81	7527300003/7	NVR MORTGAGE FINANCE, INC.	74	0.2	0.2	11,042	0.4	0.4
82	7715400000/7	CROSSMANN MORTGAGE CORP	73	0.2	0.2	9,562	0.3	0.3
83	0161146859/4	CHARTER ONE MORTGAGE CORP	71	0.2	0.2	10,376	0.4	0.4
84	0000006809/4	COLONIAL SAVINGS, F.A.	70	0.2	0.2	6,893	0.2	0.2
85	0000014141/1	BROOKVILLE NATIONAL BANK	69	0.2	0.2	2,663	0.1	0.1
86	31-1690008/5	WRIGHT-PATT FINANCIAL GROUP, L	68	0.2	0.2	6,016	0.2	0.2
87	0000006194/4	HOUSEHOLD BANK, F.S.B.	68	0.2	0.2	2,999	0.1	0.1
88	0000004410/4	SOVEREIGN BANK	67	0.2	0.2	6,641	0.2	0.2
89	31-0881021/1	THE HUNTINGTON MORTGAGE CO.	63	0.1	0.1	7,224	0.2	0.2
90	0000000711/4	FIRST FEDERAL SAVINGS BANK OF	63	0.1	0.1	5,313	0.2	0.2
91	7775100007/7	MILA, INC.	63	0.1	0.1	3,947	0.1	0.1
92	0000000086/1	FIRST NAT'L BANK GERMANTOWN	63	0.1	0.1	3,405	0.1	0.1
93	0002971869/2	HOME EQUITY OF AMERICA, INC.	61	0.1	0.1	4,100	0.1	0.1
94	0000009462/3	FARMERS & MERCHANTS BANK	61	0.1	0.1	2,590	0.1	0.1
95	0000023160/1	CHASE MANHATTAN BANK USA, NA	57	0.1	0.1	2,275	0.0	0.0
96	34-0898643/1	PNC MORTGAGE CORP OF AMERICA	56	0.1	0.1	7,883	0.3	0.3
97	7810600004/7	PROVIDENT FUNDING ASSOCIATES,	55	0.1	0.1	7,952	0.3	0.3
98	36-4334512/7	HEARTLAND ENTERPRISES, INC.	55	0.1	0.1	4,389	0.1	0.1
99	0002026871/2	OLD KENT MORTGAGE COMPANY	53	0.1	0.1	6,929	0.2	0.2
100	0000008529/4	UNION FEDERAL BANK	52	0.1	0.1	5,353	0.2	0.2
101	7909100002/7	HOMECOMINGS FINANCIAL NETWORK	52	0.1	0.1	4,337	0.1	0.1
102	7840600009/7	BNC MORTGAGE INC	52	0.1	0.1	3,807	0.1	0.1
103	3831400006/7	RYLAND MORTGAGE COMPANY	51	0.1	0.1	8,552	0.3	0.3
104	0001478802/2	HOMESIDE LENDING, INC	51	0.1	0.1	5,743	0.2	0.2
105	54-1779092/7	DYNEX FINANCIAL, INC	51	0.1	0.1	2,057	0.0	0.0
106	0000576710/2	THE OHIO BANK	50	0.1	0.1	6,392	0.2	0.2
107	0002861287/2	CITIFINANCIAL MORTGAGE COMPA	50	0.1	0.1	3,727	0.1	0.1
108	1118100001/7	MORTGAGE LENDERS NETWORK USA	49	0.1	0.1	4,548	0.1	0.1

NOTE Applications include Purchased Loans, Balances are in thousands

INCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
Purpose: All Purpose Code selected
Loan Type: All Loan Type Codes
Action: All Action Codes
Owner Occupancy: All Owner Occupancy Codes
Applicant Race: All Applicant Races
Applicant Sex: All Applicant Genders
Applicant Income: All Applicant Income Levels
Tract Income: All Tract Levels
Tract Minority: All Minority levels
Criteria: ALL INSTITUTIONS
Year: 2000 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
109	0000006199/5	RIVER VALLEY FEDERAL CR. UNION	49	0.1	0.1	1,949	0.0	0.0
110	0002914969/2	NCS MORTGAGE LENDING COMPANY	48	0.1	0.1	4,350	0.1	0.1
111	0000014470/4	TRAVELERS BANK & TRUST, FSB	45	0.1	0.1	3,698	0.1	0.1
112	0000002076/4	BROOKVILLE BUILDING & SAVINGS	45	0.1	0.1	3,497	0.1	0.1
113	39-1801203/3	GB HOME EQUITY	45	0.1	0.1	1,625	0.0	0.0
114	0000020001/3	REPUBLIC BANK	44	0.1	0.1	5,480	0.2	0.2
115	0000002641/4	CHARTER ONE BANK	43	0.1	0.1	7,168	0.2	0.2
116	1248200000/7	AMERUS HOME EQUITY, INC.	43	0.1	0.1	4,026	0.1	0.1
117	23-2681022/7	RESOURCE ONE CONSUMER DISCOUNT	43	0.1	0.1	3,073	0.1	0.1
118	0000060143/2	COMERICA BANK	42	0.1	0.1	1,207	0.0	0.0
119	0000001741/1	WELLS FARGO BANK, NA	41	0.1	0.1	4,244	0.1	0.1
120	23-2778991/7	ADVANTA FINANCE CORP.	41	0.1	0.1	2,207	0.0	0.0
121	0000017595/1	THE COMMUNITY NATIONAL BANK	38	0.1	0.1	2,259	0.0	0.0
122	4856500006/7	VANDERBILT MORTGAGE	38	0.1	0.1	1,409	0.0	0.0
123	1463300003/7	MOORE FINANCIAL ENTERPRISES, I	36	0.1	0.1	3,281	0.1	0.1
124	1003800004/7	LONG BEACH MORTGAGE COMPANY	36	0.1	0.1	3,179	0.1	0.1
125	0000002839/4	FIRST INDIANA BANK GTC942	36	0.1	0.1	2,359	0.0	0.0
126	0000000336/1	FIRST TENNESSEE BANK N A	36	0.1	0.1	2,203	0.0	0.0
127	0000060885/5	DAY MET CREDIT UNION	36	0.1	0.1	824	0.0	0.0
128	7564000004/7	PRINCIPAL RESIDENTIAL MTG,INC.	35	0.1	0.1	4,069	0.1	0.1
129	48-0875093/1	FIRST HORIZON HOME LOAN CORP.	35	0.1	0.1	3,151	0.1	0.1
130	0000006381/4	METROPOLITAN BANK AND TRUST CO	34	0.1	0.1	4,208	0.1	0.1
131	0000000164/1	FIRST NATIONAL BANK	34	0.1	0.1	2,695	0.1	0.1
132	0000033535/3	ADVANTA BANK CORP.	34	0.1	0.1	1,469	0.0	0.0
133	0000913940/2	OLD KENT BANK	34	0.1	0.1	980	0.0	0.0
134	0458600405/7	WMC MORTGAGE CORP.	32	0.1	0.1	3,203	0.1	0.1
135	33-0651685/7	PINNFUND, USA	31	0.0	0.0	3,177	0.1	0.1
136	63-0255533/3	REGIONS MORTGAGE, INC.	30	0.0	0.0	4,297	0.1	0.1
137	7362200006/7	BROADVIEW MORTGAGE COMPANY	30	0.0	0.0	2,694	0.1	0.1
138	0001073560/2	FIRST UNION MORTGAGE CORP.	28	0.0	0.0	3,254	0.1	0.1
139	0000003692/4	MONROE FEDERAL S&L ASSOC	28	0.0	0.0	3,056	0.1	0.1
140	7511600000/7	CONTIMORTGAGE CORPORATION	28	0.0	0.0	2,228	0.0	0.0
141	0000005030/4	CRUSADER BANK	28	0.0	0.0	2,037	0.0	0.0
142	0593606823/4	NATIONAL MORTGAGE CENTER	27	0.0	0.0	3,390	0.1	0.1
143	7943600003/7	SAXON MORTGAGE, INC.	27	0.0	0.0	2,588	0.1	0.1
144	0627009996/7	MERRILL LYNCH CREDIT CORP.	26	0.0	0.0	7,160	0.2	0.2

NOTE: Applications include Purchased Loans. Balances are in thousands.

INSTITUTION LEVEL

INCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
Purpose: All Purpose Code selected
Loan Type: All Loan Type Codes
Action: All Action Codes
Owner Occupancy: All Owner Occupancy Codes
Applicant Race: All Applicant Races
Applicant Sex: All Applicant Genders
Applicant Income: All Applicant Income Levels
Tract Income: All Tract Levels
Tract Minority: All Minority levels
Criteria: ALL INSTITUTIONS

Year: 2000 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
145	0000001235/4	CITIBANK, F.S.B	26	0.0	0.0	4,333	0.1	0.1
146	15349000047	FIRST NLC FINANCIAL SERVICES	26	0.0	0.0	2,178	0.0	0.0
147	0000003970/4	INDYMAC BANK	24	0.0	0.0	3,949	0.1	0.1
148	0000000056/1	FIRST SOUTHWESTERN	24	0.0	0.0	3,006	0.1	0.1
149	0001072246/2	SUNTRUST MORTGAGE, INC	24	0.0	0.0	2,535	0.0	0.0
150	35-2088209/7	CRESLEIGH FINANCIAL SVC, LLC	24	0.0	0.0	2,003	0.0	0.0
151	0000014191/4	MIDFIRST BANK	24	0.0	0.0	703	0.0	0.0
152	0000008558/4	BANK UNITED	23	0.0	0.0	2,141	0.0	0.0
153	7464900009/7	EMC MORTGAGE CORPORATION	23	0.0	0.0	1,446	0.0	0.0
154	0002039488/2	WELLS FARGO FIN'L AMERICA, INC	23	0.0	0.0	1,369	0.0	0.0
155	87-0274895/1	CROSSLAND MORTGAGE CORPORATION	22	0.0	0.0	2,034	0.0	0.0
156	0000008846/1	OLD NATIONAL BANK	22	0.0	0.0	232	0.0	0.0
157	1411700003/7	EQUITABLE MORTGAGE CORP	21	0.0	0.0	4,666	0.1	0.1
158	0000130943/2	IRWIN UNION BANK AND TRUST COM	21	0.0	0.0	748	0.0	0.0
159	0000017283/4	WAYPOINT BANK	21	0.0	0.0	188	0.0	0.0
160	0000004115/4	ASTORIA FEDERAL SAVINGS	20	0.0	0.0	4,796	0.1	0.1
161	3837309996/7	FIRST EQUITY MORTGAGE INC.	20	0.0	0.0	3,743	0.1	0.1
162	23-2772890/7	RESIDENTIAL MONEY CENTERS, INC	19	0.0	0.0	1,433	0.0	0.0
163	0000012642/4	WORLD SAVINGS BANK, FSB	18	0.0	0.0	1,940	0.0	0.0
164	7033900007/7	TITLE WESTMORTGAGE INC	18	0.0	0.0	1,730	0.0	0.0
165	3842009994/7	COLONY MORTGAGE CORPORATION	18	0.0	0.0	1,683	0.0	0.0
166	0000009859/1	SOMERVILLE NATIONAL BANK	18	0.0	0.0	849	0.0	0.0
167	0000023570/1	FIRST BANK RICHMOND	18	0.0	0.0	747	0.0	0.0
168	1437800009/7	E-LOAN, INC	17	0.0	0.0	2,174	0.0	0.0
169	0000008266/4	UNITED MIDWEST SAVINGS	17	0.0	0.0	1,227	0.0	0.0
170	0000013987/1	WELLS FARGO BANK INDIANA, NA	17	0.0	0.0	234	0.0	0.0
171	0113399725/4	ASTORIA FEDERAL MORTGAGE CORP	16	0.0	0.0	3,682	0.1	0.1
172	36-2677063/7	MSDW CREDIT CORPORATION	16	0.0	0.0	1,848	0.0	0.0
173	0001966578/2	M&T MORTGAGE CORPORATION	16	0.0	0.0	1,514	0.0	0.0
174	0001942602/2	EQUITY ONE, INC	16	0.0	0.0	1,075	0.0	0.0
175	0000021699/1	GOLETA NATIONAL BANK	16	0.0	0.0	648	0.0	0.0
176	0000005536/5	NAVY FEDERAL CREDIT UNION	15	0.0	0.0	1,334	0.0	0.0
177	1375809998/7	CUNA MUTUAL MORTGAGE CORP.	15	0.0	0.0	1,314	0.0	0.0
178	0000023063/3	BANK OF YORBA LINDA	15	0.0	0.0	1,313	0.0	0.0
179	0001035401/2	THE CIT GROUP/SALES FINANCING,	15	0.0	0.0	551	0.0	0.0
180	0000008159/4	CROWN BANK, FSB	15	0.0	0.0	293	0.0	0.0

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INCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
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Criteria: ALL INSTITUTIONS

Year: 2000 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
181	1059700002/7	FIRST CONSOLIDATED MORTGAGE CO	14	0.0	0.0	1,634	0.0	0.0
182	7892800004/7	FIELDSTONE MORTGAGE COMPANY	14	0.0	0.0	1,547	0.0	0.0
183	0000000124/4	CORNERSTONE BANK	14	0.0	0.0	1,062	0.0	0.0
184	7001800005/7	INDYMAC MORTGAGE HOLDINGS INC.	14	0.0	0.0	1,047	0.0	0.0
185	0000030003/3	GUARANTY BANK, SSB	14	0.0	0.0	466	0.0	0.0
186	0042590778/4	FORWARD FINANCIAL	14	0.0	0.0	382	0.0	0.0
187	7343000001/7	IMPAC FUNDING CORP	13	0.0	0.0	1,478	0.0	0.0
188	0752544166/4	FIRST NATIONWIDE MORTGAGE CORP	13	0.0	0.0	1,284	0.0	0.0
189	0000023253/1	TCF NATIONAL BANK	13	0.0	0.0	1,231	0.0	0.0
190	1483300003/7	FINANCE AMERICA, LLC	13	0.0	0.0	1,137	0.0	0.0
191	11-2815564/7	EHOMECREDIT CORP.	13	0.0	0.0	1,101	0.0	0.0
192	1195900005/7	LOAN FUNDING CORP. OF AMERICA	13	0.0	0.0	1,089	0.0	0.0
193	0000007975/4	USAA FEDERAL SAVINGS BANK	13	0.0	0.0	904	0.0	0.0
194	0000006594/1	SECURITY NATIONAL BANK	13	0.0	0.0	325	0.0	0.0
195	3002310011/7	GE CAPITAL MORTGAGE SERVICES	12	0.0	0.0	1,951	0.0	0.0
196	7151500007/7	VILLA MORTGAGE INC.	12	0.0	0.0	1,408	0.0	0.0
197	13-3210378/3	GREENPOINT MORTGAGE FUNDING	12	0.0	0.0	1,386	0.0	0.0
198	0000012504/4	HOME LOAN AND INVESTMENT BANK	12	0.0	0.0	1,069	0.0	0.0
199	7218600003/7	BIRMINGHAM BANCORP MORTGAGE CO	12	0.0	0.0	1,037	0.0	0.0
200	7506600003/7	OAKWOOD ACCEPTANCE CORPORATION	12	0.0	0.0	748	0.0	0.0
201	0001382226/2	HSBC MORTGAGE CORPORATION	11	0.0	0.0	2,106	0.0	0.0
202	23-2834903/3	FTM MORTGAGE COMPANY	11	0.0	0.0	1,152	0.0	0.0
203	7177900003/7	CHADWICK MORTGAGE, INC	11	0.0	0.0	1,084	0.0	0.0
204	3733609993/7	THE BANKERS G T & T CO	11	0.0	0.0	1,081	0.0	0.0
205	7140500002/7	SIBCY CLINE MORTGAGE SERVICES,	11	0.0	0.0	902	0.0	0.0
206	7177000002/7	MERITAGE MORTGAGE CORPORATION	11	0.0	0.0	864	0.0	0.0
207	0000000086/4	GREAT AMERICAN FEDERAL S&L	10	0.0	0.0	1,412	0.0	0.0
208	0000003043/4	NEW CARLISLE FEDERAL SAV BK	10	0.0	0.0	1,243	0.0	0.0
209	0000001701/4	THE GUERNSEY BANK, FSB	10	0.0	0.0	1,015	0.0	0.0
210	3839809993/7	LIBERTY MORTGAGE COMPANY	10	0.0	0.0	668	0.0	0.0
211	0000004592/4	OCWEN FEDERAL BANK	10	0.0	0.0	496	0.0	0.0
212	7162800002/7	21ST CENTURY MORTGAGE	10	0.0	0.0	110	0.0	0.0
213	0000002360/1	LEBANON CITIZENS NATIONAL BANK	9	0.0	0.0	1,635	0.0	0.0
214	0000000001/1	FIRST UNION NATIONAL BANK	9	0.0	0.0	1,315	0.0	0.0
215	7493900007/7	DAVID MORTGAGE, INC.	9	0.0	0.0	1,219	0.0	0.0
216	7765600003/7	MAC-CLAIR MORTGAGE CORP.	9	0.0	0.0	899	0.0	0.0

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INSTITUTION LEVEL

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Criteria: ALL INSTITUTIONS

Year: 2000 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
217	0640713034/4	CORINTHIAN MORTGAGE CORP	9	0.0	0.0	877	0.0	0.0
218	0510356097/4	WILMINGTON NATIONAL FINANCE	9	0.0	0.0	729	0.0	0.0
219	0000001427/1	UNITED NATIONAL BANK	9	0.0	0.0	46	0.0	0.0
220	0000008145/4	CHEVY CHASE BANK, F.S.B.	9	0.0	0.0	38	0.0	0.0
221	0841100002/7	ALLIANCE MORTGAGE COMPANY	8	0.0	0.0	1,326	0.0	0.0
222	0000004544/4	THIRD FEDERAL SAVINGS & LOAN	8	0.0	0.0	1,099	0.0	0.0
223	0000002479/1	SECOND NATIONAL BANK	8	0.0	0.0	925	0.0	0.0
224	1487900000/7	RESIDENTIAL CREDIT CORPORATION	8	0.0	0.0	711	0.0	0.0
225	0000006189/4	DOWNEY SAVINGS AND LOAN ASSOC	8	0.0	0.0	692	0.0	0.0
226	0000000109/1	NATIONAL CITY BANK, KENTUCKY	8	0.0	0.0	657	0.0	0.0
227	0000018667/1	FIRST NATIONAL BANK OF NEVADA	8	0.0	0.0	275	0.0	0.0
228	0000499613/2	FIFTH THIRD BANK, KENTUCKY,INC	8	0.0	0.0	60	0.0	0.0
229	0000014740/1	FIRST NATIONAL BANK OF AMERICA	7	0.0	0.0	2,395	0.0	0.0
230	0470659799/4	COMMERCIAL FEDERAL MORTGAGE CO	7	0.0	0.0	1,495	0.0	0.0
231	0000009846/3	BRANCH BANKING AND TRUST CO	7	0.0	0.0	1,344	0.0	0.0
232	0741878850/4	TEMPLE-INLAND MORTGAGE CO	7	0.0	0.0	869	0.0	0.0
233	0391428741/4	M&I MORTGAGE CORP	7	0.0	0.0	845	0.0	0.0
234	7285600001/7	WESTAMERICA MORTGAGE COMPANY	7	0.0	0.0	772	0.0	0.0
235	0364275816/4	AVONDALE FUNDING.COM	7	0.0	0.0	438	0.0	0.0
236	0000007837/4	DIME SAVINGS BANK OF NY, FSB	7	0.0	0.0	435	0.0	0.0
237	7592700002/7	H&R BLOCK MORTGAGE CORPORATION	7	0.0	0.0	392	0.0	0.0
238	7197000003/7	QUICKEN LOANS INC.	6	0.0	0.0	875	0.0	0.0
239	0000011968/4	PAN AMERICAN BANK, F.S.B	6	0.0	0.0	797	0.0	0.0
240	7718200008/7	AMERICAN HOME LOANS	6	0.0	0.0	583	0.0	0.0
241	0000000993/4	PEOPLES SAVINGS BANK	6	0.0	0.0	495	0.0	0.0
242	7673400003/7	INVESTAID CORPORATION	6	0.0	0.0	478	0.0	0.0
243	7875200001/7	FIRST GREENSBORO HOME EQUITY	6	0.0	0.0	451	0.0	0.0
244	0000007946/4	LIFE BANK	6	0.0	0.0	381	0.0	0.0
245	7853200002/7	PARKWAY MORTGAGE	6	0.0	0.0	308	0.0	0.0
246	0002977384/2	ASSOCIATES HOUSING FINANCE, LL	6	0.0	0.0	237	0.0	0.0
247	0000003680/4	THIRD SAVINGS AND LOAN COMPANY	6	0.0	0.0	215	0.0	0.0
248	0000030757/3	COASTAL BANC SSB	6	0.0	0.0	101	0.0	0.0
249	7042100008/7	DOLLAR MORTGAGE CORPORATION	5	0.0	0.0	1,244	0.0	0.0
250	7605000005/7	COOPERATIVE MORTGAGE SERVICES	5	0.0	0.0	748	0.0	0.0
251	7516800003/7	FIRST GUARANTY MORTGAGE CORP	5	0.0	0.0	645	0.0	0.0
252	0000008183/4	EASTERN SAVINGS BANK, FSB	5	0.0	0.0	565	0.0	0.0

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INSTITUTION LEVEL

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Criteria: ALL INSTITUTIONS

Year: 2000 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
253	0000096755/5	MIDFIRST CREDIT UNION	5	0.0	0.0	507	0.0	0.0
254	7109700009/7	MONUMENT MORTGAGE, INC	5	0.0	0.0	481	0.0	0.0
255	7568500004/7	CUSTOM MORTGAGE INC	5	0.0	0.0	414	0.0	0.0
256	7883200007/7	INDYMAC INC.	5	0.0	0.0	377	0.0	0.0
257	1200100006/7	MORTGAGE AMENITIES CORP.	5	0.0	0.0	334	0.0	0.0
258	0000090007/5	US AIRWAYS FEDERAL CU	5	0.0	0.0	86	0.0	0.0
259	0000000191/1	NATIONAL CITY BANK, MICH/ILL	5	0.0	0.0	23	0.0	0.0
260	0000169653/2	FIRST BANK	4	0.0	0.0	1,491	0.0	0.0
261	0000413208/2	HSBC BANK, USA	4	0.0	0.0	973	0.0	0.0
262	0000002092/4	FRANKLIN SAVINGS AND LOAN CO	4	0.0	0.0	698	0.0	0.0
263	7927200007/7	NEW FREEDOM MORTGAGE CORP	4	0.0	0.0	509	0.0	0.0
264	7545300007/7	LOANSDIRECT	4	0.0	0.0	376	0.0	0.0
265	0000000709/4	GUARDIAN SAVINGS BANK, FSB	4	0.0	0.0	343	0.0	0.0
266	0000006679/4	MATRIX CAPITAL BANK	4	0.0	0.0	218	0.0	0.0
267	0000001267/1	FARMERS & MECHANICS NATL BANK	4	0.0	0.0	110	0.0	0.0
268	1665100001/7	PINNACLE DIRECT FUNDING CORP	3	0.0	0.0	983	0.0	0.0
269	0000000670/4	CAPITOL FEDERAL SAVINGS	3	0.0	0.0	835	0.0	0.0
270	02-3231972/7	CRS	3	0.0	0.0	555	0.0	0.0
271	0000000827/4	COVINGTON SAVINGS & LOAN ASSOC	3	0.0	0.0	424	0.0	0.0
272	1061700007/7	TOWN & COUNTRY CREDIT CORP.	3	0.0	0.0	419	0.0	0.0
273	1596200005/7	GMFS LLC	3	0.0	0.0	365	0.0	0.0
274	0000005198/4	COMMERCIAL FEDERAL BANK	3	0.0	0.0	331	0.0	0.0
275	0000066840/5	CODE CREDIT UNION	3	0.0	0.0	309	0.0	0.0
276	1259600009/7	SOUTH STAR FUNDING, LLC	3	0.0	0.0	303	0.0	0.0
277	0002978998/2	CITIMORTGAGE, INC	3	0.0	0.0	302	0.0	0.0
278	1000200007/7	DIVERSIFIED CAPITAL CORP OF TN	3	0.0	0.0	263	0.0	0.0
279	5535100002/7	METWEST MORTGAGE SERVICES, INC	3	0.0	0.0	247	0.0	0.0
280	0000010666/3	OAK HILL BANKS	3	0.0	0.0	224	0.0	0.0
281	1045600008/7	CREVE COEUR MORTGAGE ASSOC INC	3	0.0	0.0	192	0.0	0.0
282	2436100003/7	CHARLES F. CURRY	3	0.0	0.0	190	0.0	0.0
283	1466800007/7	ONEPIPELINE.COM	3	0.0	0.0	184	0.0	0.0
284	0000013914/1	BANK ONE, WHEELING-STEUBENVILL	3	0.0	0.0	80	0.0	0.0
285	0000014362/1	LASALLE BANK NA	3	0.0	0.0	71	0.0	0.0
286	0000002098/4	MIDAMERICA BANK	2	0.0	0.0	476	0.0	0.0
287	7979400002/7	FIRST MAGNUS FINANCIAL CORP.	2	0.0	0.0	334	0.0	0.0
288	0000000264/5	HEARTLAND FCU	2	0.0	0.0	291	0.0	0.0

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Criteria: ALL INSTITUTIONS
Year: 2000 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
289	1261700007/7	PRIMARY RESIDENTIAL MORTGAGE C	2	0.0	0.0	245	0.0	0.0
290	1458900002/7	NEXSTAR FINANCIAL CORPORATION	2	0.0	0.0	234	0.0	0.0
291	0541900445/4	GREATER ATLANTIC MORTGAGE CORP	2	0.0	0.0	233	0.0	0.0
292	0000003990/4	CITIZENS BANK OF DELPHOS	2	0.0	0.0	218	0.0	0.0
293	7294500002/7	FIRST JEFFERSON MORTGAGE CORP.	2	0.0	0.0	203	0.0	0.0
294	7479800008/7	CHAPEL MORTGAGE CORPORATION	2	0.0	0.0	202	0.0	0.0
295	7323800008/7	EXPRESS CAPITAL LENDING	2	0.0	0.0	198	0.0	0.0
296	2182409993/7	HEARTWELL MORTGAGE CORPORATION	2	0.0	0.0	197	0.0	0.0
297	0000003927/4	NORTH AMERICAN SAVINGS BANK	2	0.0	0.0	191	0.0	0.0
298	7507300007/7	ALLIED MORTGAGE CAPITAL CORP.	2	0.0	0.0	183	0.0	0.0
299	3802909995/7	MORTGAGE INVESTORS CORPORATION	2	0.0	0.0	177	0.0	0.0
300	31-1662146/3	LENOX MORTGAGE CORP	2	0.0	0.0	176	0.0	0.0
301	75-2585326/7	COUNTRY PLACE MORTGAGE	2	0.0	0.0	142	0.0	0.0
302	0000004192/4	FIRST FEDERAL BANK OF THE MIDW	2	0.0	0.0	137	0.0	0.0
303	7281500005/7	REAL ESTATE MORTGAGE CORP	2	0.0	0.0	134	0.0	0.0
304	0000008308/4	BALTIMORE AMERICAN SAVINGS BAN	2	0.0	0.0	114	0.0	0.0
305	7650700000/7	AMERICA'S MONEYLINE	2	0.0	0.0	114	0.0	0.0
306	34-1831194/1	MOBILE CONSULTANTS INC.	2	0.0	0.0	112	0.0	0.0
307	7404800009/7	OCEAN WEST FUNDING	2	0.0	0.0	107	0.0	0.0
308	0000014177/4	AMERIBANK	2	0.0	0.0	100	0.0	0.0
309	0000022469/3	COLUMBIA RIVER BANK	2	0.0	0.0	96	0.0	0.0
310	0000062848/5	TELHIO CREDIT UNION	2	0.0	0.0	84	0.0	0.0
311	0000000293/5	DP&L EMPLOYEES PLUS FED CR UN	2	0.0	0.0	75	0.0	0.0
312	0000004267/4	HOME FEDERAL SAVINGS BANK	2	0.0	0.0	40	0.0	0.0
313	0000061810/5	KEMBA CINCINNATI CREDIT UNION	2	0.0	0.0	7	0.0	0.0
314	0000852218/2	CHASE MANHATTAN BANK	1	0.0	0.0	11,000	0.4	0.4
315	0000013216/1	AMERICAN NAT'L BANK & TR	1	0.0	0.0	1,182	0.0	0.0
316	0000000916/1	CHAMPAIGN NATIONAL BANK AND TR	1	0.0	0.0	850	0.0	0.0
317	0311588534/4	CORNERSTONEBANC FIN SER CORP	1	0.0	0.0	685	0.0	0.0
318	0000027374/3	MERRILL LYNCH BANK USA	1	0.0	0.0	626	0.0	0.0
319	0000027094/3	SOUTHERN PACIFIC BANK	1	0.0	0.0	420	0.0	0.0
320	0000002307/1	WELLS FARGO BANK IOWA, NA	1	0.0	0.0	397	0.0	0.0
321	0000008709/1	1ST NATIONAL BANK	1	0.0	0.0	395	0.0	0.0
322	7634000003/7	CAPITAL MORTGAGE FUNDING, L L	1	0.0	0.0	278	0.0	0.0
323	0000033134/3	ANN ARBOR COMMERCE BANK	1	0.0	0.0	232	0.0	0.0
324	0000061744/5	INT'L HARVESTER EMPL. C. U.	1	0.0	0.0	220	0.0	0.0

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INSTITUTION LEVEL

INCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
Purpose: All Purpose Code selected
Loan Type: All Loan Type Codes
Action: All Action Codes
Owner Occupancy: All Owner Occupancy Codes
Applicant Race: All Applicant Races
Applicant Sex: All Applicant Genders
Applicant Income: All Applicant Income Levels
Tract Income: All Tract Levels
Tract Minority: All Minority levels
Criteria: ALL INSTITUTIONS

Year: 2000 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
325	0000030237/3	PARKVALE BANK	1	0.0	0.0	198	0.0	0.0
326	0000015960/3	GREEN POINT BANK	1	0.0	0.0	177	0.0	0.0
327	0000008083/4	NEW SOUTH FEDERAL SAVINGS BANK	1	0.0	0.0	172	0.0	0.0
328	5219909990/7	MOUNTAIN STATES MORTGAGE CTRS	1	0.0	0.0	170	0.0	0.0
329	5135809997/7	CTX MORTGAGE COMPANY	1	0.0	0.0	170	0.0	0.0
330	0000005099/4	CALIFORNIA FEDERAL BANK	1	0.0	0.0	166	0.0	0.0
331	7648500001/7	4ADREAM.COM	1	0.0	0.0	165	0.0	0.0
332	0001079544/2	SOUTHTRUST MORTGAGE CORP	1	0.0	0.0	160	0.0	0.0
333	0000001199/5	BMI FEDERAL CREDIT UNION	1	0.0	0.0	152	0.0	0.0
334	2467100004/7	JAMES B. NUTTER AND COMPANY	1	0.0	0.0	144	0.0	0.0
335	0000017623/5	HONDA FEDERAL CREDIT UNION	1	0.0	0.0	136	0.0	0.0
336	0000001728/4	HARRINGTON BANK, FSB	1	0.0	0.0	131	0.0	0.0
337	0000013681/1	NATIONAL BANK OF COMMERCE	1	0.0	0.0	131	0.0	0.0
338	42-1472314/7	EDWARD JONES MORTGAGE, LLC	1	0.0	0.0	126	0.0	0.0
339	0000002007/1	UNION COUNTY NATIONAL BANK	1	0.0	0.0	126	0.0	0.0
340	3827009995/7	UNION NATIONAL MORTGAGE CO.	1	0.0	0.0	122	0.0	0.0
341	0000604024/2	MINSTER BANK	1	0.0	0.0	121	0.0	0.0
342	0001016316/2	MID AM BANK	1	0.0	0.0	118	0.0	0.0
343	0000027802/3	LENOX SAVINGS BANK	1	0.0	0.0	112	0.0	0.0
344	7699300007/7	AMERICAN HOME MORTGAGE CORP	1	0.0	0.0	110	0.0	0.0
345	0000820310/2	COMMUNITY FIRST BANK & TRUST	1	0.0	0.0	107	0.0	0.0
346	39-1856165/3	SHELTER MORTGAGE COMPANY, LLC	1	0.0	0.0	103	0.0	0.0
347	0000003309/4	FIRST FEDERAL LINCOLN BANK	1	0.0	0.0	103	0.0	0.0
348	7555300005/7	CIMARRON MORTGAGE COMPANY	1	0.0	0.0	96	0.0	0.0
349	7937800000/7	MORTGAGE PORTFOLIO SERVICE INC	1	0.0	0.0	92	0.0	0.0
350	7469500007/7	ALLIED MORTGAGE CORPORATION	1	0.0	0.0	92	0.0	0.0
351	0000005551/4	BANKATLANTIC	1	0.0	0.0	90	0.0	0.0
352	03713814944/4	STATE FARM FINANCIAL SERVICES,	1	0.0	0.0	86	0.0	0.0
353	0000002747/1	HORIZON BANK, N.A.	1	0.0	0.0	84	0.0	0.0
354	1424400008/7	INTERBAY FUNDING, L.L.C.	1	0.0	0.0	83	0.0	0.0
355	0002576572/2	PRISM MORTGAGE COMPANY	1	0.0	0.0	83	0.0	0.0
356	7339400008/7	NATION'S STANDARD MORTGAGE COR	1	0.0	0.0	81	0.0	0.0
357	0000008043/4	DOLLAR BANK, FSB	1	0.0	0.0	80	0.0	0.0
358	0000007799/3	CITIZENS & NORTHERN BANK	1	0.0	0.0	80	0.0	0.0
359	1463600006/7	MORTGAGEIT, INC.	1	0.0	0.0	78	0.0	0.0
360	1075700003/7	AURORA LOAN SERVICES	1	0.0	0.0	78	0.0	0.0

NOTE: Applications include Purchased Loans, Balances are in thousands.

INSTITUTION LEVEL

INCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
Purpose: All Purpose Code selected
Loan Type: All Loan Type Codes
Action: All Action Codes
Owner Occupancy: All Owner Occupancy Codes
Applicant Race: All Applicant Races
Applicant Sex: All Applicant Genders
Applicant Income: All Applicant Income Levels
Tract Income: All Tract Levels
Tract Minority: All Minority levels
Criteria: ALL INSTITUTIONS
Year: 2000 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
361	7942800007/7	TRANSAMERICA MORTGAGE COMPANY	1	0.0	0.0	75	0.0	0.0
362	7152500000/7	PLATINUM CAPITAL GROUP	1	0.0	0.0	74	0.0	0.0
363	1098000002/7	MOTRGAGE NOW, INC	1	0.0	0.0	71	0.0	0.0
364	35-1714970/5	FORUM FINANCIAL GROUP	1	0.0	0.0	69	0.0	0.0
365	0000009179/1	PARK NATIONAL BANK	1	0.0	0.0	69	0.0	0.0
366	22-2630964/1	CHAMPION MORTGAGE CO/KEYCORP	1	0.0	0.0	65	0.0	0.0
367	0000023876/1	FIRST BANK OF ARIZONA	1	0.0	0.0	63	0.0	0.0
368	7905300009/7	AMERICREDIT CORP OF CALIFORNIA	1	0.0	0.0	62	0.0	0.0
369	0000016782/4	ING BANK, FSB	1	0.0	0.0	60	0.0	0.0
370	0000017117/5	R.I.A. FEDERAL CREDIT UNION	1	0.0	0.0	60	0.0	0.0
371	7015500006/7	HOWARD HANNA FINANCIAL SERV	1	0.0	0.0	58	0.0	0.0
372	0000006081/4	FIDELITY BANK	1	0.0	0.0	57	0.0	0.0
373	0000008097/4	PEOPLES COMMUNITY BANK	1	0.0	0.0	56	0.0	0.0
374	1085800002/7	SPECIALTY MORTGAGE CORPORATION	1	0.0	0.0	52	0.0	0.0
375	0000011394/3	SHORELINE BANK	1	0.0	0.0	52	0.0	0.0
376	0000016101/1	SUCCESS NATIONAL BANK	1	0.0	0.0	52	0.0	0.0
377	0001390342/2	FIFTH THIRD BANK, FLORIDA	1	0.0	0.0	50	0.0	0.0
378	3447609992/7	COLUMBIA EQUITIES, LTD	1	0.0	0.0	48	0.0	0.0
379	0000013679/1	BANK OF OKLAHOMA, N.A.	1	0.0	0.0	45	0.0	0.0
380	7632300003/7	UNIVERSAL MORTGAGE	1	0.0	0.0	44	0.0	0.0
381	0000008337/4	CHARTER BANK	1	0.0	0.0	40	0.0	0.0
382	7165700002/7	MAJESTIC MORTGAGE CORPORATION	1	0.0	0.0	39	0.0	0.0
383	0000004142/5	HUGHES AIRCRAFT EMPL FCU	1	0.0	0.0	37	0.0	0.0
384	0000006301/1	MELLON BANK, N.A.	1	0.0	0.0	33	0.0	0.0
385	0000006288/5	FIRST RESOURCE FCU	1	0.0	0.0	30	0.0	0.0
386	0002534303/2	MID AM FIN SERV-SKY FIN GROUP	1	0.0	0.0	25	0.0	0.0
387	0000027134/3	FLAGSHIP BANK & TRUST COMPANY	1	0.0	0.0	24	0.0	0.0
388	0000032574/3	BEAL BANK	1	0.0	0.0	24	0.0	0.0
389	0002524706/2	NORWEST HOME IMPROVEMENT, INC	1	0.0	0.0	20	0.0	0.0
390	0000675332/2	SUNTRUST BANK	1	0.0	0.0	20	0.0	0.0
391	0000061090/5	SHAREFAX CREDIT UNION, INC.	1	0.0	0.0	19	0.0	0.0
392	0000061623/5	KEMBA COLUMBUS CREDIT UNION	1	0.0	0.0	16	0.0	0.0
393	0000817833/2	SOUTHTRUST BANK	1	0.0	0.0	15	0.0	0.0
394	0000015115/4	FIRST ALLIANCE BANK	1	0.0	0.0	15	0.0	0.0
395	0002418980/2	WELLS FARGO FIN'L ACCPTCE AMER	1	0.0	0.0	12	0.0	0.0
396	0000001275/4	QUAKER CITY BANK (US MORTGAGE)	1	0.0	0.0	8	0.0	0.0

NOTE. Applications include Purchased Loans, Balances are in thousands.

MARKET SHARE ANALYSIS
INSTITUTION LEVEL

INCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
Purpose: All Purpose Code selected
Loan Type: All Loan Type Codes
Action: All Action Codes
Owner Occupancy: All Owner Occupancy Codes
Applicant Race: All Applicant Races
Applicant Sex: All Applicant Genders
Applicant Income: All Applicant Income Levels
Tract Income: All Tract Levels
Tract Minority: All Minority levels
Criteria: ALL INSTITUTIONS
Year: 2000 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
397	0000011063/3	FIRST-CITIZENS BANK & TRUST CO	1	0.0	0.0	8	0.0	0.0
398	0000008201/4	ESSEX SAVINGS BANK FSB	1	0.0	0.0	7	0.0	0.0
399	0000138510/2	FIFTH THIRD BANK, NORTHERN KY	1	0.0	0.0	5	0.0	0.0
400	0000010592/1	WELLS FARGO BANK SOUTH DAKOTA	1	0.0	0.0	5	0.0	0.0
GROUP TOTALS:			31,690	100.0	100.0	2,553,620	100.0	100.0
OTHER INSTTUTIONS:			0		0.0	0		0.0
MARKET TOTALS			31,690		100.0	2,553,620		100.0

NOTE: Applications include Purchased Loans, Balances are in thousands

INCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
Purpose: Refinancing (3)
Loan Type: Conventional (1)
Owner Occupancy: All Owner Occupancy Codes
Criteria: ALL INSTITUTIONS
Year: 2000 **Analysis Perspective:** HMDA

Segment	Total Applications (Including Purchases)		Loans Originated (Including Purchases)		Applications Approved but not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness		Loans Purchased	
	Number	%Total	Number	%Apps	Number	%Apps	Number	%Apps	Number	%Apps	Number	%Apps	Number	%Apps
RACE														
Native	30	0.2	11	36.7	3	10.0	13	43.3	0	0.0	3	10.0	0	0.0
Asian	43	0.3	26	60.5	5	11.6	7	16.3	2	4.7	3	7.0	2	4.7
Black	1,171	8.4	391	33.4	144	12.3	435	37.1	121	10.3	80	6.8	28	2.4
Hispanic	39	0.3	16	41.0	3	7.7	14	35.9	3	7.7	3	7.7	0	0.0
White	5,863	42.1	2,953	50.4	693	11.8	1,462	24.9	467	8.0	288	4.9	205	3.5
Joint	61	0.4	38	62.3	4	6.6	16	26.2	2	3.3	1	1.6	2	3.3
Other	537	3.9	33	6.1	17	3.2	179	33.3	304	56.6	4	0.7	1	0.2
Not Available	6,181	44.4	2,104	34.0	917	14.8	2,129	34.4	890	14.4	141	2.3	863	14.0
GENDER														
Joint	4,126	29.6	1,809	43.8	480	11.6	1,115	27.0	507	12.3	215	5.2	127	3.1
Male	2,447	17.6	1,001	40.9	301	12.3	704	28.8	328	13.4	113	4.6	56	2.3
Female	2,191	15.7	896	40.9	300	13.7	642	29.3	259	11.8	94	4.3	75	3.4
Not Available	5,161	37.1	1,866	36.2	705	13.7	1,794	34.8	695	13.5	101	2.0	843	16.3
APPLICANT INCOME														
< 50%	2,128	15.3	687	32.3	272	12.8	698	32.8	363	17.1	108	5.1	60	2.8
50% to < 80%	3,636	26.1	1,351	37.2	529	14.5	1,172	32.2	447	12.3	137	3.8	113	3.1
80% to < 100%	2,023	14.5	747	36.9	295	14.6	636	31.4	247	12.2	98	4.8	48	2.4
100% to < 120%	1,537	11.0	591	38.5	254	16.5	454	29.5	173	11.3	65	4.2	44	2.9
>=120%	2,953	21.2	1,390	47.1	420	14.2	753	25.5	295	10.0	95	3.2	93	3.1
Not Available	1,648	11.8	806	48.9	16	1.0	542	32.9	264	16.0	20	1.2	743	45.1
TRACT INCOME														
Low	202	1.5	73	36.1	22	10.9	67	33.2	38	18.8	2	1.0	14	6.9
Moderate	2,123	15.2	708	33.3	293	13.8	742	35.0	288	13.6	92	4.3	151	7.1
Middle	8,158	58.6	3,110	38.1	1,061	13.0	2,591	31.8	1,092	13.4	304	3.7	609	7.5
Upper	3,442	24.7	1,681	48.8	410	11.9	855	24.8	371	10.8	125	3.6	327	9.5
Not Available	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
TRACT MINORITY														
< 10%	9,200	66.1	3,975	43.2	1,186	12.9	2,573	28.0	1,123	12.2	343	3.7	757	8.2
>= 10% to < 20%	1,281	9.2	488	38.1	184	14.4	422	32.9	155	12.1	32	2.5	100	7.8
>= 20% to < 50%	1,910	13.7	634	33.2	227	11.9	687	36.0	292	15.3	70	3.7	134	7.0
>= 50% to < 80%	1,264	9.1	403	31.9	157	12.4	462	36.6	182	14.4	60	4.7	93	7.4
>= 80%	270	1.9	72	26.7	32	11.9	111	41.1	37	13.7	18	6.7	17	6.3
Not Available	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
TOTALS	13,925	100.0	5,572	40.0	1,786	12.8	4,255	30.6	1,789	12.8	523	3.8	1,101	7.9

INCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
Purpose: All Purpose Codes selected
Loan Type: All Loan Type Codes
Owner Occupancy: All Owner Occupancy Codes
Criteria: ALL INSTITUTIONS
Year: 2000 **Analysis Perspective:** HMDA

Segment	Total Applications		Home Purchase		Home Improvement		Refinancing		Multi-family		
	Number	%Total	Number	%Apps	Number	%Apps	Number	%Apps	Number	%Apps	
RACE											
Native	121	0.4	80	66.1	11	9.1	30	24.8	0	0.0	
Asian	208	0.7	137	65.9	26	12.5	45	21.6	0	0.0	
Black	2,769	9.9	1,082	39.1	470	17.0	1,216	43.9	1	0.0	
Hispanic	131	0.5	67	51.1	21	16.0	43	32.8	0	0.0	
White	17,011	60.7	8,414	49.5	2,475	14.5	6,110	35.9	12	0.1	
Joint	235	0.8	136	57.9	35	14.9	63	26.8	1	0.4	
Other	696	2.5	86	12.4	70	10.1	539	77.4	1	0.1	
Not Available	10,519	37.6	2,778	26.4	1,497	14.2	6,235	59.3	9	0.1	
GENDER											
Joint	10,685	38.1	4,977	46.6	1,444	13.5	4,256	39.8	8	0.1	
Male	6,502	23.2	2,968	45.6	974	15.0	2,553	39.3	7	0.1	
Female	5,351	19.1	2,353	44.0	729	13.6	2,268	42.4	1	0.0	
Not Available	9,152	32.7	2,482	27.1	1,458	15.9	5,204	56.9	8	0.1	
APPLICANT INCOME											
< 50%	4,197	15.0	1,321	31.5	707	16.8	2,169	51.7	0	0.0	
50% to < 80%	8,159	29.1	3,187	39.1	1,246	15.3	3,726	45.7	0	0.0	
80% to < 100%	4,688	16.7	1,856	39.6	743	15.8	2,089	44.6	0	0.0	
100% to < 120%	3,695	13.2	1,504	40.7	625	16.9	1,566	42.4	0	0.0	
>=120%	7,345	26.2	3,193	43.5	1,167	15.9	2,985	40.6	0	0.0	
Not Available	3,606	12.9	1,719	47.7	117	3.2	1,746	48.4	24	0.7	
TRACT INCOME											
Low	322	1.1	78	24.2	37	11.5	207	64.3	0	0.0	
Moderate	3,909	14.0	1,146	29.3	607	15.5	2,153	55.1	3	0.1	
Middle	17,259	61.6	6,175	35.8	2,692	15.6	8,379	48.5	13	0.1	
Upper	10,200	36.4	5,381	52.8	1,269	12.4	3,542	34.7	8	0.1	
Not Available	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	
TRACT MINORITY											
< 10%	22,547	80.5	9,954	44.1	3,124	13.9	9,451	41.9	18	0.1	
>= 10% to < 20%	2,966	10.6	1,171	39.5	475	16.0	1,320	44.5	0	0.0	
>= 20% to < 50%	3,530	12.6	1,037	29.4	531	15.0	1,957	55.4	5	0.1	
>= 50% to < 80%	2,201	7.9	544	24.7	377	17.1	1,280	58.2	0	0.0	
>= 80%	446	1.6	74	16.6	98	22.0	273	61.2	1	0.2	
Not Available	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	
TOTALS	31,690	113.1	12,780	40.3	4,605	14.5	14,281	45.1	24	0.1	

INCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
Purpose: All Purpose Codes selected
Loan Type: All Loan Type Codes
Owner Occupancy: All Owner Occupancy Codes
Criteria: ALL INSTITUTIONS
Year: 2000 **Analysis Perspective:** HMDA

Segment	Total Applications		Conventional		FHA		VA		FSA/RHS	
	Number	%Total	Number	%Apps	Number	%Apps	Number	%Apps	Number	%Apps
RACE:										
Native	121	0.4	119	98.3	1	0.8	1	0.8	0	0.0
Asian	208	0.7	190	91.3	16	7.7	2	1.0	0	0.0
Black	2,769	9.9	2,340	84.5	349	12.6	80	2.9	0	0.0
Hispanic	131	0.5	100	76.3	22	16.8	9	6.9	0	0.0
White	17,011	60.7	14,336	84.3	2,229	13.1	442	2.6	4	0.0
Joint	235	0.8	191	81.3	27	11.5	17	7.2	0	0.0
Other	696	2.5	680	97.7	14	2.0	2	0.3	0	0.0
Not Available	10,519	37.6	9,797	93.1	564	5.4	158	1.5	0	0.0
GENDER:										
Joint	10,685	38.1	9,162	85.7	1,175	11.0	347	3.2	1	0.0
Male	6,502	23.2	5,502	84.6	822	12.6	176	2.7	2	0.0
Female	5,351	19.1	4,638	86.7	677	12.7	35	0.7	1	0.0
Not Available	9,152	32.7	8,451	92.3	548	6.0	153	1.7	0	0.0
APPLICANT INCOME:										
< 50%	4,197	15.0	3,793	90.4	360	8.6	43	1.0	1	0.0
50% to < 80%	8,159	29.1	6,863	84.1	1,129	13.8	167	2.0	0	0.0
80% to < 100%	4,688	16.7	3,975	84.8	562	12.0	148	3.2	3	0.1
100% to < 120%	3,695	13.2	3,200	86.6	367	9.9	128	3.5	0	0.0
>=120%	7,345	26.2	6,895	93.9	330	4.5	120	1.6	0	0.0
Not Available	3,606	12.9	3,027	83.9	474	13.1	105	2.9	0	0.0
TRACT INCOME:										
Low	322	1.1	307	95.3	13	4.0	2	0.6	0	0.0
Moderate	3,909	14.0	3,534	90.4	328	8.4	46	1.2	1	0.0
Middle	17,259	61.6	14,947	86.6	1,948	11.3	362	2.1	2	0.0
Upper	10,200	36.4	8,965	87.9	933	9.1	301	3.0	1	0.0
Not Available	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
TRACT MINORITY:										
< 10%	22,547	80.5	19,569	86.8	2,475	11.0	499	2.2	4	0.0
>= 10% to < 20%	2,966	10.6	2,457	82.8	352	11.9	157	5.3	0	0.0
>= 20% to < 50%	3,530	12.6	3,223	91.3	269	7.6	38	1.1	0	0.0
>= 50% to < 80%	2,201	7.9	2,079	94.5	108	4.9	14	0.6	0	0.0
>= 80%	446	1.6	425	95.3	18	4.0	3	0.7	0	0.0
Not Available	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
TOTALS:	31,690	113.1	27,753	87.6	3,222	10.2	711	2.2	4	0.0

DECLINE SUMMARY

INCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
Purpose: All Purpose Codes selected
Loan Type: All Loan Type Codes
Owner Occupancy: All Owner Occupancy Codes
Criteria: ALL INSTITUTIONS
Year: 2000 **Analysis Perspective:** HMDA

Segment	Total Applications Denied		Debt-to-Income Ratio		Employment History		Credit History		Collateral		Cash, PMI, or Bad Data (6, 7 & 8)		Other	
	Number	%Total	Number	%Apps	Number	%Apps	Number	%Apps	Number	%Apps	Number	%Apps	Number	
RACE														
Native	20	0.3	3	15.0	0	0.0	9	45.0	4	20.0	3	15.0	3	15.0
Asian	23	0.4	8	34.8	0	0.0	8	34.8	2	8.7	1	4.3	7	30.4
Black	880	15.0	192	21.8	7	0.8	426	48.4	110	12.5	50	5.7	150	17.0
Hispanic	31	0.5	4	12.9	1	3.2	14	45.2	6	19.4	0	0.0	5	16.1
White	2,923	49.7	638	21.8	49	1.7	1,314	45.0	465	15.9	219	7.5	523	17.9
Joint	37	0.6	6	16.2	2	5.4	18	48.6	3	8.1	2	5.4	5	13.5
Other	224	3.8	12	5.4	0	0.0	90	40.2	135	60.3	4	1.8	7	3.1
Not Available	3,113	53.0	464	14.9	33	1.1	1,216	39.1	816	26.2	188	6.0	434	13.9
GENDER:														
Joint	1,937	33.0	335	17.3	29	1.5	859	44.3	378	19.5	132	6.8	298	15.4
Male	1,390	23.7	287	20.6	15	1.1	608	43.7	204	14.7	108	7.8	249	17.9
Female	1,229	20.9	288	23.4	21	1.7	547	44.5	178	14.5	74	6.0	203	16.5
Not Available	2,695	45.9	417	15.5	27	1.0	1,081	40.1	781	29.0	153	5.7	384	14.2
APPLICANT INCOME														
< 50%	1,351	23.0	370	27.4	28	2.1	546	40.4	160	11.8	70	5.2	195	14.4
50% to < 80%	2,124	36.1	456	21.5	28	1.3	940	44.3	354	16.7	127	6.0	303	14.3
80% to < 100%	1,094	18.6	191	17.5	14	1.3	472	43.1	206	18.8	70	6.4	189	17.3
100% to < 120%	785	13.4	101	12.9	9	1.1	357	45.5	159	20.3	53	6.8	126	16.1
>=120%	1,255	21.4	165	13.1	8	0.6	538	42.9	275	21.9	113	9.0	270	21.5
Not Available	642	10.9	44	6.9	5	0.8	242	37.7	387	60.3	34	5.3	51	7.9
TRACT INCOME:														
Low	101	1.7	15	14.9	1	1.0	44	43.6	19	18.8	5	5.0	19	18.8
Moderate	1,268	21.6	212	16.7	22	1.7	532	42.0	242	19.1	80	6.3	192	15.1
Middle	4,410	75.1	774	17.6	53	1.2	1,903	43.2	964	21.9	272	6.2	655	14.9
Upper	1,472	25.1	326	22.1	16	1.1	616	41.8	316	21.5	110	7.5	268	18.2
Not Available	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
TRACT MINORITY:														
< 10%	4,472	76.1	847	18.9	65	1.5	1,902	42.5	944	21.1	285	6.4	732	16.4
>= 10% to < 20%	659	11.2	98	14.9	8	1.2	283	42.9	166	25.2	58	8.8	94	14.3
>= 20% to < 50%	1,133	19.3	193	17.0	11	1.0	488	43.1	234	20.7	70	6.2	161	14.2
>= 50% to < 80%	811	13.8	157	19.4	6	0.7	358	44.1	161	19.9	42	5.2	120	14.8
>= 80%	176	3.0	32	18.2	2	1.1	64	36.4	36	20.5	12	6.8	27	15.3
Not Available	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
TOTALS:	7,251	123.4	1,327	18.3	92	1.3	3,095	42.7	1,541	21.3	467	6.4	1,134	15.6

Denial reasons were selected

There were also 1375 Declined Applications with no reason given

MARKET SHARE ANALYSIS

INSTITUTION LEVEL

INCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
Purpose: Home Purchase (1)
Loan Type: Conventional (1)
Action: All Action Codes
Owner Occupancy: All Owner Occupancy Codes
Applicant Race: All Applicant Races
Applicant Sex: All Applicant Genders
Applicant Income: All Applicant Income Levels
Tract Income: All Tract Levels
Tract Minority: All Minority levels
Criteria: ALL INSTITUTIONS
Year: 2000 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
1	0002712969/2	FIFTH THIRD MORTGAGE COMPANY	647	6.9	6.9	83,789	8.7	8.7
2	31-0856949/1	NATIONAL CITY MORTGAGE COMPANY	645	6.8	6.8	73,296	7.6	7.6
3	0002977151/2	ASSOCIATES HOME EQUITY SERVICE	405	4.3	4.3	27,201	2.8	2.8
4	95-2318940/1	WELLS FARGO HOME MORTGAGE	363	3.8	3.8	43,815	4.5	4.5
5	6414109996/7	COUNTRYWIDE HOME LOANS	316	3.3	3.3	36,089	3.7	3.7
6	0000008109/4	UNION SAVINGS BANK	312	3.3	3.3	36,817	3.8	3.8
7	0000000786/1	NATIONAL CITY BANK	309	3.2	3.2	32,286	3.3	3.3
8	0000007621/1	BANK ONE, NA	299	3.1	3.1	23,186	2.4	2.4
9	0341151450/4	LIBERTY LENDING SERVICES, INC.	248	2.6	2.6	25,665	2.6	2.6
10	38-2769122/3	REPUBLIC BANC MORTGAGE CORP	203	2.1	2.1	25,252	2.6	2.6
11	36-4114231/1	FIRST FRANKLIN FINANCIAL CORP	191	2.0	2.0	11,980	1.2	1.2
12	0000008039/4	LIBERTY SAVINGS BANK, FSB	183	1.9	1.9	17,110	1.7	1.7
13	0000000024/1	FIRSTAR BANK, N.A.	176	1.8	1.8	17,414	1.8	1.8
14	0000004072/4	OHIO SAVINGS BANK	156	1.6	1.6	22,063	2.3	2.3
15	0680267088/4	NORTH AMERICAN MORTGAGE CO.	138	1.4	1.4	13,096	1.3	1.3
16	0363744610/4	ABNAMRO MTG. GROUP INC.	133	1.4	1.4	15,170	1.5	1.5
17	7731100009/7	LEGACY MORTGAGE	132	1.4	1.4	15,529	1.6	1.6
18	56-1796719/1	NATIONSCREDIT FINANCIAL SERVIC	128	1.3	1.3	10,064	1.0	1.0
19	2295609996/7	RESIDENTIAL FUNDING CORPORATIO	125	1.3	1.3	11,593	1.2	1.2
20	0000008566/4	SUPERIOR BANK	120	1.2	1.2	9,293	0.9	0.9
21	4216200005/7	GMAC MORTGAGE	116	1.2	1.2	11,967	1.2	1.2
22	0000008412/4	FLAGSTAR BANK, FSB	112	1.1	1.1	12,497	1.3	1.3
23	3027509990/7	CENDANT MORTGAGE	104	1.1	1.1	13,601	1.4	1.4
24	0000000200/1	FLEET NATIONAL BANK	103	1.0	1.0	12,838	1.3	1.3
25	7606200003/7	RBMG, INC.	99	1.0	1.0	11,189	1.1	1.1
26	3813209993/7	SCHMIDT MORTGAGE COMPANY	93	0.9	0.9	12,433	1.2	1.2
27	2294709990/7	CONSECO FINANCE SERVICING CORP	93	0.9	0.9	4,235	0.4	0.4
28	33-0862379/3	GREENPOINT CREDIT, LLC	88	0.9	0.9	3,055	0.3	0.3
29	0132729067/4	NAMCO ASSET MANAGEMENT, INC.	75	0.8	0.8	6,979	0.7	0.7
30	0000014761/1	KEYBANK NATIONAL ASSOCIATION	74	0.7	0.7	8,048	0.8	0.8
31	0000013044/1	BANK OF AMERICA, N.A.	74	0.7	0.7	7,854	0.8	0.8
32	7604800006/7	OPTION ONE MORTGAGE CORP.	70	0.7	0.7	5,784	0.6	0.6
33	7185300006/7	ACCREDITED HOME LENDERS, INC.	68	0.7	0.7	4,419	0.4	0.4
34	0001999138/2	THE CIT GROUP/CONSUMER FINANCE	67	0.7	0.7	4,988	0.5	0.5
35	0000574529/2	FIFTH THIRD BANK	65	0.6	0.6	8,247	0.8	0.8
36	0002975027/2	ASSOCIATES FINANCIAL SERVICES	61	0.6	0.6	4,483	0.4	0.4

TE: Applications include Purchased Loans, Balances are in thousands.

MARKET SHARE ANALYSIS

INSTITUTION LEVEL

INCLUDED IN THIS ANALYSIS

Geographic Area: TRACT GROUP: MONTGOMERY COUNTY
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Tract Minority: All Minority levels
Criteria: ALL INSTITUTIONS
Year: 2000 **Analysis Perspective:** HMDA

Rank	ID/Agency	Name	Number of Applications	% of Group	% of Market	Amount of Applications	% of Group	% of Market
37	0000034536/3	CONSECO BANK, INC.	61	0.6	0.6	1,389	0.1	0.1
38	59-2645397/1	ALTEGRA CREDIT COMPANY	59	0.6	0.6	4,990	0.5	0.5
39	1125400003/7	EQUIFIRST CORPORATION	58	0.6	0.6	5,671	0.5	0.5
40	0161146859/4	CHARTER ONE MORTGAGE CORP	54	0.5	0.5	8,220	0.8	0.8
41	3833009998/7	AMERICAN MORTGAGE SERVICE COMP	54	0.5	0.5	5,378	0.5	0.5
42	7527300003/7	NVR MORTGAGE FINANCE, INC.	51	0.5	0.5	8,462	0.8	0.8
43	54-1779092/7	DYNEX FINANCIAL, INC	51	0.5	0.5	2,057	0.2	0.2
44	0000000711/4	FIRST FEDERAL SAVINGS BANK OF	50	0.5	0.5	4,156	0.4	0.4
45	0000022559/1	FIRST UNION NATIONAL BANK - DE	49	0.5	0.5	3,827	0.3	0.3
46	3831400006/7	RYLAND MORTGAGE COMPANY	46	0.4	0.4	7,745	0.8	0.8
47	0000023160/1	CHASE MANHATTAN BANK USA, NA	45	0.4	0.4	1,747	0.1	0.1
48	13-2999081/1	CITIMORTGAGE INC.	44	0.4	0.4	5,479	0.5	0.5
49	0000576710/2	THE OHIO BANK	42	0.4	0.4	5,305	0.5	0.5
50	0000060143/2	COMERICA BANK	40	0.4	0.4	1,142	0.1	0.1
51	1126000006/7	SEBRING CAPITAL CORPORATION	39	0.4	0.4	3,104	0.3	0.3
52	2182009998/7	WASHTENAW MORTGAGE COMPANY	38	0.4	0.4	3,963	0.4	0.4
53	0000020001/3	REPUBLIC BANK	37	0.3	0.3	4,672	0.4	0.4
54	75-2570083/7	CENTEX HOME EQUITY CORPORATION	37	0.3	0.3	2,952	0.3	0.3
55	0000017595/1	THE COMMUNITY NATIONAL BANK	36	0.3	0.3	1,962	0.2	0.2
56	7810600004/7	PROVIDENT FUNDING ASSOCIATES,	35	0.3	0.3	5,111	0.5	0.5
57	0000008551/4	WASHINGTON MUTUAL BANK, FA	35	0.3	0.3	3,925	0.4	0.4
58	31-1690008/5	WRIGHT-PATT FINANCIAL GROUP, L	35	0.3	0.3	3,093	0.3	0.3
59	7775100007/7	MILA, INC.	34	0.3	0.3	1,856	0.1	0.1
60	0000003269/1	WELLS FARGO BANK WEST, NA	34	0.3	0.3	991	0.1	0.1
61	0000002641/4	CHARTER ONE BANK	32	0.3	0.3	5,636	0.5	0.5
62	0000006069/4	LEHMAN BROTHERS BANK, FSB	29	0.3	0.3	2,359	0.2	0.2
63	0000002076/4	BROOKVILLE BUILDING & SAVINGS	28	0.2	0.2	2,355	0.2	0.2
64	7756000001/7	AMERIQUEST MORTGAGE COMPANY	28	0.2	0.2	2,119	0.2	0.2
65	7909100002/7	HOMECOMINGS FINANCIAL NETWORK	27	0.2	0.2	2,121	0.2	0.2
66	95-2622032/7	AAMES FUNDING CORPORATION	26	0.2	0.2	2,212	0.2	0.2
67	34-0898643/1	PNC MORTGAGE CORP OF AMERICA	24	0.2	0.2	4,457	0.4	0.4
68	0000013349/1	UNION PLANTERS BANK, N.A.	24	0.2	0.2	2,848	0.2	0.2
69	7715400000/7	CROSSMANN MORTGAGE CORP	24	0.2	0.2	2,623	0.2	0.2
70	0000025653/3	FREMONT INVESTMENT & LOAN	24	0.2	0.2	1,798	0.1	0.1
71	31-0881021/1	THE HUNTINGTON MORTGAGE CO.	23	0.2	0.2	3,255	0.3	0.3
72	41-1704421/1	WELLS FARGO FUNDING	23	0.2	0.2	3,029	0.3	0.3

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