

PUBLIC DISCLOSURE

March 31, 2001

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

BANK ONE, MICHIGAN
#331647

611 Woodward Avenue, Detroit, MI. 48226-3497

Federal Reserve Bank of Chicago

230 South LaSalle Street, Chicago, IL. 60604-1413

NOTE: This document is an evaluation of this institutions record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

TABLE OF CONTENTS

I.	Institution Rating	
	a. Overall Rating-----	1
	b. Performance Test Ratings Table-----	1
	c. Summary of Major Factors Supporting Rating-----	1
II.	Institution	
	a. Description of Institution-----	2
	b. Conclusions With Respect to Performance Tests-----	4
III.	State	
	a. Summary	
	i. State Rating-----	19
	ii. Scope of Examination-----	19
	iii. Description of Operations-----	19
	iv. Conclusions with Respect to Performance Tests-----	21
	b. Detroit MSA-----	22
	i. Description of Operations-----	22
	ii. Conclusions with Respect to Performance Tests-----	24
	c. Grand Rapids/Muskegon/Holland MSA-----	31
	i. Description of Operations-----	31
	ii. Conclusions with Respect to Performance Tests-----	33
	d. Flint MSA-----	38
	i. Description of Operations-----	38
	ii. Conclusions with Respect to Performance Tests-----	39
	e. Ann Arbor MSA-----	44
	i. Description of Operations-----	44
	ii. Conclusions with Respect to Performance Tests-----	46
	f. Non-Metropolitan Area-----	50
	i. Description of Operations-----	50
	ii. Conclusions with Respect to Performance Tests-----	51
	g. Benton Harbor MSA-----	56
	i. Description of Operations-----	56
	ii. Conclusions with Respect to Performance Tests-----	57
	h. Kalamazoo/Battle Creek MSA-----	59
	i. Description of Operations-----	59

ii.	Conclusions with Respect to Performance Tests-----	61
i.	Lansing/E. Lansing MSA-----	62
i.	Description of Operations-----	62
ii.	Conclusions with Respect to Performance Tests-----	64
j.	Saginaw/Bay City/Midland MSA-----	65
i.	Description of Operations-----	65
ii.	Conclusions with Respect to Performance Tests-----	66
V.	Appendix	
a.	Scope of Examination-----	68
b.	Summary of State and Intrastate Metropolitan Area Ratings-----	70
c.	Market Share Table-----	71
d.	Lending Exhibits-----	72

INSTITUTION'S CRA RATING

INSTITUTION CRA RATING: OUTSTANDING

The following table indicates the performance level of Bank One, Michigan, (BOM) with respect to the lending, investment, and service tests.

PERFORMANCE LEVELS	BANK ONE, MICHIGAN		
	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	X
High Satisfactory			
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

**Note: The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.*

The major factors supporting the institution's lending performance include:

- Overall high level of responsiveness to credit needs
- Excellent concentration of loans in the assessment area
- Generally excellent geographic distribution of home mortgage and business loans
- Excellent distribution of loans to borrowers of different income levels
- Good distribution of loans to businesses of different revenue sizes
- Excellent level of community development lending, particularly in the Detroit MSA
- Extensive use of flexible lending practices

The substantial commitment to community development, participation in civic organizations, business associations, and philanthropic donations has continued to be supported through the current Bank One organization. BOM continues to be a community leader in corporate philanthropic contributions in the markets it serves, and a significant financial commitment to community investment initiatives has remained intact. A Community Advisory Council comprised of former external directors provides a forum to assist management in assessing BOM's affirmative action and diversity training initiatives, philanthropic commitments, marketplace effectiveness, and other social initiatives.

Corporate citizenship continues to be emphasized and is actively promoted through the Michigan Public Affairs Division, along with community involvement by senior management. The Public Affairs Division provides a critical interface within markets served, and promotes initiatives including numerous community affairs programs. The division also monitors CRA programs, including contributions and BOM membership support of nonprofit and business associations.

DESCRIPTION OF INSTITUTION

BOM is a subsidiary of BANK ONE CORPORATION (NYSE: ONE), the nation's fifth largest bank holding company, with assets of more than \$270 billion. Bank One offers a full range of financial services to commercial and business customers and consumers. For more information about Bank One, access its website at www.bankone.com.

BOM came into being when First Chicago Corporation, parent company of BOM, was acquired by Bank One Corporation on October 1, 1998. The surviving corporation is headquartered in Chicago. On May 17, 1999, NBD Bank changed its corporate name to Bank One – Michigan. Bank One is a full-service bank offering a broad range of financial services to commercial and business customers and consumers through its market assessment area. This includes all or a portion of the state's eight Metropolitan Statistical Areas (MSA's) and one non-metropolitan area. Bank One's main office is located in Detroit, Michigan and serves most of the state with a network of 256 banking centers and 467 ATM's. The bank delivers products through traditional banking centers and "express and convenience" locations in grocery stores, shopping centers, on college and university campuses and in a variety of other facilities.

An important component of the bank's CRA activity is the Community Development Corporation (CDC). The CDC, a subsidiary of ONE, was developed to help meet the need for alternative forms of community development financing. The CDC is designed to assist members of the organization work with branch managers and/or the CRA coordinator to develop strategies and opportunities for housing projects. The focus of the CDC is the development of single- and multi-family housing as well as expansion of commercial retail and light industrial projects. The CDC allows the bank to extend typical bank lending to participate more directly in the development process. The CDC works in partnership with community groups, nonprofit or for-profit corporations, or private developers to improve the various communities. Stabilization and renewal of low- and moderate-income neighborhoods is evident through the bank's equity investments and construction lending in housing-related and economic development projects.

BOM had total assets statewide of \$21.3 billion and total deposits of \$16.1 billion as of December 31, 2000, making it a leader in some markets.

The bank's competitors are: Comerica (Detroit - \$33.7 billion in assets); Old Kent Bank (Grand Rapids - \$23.5 billion in assets) (recently purchased by Fifth Third Bank);

Michigan National Bank (Farmington Hills, Michigan - \$11.9 billion in assets); and Citizens Bank (Flint, Michigan - \$5.5 billion in assets).

SCOPE OF EXAMINATION

The previous evaluation of the bank was dated August 10, 1998. The current evaluation assesses the bank's performance from July 1, 1998 to January 1, 2001. Home-purchase, home-improvement, refinanced, small business and community development loans were reviewed in conjunction with the Lending Test. The evaluation period for the Investment and Service Tests is the same as that for the Lending Test. Community-development investments, community-development services, retail banking locations and retail banking services were reviewed in connection with these tests.

The scope of this examination included a review of the accuracy of the bank data analyzed to develop the conclusions and ratings. The data tested includes data made available to the public in accordance with the Home Mortgage Disclosure Act (HMDA) and the CRA regulation. Non-public data was also reviewed for accuracy such as qualified investments, community development services and loans.

The bank's HMDA data was found to be accurate; however, several errors were found in the bank's small business loan submission. Management was able to correct the errors prior to the analysis portion of the examination and that allowed the use of the data during the evaluation.

Assessment areas receiving full-scope reviews were the State of Michigan, Ann Arbor MSA #0440, Detroit MSA #2160, Flint MSA #2640, Grand Rapids MSA#3000 and Non-Metro Michigan. In general, the percentage of deposits derived from each assessment area reflects the relative weight the bank's performance was given in each area in developing the overall conclusions for the bank.

- The State of Michigan is one of the five states designated by the Census Bureau as being in the East North Central Division of the Midwest Region of the nation. Michigan's growth rate ranked it nationally as 33rd by percentage and 13th by number. According to Census Bureau estimates, Michigan's population grew by 6.1% from 1990 - 1996 compared to 9.6% for the nation.
- The Ann Arbor MSA #0440 assessment area includes two of the three counties that comprise the MSA, Washtenaw and Livingston counties.
- The Detroit MSA #2160 assessment area consist of five of the six counties that comprise the MSA. The five counties are: Lapeer, Macomb, Oakland, St. Clair, and Wayne.

- The Flint MSA #2640 assessment area includes all of Genesee County and part of Shiawassee County.
- The Grand Rapids/Muskegon/Holland MSA #3000 encompasses Kent and Ottawa counties and the adjacent southern portion of Muskegon County.
- The Non-Metro assessment area consist of the northwestern section from Roscommon County; continuing north to Grand Travers, Kalkaska and Leelanau Counties; and continuing further north to the corner of the lower Peninsula of Michigan with Charlevoix and Emmet Counties.
Assessment areas receiving limited-scope reviews were Benton Harbor MSA #0870, Kalamazoo/Battle Creek MSA #3720, Lansing/E. Lansing MSA #4040, and Saginaw/Bay City/Midland MSA #6060.
- The Benton Harbor MSA #0870 assessment area is defined as all of Berrien County or the whole MSA.
- The Kalamazoo/Battle Creek MSA #3720 assessment area contains portions of two contiguous counties, Calhoun and Kalamazoo.
- The Lansing/E. Lansing MSA #4040 assessment area is centrally located within the state and includes all of Clinton, Eaton and Ingham counties.
- The Saginaw/Bay City/Midland MSA #6960 assessment area comprises all of Bay, Midland, Saginaw, Sanilac, and Tuscola counties.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS:

The bank's overall Community Reinvestment Act (CRA) performance reflects a genuine commitment to meeting the credit needs of its assessment areas.

The bank's overall lending performance is **outstanding**. This rating is supported by the high concentration of loans within the assessment areas, the strong record of lending to businesses of different revenue sizes, the extensive community development lending efforts and excellent distribution of loans within the assessment areas. Lending to borrower's of different incomes reflects excellent penetration and responsiveness to the credit needs of low- and moderate-income borrowers. The bank makes extensive use of flexible lending practices.

The bank's overall performance under the investment test is **outstanding**. This is primarily the result of its strong performance in two principle banking market; the Detroit MSA and the Grand Rapids/Muskegon/Holland MSA. These two markets

represent 83% of the bank's deposit base. The bank exercises a leadership position through its CDC in a wide range of community development projects. However, performance in some of the bank's assessment areas are less than satisfactory. There are investment opportunities and needs in the other MSAs in the bank's assessment areas. In these areas, few investments were made since the last examination and are considered to be below what can reasonably be expected given the bank's resources.

The bank's performance under the service test is **outstanding**. Banking services are accessible to all portions of the bank's assessment areas. There is a significant network of full-service branches located in low- and moderate-income communities. The bank provides an excellent level of community development services, and services available at the different offices do not vary in a way that would inconvenience any portions of the assessment area.

Individual assessment area ratings for the Lending, Investment and Service tests are contained in this performance evaluation. A sample of bank assessment areas were chosen for full-scope reviews and the remaining assessment areas were reviewed in a more limited manner. The data contained in the tables in Appendix D was evaluated for each bank assessment area and was factored into the overall conclusions.

LENDING TEST

The examination team reviewed the bank's loan portfolio to evaluate the lending volume, geographic distribution of loans, distribution of lending by borrower characteristics, community development lending, and use of innovative and flexible lending practices.

A substantial majority of loans are made in the bank's assessment areas. Lending to low- and moderate-income tracts revealed an excellent penetration in the geographies of its combined assessment area. A lending analysis by applicant income showed an excellent penetration ratio among low- and moderate-income applicants. In addition, lending to small businesses is considered highly satisfactory based on the high percentage of lending within low- and moderate-income tracts and the high percentage of market share. The bank makes excellent use of government lending programs in response to credit needs in its assessment areas and shows strong performance in community development lending. Based on the performance criterion, the bank's overall lending performance for the combined assessment area is considered **outstanding**.

Lending Activity:

The following table illustrates the bank's lending activity by loan type used in the analysis of its performance under the lending test:

SUMMARY OF LENDING				
Bank One, Michigan				
January 1, 1999 to September 30, 2001				
Loan Type	#	%	(000's)	%
HMDA home purchase	14,911	24.0	1,793,143	32.2
HMDA refinancings	25,900	41.8	2,086,116	37.4
HMDA home improvement	4,366	7.0	72,614	1.3
HMDA multifamily	1	0.0	4	0.0
Total HMDA-Related	45,178	72.8	3,951,877	70.9
Total Small Business	16,847	27.2	1,620,156	29.1
TOTAL LOANS	62,025		5,572,033	

The bank's performance compared with its peers, according to the Uniform Bank Perform Report (UBPR) dated September 30, 2000, is demonstrated in the following table:

	Bank Average Loan Mix (%)	Peer Average Loan Mix (%)
REAL ESTATE	29.73	41.28
Construction	6.19	3.77
Home Equity	1.56	3.50
Residential (1-4)	13.75	23.27
Commercial	9.34	10.77
Agricultural	0.05	0.22
Multi-family	0.40	1.39
LOANS TO INDIVIDUALS	11.96	11.31
CREDIT CARD LOANS	0.65	1.40
COMMERCIAL AND INDUSTRIAL LOANS	52.46	27.13
AGRICULTURAL LOANS	0.23	0.37
MUNICIPAL LOANS	0.20	0.42
OTHER LOANS*	4.09	3.20
FINANCIAL INSTITUTION LOANS	0.08	1.23
FOREIGN OFFICE LOANS & LEASES	0.00	2.59
LEASE FINANCING RECEIVABLES	1.24	5.03
NET LOAN/LEASE-TO-DEPOSIT-RATIO	96.36%	98.75%

*Excludes financial institution loans, acceptances of other banks, foreign office loans and leases and lease financing receivables. Figures were rounded to the nearest tenth.

As the above table illustrates, the bank's percentage of commercial and industrial loans exceeds the peer group by 25.33%. The bank's real estate loan mix is 11.55% lower on average than its peers. Approximately 9.52% of this difference is in the residential (1-4) real estate loans, 2.42% in real estate construction and 1.94% in revolving home equity. Given the bank's emphasis on retail lending, the bank's portfolio is expected to increase gradually. The bank's credit card loan mix is lower

than that of its peers. This is attributed to offering only business credit cards; only a few of its programs are considered credit card programs for purposes of the UBPR. Other loan percentages are consistent with the bank's peer group.

Assessment Area Concentration:

BOM originated an excellent percentage of its 1999 loans in the assessment area. The bank originated 95.7% of its HMDA-related loans and 92.6% of its business loans in the assessment area. Overall, 94.8% of the bank's 1999 loans were originated within the assessment area. In 2000, the bank originated 96.6% of its HMDA-related loans and 95.7% of its business loans in the assessment area. Overall, 96.4% of the bank's 2000 loans were originated within the assessment area. See Exhibit # 1 through 2, Appendix D.

Geographic Distribution:

The geographic distribution of the bank's originations is excellent, considering the percentage of originations within LMI geographies. The overall geographic distribution for HMDA-related loans was 17.0% by number in LMI geographies. Geographic distribution for small business loans in LMI areas was 18.6% by number and 20.9% by dollar, and is considered to be excellent. Twenty-four or 7.7% of the assessment area's low-income geographies do not have housing and/or minimal population. Michigan University is located in one low-income census tract and Michigan State University is located in one low-income census tract.

The number of HMDA-related originations per 1,000 owner-occupied housing units in low- and moderate-income geographies is consistent with the number of originations in middle- and upper-income geographies. See Exhibit 7, Appendix D.

The bank's 1999 HMDA-related loans reflect an excellent penetration throughout the combined assessment area when compared to the distribution rate for aggregate lenders. While the bank has a slightly lower percentage of the aggregate market, its loan volume in geographies of all types is consistent with that of aggregate lenders and exceeds the aggregate lenders' penetration in low- and moderate-income geographies. The bank originated 16.5% of its 1999 HMDA originations in low- and moderate-income geographies. This distribution rate exceeds the 15.1% distribution rate for aggregate lenders. See exhibits 3 through 8, Appendix D.

Borrower Distribution:

During 1999, 31.3% of the bank's business loans were made to small businesses and 84.4% of its loans were originated in amounts of \$100,000 or less. During 2000, 27.6% were made to small businesses and 74.1% were in amounts of \$100,000 or less. See exhibit 9 and 10, Appendix D.

The bank's 1999 HMDA-related loans reflect an excellent distribution among borrowers of different incomes in the combined assessment area. The bank's HMDA-related loans reflect a 29.4% distribution rate to low- and moderate-income borrowers. This distribution rate is more than double that of the aggregate lenders distribution rate of 14.5% to this segment. See exhibit 11, Appendix D.

Community Development Lending:

BOM is considered a leader in making community development loans. Community development lending totaled approximately \$103,420,200 million since the previous examination. The dollar amount of community development loans represent an \$81,670,500 or 376% increase over the previous examination total of \$21,700,000. Approximately \$73,000,000 million of the total amount of community development loans was originated through the bank's Community Development Corporation (CDC). Lending efforts through the bank's CDC have stimulated redevelopment throughout various low- and moderate-income areas within the bank's AAs.

Flexible Lending Practices

BOM makes extensive use of government-sponsored loan programs. For the period from January 1, 1999 to December 31, 2000, the bank made 1,303 government-sponsored loans totaling \$101.9 million. In addition, 82 loans totaling \$5.4 million were originated through the Bank One Affordable Dream Mortgages flexible loan program. See exhibit #12, Appendix D.

BOM joined the U.S. Small Business Administration (SBA) and the National Community Reinvestment Coalition today to introduce "Community Express," a new loan program to make SBA-backed loans to metro Detroit businesses in low- and moderate-income communities. Bank One, Michigan, is the only lender in the state to offer this program.

Community Express Loan Program

The Community Express program will provide lines of credit, term loans and commercial mortgages. Once an applicant completes the loan application, the bank will determine the borrower's eligibility and report back within approximately 48 hours.

Loans can range from \$10,000 to \$250,000, significantly more than the maximum \$150,000 provided by the existing SBA Express program. Small business owners can

use the loans to obtain working capital, lease or buy equipment, and purchase inventory, machinery and commercial space.

An important benefit for Community Express borrowers is the program's pre-and post-loan technical and management assistance. This assistance covers various facets of business operations, such as budgeting, marketing and management.

Community Express, a part of the SBA's New Markets Initiative, is a five-year pilot-program being offered in conjunction with BOM, the nation's fourth largest SBA lender, and the National Community Reinvestment Coalition, a nonprofit trade association comprised of community development and advocacy groups.

Production in year 2000 (1/11/00 through 9/30/00) was 10 loans totaling \$919,700.

Bank One Affordable Dream Mortgages

The Bank One Affordable Dream Mortgage is designed for homebuyers with limited cash for down payment. It offers flexible underwriting guidelines for borrowers at or below 80% of median family income.

- Down payment: A minimum investment of the greater of \$500 or 1% of the home's sale price must be provided by the borrower with the remainder of the down payment and closing costs coming from a variety of sources such as gifts, grants, or down payment assistance programs.
- Credit History: Non-traditional credit history is acceptable for those without an established credit history.
- Maximum loan-to-value is 97%, private mortgage insurance can be used and no reserves are required.
- Homebuyer Education: A homebuyer-counseling seminar must be completed.

INVESTMENT TEST

The bank has made considerable strides to promote community development through extensive involvement in community development initiatives via its CDC. These investments have promoted stabilization and revitalization of various neighborhoods and investments in statewide organizations benefit each of the bank's assessment areas to some extent. However, the bank's investments are concentrated in the Detroit MSA. The strong performance in this its principle market is the primary reason for the **outstanding** rating for the investment test overall. Qualified investments in some of the bank's other assessment areas, particularly the MSAs, are few. There are

clearly investment needs in these communities and the bank has the resources to identify and respond to those needs.

The examination team reviewed the bank's investment portfolio, donations and special programs that foster community development. Qualified investments or grants were reviewed for innovativeness, responsiveness to credit and community development needs, and to the degree that they are uncommon investments for private investors.

Since the last examination, the bank originated qualified investments in the form of 33 equity investments totaling approximately \$25.6 million. The following table details the most significant investments made during the period under review:

BANK ONE INVESTMENT ACTIVITY (Highlights)		
Organization	Amount	Purpose
Banc One Capital Funding Corporation	\$11,551,104	The Globe Apartments. 77 low-income housing units at 315 Commerce Avenue, Grand Rapids, MI
Banc One Capital Funding Corporation in LIHTC program	\$3,390,029	Low Income Housing Tax Credits (LIHTC) public program for 148 low-income housing units at Haggerty Road, Detroit, MI.
Banc One Capital Funding Corporation	\$2,382,165	Manchester Place Phase II. 56 low-income housing units at 14350 Second Avenue, Highland Park, MI
Banc One Capital Funding Corporation in LIHTC program	\$1,975,394	LIHTC public program for 75 low-income housing units in Highland Park, MI.
NBD CDC investment in the MCFH Non-profit Housing Corporation	\$1,000,000	For the purpose of investing in low- to moderate-income residential rental properties located in the State of Michigan.
Cass Avenue Development Corporation	\$756,283	Vacant six-story building conversion into mix of 16 market rate and 24 affordable housing units with commercial space on ground floor. Detroit, MI.
The Jeremiah CDC	\$481,603	New construction of 60 scattered site single family rental homes in southwest Detroit, MI.
First Chicago Leasing Corporation investment in Huntington Place Apartments	\$440,852	28 affordable units at 1873 West Nestel Road, Prudenville, MI.
Kearsley-Daly Villa Limited Dividend Housing Association LP	\$393,979	Formed to own and operate a 100 senior housing development at 3058 Northy Genesee, Flint, MI.
HOP VIII	\$375,000	The fund preserves housing as owner-occupied dwellings and stabilizes neighborhoods in targeted areas of Kalamazoo, MI.

In addition to these investments the bank makes use of philanthropic donations/grants that qualify under CRA. These totalled 234 for \$5,576,057 since the previous examination.

Furthermore, Bank One has 63 qualified investments with current outstanding balances of \$18.4 million on its books. These investments were originated prior to the scope of this examination, but still show a considerable amount of monies invested back into the various assessment areas.

SERVICE TEST

The bank's system for delivering retail banking and community development services was reviewed as well as its alternative delivery systems. The examination team reviewed bank services for range, accessibility, innovativeness and responsiveness.

Overall, the bank is considered highly responsive to credit and community development service needs. The branch delivery system, which includes 256 branches and 457 ATMs within the combined AA, provides a wide range of services and reasonable banking hours. These services appear to be reasonably accessible to all geographies and there is a significant network of full service branches located in low or moderate income communities especially in the City of Detroit. Changes in the branch delivery system had no impact on accessibility. Extensive branch officer membership or representation on various government, civic and community development-related organizations are evident. The bank is recognized by community organizations as being a leader in community development services. Services also were provided indirectly through the underwriting of securities that impact the development activity within the Empowerment Zones and support affordable housing in the state. Based on the performance context, the bank is considered **outstanding** under the service test

Retail Banking Services

The institution is a full-service bank with branches and ATMs located throughout its nine AAs. Customers have access to various banking services through the bank or one of its affiliates. Consumer banking products and services include demand, savings and time deposit accounts; installment loans and related services; lines of credit and other open-end credit products; mortgage banking; electronic banking; safekeeping; non-deposit investment products and related services, including mutual funds, annuities and discount brokerage services; and trust and investment services. Trust and investment services include financial planning, tax counseling, custody services and fiduciary services, including acting as executor, administrator and personal representative of an estate.

Products and services tailored to the needs of small businesses include small business loans, equipment leasing, cash management accounts, payroll direct deposit, retirement plans and merchant services, such as the processing of credit card transactions and check verification. Additionally, the bank offers small business customers a complete line of business insurance products, including property, business interruption, commercial liability and workers compensation.

The bank offers its middle-market customers targeted products, including traditional lending arrangements, asset-based lending, commercial real estate and lease financing. Corporate finance products and services offered include merger and acquisition advisory services, financial advisory services, interest rate protection products and mezzanine debt capabilities. Other available services are cash management, international transactions, investment management, corporate trust and employee benefit products.

Loan Products

Residential Loans for one-to-four family dwelling units
Residential Loans for multi-family dwelling units of five or more families
Home Improvement Loans
Equipment Leases
Vehicle Leases
Working Capital Term Loans
Home Construction Loans
Commercial Loans to small and large businesses
Commercial Lines of Credit
Letters of Credit
Consumer Loans for many different purposes
Consumer Lines of Credit
Education Loans
Loans to local government and schools
Credit Cards
Commercial Real Estate Development and Construction Loans
Farm Loans
Commercial Leases

A new alliance that increases access to capital and credit for Hispanic-owned businesses. "Alianza" is the first nationwide venture capital fund created exclusively for Hispanic-owned businesses. Bank One invests \$5 million to capitalize the fund and will help raise an additional \$5 million from investors. Affinity credit card holders can take advantage of promotional interest rates, business-to-business discounts, consolidation billing and other benefits with no annual fee. The alliance also includes an affinity reward program that will help deliver educational programs locally.

Deposit Products and Services

Personal Checking Accounts for Individuals and Households
 Packaged Programs of personal Banking Services
 Low-Cost Checking and Savings for Students, Seniors, and People on a Budget
 Variable Rate Personal Savings Accounts
 Direct Deposit to Checking and/or Savings Accounts
 Certificates of Deposit
 Overdraft Protection
 Automated Teller Machine and Point of Sale Account Access
 Individual Retirement Accounts and Pre-Retirement Programs
 Checking and Saving Programs for Business
 Pension and Retirement Planning Programs for Businesses
 Trust Services
 Investment Services
 Access to Account Information Via Telephone

Government check cashing services are available at all Bank One locations, for both Bank One account holders and non-Bank One account holders. The standard check cashing policy is followed, and the applicable fee is charged for all checks presented for non-account holders. This policy and the fee charged are standard at all locations. The standard fee for non-account holders in Michigan is \$5.00.

Distribution of Branches Among Geographies

The bank has 256 branches in its nine AAs. The distribution of those branches by AA, county and income level is as follows:

AA	Low-	Mod	Mid	Upper-	Total
Ann Arbor	1	2	5	4	12
Benton Harbor	1	1	2	1	5
Detroit	12	15	57	49	133
Flint	5	3	12	10	30
Grand Rapids	2	5	22	7	36
Kalamazoo	0	0	2	1	3
Lansing	1	1	1	2	5
Saginaw	1	2	8	2	13
Non- Metro	0	2	14	3	19
TOTAL	23	31	123	79	256

Overall, 21.1% of the bank's branches are located in low- or moderate-income geographies, compared with 31.7% of these geographies in the combined AA. In the largest AA (Detroit MSA), 20.3% of the branches are located in low- or moderate-income geographies, and the Detroit AA geographies are 35.0% low- or moderate-income. Again, it should be noted that within the Detroit AA, 46 or 13.7% of low- and moderate-income geographies contain large industrial facilities with negligible permanent residents. The percentage of all branches located in middle-income geographies is 48.0%, compared with the percentage (45.5%) of middle-income geographies in the combined AAs. The percentage of all branches in upper-income geographies is 30.9%, which exceeds the percentage (22.8%) in the combined AA's income geographies. Overall, the bank maintains a strong branch presence in low- and moderate-income geographies, especially in the Detroit MSA.

The bank considers several different types of branches for analysis purposes:

- a full-service banking center
- a financial center (full-service in a supermarket)
- a sales center (no cash transactions)
- a drive-in banking center (no sales or loan applications)
- a sales center and drive-in banking center
- an express banking center (a no-cash branch)

Lobby hours at the branches normally range from 9-9:30 a.m. to 4 p.m. or later, depending on the day of the week; the total number of daily lobby hours is 6.5. Saturday lobby hours are usually 9 a.m. to 3 p.m. Drive-up hours are normally 9-9:30 a.m. to 6-7 p.m. weekdays and 9 a.m. to 2 p.m. Saturdays. Customer needs determine lobby and drive-up hours, and are consistent throughout the branch locations.

Record of Opening and Closing Offices

Examiners reviewed the bank's record of the opening and closing of its facilities. Bank management identifies areas that are either over- or under-represented. The bank evaluates all significant branch office data in the context of overall bank/market performance. Conclusions are reached after considering the costs/benefits of the closings, any comments from the Federal Reserve Bank and/or the community, and the effects on the community.

Since the previous examination the bank has closed 25 offices; 5 in low- or moderate-income geographies. Bank documentation supporting the branch closings indicated that the primary reason for the closings was facility overlap. The bank identified alternative facilities that, after the branches closed, were a reasonable extra distance

for customers. Discussions with community representatives, a review of complaints received by the bank and documentation from the Federal Reserve Bank of Chicago did not indicate any strong opposition to these closings. During the same time period, 14 branches opened.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and low- and moderate-income individuals.

Alternative Systems for Delivering Retail Banking Services

In an effort to make banking services accessible to customers in its AAs, the bank has established a network of Automated Teller Machines (ATMs). Of the 457 ATMs, 350 are full-service and located at branches, 49 are full-service but located somewhere other than a banking facility, and 58 are detached with limited service.

The 457 ATMs are distributed throughout the AAs as follows:

AA	Low-	Mod	Mid	Upper-	Total
Ann Arbor	2	1	10	9	22
Benton Harbor	1	1	2	1	5
Detroit	25	29	126	110	293*
Flint	8	3	24	14	49
Grand Rapids	2	6	29	10	47
Kalamazoo	0	0	1	1	3*
Lansing	1	1	1	3	6
Saginaw	1	2	9	2	14
Non- Metro	0	2	10	4	18
TOTAL	40	45	214	154	457

*Unclassified branches in total.

Overall, 18.6% of the bank's ATM's are located in low- or moderate-income geographies, 46.8% middle-income, 33.7% upper-income and .9% were unclassified. Given the concentration of geographies in urban areas, the percentage of ATMs in those low- or moderate-income geographies is reasonable, as access to these machines would not require excessive travel. Many of the bank's ATMs are bilingual (English and Spanish). Most of these are located in areas with dense Hispanic populations.

The bank complements its traditional branch network with "Telephone Banking Centers" which provide the convenience of telephone banking 24 hours a day, seven days a week. Customers are able to check deposits and loan balances; verify up to 60 days of deposit and withdrawal information; transfer money between their deposit accounts; and make loan, mortgage, check-guard or credit card payments.

The bank offers a product called Passport. Passport is a link to a variety of bank financial services. Customers are able to shop, and the amount of purchases is deducted from their checking accounts. The Passport card also offers banking by telephone 24 hours a day. Additionally, with Home Computer Banking System Plus a customer can make deposits and withdrawals, transfer money and perform other transactions at the bank's automated teller machines.

The bank has implemented Access Banking Centers which give customers the freedom to do their banking electronically without waiting in a teller line. The center features a newly developed touch-screen kiosk that helps customers learn more about the bank's electronic banking channels. The kiosk also provides customers with access to the bank's Internet site. The center includes two large screens, full-service automated teller machines (ATMs) and a direct link to the telephone-banking center, mortgage hotline and investment services.

The bank has implemented the use of video tellers, a television-like monitor with which a customer can talk to an employee whose face appears on a screen. Video tellers free up lobby space, giving customers more room and privacy when meeting with bank representatives. Customers approach a video station outfitted with a telephone, television monitor, camera and pneumatic tube system similar to those used at bank drive-through windows. The bank is the first in the Detroit region to install a video-teller system.

Community Development Service Activity

The bank's officers and employees recognize their obligation to seek to understand and meet the credit needs of the bank's entire community, including low- and moderate-income areas. Consistent effort is made to discover those needs and to initiate actionable steps.

Officers throughout the bank are actively involved in community organizations, which help to determine how the bank can better serve the community's credit needs. Contact includes visits with individual lenders, responding to meeting invitations, and providing technical and financial assistance. Also included is a continuous calling program to area realtor boards, builders and board members and committees to gain direct insight into the community's needs.

Bank officers are encouraged to participate in local trade associations and other business-related organizations. These contacts afford an opportunity to exchange ideas on private business and community credit needs.

The manager of community relations of the bank's Civic and Community Affairs department, through outreach and assessment, identifies community groups interested in economic development. He sorts out the issues and their interests, analyzes the

challenges and opportunities, and recommends strategies and action plans.

Community Relations has four primary activities:

1. Leading groups through the process of housing and commercial real estate development, possibly helping the group to obtain gap financing and operating support
2. Organizing community economic development conferences
3. Setting up home repair workshops
4. Monitoring the pre- and post-counseling for the 97 Plus Mortgage Product.

The bank strongly supports community outreach and development. The details of which can be found under the individual AA's service tests.

The bank offers many of the following services throughout their assessment areas.

Home Ownership Seminars

Mortgage officer's partner with various individuals to provide basic information to new homebuyers that provide an effective method to shop for and finance a home. An appraiser provides guidance to the prospective homebuyer on how to evaluate a home. An attorney provides instruction on the importance of a purchase agreement and suggests an attorney review the document before signing. The mortgage representative provides information on qualifications for a mortgage: specifically, criteria to determine eligibility, and mortgage options and costs, from purchase to closing. Another bank employee provides assistance in creating a budget to accommodate the new monthly mortgage payment and to explain additional home ownership costs (i.e., maintenance, utilities, insurance, etc.). A title company provides information on title concerns. The group concludes by summarizing the entire home ownership process step by step. The seminars generally result in several customer calls and a number of applications.

Housing Conferences

Housing conferences are conducted throughout the state, which are designed to address various aspects of housing. These include the impact of the economy on housing in various communities and ways to create effective partnerships in a citywide housing plan. The conferences provide a forum for community groups and individuals to increase their awareness of housing resources in the community. Community groups work in

partnership with bank personnel to plan and present workshops on various aspects of housing and community development. Individuals gain realistic information about the responsibilities of home ownership.

Mortgage Credit Pre- and Post-Purchase Counseling Program

This program is designed to prepare potential mortgage applicants with credit education and budget counseling. The two-hour, pre-purchase counseling session includes a review of the responsibilities of home ownership, budget planning, and the benefits of staying within a budget. Any borrower who has received the pre-purchase counseling and becomes 10 days late on a mortgage payment is referred back to the counselor. Generally, the issues are resolved via a telephone conversation. However, if a face-to-face meeting is required, topics could range from additional budget planning to referrals to community resources that provide assistance in the prevention of mortgage foreclosure.

Home Repair Workshops

Home repair workshops are conducted throughout Michigan. They teach homeowners and renters how to perform minor repairs, do preventive maintenance and coordinate activities with potential contractors. The workshops are generally presented in three-hour sessions over a period of six weeks. Topics covered include plumbing, electrical, plaster, and window repair, as well as housing inspection and weatherizing techniques. Group size is limited to encourage hands-on participation. In certain cases, skills are applied on an actual house that is in the process of rehabilitation.

Economic Development Corporations

The bank participated in the development of an Economic Development Corporation (EDC). The purpose of an EDC is to provide the technical assistance and training of individuals who wish to start small businesses or corporations. The bank's Alpena office was instrumental in the formation of an EDC and contributed substantial funding to the formation of the revolving loan funds. The concept is to make loans available to prospective applicants at rates much lower than the market. The loans are paid back to the revolving loan fund over time, and the money is then lent to new applicants. The "micro" program is for loans of \$10,000 or less and is designed for those individuals who cannot secure conventional financing at a local bank. The regular program allows for loans up to \$50,000, and the loans are intended as startup loans until the new business has sufficient cash flow with which the business can obtain conventional financing. One of the main goals of the EDC, and one of the necessary ingredients for each new loan request, is the creation of new jobs in the community.

Consumer Credit Education - "Credit: Tool or Trap"

“Credit: Tool or Trap” is a package of five video segments and a discussion guide designed to help individuals use credit wisely. Topics include how to establish and keep a good credit rating, basic facts about credit cost, how to avoid common traps, what to do if you cannot pay your bills, and the costs and benefits of declaring bankruptcy. The program is designed to discuss various consumer credit topics. Discussion leaders will use the videos in adult education settings with church and neighborhood groups, as well as in traditional classrooms.

In-School Banking

The in-school banking program involves a student-run bank, complete with the ability to conduct savings account functions. This program provides the student with the hands-on experience of running a bank. Students staff the bank, while bank personnel provide supervision. The program is designed to increase students’ knowledge of banking functions, savings practices and individual money management. The students apply for various bank positions such as branch manager, assistant manager, teller, and security manager. The main goal is to make the banker experience as authentic as possible.

Newsletter

The bank publishes a quarterly newsletter that is made available to community leaders and bank employees in southeast Michigan. It contains articles on the bank’s involvement in the community and information on bank services as well as contacts within the bank in the areas of CRA, civic and community affairs, public affairs, governmental relations, the small business center, community relations, the bank’s CDC and contributions.

COMPLIANCE WITH ANTIDISCRIMINATION LAWS

No violations of the substantive provisions of the antidiscrimination laws and regulations were identified. The bank has implemented fair lending policies, procedures, and training programs and regularly conducts internal reviews for compliance with policies and procedures.

The 1999-2001 Community Action Plan that Bank One negotiated with the Detroit Alliance for Fair Banking (DAFB) calls for the co-development of multi-family and single family housing within the City of Detroit that includes African American contractor/developer participation. BOM will set aside \$10 million for financing opportunities to assist city based and minority contractors. The Detroit Home Ownership Counseling Collaborative was formed to provide homebuyer counseling, foreclosure prevention and down payment assistance.

STATE OF MICHIGAN

CRA RATING FOR MICHIGAN

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The ratings for the State of Michigan are consistent with the ratings for the institution overall. The major factors affecting the State of Michigan rating are identical to the overall.

SCOPE OF EXAMINATION

The scope of examination for the State of Michigan is consistent with the scope of the examination for the institution. All assessment areas are within the state and were evaluated for lending, investment, and service performance as indicated in the tables in Appendix B.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MICHIGAN:

The following is a list of Assessment Area (AA) changes for Bank One, Michigan from its last CRA examination in August of 1998 through its current exam date ending in 2001:

- All 29 tracts in the Alpena AA were removed. This includes all of Alpena, Alcona, Oscoda, and Presque Isle Counties. The reasons for these changes:
 - Six branches were sold in October 1999. Four of the branches were in three middle-income tracts in Alpena County (Tracts 5, 8, and 9). One branch was in bna 9505 in Presque Isle County, a middle-income bna. The other branch was in bna 9705 in Oscoda County, a moderate-income bna.
- 18 of the 29 bna's in the Cadillac AA were removed. This includes all of Missaukee, Osceola, and Wexford Counties. Roscommon County (11 bna's) remains intact and is now part of the rolled-up Non-Metro AA. Reasons for change:
 - One branch in a middle-income bna (9604) in Missaukee County was sold in October 1999.

- Three branches in three different bna's in Osceola County were sold in October 1999. The bna's were middle-income areas - 9702 and 9704, and moderate-income bna 9701.
- Seven branches in five different bna's in Wexford County were sold in October 1999. Four of the bna's were middle-income areas – 9801, 9805, 9807, and 9808, and one of the bna's was a moderate-income 9803. (Two branches were sold each in bna's 9807 and 9808).
- All 12 tracts in Huron County were removed from the Sandusky AA, leaving Sanilac and Tuscola Counties, which have since been rolled into the Saginaw AA. Eleven of the twelve tracts in Huron County are middle-income, the other is a moderate-income tract. The Sandusky AA was eliminated. There have not been any branches in Huron County since before 1998.
 - All 27 tracts in Bay County and all 17 tracts in Midland County were added to the Saginaw AA in first quarter 1999.
 - 3 of the 13 tracts in Montcalm County were added to the Grand Rapids AA. All three of the tracts are middle-income tracts. A full-service ATM was opened in tract 9812, a middle-income tract, in 1999.

Overall Assessment Area definition changes from the previous CRA examination dated August 10, 1998 to the current CRA examination can be summarized by the following: Total Change: Net Decrease of 12 tracts from 1,971 in 1998 to 1,959 in 2001.

ECONOMY

Michigan's economy has been growing for more than nine years without interruption. It is the longest period of continuous economic growth ever recorded. A principal measure of the relative strength of the Michigan economy in comparison with the nation is the Gross State Product (GSP), the value of all goods and services that are produced within the state. Between 1992 and 1998, real GSP in Michigan grew at an average annual rate of 4.4% compared to 4.2% for the entire country. During the first two quarters of 2000, the growth rate in the nation is estimated to have been 5.2% while Michigan's rate was between 4% and 5%.

Michigan's labor force has increased by almost 12 percent from 1990 - 1999 and the number of employed grew by almost 17 percent. The strong economy helped cut Michigan's unemployment rate by more than half (-56.6%) while the nation's unemployment rate was reduced by about a quarter (-28.6%). Michigan turned its unemployment rate around in 1994, and since that time has had a rate lower than that-of the US.

HOUSING

Michigan's prosperous economy and low unemployment rate has a direct impact on housing. Families are earning a better living than they were a decade ago allowing new homebuyers to enter the market and existing homeowners to move up. This produces a significant demand for new housing, which is driving housing costs up to very high levels. Finding decent affordable housing, both rental and owner occupied, for low- and moderate-income families is a challenge across the state.

Several agencies are working in Michigan to address the need for affordable housing. The state is fortunate to have a sophisticated state housing finance authority, the Michigan State Housing Development Authority (MSHDA). MSHDA works in partnership with local banks to provide low-interest first mortgage loans with cash assistance to qualified first time homebuyers. To help provide more housing, MSHDA offers Private Activity Bonds and Low Income Housing Tax Credits to developers of low to moderately priced rental housing. Michigan has several non-profit intermediaries which help nonprofit developers finance affordable housing on a statewide basis: There are three Local Initiative Support Corporation affiliates in the state: Michigan out-state, Detroit and Kalamazoo. Michigan Housing Trust Fund provides low interest loans for pre-development costs. Michigan Capital Fund for Housing accepts investments from banks and institutional investors and purchases Low Income Housing Tax Credits within Michigan.

COMPETITION

The Michigan business sector is competitive among the financial institutions operating there. Several mergers and acquisitions have occurred over the past few years, and a few new financial institutions have entered the market. The bank's largest competitor, Comerica, is headquartered in Detroit. Additional competition stems from other national and state banks such as Old Kent, which was recently purchased by Fifth Third Bank; National City, headquartered in Cleveland; and two banks recently purchased by ABN AMRO, Michigan National and Standard Federal. In addition, there are non-bank financial providers such as Merrill Lynch, the Money Store, AT & T Capital, insurance companies, credit unions and mortgage lenders.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MICHIGAN:

The discussion of the performance for the institution is reflective of the performance in the State of Michigan. This takes into account the fact that operations in the State of Michigan account for 100% of the deposit and loan activity of the bank. Discussion of performance in the individual assessment areas within the State of Michigan follows.

METROPOLITAN AREAS (Full Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN DETROIT MSA #2160:

The Detroit Assessment Area holds over 76% of BOM total deposits across the state -easily the largest percentage share of deposits for the bank. For this reason, some key performance context issues regarding the area will be described below.

The Detroit AA is comprised of five of the six counties in the Detroit MSA: Wayne, Oakland, Macomb, Lapeer and St. Clair. Located in the heart of Michigan's booming automotive and manufacturing industry, the Detroit AA has 133 Bank One Banking Centers and 293 ATMs, 251 of them deposit taking. As the center of manufacturing growth in southeast Michigan shifts north up the 1-75 corridor, it is producing a sprawling, urban/suburban metropolis in southeast Michigan. In the years since 1990, the populations of the five counties in the MSA have continued to shift. This migration is tracked and reported in annual county population estimates issued by the Census Bureau.

This movement is out of the older urban areas of Detroit and Wayne County and into the formerly rural areas of the counties to the north. Between 1998 and 1999, Wayne County lost 5,266 residents to Oakland County, 4,329 to Macomb and 2,206 to Livingston. Over the years, this flow of people and income has helped Oakland County achieve the second highest per capita income in the United States while Wayne County and the city of Detroit's per capita income has fallen to one of the lowest. These fast growing, affluent suburban areas in close proximity to older, fully built urban areas with a LMI borrowers and LMI Census Tracts offers both opportunities and challenges for BOM.

According to 1990 Census data, the assessment area encompasses 1,138 census tracts, of which 216 (19.0%) are low-income, 182 (16.0%) are moderate-income, 461 (40.5%) are middle-income, and 279 (24.5%) are upper-income. The estimated 2000 HUD Median Family income for the assessment area is \$63,200. The 1990 Census data also indicates that 12.97% of the assessment area's households are below the poverty level.

The MSA's economy is largely dependent on manufacturing, particularly automobile and auto-related products. The following chart shows the principal employees in Wayne, Oakland and Macomb Counties:

FIRM	# OF FACILITIES	COUNTY	# OF EMPLOYEES	PRODECT SERVICE
Daimler Chrysler Corporation	2	Oakland	26,000	Testing & Minivan
General Motors Corporation	1	Oakland	4,600	Auto assembly
William Beaumont Hospital	1	Oakland	10,000	Health Care
Kmart Corporation	1	Oakland	6,500	Retail
St. John Health System	1	Wayne	7,500	Health Care
Northwest Airlines	1	Wayne	7,200	Air transportation
Comerica Bank	1	Wayne	5,708	Banking
Daimler Chrysler Corporation	1	Wayne	4,500	Auto assembly
Daimler Chrysler Corporation	2	Macomb	7,240	Stamping & assembly
General Motors Corporation	1	Macomb	4,000	Automobile Manuf.
Ford Motor Company	1	Macomb	4,000	Auto assembly

According to the Michigan Employment Security Commission, the March 2000 and March 2001 unemployment rates for the assessment area and the State of Michigan are as follows:

UNEMPLOYMENT DATA Detroit MSA #2160		
Geographic Area	March 2001 (%)	March 2000 (%)
Detroit MSA	4.6%	3.2%
STATE OF MICHIGAN	5.2%	3.8%

Although the bank receives competition in its assessment area from a variety of different types and size institutions offering financial services, it is appropriate to compare it with the larger institutions that have similar resources and have a substantial presence in its market areas. The June 30, 2000 FDIC Report of Offices and Deposits of FDIC Insured Institutions identified those institutions within the bank's assessment areas as follows:

Detroit MSA #2160		
Wayne County		
Institution	Asset Size (000)	Branches In County
Comerica Bank	\$33,697,049	68

Michigan National Bank	\$11,917,513	42
Standard Federal Bank, F.S.B.	\$20,596,091	42
National City Bank of MI/IL	\$16,871,270	47
Charter One Bank	\$32,953,855	39
Old Kent Bank	\$23,465,992	18

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN DETROIT MSA #2160:

LENDING TEST – DETROIT MSA #2160

The bank's overall lending performance is "*outstanding*" due to the following factors: a high concentration of loans within the assessment areas, a strong record of lending to businesses of different revenue sizes, the extensive community development lending efforts and excellent distribution of loans within the assessment areas. Lending to borrower's of different incomes reflects excellent penetration and responsiveness to the credit needs of low- and moderate-income borrowers.

Lending Activity:

Bank One's lending activity reflects an excellent responsiveness to credit needs in the assessment area. The bank has reinvested back into the community in the form of home mortgage and businesses loans a high percentage of the deposits derived from this assessment area.

Geographic Distribution:

The geographic distribution of the bank's loans reflects an excellent distribution of loans throughout the assessment area. The bank's geographic distribution of HMDA-related loans is higher for loans originated in low- and moderate-income geographies than those of aggregate lenders. For 1999 and 2000, the percentage of HMDA-related originations per 1,000 owner-occupied units in low- and moderate-income census tracts was similar to that for middle- and upper-income census tracts. The distribution of the bank's small business loans also reflects an excellent penetration throughout the assessment area, particularly the dollar amount of those loans. The distribution of business loans in low- and moderate-income census tracts was very similar to the distribution of businesses in those geographies.

The geographic distribution of the bank's originations in the Detroit MSA is excellent, considering the percentage of originations within LMI geographies in this assessment area. The geographic distribution for the bank's HMDA-related loans in LMI

geographies was 20.7%, and was 19.7% by number and 21.7% by dollar for the bank’s business loans. (See Exhibit 13 and 14 in Appendix D.) By comparison, LMI census tracts comprise 35.0% of all census tracts in this assessment area. Sixteen or 7.4% of the 216 total low-income census tracts do not have housing and/or population.

The chart in Exhibit 16 shows that the bank originates a similar percentage of HMDA-related loans per 1,000 owner-occupied units within middle- and upper-income census tracts than in low- and moderate-income census tracts.

The chart in Exhibit 17 shows that the bank originated 20.5% of its 1999 HMDA-related loans within low- and moderate-income census tracts. This distribution of loans exceeded the aggregate lenders’ distribution rate of 17.6% in these geographies. The geographic distribution of the bank’s 1999 HMDA-related loans reflects an excellent penetration throughout the MSA when compared to the loan distribution for aggregate lenders.

Distribution by Borrower Income and Revenue Size of the Business:

The bank has an excellent distribution of loans to borrowers of different income levels in the assessment area. The distribution of the bank’s HMDA-related loan to low- and moderate-income borrowers substantially exceeded that of aggregate lenders to this segment. An adequate percentage of the bank’s business loans were to small businesses and a high percentage of business loans were in amounts of \$100,000 or less.

The tables in Exhibits 18 and 19 show that the bank over the previous one year and nine months originated 31.9% of its HMDA-related loans to low- and moderate-income borrowers. This distribution rate is similar to the 38.7% distribution of low- and moderate-income families in the assessment area. The bank’s business loans reflect an adequate distribution to small businesses.

The tables in Exhibits 20 and 21 show that the bank originated:

- An adequate percentage of its loans to small businesses.
- A high percentage of loans in amounts of \$100,000 or less.

The following table compares the bank’s small business lending in low- and moderate-income (LMI) census tracts to the distribution of businesses in those tracts:

Comparison of Loans and Businesses in LMI Census Tracts Detroit MSA #2160			
# of Loans in LMI Census Tracts	% of Total Loans in LMI Census Tracts	# of Businesses in LMI Census Tracts	% of Total Business in LMI Census Tracts

2,970	20.8%	18,716	20.1%
-------	-------	--------	-------

The following table shows the bank’s rank among the bank lenders who reported loans in Wayne, St. Clair, Macomb, Oakland and Lapeer Counties in 1999, by number and dollar amount of business loans and the number and dollar amount of loans to small businesses:

County	# of loans	\$ of loans	# of loans to small businesses	\$ of loans to small businesses
Wayne County	4 th	2 nd	4 th	3 rd
St. Clair County	1 st	2 nd	1 st	2 nd
Macomb County	3 rd	3 rd	9 th	5 th
Oakland County	4 th	2 nd	4 th	3 rd
Lapeer County	3 rd	1 st	2 nd	1 st

Further analysis revealed that BOM had the following county deposit market share rankings as of June 30, 2000: Wayne – 2nd out of 29 banks, St. Clair – 2nd 9 banks, Macomb – 3rd out of 20 banks, Oakland – 3rd out of 31 and Lapeer – 4th out of 9 banks. The analysis revealed that in some instances, the bank reinvests back into the community in the form of business loans at a lower rate than it receives deposits from the community.

The bank has an excellent distribution of loans to low- and moderate-income borrowers. The bank’s distribution of loans to the low- and moderate-income segment exceeded that of aggregate lenders by a substantial margin.

As illustrated in Exhibit 22, 31.3% of the bank’s 1999 HMDA-related originations were to low- and moderate-income borrowers. This distribution rate exceeded the 16.3% distribution rate for aggregate lenders by a large margin.

Community Development Lending:

Bank One is a leader in making community development loans in this assessment area. The bank originated 26 community development loans totaling \$87,000,700 in the Detroit assessment area. These loans represent 66.7% of the total number of community development loans originated in all assessment areas and 84.1% of total dollars. The bank’s more significant community development loans are summarized as follows:

TYPE	AMOUNT (\$ (000))	DESCRIPTION
Economic Development (Job Retention)	\$15,000,000	This \$15MM participation in a \$145MM two-and-a-half year secured construction loan converting into a 14.5 year secured term loan was used to construct a new 40,000 seat open air sport facility in the Downtown Development Authority’s (DDA)

TYPE	AMOUNT (\$ (000))	DESCRIPTION
		Downtown District. The goal of the project is to help promote economic development and prevent deterioration in the City of Detroit's downtown business district.
Economic Development (Job Creation/Retention)	\$11,250,000	This 12-month secured non-revolving multiple draw facility will assist the borrower in the construction of a 172,000 square foot industrial building in the Detroit Renaissance Zone. A total of 230 jobs will be created and/or retained as a result of this project.
Economic Development (Job Creation)	\$10,500,000	An unsecured six-month loan to acquire and renovate a 325,000 square foot vacant industrial building, formerly known as the Cadillac Engineering Building, located in a low-income geography in the City of Detroit. The goal of the project is to attract jobs.
Affordable Housing	\$9,850,000	A 24-month construction loan that financed the rehabilitation of a 476 low- and moderate-income income unit apartment complex. The project consists of 23 buildings on a 17-acre site in a moderate-income geography.
Affordable Housing	\$8,250,000	A 42-month term loan with a 20-year amortization schedule to purchase and convert 315 rental units into condominiums in Westland, MI. The condominiums will sell for a base price of \$59,900 and are directed at the low- and moderate-income segment.
Economic Development (Job Creation)	\$6,400,000	An 18-month construction loan that will convert to a 3-year term loan. The loan financed the construction of a 77,000 square foot neighborhood retail center in a moderate-income census tract in the City of Detroit. The goal of the project is to create jobs in this low- and moderate-income area. Approximately 50 jobs have been created.
Affordable Housing	\$5,200,000	A 90-day bridge loan to provide short term financing for the acquisition of a 207-unit apartment complex known as the Rosewood Manor Apartments and townhouses. The building is an existing rent subsidized property with 98% of the units occupied by low- and moderate-income residents under the HUD Section 8 and 236 programs.
Michigan Capital Fund for Housing LP VI	\$3,880,500	This warehouse line of credit is for the purpose of funding investments in MCFH LP VI. The line of credit will be used to make the first installments into the lower tier limited partnership for fund VI. All housing projects benefit low- and moderate-income residents.
Affordable Housing	\$2,500,000	The loan will finance the rehabilitation and conversion of a vacant building into a 40-unit apartment complex. Twenty-four of the units will be made available to low- and moderate-income residents and the first floor of the building will be rehabilitated into 3,887 square feet of commercial space. The building is located in a low-income census tract in the Detroit downtown section, in the federally designated Detroit Empowerment Zone.
Education	\$1,600,000	A participation in a \$3,200,000 five-year secured term loan made to Edison Schools Inc., to build and manage a charter school the YMCA Learning Center. The school opened in fall 1999 and services 648 students. The school is located in a moderate-income

TYPE	AMOUNT (\$ (000))	DESCRIPTION
		census tract and provides programs to low- and moderate-income students including day care and after school programs and classes.
Economic Development (Job Creation)	\$1,325,000	A 24-month construction loan that financed the construction of a 10,880 square foot building in the City of Detroit federally designated Empowerment Zone. The building was constructed by AMAC Sales & Builders Co., Inc., a one hundred percent owned minority firm.
Affordable Housing	\$1,000,000	Funds were used to complete a capital improvement program at this 130 unit low- and moderate-income apartment complex. The project is located in a low-income census tract in the City of Detroit.
Totals	\$76,755,500	

INVESTMENT TEST - DETROIT MSA #2160

The bank’s performance under the investment test is considered “*outstanding*”. The bank has made an excellent number of investments and grants to foster community development, particularly given its size and available resources. The bank exhibits excellent responsiveness to credit and community needs. Interviews with community representatives indicated that the bank participates strongly in community development opportunities, particularly with regard to affordable housing.

Community Development Investment and Grant Activity

The bank had a 21 qualified investments totaling \$10,887,132 since the previous examination.

In addition to these investments the bank makes use of philanthropic donations/grants that qualify under CRA. This totalled 109 for \$4,437,461 since the previous examination.

These totals represent 48.5% of the total of new investments/grants since the previous examination. The bank is ranked 1st and has a 23.6% market share of total deposits in this market. The Detroit MSA also represents the bank’s largest market in the state.

SERVICE TEST – DETROIT MSA #2160

The bank’s performance under the service test is considered generally strong and is rated “*outstanding*”. Delivery systems, including alternative delivery systems, are accessible to all portions of the bank’s assessment area. The bank’s record of opening and closing branches has not adversely affected the accessibility of its delivery systems. Also, services do not vary in a way that inconveniences any certain

portion of the assessment area. In addition, the bank provides a relatively high level of community development services. This demonstrates the bank’s commitment to the development needs within its community.

Retail Banking Services

The Detroit assessment area accounts for 76.5% of Bank One's total deposit base. A full-range of deposit services and consumer loan products are available at all branch locations. The bank offers a low cost-checking product which has been well received in the low- and moderate-income areas of the bank's community.

Distribution of Branches by Census Tracts

The bank has 133 branches in this assessment area. The chart below illustrates the bank’s branches by the income levels of the census tracts in which they are located:

DETROIT MSA GEOGRAPHIC DISTRIBUTION OF BRANCHES (BY CENSUS TRACT INCOME LEVEL)					
MSA	TOTAL	LOW	MOD	MIDDLE	UPPER
Detroit	133	12	15	57	49

Bank One branches in low- to moderate-income geographies represent 20.3% of all of the bank’s branch locations throughout the Detroit MSA. Within the bank’s assessment area, low- and moderate-income geographies represent 35.0% of the area.

It should be noted that within this AA, 46 or 13.7% of low- and moderate-income geographies contain large industrial facilities with negligible permanent residents.

Alternative Systems for Delivering Retail Banking Services

The bank offers alternative systems for delivering banking services by making 293, ATMs/CDMs available within its Detroit MSA assessment area. Of the 293 ATMs/CDMs located in the Detroit MSA; 54 or 18.4% are located in low- to moderate-income census tracts. Within the overall total there are 47 CDMs all stand alone of which 43 are 24-hour service. Of the 25 machines located in low-income areas: 22 are ATMs of which 13 are 24-hour and attached; 4 are attached but not 24-hour available; and 4 are neither attached to a branch nor have 24-hour service. The 3 CDM's in low-income areas are neither attached nor 24-hour service.

Of the 29 machines located in moderate-income areas: 2 are CDMs that are neither attached nor 24-hour service. Of the 27 ATMs in moderate-income areas: 20 are

attached and 24-hour service; 1 is a 24-hour stand alone; 3 are stand alone; and 3 are attached but but not 24-hour service.

Record of Opening and Closing Offices

Since the previous examination, the bank has opened three branches both in upper-income areas. In addition, the bank closed fifteen branches; one low-income area, 3 moderate-income areas and eleven in middle-income areas.

Reasonableness of Business Hours and Services

The bank’s hours of operation offer notable convenience to the customer base. Although bank hours vary by location, banking services can be conducted as earlier or later if needed. Saturday hours of operation are also available at most banking offices. BOM is committed to the communities in which banking offices are located. Personal Bankers are equipped to conduct some financial transactions and services for their customers outside of the banking office at times that may be more convenient for their customers.

Community Development Services

The following is a partial list of community and civic organizations on which bank officers serve, or with which they are affiliated in the Detroit MSA assessment area:

BANK ONE QUALIFIED SERVICES (Highlights)		
Organization	Purpose of Organization	Purpose of Qualified Services
Detroit/Wayne County Homeless Action Network	Organizes resources from a variety of sources that collaborate to develop and implement programs to eliminate homelessness.	Panelist at workshop that focuses on the common challenges in creating and preserving affordable

BANK ONE QUALIFIED SERVICES (Highlights)		
Organization	Purpose of Organization	Purpose of Qualified Services
		housing.
Community Development Advocates of Detroit	Provides a City-wide voice for community development corporations by enhancing the effectiveness of the CDC's.	Board Member
Detroit Alliance for Fair Banking	Committed to assisting the citizens of Detroit gaining financial empowerment.	Panelist at workshop on Community Development
Detroit Community Development Fund Associate	Strengthen the capabilities of Detroit based community development organizations	Program Grant Committee and Board Member
Detroit Homeownership Counseling Collaborative	Low-to moderate-income homeownership achievement through effective education and counseling.	Board Member
Emmanuel Community House	Non-Profit low-income housing development corporation.	Planning Committee Member
Financial Institutions Community Development Conference	Discussions on vital issues of community development	Leader of Workshop
Habitat for Humanity	Renovates, builds, and finances affordable single family homes expressly for LMI individuals and families.	Member of Board of Directors
Local Initiative Support Corporation	National not-for-profit intermediary that provides sources to funds for the development of affordable housing.	Member of Advisory Committee
Macomb County CRA Association	Identifies the financial needs of the Macomb LMI community and promotes efforts to fulfill those needs.	Member of Committee
Michigan Housing Trust Fund	Provides financial assistance and technical support for building affordable housing	Loan Committee Member & Board Trustee

The above summary of qualified services shows BOM officers to be involved in numerous organizations that provide qualified services to the Detroit MSA.

METROPOLITAN AREAS (Full Review)

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN GRAND RAPIDS/
MUSKEGON/HOLLAND MSA #3000:**

Grand Rapids/Muskegon/Holland MSA is the bank's second largest AA. The area is comprised of the contiguous counties of Kent and Ottawa, and the adjacent southern portion of Muskegon County. Located in western Michigan, the AA borders Lake Michigan. The AA consists of 820,870 residents in 183 census tracts with a median family income of \$37,132.

Family households comprise 73.5% of the population. Of that group, 17.4% is low-income families, 17.9% is moderate-income, 26.6% is middle-income and 38.1% is upper-income. Low-income census tracts account for 20 of the 183 census tracts in the Grand Rapids AA. Of the remaining tracts, 29 are moderate-income, 100 are middle-income and 34 are upper-income. 19.2% of the population is living in low- or moderate-income census tracts.

Of the 305,558 housing units in the Grand Rapids area, 64.5 % is owner-occupied and 11.9% is vacant. A median housing value of \$66,376 is 10.5% higher than Michigan's median. However, the area's median housing stock age of 33 years is comparable to the State median of 30 years. Single-family homes constitute 68.4% of all available housing, with 2- to 4-family dwellings representing 13.5%. Approximately 13.2% of the housing stock contains five or more housing units. With an increasing population, additional housing construction is likely to follow. Based on the median housing age, there appears to be a demand for home purchases and home improvement loans.

BANK ONE – GRAND RAPIDS/MUSKEGON/HOLLAND MSA #3000		
Assessment Characteristics	MSA	STATE
<i>Tract Summary</i>		
Total Number of Census Tracts	183	--
Number of Low-Income Census Tracts	20	--
Number of Moderate-Income Census Tracts	29	--
Number of Middle-Income Census Tracts	100	--
Number of Upper-Income Census Tracts	34	--
<i>Income Summary</i>		
Median Family Income	\$37,132	\$36,652
Percent Low-Income Families	17.4%	20.9%
Percent Moderate-Income Families	17.9%	17.3%
Percent Middle-Income Families	26.6%	23.0%
Percent Upper-Income Families	38.1%	38.8%
Percent of Families Below Poverty	7.2%	10.2%
<i>Unemployment Summary</i>		
Total Population	820,870	9,295,297
Labor Force Population	421,455	4,554,160
Percent Unemployment	5.5%	8.2%
Unemployment Rate (Ottawa County)**	2.7%**	4.8%**
Unemployment Rate (Kent County)**	3.1%**	
Unemployment Rate (Muskegon County)**	4.7%**	

BANK ONE – GRAND RAPIDS/MUSKEGON/HOLLAND MSA #3000		
Assessment Characteristics	MSA	STATE
<i>Housing Summary</i>		
Total Housing Units	305,558	3,826,765
Percent Owner-Occupied Units	64.5%	63.0%
Percent Rental Units	23.6%	25.8%
Percent Vacant Units	11.9%	11.2%
Median Housing Value	\$66,376	\$60,062
Median Gross Rent	\$425	\$423

*1990 Census Data

**Michigan Department of Career Development 1999 Labor Statistics

The following table depicts the employment, by industry, of the three counties in the Grand Rapids assessment area according to the Bureau of Economic Analysis, U.S. Department of Commerce; 1996.

Ottawa County – Major Industries	
Industry	Employees
Manufacturing	40,833
Service Industry	31,577
State and Local Government	11,630
Kent County	
Manufacturing	80,243
Service Industry	109,579
State and Local Government	22,935
Muskegon County	
Manufacturing	15,264
Service Industry	19,756
State and Local Government	8,852

Ottawa County - Major Employers			
FIRM	LOCATION	EMPLOYEES	PRODUCT
Prince Corporation*	Holland	4,900	Automotive Interior Parts
Meijer, Inc**	Grand Haven, Holland	2,026	Department Store
Donnelly Corp.*	Holland	2,000	Auto Mirrors, Door Handles
Bil-Mar Foods Inc.*	Zeeland	2,000	Processed Dinners & Food Products
Grand Valley State University**	Allendale	1,609	Education
General Motors*	Coopersville	1,600	Gasoline Fuel Injectors
Miller, Herman Inc.*	Zeeland	1,560	Modular space/seating systs
Lifesaver Co.*	Holland	1,150	Candy, Mints, Chewing Gum
Holland Community Hospital**	Holland	1,108	Health Care
County of Ottawa**	Ottawa	966	Government
Kent County			
Amway Corporation **	Ada	5,000	Clothing, Hsehd Cleaners,

Ottawa County - Major Employers			
FIRM	LOCATION	EMPLOYEES	PRODUCT
			Food Products
Butterworth Hospital**	Grand Rapids	3,200	Health Care
General Motors Corp.*	Wyoming	2,500	Auto Body Stampings, Dies & Fix
Delphi Interior/ Lighting Sysys*	Grand Rapids	1,500	Auto Interiors
Meijer Inc,**	Grand Rapids	2,000	Department Store
Mercy Health Services**	GrandRapids	2,000	Health Care
Blodgett Memorial Med. Cntr.**	Grand Rapids	1,900	Health Care
City of Grand Rapids**	Grand Rapids	1,400	Government
Delphi Energy/ Engine Mgt Sysys*	Wyoming	1,200	Hydraulic Valve Lifters
Smith Industries Aerospace*	Wyoming	1,100	Air, Missile, Space Navigational Systems
Muskegon County			
Howmet Corp/ Whitehall Casting*	Whitehall	1,600	Aerospace prec invest castings
Meijer Inc.**	Muskegon	1,300	Department stores
Hackley Hospital**	Muskegon	940	Health care
GTE North Inc.**	Fruitport	860	Telecommunications
Warren, S D Co*	Muskegon	816	Pulp mill; high grade papers

*Source: 1998 Harris Publishing Company Industrial Directory

**Source: Michigan Economic Development Corporation

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN GRAND RAPIDS / MUSKEGON / HOLLAND MSA #3000:

LENDING TEST – GRAND RAPIDS/MUSKEGON/HOLLAND MSA #3000

The bank's performance under the lending test is considered *"high satisfactory"*. The geographic distribution of loans reflects a very good penetration throughout the assessment area; the dollar amount of the distribution of the bank's small business loans is excellent. Loan distribution by applicant income reflects an excellent penetration among borrowers of different income levels. Lending to businesses of different sizes reflects very good distribution. The bank makes a low level of community development loans in this assessment area.

Lending Activity:

Bank One's lending activity reflects a good responsiveness to the credit needs in the assessment area. The bank has reinvested back into the community in the form of home mortgage and businesses loans a good percentage of the deposits derived from this assessment area.

Geographic Distribution:

The geographic distribution of the bank's loans reflects a good distribution of loans throughout the assessment area. The geographic distribution of the bank's HMDA-related loans is similar to that of aggregate lenders for loans originated in low- and moderate-income geographies. The distribution of the bank's small business loans reflects an excellent penetration throughout the assessment area. The dollar distribution of business loans in low- and moderate-income census tracts exceeded the percentage of low- and moderate-income census tracts in the assessment area.

The geographic distribution for the bank's 1999 and 2000 HMDA-related loans was 11.8% by number in LMI geographies. The geographic distribution for small business loans in LMI areas was 22.6% by number and 27.0% by dollar (see Exhibits 23-26). By comparison, LMI census tracts comprise 31.8% of all census tracts in the assessment area. Two or 10.0% of the total number of low-income census tracts in the assessment area do not have housing and/or minimal population.

Exhibit 27 shows that the bank originates a lower percentage of HMDA-related loans in low- and moderate-income census tracts than in middle- and upper-income census tracts.

Exhibit 28 shows that the bank originated 10.5% of its 1999 HMDA-related loans within low- and moderate-income census tracts. This distribution rate of loans is slightly below the aggregate lenders' distribution rate of 12.9% in those geographies. The bank's 1999 HMDA-related loans reflect a good distribution throughout the assessment area when compared to aggregate lenders.

Distribution by Borrower Income and Revenue Size of the Business:

The bank exhibits an excellent record of serving the credit needs of low- and moderate-income borrowers and small businesses. The distribution of the bank's HMDA-related loans to low- and moderate-income borrowers substantially exceeded that of aggregate lenders. The bank makes an adequate percentage of loans to small businesses. A high percentage of the bank's business loans were originated in amounts of \$100,000 or less.

Exhibits 29 and 30 show that the bank over the previous one year and nine months originated 29.7% of its HMDA-related loans to low- and moderate-income borrowers.

Exhibits 31 and 32 show that the bank originated:

- A good percentage of its 1999 and 2000 business loans to small businesses.
- A high percentage of the bank's loans were in amounts of \$100,000 or less.

The following table compares the bank's small business lending in low- and moderate-income (LMI) census tracts to the distribution of businesses in those tracts:

Comparison of Loans and Businesses in LMI Census Tracts Grand Rapids MSA #3000			
# of Loans in LMI Census Tracts	% of Total Loans in LMI Census Tracts	# of Businesses in LMI Census Tracts	% of Total Business in LMI Census Tracts
863	11.80	4,945	20.8

The following table shows the bank's rank among the 57 large bank lenders who reported loans in the MSA in 1999, by number and dollar amount of business loans and the number and dollar amount of loans to small businesses:

Assessment Area	# of loans	\$ of loans	# of loans to small businesses	\$ of loans to small businesses
Kent	2 nd	2 nd	4 th	2 nd
Ottawa	3 rd	3 rd	7 th	6 th
Muskegon	5 th	5 th	9 th	6 th

Further analysis revealed that Bank One had the following county deposit market share rankings as of June 30: Kent – 2nd out of twenty-seven banks, Ottawa – 5th out of eighteen banks and Muskegon – 10th out of twelve banks. These lending market share rankings are consistent with the bank's deposit market share rankings. This illustrates the bank's ability to reinvest deposits back into the community in the form of business loans at a rate similar to that which it receives deposits from the community.

Exhibit 33 shows that 28.9% of the bank's 1999 HMDA-related originations were to low- and moderate-income borrowers. This distribution rate substantially exceeded the 10.5% distribution rate for aggregate lenders. The bank's loans reflect an excellent distribution to borrowers of different income levels when compared to aggregate lenders.

Community Development Lending:

The bank originated community development loans at a very low level in this assessment area. One community development loan totaling \$341,000 was made in this assessment area. Community development loans made in this assessment area represents 2.6% of the total number and 0.3% of the total dollar amount of community development loans made in the bank's entire assessment area. The bank derives 6.7% of its deposit base from this assessment area.

INVESTMENT TEST - GRAND RAPIDS/ MUSKEGON/ HOLLAND MSA #3000

The bank's performance under the investment test is considered "*outstanding*". The bank has made a good number of investments and grants to foster community development, particularly given its size and available resources. The volume of qualified investments is excellent, based on dollar amount, and in consideration of the available opportunities in the bank's assessment area. Interviews with community representatives indicated that

the bank participates adequately in community development opportunities, particularly with regard to affordable housing.

Community Development Investment and Grant Activity

The bank had a total of \$11,574,072 in qualified investments since the previous examination.

In addition to these investments the bank makes use of philanthropic donations/grants that qualify under CRA. This totalled 49 for \$477,221 since the previous examination.

These totals represent 38.1% of the total of new investments/grants since the previous examination. The bank is ranked 3rd and has a 11.2% market share of total deposits in this market. The Grand Rapids/Muskegon/Holland MSA also represents the bank's second largest market in the state.

SERVICE TEST - GRAND RAPIDS/ MUSKEGON/ HOLLAND MSA #3000

The bank's performance under the service test is considered "*high satisfactory*". The bank's delivery systems, including alternative delivery systems, are accessible to essentially all portions of the bank's assessment area. The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. Also, services do not vary in a way that inconveniences any portion of the assessment area. In addition, the bank provides a relatively high level of community development services, particularly with an emphasis on education, affordable housing and small business development. This demonstrates the bank's commitment to the development needs within its community. Bank staff/officers and senior management also donate time and technical expertise on behalf of the bank to a number of organizations in support of community development activities.

Retail Banking Services

The Grand Rapids/Muskegon/Holland MSA assessment area accounts for 6.7% of Bank One's total deposit base. A full-range of deposit services and consumer loan products are available at all branch locations.

Distribution of Branches by Census tracts

The bank has 36 branches in this assessment area. The chart below illustrates the bank's branches by the income levels of the census tracts in which they are located:

GRAND RAPIDS/MUSKEGON/HOLLAND MSA GEOGRAPHIC DISTRIBUTION OF BRANCHES (BY CENSUS TRACT INCOME LEVEL)					
MSA	TOTAL	LOW	MOD	MIDDLE	UPPER
GrandRapids / Muskegon/Holland	36	2	5	22	7

BOM branches in low- to moderate-income geographies represent 19.4% of all of the bank's branch locations throughout the Grand Rapids/Muskegon/Holland MSA. Within the bank's assessment area, low- and moderate-income geographies represent 26.8% of the area.

Alternative Systems for Delivering Retail Banking Services

The bank offers alternative systems for delivering banking services by making 47, ATMs available within its Grand Rapids/Muskegon/Holland MSA assessment area. Of which, 8 or 17.0%, are located in low- to moderate-income census tracts. Of the 2 ATM's located in low-income areas: one is 24 hour-service and attached and one is neither.

Record of Opening and Closing Offices

Since the previous examination, the bank closed two branches since the previous examination in the Grand Rapids/Muskegon/Holland MSA. One of the closed branches was in a moderate-income area; and one was in a upper-income area. All 6 ATMs located in moderate-income areas are 24-hour service and attached.

Reasonableness of Business Hours and Services

BOM is strongly committed to the communities in which banking offices are located. Personal Bankers are equipped to conduct some financial transactions and services for their customers outside of the banking office at times that may be more convenient for their customers.

Community Development Services

The following is a list of community and civic organizations on which bank officers serve, or with which they are affiliated in the Grand Rapids/Muskegon/Holland MSA assessment area:

BANK ONE QUALIFIED SERVICES (Highlights)		
Organization	Purpose of Organization	Purpose of Qualified Services
Grand Action	Created to promote, design and construct Van Andel Arena in low-income area of downtown Grand rapids.	Co-chair expansion that created 916 jobs and help retained 565 similar jobs.
Garfield Development Corporation	GDC undertakes and assist in community revitalization needs of low- and moderate-income residents.	Board Member
Home Repair Services	Equips low-income homeowners with critical repairs and low-cost supplies.	Capital Campaign Team Leader
Neighborhood Revitalization Corporation	Provide affordable and code compliant housing to low- and moderate-income residents.	Board Member

The above summary of qualified services shows BOM officers to be involved in numerous organizations that provide qualified services to the Grand Rapids/Muskegon/Holland MSA.

BOM at Work

BOM at Work (BOAW) is offered in Grand Rapids and Lansing. It offers a unique product package as well as a delivery system and is utilized as a proactive distribution channel to supplement the banking center network. Through this program, Banking Center Managers call on businesses to seek permission to promote direct deposit and Bank One products to their employees. If approved, they conduct presentations at the company's place of business or distribute new account kits via the company's personnel office. Generally, prospective companies are existing customers or companies that are establishing a business relationship with Bank One. Marketing materials are also available in Spanish.

**METROPOLITAN AREAS
(Full Review)**

DESCRIPTION OF INSTITUTION'S OPERATIONS IN FLINT MSA #2640:

The Flint MSA #2640 AA consists of Genesee County and is located in the southeastern part of Michigan's lower peninsula about 60 miles from Detroit and 50 miles from Lansing. The MSA's economy is largely dependent on manufacturing, particularly automobile and auto related products. Eight general Motors plants are among the ten largest manufacturing employers in Flint, providing over 30,000 jobs in the area. Just over one-third of the land in the MSA is farmed.

According to 1990 Census Data the AA has a population of 477,395. This assessment area has 129,672 (72.7%) family households, and the median family income is \$36,389, almost identical to the State median of \$36,652. Of the family population, 23.7% is low-income; 14.6% is moderate-income; 21.5% is middle-income; and 40.2% is upper-income. The AA includes 113 census tracts: 17 low-income, 19 moderate-income, 49 middle-income and 28 upper-income.

Owner-occupied housing represents 38.2% of the housing stock, and has a median value of \$49,182. This is approximately 18.1% lower than the State median of \$60,062; however, 11.9% of the housing is vacant. The housing stock includes 70.9% single units, 8.4% 2- to 4-family units and 11.2% dwellings with five units or more. Existing housing has a median age of 31 years, and 28.0% of that stock was built before 1950. Historically depressed, the area now shows steady improvement in the employment situation. Considering the age of the housing stock and the increasing incomes of residents, requests are expected to rise here for home mortgages and home improvement loans.

BANK ONE - FLINT MSA #2640 Assessment Characteristics	MSA	STATE
<i>Tract Summary</i>		
Total Number of Census Tracts	113	
Number of Low-Income Census Tracts	17	
Number of Moderate-Income Census Tracts	19	
Number of Middle-Income Census Tracts	49	
Number of Upper-Income Census Tracts	28	
<i>Income Summary</i>		
Median Family Income	\$36,389	\$36,652
Percent Low-Income Families	23.7%	20.9%
Percent Moderate-Income Families	14.6%	17.3%
Percent Middle-Income Families	21.5%	23.0%
Percent Upper-Income Families	40.2%	38.8%
Percent of Families Below Poverty	13.6%	10.2%
<i>Unemployment Summary</i>		
Total Population	477,395	9,295,297
Labor Force Population	224,461	4,554,160

Unemployment Rate	6.0%	4.8%
<i>Housing Summary</i>		
Total Housing Units	192,220	3,826,765
Percent Owner-Occupied Units	66.5%	63.0%
Percent Rental Units	26.7%	25.8%
Percent Vacant Units	6.8%	11.2%
Median Housing Value	\$49,182	\$60,062
Median Gross Rent	\$397	\$423

*1990 Censu Data and the Michigan Department of Career Development 1999 Labor Statistics

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLINT MSA #2640:

LENDING TEST – FLINT MSA #2640

The bank's performance under the lending test is considered "*outstanding*". The bank's geographic distribution of loans reflects good penetration throughout the assessment area. The distribution of loans reflects an excellent penetration of borrowers of different income levels, and an adequate distribution to businesses of different revenue sizes. The bank is a significant small business lender in this assessment area and utilized government assisted programs to augment its conventional products. Its community development lending indicates significant penetration in low- and moderate-income census tracts. Community contacts have acknowledged the bank's leadership role in varied projects.

Lending Activity:

Bank One's lending activity reflects an excellent responsiveness to credit needs in the assessment area. The bank has reinvested back into the community in the form of home mortgage and businesses loans a high percentage of the deposits derived from this assessment area.

Geographic Distribution:

The geographic distribution of the bank's loans reflects a good distribution of loans throughout the assessment area. The bank's geographic distribution of HMDA-related loans is similar to that of aggregate lenders for loans originated in low- and moderate-income geographies. The geographic distribution of the bank's small business loans reflects an excellent penetration throughout the assessment area. The distribution of business loans in low- and moderate-income census tracts was very similar to the distribution of businesses in those geographies.

The geographic distribution for the bank's HMDA-related loans was 14.6% by number in LMI geographies. The geographic distribution for small business loans in LMI areas

was 17.8% by number and 16.9% by dollar. See Exhibits 34-37. By comparison, LMI census tracts comprise 31.8% of all census tracts in the assessment area.

Exhibit 38 shows that the bank originates a lower percentage of HMDA-related loans in low- and moderate-income census tracts than in middle- and upper-income census tracts.

Exhibit 39 shows that the bank originated 14.8% of its 1999 HMDA-related loans within low- and moderate-income census tracts. This distribution rate of loans is slightly below the aggregate lenders' distribution rate of 16.5% in those geographies. The bank's 1999 HMDA-related loans reflect a good distribution throughout the assessment area when compared to aggregate lenders.

Distribution by Borrower Income and Revenue Size of the Business:

The bank has an excellent record of serving the credit needs of low- and moderate-income borrowers and small businesses. The distribution of the bank's HMDA-related loans to low- and moderate-income borrowers substantially exceeded that of aggregate lenders. The bank is ranked 1st in the MSA in making business loans and is ranked 3rd in originating loans to small businesses.

Exhibits 40 and 41 show that the bank over the previous one year and nine months originated 29.9% of its HMDA-related loans to low- and moderate-income borrowers.

Exhibits 42 and 43 show that the bank originated:

- A high percentage of its 1999 and 2000 business loans to small businesses.
- A high percentage of the bank's loans were in amounts of \$100,000 or less.

The following table compares the bank's small business lending in low- and moderate-income (LMI) census tracts to the distribution of businesses in those tracts:

Comparison of Loans and Businesses in LMI Census Tracts Flint MSA #2640			
# of Loans in LMI Census Tracts	% of Total Loans in LMI Census Tracts	# of Businesses in LMI Census Tracts	% of Total Business in LMI Census Tracts
368	18.0%	2,269	22.9%

The following table shows the bank's rank among the 14 bank lenders who reported loans in the MSA in 1999, by number and dollar amount of business loans and the number and dollar amount of loans to small businesses:

Assessment Area	# of loans	\$ of loans	# of loans to small businesses	\$ of loans to small businesses
Genesee	1 st	1 st	3 rd	2 nd

Further analysis revealed that Bank One had a county deposit market share ranking of 2nd out of 14 banks in Genesee County as of June 30, 2000. This lending market share ranking is consistent with the bank's deposit market share ranking. This illustrates the bank's ability to reinvest deposits back into the community in the form of business loans at a rate similar to that which it receives deposits from the community.

As illustrated in Exhibit 44, 30.0% of the bank's 1999 HMDA-related originations were to low- and moderate-income borrowers. This distribution rate substantially exceeded the 14.3% distribution rate for aggregate lenders.

Community Development Lending:

The bank originated 4 housing-related community development loans totaling \$9,098,500 in the Flint assessment area. Community development lending in this assessment area represent 10.3% of the total number and 8.8% of the total dollar amount of loans of this type made throughout the bank's entire assessment area. The bank derives 5.9% of its deposit base from this assessment area. The bank's more significant community development loans are summarized as follows:

PROGRAM	AMOUNT (\$ (000))	DESCRIPTION
Affordable Housing	\$3,300,000	The loan funded the construction of a 144-unit low- and moderate-income apartment complex in the City of Flint, MI. The loan was made through the Banc One Capital Funding Corporation.
Michigan Capital Funds for Housing LP VI	\$298,500	This warehouse line of credit is for the purpose of funding investments in MCFH LP VI. The line of credit will be used to make the first installments into the lower tier limited partnership for fund VI. This is a participation in a statewide line of credit for \$5,000,000 allocated to all Michigan assessment areas by deposit size. All projects will the benefit low- and moderate-income segment. The line of credit was made through Banc One CDC.
Totals	\$3,598,500	

INVESTMENT TEST - FLINT MSA #2640

The bank's performance under the investment test is considered "*low satisfactory*". The bank has an adequate level of qualified community development investments/grants; however, the bank is not in a leadership position particularly in investments not routinely provided by private investors. Further, the bank has not made use of complex and innovative investments to support community development

initiatives. Interviews with community representatives revealed that various opportunities exist for investment by financial institutions to promote community development.

Community Development Investment and Grant Activity

The bank had a qualified investment totaling \$393,979 since the previous examination to a Michigan limited partnership formed to own and operate a 100 unit senior housing development in Genesee Township.

In addition to these investments the bank makes use of philanthropic donations/grants that qualify under CRA. This totalled 22 for \$273,608 since the previous examination. These totals represent 2.1% of the total of new investments/grants since the previous examination. The bank is ranked 2nd and has a 30.3% market share of total deposits in this market. The Flint MSA also represents the bank's third largest market in the state.

SERVICE TEST – FLINT MSA #2640

The bank's performance under the service test is considered generally strong and is rated "*high satisfactory*". Delivery systems, including alternative delivery systems, are accessible to all portions of the bank's assessment area. The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems. Also, services do not vary in a way that inconveniences any certain portion of the

assessment area. In addition, the bank provides a relatively high level of community development services. This demonstrates the bank's commitment to the development needs within its community.

Retail Banking Services

The Flint assessment area accounts for 5.9% of Bank One's total deposit base. A full-range of deposit services and consumer loan products are available at all branch locations. The bank offers a low cost-checking product which has been well received in the low- and moderate-income areas of the bank's community.

Distribution of Branches by Census Tracts

The bank has 30 branches in this assessment area. The chart below illustrates the bank's branches by the income levels of the census tracts in which they are located:

FLINT MSA GEOGRAPHIC DISTRIBUTION OF BRANCHES (BY CENSUS TRACT INCOME LEVEL)					
MSA	TOTAL	LOW	MOD	MIDDLE	UPPER
Flint	30	5	3	12	10

BOM branches in low- to moderate-income geographies represent 26.7% of all of the bank’s branch locations throughout the Flint MSA. Within the bank’s assessment area, low- and moderate-income geographies represent 31.9% of the area.

Alternative Systems for Delivering Retail Banking Services

The bank offers alternative systems for delivering banking services by making 49, ATMs/CDMs available within its Flint MSA assessment area. Of the 44 ATMs/ and 5 CDMs located in the Flint MSA; 11 or 22.4% are located in low- to moderate-income census tracts. Of the 8 machines located in low-income areas: 7 are ATMs of which 4 are both 24-hour service and attached; 1 is a 24-hour stand alone; and one is not a 24-hour stand alone. The CDM is a 24-hour service stand alone.

All three ATMs in moderate-income areas are both 24-hour service and attached.

Record of Opening and Closing Offices

Since the previous examination, the bank has neither opened nor closed branches.

Reasonableness of Business Hours and Services

The bank’s hours of operation offer notable convenience to the customer base. Although bank hours vary by location, banking services can be conducted as earlier or later if needed. Saturday hours of operation are also available at most banking offices. Bank One is committed to the communities in which banking offices are located. Personal Bankers are equipped to conduct some financial transactions and services for their customers outside of the banking office at times that may be more convenient for their customers.

Community Development Services

The following is a list of community and civic organizations on which bank officers serve, or with which they are affiliated in the Flint MSA assessment area:

BANK ONE QUALIFIED SERVICES (Highlights)		
Organization	Purpose of Organization	Purpose of Qualified Services

BANK ONE QUALIFIED SERVICES (Highlights)		
Organization	Purpose of Organization	Purpose of Qualified Services
Flint Area Investment Fund	FAIF provides new home purchase, home improvement, credit counseling, small business loans, etc.	Board of Directors Conduct workshops
Michigan Works, career Alliance, Inc.	MWCA prepares underemployed adults and youths with lifelong employment skills.	Board Member
Salem Housing Task Force	Provide safe, decent, and affordable housing for families of limited income.	Finance Committee

The above summary of qualified services showed BOM officers to be involved in numerous organizations that provide qualified services to the Flint MSA.

METROPOLITAN AREAS (Full Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ANN ARBOR MSA #0440:

The Ann Arbor AA consists of Livingston and Washtenaw County's and is located in the southeastern part of Michigan. The MSA is home to the City of Ann Arbor, a major educational and medical center in the country. The University of Michigan, the first state university in the nation has played a prominent role in Ann Arbor's growth. Private industrial research and development joined by the university's various institutes of science and technology have raised Ann Arbor to rank as a major Midwest center for aeronautical, space, nuclear, chemical and metallurgical research.

According to 1990 Census Data the AA has a population of 398,462. This assessment area has 96,224 (66.8%) family households, and the median family income is \$48,174, 31.4% higher than the State median of \$36,652. Of the family population, 16.5% is low-income; 16.8% is moderate-income; 25.1% is middle-income; and 41.6% is upper-income. The AA includes 103 census tracts: 11 or 10.7% are low-income, 17 or 16.5% are moderate-income, 47 or 45.6% are middle-income and 28 or 27.2% upper-income.

Owner-occupied housing represents 64.6% of the housing stock, and has a median value of \$96,262. This is approximately 60.3% higher than the State median of \$60,062. The housing stock includes 57.4% single units, 10.8% 2- to 4-family units and 23.2% dwellings with five units or more. Existing housing has a median age of 37 years, and 21.5% of that stock was built before 1950.

BANK ONE - ANN ARBOR MSA #0440		
Assessment Characteristics	MSA	STATE

BANK ONE - ANN ARBOR MSA #0440		
Assessment Characteristics	MSA	STATE
<i>Tract Summary</i>		
Total Number of Census Tracts	103	
Number of Low-Income Census Tracts	11	
Number of Moderate-Income Census Tracts	17	
Number of Middle-Income Census Tracts	47	
Number of Upper-Income Census Tracts	28	
<i>Income Summary</i>		
Median Family Income	\$48,174	\$36,652
Percent Low-Income Families	16.5%	20.9%
Percent Moderate-Income Families	16.8%	17.3%
Percent Middle-Income Families	25.1%	23.0%
Percent Upper-Income Families	41.6%	38.8%
Percent of Families Below Poverty	5.3%	10.2%
<i>Unemployment Summary</i>		
Total Population	398,582	9,295,297
Labor Force Population	220,742	4,554,160
Unemployment Rate	2.0%	4.8%
<i>Housing Summary</i>		
Total Housing Units	158,447	3,826,765
Percent Owner-Occupied Units	64.6%	63.0%
Percent Rental Units	29.0%	25.8%
Percent Vacant Units	6.3%	11.2%
Median Housing Value	\$96,262	\$60,062
Median Gross Rent	\$534	\$423

*1990 Censu Data and the Michigan Department of Career Development 1999 Labor Statistics

General Motors Corporation is the largest employer in Livingston County with 2,950 employees. Other large employers in the county include Citizens Insurance (1,050), McPherson Hospital (750), Health Care Innovations (700) Ogihara America Inc (620) and Wal-Mart (350).

The largest employer in Wastenaw County is the University of Michigan with 24,059 employees. Other large employers include the University of Michigan Medical Center, the Power Train Division of the General Motors Corporation, Saint Joseph Mercy Hospital, Pfizer Global Research and Development, Eastern Michigan University and the Borders Group.

*Source: Michigan Economic Development Corporation

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ANN ARBOR MSA #0440:

LENDING TEST – ANN ARBOR MSA #0440

The bank's performance under the lending test is considered "*Outstanding*". The geographic distribution of loans shows a good penetration throughout the assessment area. The bank's loans reflect an excellent penetration of borrowers of different income levels, and an adequate distribution to businesses of different sizes. The level of community development loans made by the bank in this assessment area is considered to be excellent.

Lending Activity

Bank One's lending activity reflects an excellent responsiveness to the credit needs in this assessment area. The bank has reinvested back into the community in the form of home mortgage and businesses loans a high percentage of deposits derived from this assessment area.

Geographic Distribution:

The geographic distribution of the bank's loans reflects a good penetration of low- and moderate-income geographies. The distribution of the bank's HMDA-related loans mirrors the distribution of aggregate lenders in those geographies. The dollar amount of small business loans in LMI geographies reflects an excellent distribution.

The geographic distribution of the bank's originations in the Ann Arbor MSA is good, considering the percentage of originations within LMI geographies in this assessment area. The overall geographic distribution for HMDA-related loans was 10.8% by number in LMI geographies. Geographic distribution for small business loans in LMI areas was 15.6% by number and 20.8% by dollar, and is considered to be excellent. See Exhibits 45-48. One low-income census tract does not have any housing units.

The chart in Exhibit 49 shows that the bank originates a much lower percentage of HMDA-related loans per 1,000 owner-occupied units in low- and moderate-income census tracts than in middle- and upper census tracts.

The chart in Exhibit 50 shows that the bank originated 10.3% of its 1999 HMDA-related loans within low- and moderate-income census tracts. This distribution of loans mirrors the aggregate lenders' distribution rate of 10.3% in these geographies. The geographic distribution of loans reflects a good penetration throughout the MSA when compared to that of the aggregate.

Distribution by Borrower Income and Revenue Size of the Business:

The bank’s HMDA-related loans reflect an excellent distribution to borrowers of different income levels in this assessment area. The bank’s distribution of loans to low- and moderate-income borrowers exceeded that of aggregate lenders by a substantial margin. The distribution of loans to businesses of different revenue sizes is adequate, and is increasing over time.

Exhibits 51 and 52 show that the bank originates a high percentage (24.4%) of HMDA-related loans to low- and moderate-income borrowers.

The bank’s business loans reflect an adequate distribution to businesses of different revenue size. A high percentage of the bank’s business loans were originated in amounts of \$100,000 or less.

Exhibits 53 and 54 show that the bank originated:

- An adequate percentage of its loans to small businesses and;
- An excellent percentage of loans in amounts of \$100,000 or less.

Comparison of Loans and Businesses in LMI Census Tracts Ann Arbor MSA #0440			
# of Loans in LMI Census Tracts	% of Total Loans in LMI Census Tracts	# of Businesses in LMI Census Tracts	% of Total Business in LMI Census Tracts
138	15.6%	2,487	20.4%

The following table shows the bank’s rank among the 32 large bank lenders who reported loans in the MSA in 1999, by number and dollar amount of business loans and the number and dollar amount of loans to small businesses:

Assessment Area	# of loans	\$ of loans	# of loans to small businesses	\$ of loans to small businesses
Washtenaw	2 nd	5 th	6 th	5 th
Livingston	7 th	4 th	7 th	3 rd

Further analysis revealed that Bank One had the following county deposit market share rankings as of June 30: Washtenaw – 4th out of 18 banks and Livingston – 5th out of 14 banks. These lending market share rankings are consistent with the bank’s deposit market share rankings. This illustrates the bank’s ability to reinvest deposits back into the community in the form of business loans at a rate similar to that which it receives deposits from the community.

The bank has an excellent distribution of loans to borrowers of different income levels in this assessment area. The distribution of loans to low- and moderate-income borrowers exceeded that of aggregate lenders by a substantial margin.

The table in Exhibit 55 shows that 24.7% of the bank's HMDA-related loans were made to low- and moderate-income borrowers. This distribution rate exceeded the aggregate lenders' distribution rate of 9.1% by a substantial margin. The bank has an excellent distribution of HMDA-related loans to low- and moderate-income borrowers when compared to aggregate lenders.

Community Development Lending:

The bank is a leader in making community development loans. The bank made two housing-related community development loans in this MSA totaling \$3.6 million. The community development loans in this assessment area represents 3.5% of the total dollar amount of community development loans made throughout the entire assessment area. This assessment area generates 2.9% of the bank's deposit base.

INVESTMENT TEST - ANN ARBOR MSA #0440

The bank's investment portfolio, including grants and donations that contribute to assessment area community development efforts, within the bank's Ann Arbor MSA #0440 assessment area is considered "*needs to improve*".

Community Development Investment and Grant Activity

The bank had a qualified investment to the Shelter Association of Ann Arbor totaling \$22,548 for the Williams Street apartment project. The apartments will be operated by the Shelter Association of Ann Arbor and will provide housing for six low-income individuals.

Additionally, the philanthropy that qualifies for CRA credit was 6 donations/grants for \$14,496 since the previous examination.

These totals represent .1% of the total of new investments/grants since the previous examination. The bank is ranked 3rd and has a 11.2% market share of total deposits in this market. The Ann Arbor MSA also represents the bank's fifth largest market in the state.

SERVICE TEST - ANN ARBOR MSA #0440

The bank's performance under the service test is considered generally strong and rated "*outstanding*". Delivery systems, including alternative delivery systems, are readily accessible to all portions of the bank's assessment area. The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. Also, services do not vary in a way that inconveniences any certain portion of the assessment area.

In addition, the bank is a leader in providing community development services, particularly with an emphasis on education, affordable housing and small business development. This demonstrates the bank’s commitment to the development needs within its community. Bank staff/officers and senior management also donates time and technical expertise on behalf of the bank to a number of organizations in support of community development activities.

Retail Banking Services

The Ann Arbor MSA assessment area accounts for 2.9% of Bank One's total deposit base. A full-range of deposit services and consumer loan products are available at all branch locations. The bank offers a low cost-checking product and these accounts have been well received in the low- and moderate-income areas within the Ann Arbor MSA assessment area.

Distribution of Branches by Census Tracts

The bank has twelve branches of which all are full-service locations. The chart below illustrates the bank’s branches by the income levels of the census tracts in which they are located:

ANN ARBOR MSA #0440 GEOGRAPHIC DISTRIBUTION OF BRANCHES (BY CENSUS TRACT INCOME LEVEL)					
MSA	TOTAL	LOW	MOD	MIDDLE	UPPER
Ann Arbor	12	1	2	5	4

Bank One branches in low- to moderate-income geographies represent 25.0% of all of the bank’s branch locations throughout the Ann Arbor MSA. Within the bank’s Ann Arbor MSA assessment area, low- and moderate-income geographies represent 27.2% of the area.

Alternative Systems for Delivering Retail Banking Services

The bank offers alternative systems for delivering banking services by making 22, ATMs/CDMs available within its Ann Arbor MSA assessment area. Of these 19 are full-service, 16 have 24-hour availability, and 16 are attached to branch locations. Of the total 22 ATMs/CDMs located in the Ann Arbor MSA, 3 or 13.6% are located in low- to moderate-income census tracts. Of these 3; one is a full-service 24-hour attached atm in a moderate-income geography, one is a full-service 24-hour attached atm in a low-income area, and one is a cdm 24-hour stand alone located in a low-income area.

Record of Opening and Closing Offices

Since the previous examination, the bank closed one branch in the Ann Arbor MSA. The closed branch was located in a middle-income area.

Reasonableness of Business Hours and Services

The bank’s hours of operation offer notable convenience to the customer base. Although bank hours vary by location, banking services can be conducted as earlier or later if needed. Saturday hours of operation are also available at most banking offices. Bank One

is committed to the communities in which banking offices are located. Personal Bankers are equipped to conduct some financial transactions and services for their customers outside of the banking office at times that may be more convenient for their customers.

Community Development Services

The following is a partial list of community and civic organizations on which bank officers serve, or with which they are affiliated in the Ann Arbor MSA assessment area:

BANK ONE QUALIFIED SERVICES (Highlights)		
Organization	Purpose of Organization	Purpose of Qualified Services
Washtenaw County CRA Association	Identify the credit needs of the LMI community and actively promote efforts to meet those needs within a framework of sound banking practices.	Member of Committee
Salvation Army	International religious organization which provides various services to low-income individuals.	Board Member

**NONMETROPOLITAN STATEWIDE
(Full Review)**

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MICHIGAN NONMETROPOLITAN AREA:

The Non-Metro AA consists of Alcona, Alpena, Charlevoix, Emmet, Grand Traverse, Kalkaska, Leelanau, Missaukee, Osceola, Oscoda, Presque Isle, Roscommon, Sanilac, Tuscola, and Wexford Counties. According to 1990 Census Data the AA has a population of 361,354. Non-Metro Michigan AA has 100,987 (74.0%) family households, and the median family income is \$28,264, 22.9% lower than the State median of \$36,652. Of the family population, 18.7% is low-income; 18.6% is moderate-income; 23.1% is middle-income; and 39.6% is upper-income. The AA includes 127 census tracts: 5 low-income, 19 moderate-income, 88 middle-income and 15 upper-income.

Owner-occupied housing represents 58.1% of the housing stock, and has a median value of \$49,222. This is approximately 18.0% lower than the State median of \$60,062; however, 18.7% of the housing is vacant. The housing stock includes 81.0% single units, 4.8% 2- to 4-family units and 4.7% dwellings with five units or more. Existing housing has a median age of 38 years, and 30.2% of that stock was built before 1950.

BANK ONE - NON-METRO		
Assessment Characteristics	MSA	STATE
<i>Tract Summary</i>		
Total Number of Census Tracts	127	
Number of Low-Income Census Tracts	5	
Number of Moderate-Income Census Tracts	19	
Number of Middle-Income Census Tracts	88	
Number of Upper-Income Census Tracts	15	
<i>Income Summary</i>		
Median Family Income	\$28,264	\$36,652
Percent Low-Income Families	18.7%	20.9%
Percent Moderate-Income Families	18.6%	17.3%
Percent Middle-Income Families	23.1%	23.0%
Percent Upper-Income Families	39.6%	38.8%
Percent of Families Below Poverty	10.2%	10.2%
<i>Unemployment Summary</i>		
Total Population	361,354	9,295,297
Labor Force Population	165,397	4,554,160
Percent Unemployment	9.2%	8.2%
<i>Housing Summary</i>		
Total Housing Units	187,839	3,826,765
Percent Owner-Occupied Units	58.1%	63.0%
Percent Rental Units	23.2%	25.8%
Percent Vacant Units	18.7%	11.2%
Median Housing Value	\$49,222	\$60,062
Median Gross Rent	\$359	\$423

*1990 Census Data

***Michigan Department of Career Development 1999 Labor Statistics*

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MICHIGAN NONMETROPOLITAN AREA:

LENDING TEST - NON-METRO MICHIGAN

The bank's performance under the lending test is considered *"high satisfactory"*. The bank's non-metropolitan assessment area is comprised primarily of middle-income BNAs, (70%). The geographic penetration of loans is generally excellent throughout the assessment area. The distribution of borrowers reflects a good penetration among customers of different income levels and loan distribution to businesses of different revenue sizes was good. The bank originated a poor level of community development loans in this assessment area. Community contacts in these areas expressed favorable remarks concerning the bank's responsiveness to credit needs in their communities.

Lending Activity:

Bank One's lending activity reflects a good responsiveness to credit needs in the assessment area. The bank has reinvested back into the community in the form of home mortgage and businesses loans a good percentage of the deposits derived from this assessment area.

Geographic Distribution:

The geographic distribution of the bank's loans reflects an excellent distribution of loans throughout the assessment area. The bank's geographic distribution of HMDA-related loans exceeded that of aggregate lenders for loans originated in low- and moderate-income geographies. The bank originated a higher percentage of loans in low- and moderate-income geographies than the percentage of businesses in those geographies.

The geographic distribution for the bank's 1999 and 2000 HMDA-related loans was 13.2% by number in LMI geographies. The geographic distribution for small business loans in LMI areas was 7.2% by number and 9.2% by dollar. The bank did not originate any HMDA-related or small business loans in Low-income geographies (see Exhibits 56-59). Low-income geographies comprise 3.9% of the total number of geographies in the assessment area. Three of the five low-income geographies in the assessment area did not have a population and/or housing.

Exhibit 60 shows that the bank originates a higher percentage of HMDA-related loans per 1,000 owner-occupied units within middle- and upper-income geographies than in low- and moderate-income geographies.

Exhibit 61 shows that the bank originated 13.3% of its 1999 HMDA-related loans within low- and moderate-income geographies. This distribution of loans exceeded the aggregate lenders' distribution rate of 8.7% in those geographies.

Distribution by Borrower Income and Revenue Size of the Business:

Exhibits 62 and 63 show that the bank over the previous one year and nine months originated a good percentage of its HMDA-related loans to low- and moderate-income borrowers (13.8%). This distribution rate is below the 37.3% distribution of low- and moderate-income families in the assessment area.

Exhibits 64 and 65 show that the bank originated:

- A good percentage of its loans to small businesses,
- An excellent percentage of loans in amounts of \$100,000 or less.

The following table compares the bank's small business lending in low- and moderate-income (LMI) census tracts to the distribution of businesses in those tracts:

Comparison of Loans and Businesses in LMI Census Tracts Non-metro Assessment area			
# of Loans in LMI Census Tracts	% of Total Loans in LMI Census Tracts	# of Businesses in LMI Census Tracts	% of Total Business in LMI Census Tracts
273	13.2%	1,306	9.5%

There were no businesses in low-income geographies in this assessment area. The table shows that the bank originated a higher percentage of loans in moderate-income geographies than the percentage of businesses in those geographies.

The following table shows the bank's rank among the 33 large bank lenders who reported loans in the CMSA in 1998, by number and dollar amount of business loans and the number and dollar amount of loans to small businesses:

Assessment Area	# of loans	\$ of loans	# of loans to small businesses	\$ of loans to small businesses
Grand Traverse	4 th	3 rd	4 th	4 th
Roscommon	2 nd	1 st	2 nd	1 st
Kalkaska	1 st	2 nd	1 st	3 rd

Leelanau	4 th	3 rd	3 rd	4 th
Charlevoix	5 th	4 th	5 th	4 th
Emmet	2 nd	2 nd	2 nd	2 nd

Further analysis revealed that BOM had the following county deposit market share rankings as of June 30: Grand Traverse County – 3rd out of 10 banks, Kalkaska – 1st out of 3 banks, Leelanau County – 3rd out of 4 banks, Charlevoix County – 4th out of 6 banks, and Emmety County – 1st out of 10 banks. These lending market share rankings are consistent with the bank’s deposit market share rankings. This illustrates the bank’s ability to reinvest deposits back into the community in the form of business loans at a rate similar to that which it receives deposits from the community.

Exhibit 66 shows that 13.8% of the bank's 1999 HMDA-related originations were to low- and moderate-income borrowers. This distribution rate is below the 17.0% distribution rate for aggregate lenders.

Community Development Lending:

The bank originated a poor level of community development loans in this assessment area. The bank originated one housing-related community development loan totaling \$139,500. These loans represent 2.6% of the total number and 0.1% of the total dollar amount of community development loans made in the bank’s entire assessment area. The bank derives 4.1% of its deposit base from this assessment area.

INVESTMENT TEST- NON-METRO MICHIGAN

The bank’s performance under the investment test is considered “*outstanding*”. There are fewer opportunities for investments in these geographies that are predominantly middle-income.

Community Development Investment and Grant Activity

The bank had 5 qualified investments totaling \$1,654,284 since the previous examination.

In addition to these investments the bank makes use of philanthropic donations/grants that qualify under CRA. This totalled 13 for \$63,216 since the previous examination.

These totals represent 5.4% of the total of new investments/grants since the previous examination. The bank is ranked 2nd and has a 18.9% market share of total deposits in this market. The Non-Metro assessment area also represents the banks fourth largest market in the state.

SERVICE TEST- NON-METRO MICHIGAN

The bank's performance under the service test is considered "*high satisfactory*". The bank's delivery systems, including branches and electronic delivery systems are accessible to all geographies within these assessment areas. Changes in the bank's branch locations did not adversely affect accessibility to the few low- and moderate-income BNAs. The bank provides a high level of community development services in relation to the needs in these communities. Bank officers and staff provide a high level of assistance and leadership in community organizations.

Retail Banking Services

The Non-Metro assessment area accounts for 4.1% of Bank One's total deposit base. A full-range of deposit services and consumer loan products are available at all branch locations.

Distribution of Branches by Census tracts

The bank has 19 branches in this assessment area. The chart below illustrates the bank's branches by the income levels of the census tracts in which they are located:

NON-METRO MICHIGAN GEOGRAPHIC DISTRIBUTION OF BRANCHES (BY CENSUS TRACT INCOME LEVEL)					
AA	TOTAL	LOW	MOD	MIDDLE	UPPER
Non-Metro Michigan	19	0	2	14	3

BOM branches in low- to moderate-income geographies represent 10.5% of all of the bank's branch locations throughout the Non-Metro assessment area. Within the bank's assessment area, low- and moderate-income geographies represent 18.9% of the area.

Alternative Systems for Delivering Retail Banking Services

The bank offers alternative systems for delivering banking services by making 18, ATMs/CDMs available within its Non-Metro assessment area. Of which, 2 or 11.1%, are located in moderate-income census tracts. Both are 24-hour service and attached. The one CDM is located in a middle-income area and attached but not 24-hour service.

Record of Opening and Closing Offices

Since the previous examination, the bank opened two branches in middle-income areas.

Reasonableness of Business Hours and Services

Bank One is strongly committed to the communities in which banking offices are located. Personal Bankers are equipped to conduct some financial transactions and services for their customers outside of the banking office at times that may be more convenient for their customers.

Community Development Services

The bank provides a high level of community development services in relation to the needs in these communities. Bank officers and staff provide a high level of assistance and leadership in community organizations.

METROPOLITAN AREAS (Limited Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN BENTON HARBOR MSA #0870:

The Benton Harbor AA consists of Berrien County. Berrien County is situated on the eastern shore of Lake Michigan, near the Michigan-Indiana border. Bordered on the west by 42 miles of Lake Michigan, the County has 306 inland lakes and is a popular tourist destination. According to 1990 Census Data the AA has a population of 161,378. Benton Harbor has 44,392 (72.3%) family households, and the median

family income is \$32,219, 12.0% lower than the State median of \$36,652. Of the family population, 21% is low-income; 16.7% is moderate-income; 23.5% is middle-income; and 38.7% is upper-income. The AA includes 53 census tracts: eight low-income, four moderate-income, 30 middle-income and 11 upper-income.

Owner-occupied housing represents 61.1% of the housing stock, and has a median value of \$52,723. The median value is approximately 12.0% lower than the State median of \$60,062, and 12.2% of the housing is vacant. The housing stock includes 74.0% single units, 10.4% 2- to 4-family units and 9.0% dwellings with five units or more. Existing housing has a median age of 46 years, and 35.4 % of that stock was built before 1950. Historically depressed, the area now shows steady improvement in the employment situation. Considering the age of the housing stock and the increasing incomes of residents, requests are expected to rise here for home mortgages and home improvement loans.

7

BANK ONE - BENTON HARBOR MSA #0870 Assessment Characteristics	MSA	STATE
<i>Tract Summary</i>		
Total Number of Census Tracts	53	
Number of Low-Income Census Tracts	8	
Number of Moderate-Income Census Tracts	4	
Number of Middle-Income Census Tracts	30	
Number of Upper-Income Census Tracts	11	
<i>Income Summary</i>		
Median Family Income	\$32,219	\$36,652
Percent Low-Income Families	21.0%	20.9%
Percent Moderate-Income Families	16.7%	17.3%
Percent Middle-Income Families	23.5%	23.0%
Percent Upper-Income Families	38.7%	38.8%
Percent of Families Below Poverty	11.6%	10.2%
<i>Unemployment Summary</i>		
Total Population	161,378	9,295,297
Labor Force Population	79,009	4,554,160
Percent Unemployment	7.3%	8.2%
Unemployment Rate	4.0%	4.8%
<i>Housing Summary</i>		
Total Housing Units	69,532	3,826,765
Percent Owner-Occupied Units	61.1%	63.0%
Percent Rental Units	26.7%	25.8%
Percent Vacant Units	12.2%	11.2%
Median Housing Value	\$52,723	\$60,062
Median Gross Rent	\$368	\$423

*1990 Censu Data

**Michigan Department of Career Development 1999 Labor Statistics

Major employers in Benton Harbor include: Whirlpool, a manufacturer of home appliances employing 950; Benton Harbor Schools 900 employees; Leco, an

engineering/scientific instruction company employing 900 people; Gast Manufacturing Corp, manufacturer of small motors employs about 600 people; Imperial Printing, a printing company employing approximately 500 workers; Meijer Inc, a department store has 487 employees.

BERRIEN COUNTY – MAJOR EMPLOYERS			
FIRM	LOCATION	EMPLOYEES	PRODUCT
Bosch Braking Systems*	Saint Joseph	1,100	Auto parts, hydraulics & ductile iron castings.
Lakeland Regional Health Systems, Inc.**	Berrien Center	3,000	Health Care
Indiana Michigan Power Co**	Bridgman	1,139	Electric Services
Andrews University**	Berrien Springs	1,018	Education
Whirlpool Corp*	Benton Harbor	950	Residential major home appliances
Benton Harbor Area Schools**	Benton Harbor	932	Education
Leco Corp*	Saint Joseph	900	Determinators for gases in metals, carbon, sulfur, and silicon
Gast Manufacturing Corp*	Benton Harbor	600	Air motors, pumps, and compressors
Berrien County**	Saint Joseph	540	Legislative Bodies
Imperial Printing Co Inc*	Saint Joseph	500	Offset Printing, trade publications printing & media duplication
Meijer, Inc**	Benton Harbor	487	Department Stores

*Source: 1998 Harris Publishing Company Industrial Directory

**Source: Michigan Economic Development Corporation

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN BENTON HARBOR MSA #0870:

Lending Activity: See Exhibits 68-79

Lending activity reflects a good responsiveness to credit needs in this assessment area.

Geographic Distribution:

The geographic distribution of the bank's loans reflect a poor penetration throughout the assessment area. The distribution of the bank's HMDA-related loans is below the distribution of aggregate lenders in LMI geographies. The dollar amount of small business loans in those geographies reflects an excellent distribution.

Distribution by Borrower Income and Revenue Size of the Business:

The bank's HMDA-related loans reflect an excellent distribution to borrowers of different income levels in this assessment area. The bank originates a high percentage (28.2%) of HMDA-related loans to low- and moderate-income borrowers. The bank's distribution of HMDA-related loans to low- and moderate-income borrowers exceeded that of aggregate lenders by a substantial margin.

Community Development Lending:

The bank is a leader in making community development loans.

INVESTMENT TEST – BENTON HARBOR MSA # 0870

The bank has a poor level of qualified community development investments/grants and the bank is not in a leadership position particularly in those investments not routinely provided by private investors. This is evident through the low level of investments, based on volume and dollar amount, in consideration of the available opportunities in the assessment area. Further, the bank has not made use of complex and innovative investments to support community development initiatives.

SERVICE TEST – BENTON HARBOR MSA #0870

Delivery systems, including alternative delivery systems, are accessible to all portions of the bank's assessment area. The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems. Also, services do not vary in a way that inconveniences any certain portion of the assessment area. In addition, the bank provides a relatively high level of community development services.

METROPOLITAN AREAS
(Limited Review)**DESCRIPTION OF INSTITUTION'S OPERATIONS IN KALAMAZOO /
BATTLE CREEK MSA #3720:**

The Kalamazoo/Battle Creek MSA #3720 assessment area is comprised of 67 census tracts. Located in south central Michigan, the AA consists of portions of two contiguous counties, Calhoun and Kalamazoo. With a population of 249,841, the Kalamazoo AA contains 61,866 family households. Median family income is \$35,458. Kalamazoo County boasts a large amount of acreage set aside for the preservation of natural resources. Calhoun County is home to some of the world's largest cereal plants, including Post and Kellogg. Low-income families constitute 21.5% of the households, compared with 15.9% moderate-income, 21.6% middle-income and 41.0% upper-income; however, 11.0% of those families live below the poverty level. Of its 67 census tracts, the Kalamazoo AA comprises 13 low-income, 14 moderate-income, 20 middle-income and 20 upper-income tracts. Of the entire population, 33.8% lives in low- or moderate-income tracts, making bank services a necessity for both those income levels.

A total of 57.1% of the 102,179 housing units are owner-occupied. The median housing value is 10% lower than the State median of \$60,062. Further, 34.1% of the homes were built before 1950. Kalamazoo is an established community, its housing stock include; 60.9% are single units; 12.7% are 2-4 Units; 22.2% are dwellings with 5 units or more; 3.6% are mobile homes. As a result, purchases of existing housing stock, home equity lines or home improvement loans are high in this area.

BANK ONE – KALAMAZOO / BATTLE CREEK MSA #3720		
Assessment Characteristics	MSA	STATE
<i>Tract Summary</i>		
Total Number of Census Tracts	67	--
Number of Low-Income Census Tracts	13	--
Number of Moderate-Income Census Tracts	14	--
Number of Middle-Income Census Tracts	20	--
Number of Upper-Income Census Tracts	20	--
<i>Income Summary</i>		
Median Family Income	\$35,458	\$36,652
Percent Low-Income Families	21.5%	20.9%
Percent Moderate-Income Families	15.9%	17.3%
Percent Middle-Income Families	21.6%	23.0%
Percent Upper-Income Families	41.0%	38.8%
Percent of Families Below Poverty	11.0%	10.2%
<i>Unemployment Summary</i>		
Total Population	249,841	9,295,297
Labor Force Population	127,823	4,554,160
Percent Unemployment	7.3%	8.2%
Unemployment Rate (Calahoun County)**	4.2%**	4.8%**
Unemployment Rate (Kalamazoo County)**	2.9%**	
<i>Housing Summary</i>		
Total Housing Units	102,179	3,826,765
Percent Owner-Occupied Units	57.1%	63.0%

BANK ONE – KALAMAZOO / BATTLE CREEK MSA #3720		
Assessment Characteristics	MSA	STATE
Percent Rental Units	36.4%	25.8%
Percent Vacant Units	6.4%	11.2%
Median Housing Value	\$54,556	\$60,062
Median Gross Rent	\$408	\$423

*1990 Census Data

**Michigan Department of Career Development 1999 Labor Statistics

The following table depicts the employment, by industry, of the two counties in the Kalamazoo/Battle Creek assessment area according to the Bureau of Economic Analysis, U.S. Department of Commerce; 1996.

Calhoun County – Major Industries	
Industry	Employees
Manufacturing	17,916
Service Industry	19,530
State and Local Government	6,773
Kalamazoo County – Major Industries	
Manufacturing	28,002
Service Industry	44,736
State and Local Government	16,098

Battle Creek, the home of Kellogg’s Inc., is located in Calhoun County. Kellogg’s is a nationally known cereal producer, and area employment is consequently high in the non-durable goods industry. The area’s largest employers are: Upjohn, pharmaceuticals, 7,100; Kellogg, cereals, 5,000; Defense Logistics Service Center, federal supply intelligence, 4,500; GM B-O-C, body stamping, 3,000; and Western Michigan University, higher education, 2,863. Employment by industry is as follows:

Calhoun County – Major Employers			
FIRM	LOCATION	EMPLOYEES	PRODUCT
Denso Manufacturing*	Battle Creek	2,000	Auto parts, heating and cooling systems
Kellogg Co.*	Battle Creek	1,867	Cereals
State Farm Fire & Casualty Co.**	Marshall	1,355	Insurance
Kraft Foods*	Battle Creek	1,201	Cereals
Tokai Rika USA Inc.*	Battle Creek	670	Assemble of Automobile switches
Kalamazoo County			
Pharmacia & Upjohn Inc.*	Kalamazoo	6,400	Pharmaceutical, chem, agriculture products
General Motors Corp.**	Kalamazoo	3,000	Construction materials
National City Bank**	Kalamazoo	2,800	Data processing
Marriott International Inc.**	Kalamazoo	2,200	Dinning
Meijer, Inc.**	Kalamazoo	1,900	Department store
General Motors Corp.*	Kalamazoo	1,800	Automobile metal stamping

Calhoun County – Major Employers			
FIRM	LOCATION	EMPLOYEES	PRODUCT
Bronson Methodist Hospital	Kalamazoo	1,845	Health Care
Borgess Medical Center Inc.	Kalamazoo	1,840	Health Care
City of Kalamazoo	Kalamazoo	950	Government
Michigan Dept Mental Health	Kalamazoo	900	Psychiatric Hospital

*Source: 1998 Harris Publishing Company Industrial Directory

**Source: Michigan Economic Development Corporation

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KALAMAZOO / BATTLE CREEK MSA #3720:

LENDING TEST - KALAMAZOO/ BATTLE CREEK MSA #3720 – See Exhibits 80-92

The geographic distribution of loans reflects an excellent penetration throughout the assessment area. The distribution of borrowers shows an excellent penetration among customers of different incomes. Overall, small business lending is weak reflecting poor distribution to small businesses. In addition, the bank made a poor level of community development loans in this assessment area.

Lending Activity:

Bank One's lending activity reflects a good responsiveness to the credit needs in this assessment area.

INVESTMENT TEST - KALAMAZOO/ BATTLE CREEK MSA #3720

The bank has an adequate level of qualified community development investments/grants and the bank is not in a leadership position particularly in investments not routinely provided by private investors. Further, the bank has not made use of complex and innovative investments to support community development initiatives. Interviews with community representatives revealed that the assessment area various opportunities exist for investment by financial institutions to promote community development.

SERVICE TEST - KALAMAZOO/ BATTLE CREEK MSA #3720

The bank's delivery systems, including alternative delivery systems, are accessible to essentially all portions of the bank's assessment area. The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. Also, services do not vary in a way that inconveniences any certain portion of the assessment area. In addition, the bank provides a relatively high level of community development services,

particularly with an emphasis on education, affordable housing and small business development.

METROPOLITAN AREAS (Limited Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN LANSING / E. LANSING MSA #4040:

The Lansing / E. Lansing MSA #4040 assessment area encompasses Clinton, Eaton and Ingham counties, and is centrally located within the state. The Lansing/E. Lansing AA has a population of 432,674. Lansing, the state capital, is located in Ingham County as is Michigan State University.

With a median family income of \$38,660, families constitute 67.8% of the households. Of these 19.3% are low-income, 17.8% are moderate-income, 24.7% are middle-income and 38.2% are upper-income. College students, people institutionalized or those in group quarters account for 5.0% of the population. Of the 116 census tracts in this AA, 22.4% are upper-income tracts, 53.4% are middle-income, 15.5% are moderate-income and 8.6% are low-income tracts. Of the population, 18.9% live in low- or moderate-income tracts.

Single-unit housing comprises 63.3% of the housing stock, with 2- to 4-family units consisting of 11.4% and dwellings with five or more units totaling 19.2%. Of the 104,456 housing units, nearly half (48,744) were built prior to 1950. The housing stock has a median age of 31 years and a median value of \$64,241. Owners occupy 61.5% of the stock.

BANK ONE – LANSING / E. LANSING MSA #4040		
Assessment Characteristics	MSA	STATE
<i>Tract Summary</i>		
Total Number of Census Tracts	116	--
Number of Low-Income Census Tracts	10	--
Number of Moderate-Income Census Tracts	18	--
Number of Middle-Income Census Tracts	62	--
Number of Upper-Income Census Tracts	26	--
<i>Income Summary</i>		
Median Family Income	\$38,660	\$36,652
Percent Low-Income Families	19.3%	20.9%
Percent Moderate-Income Families	17.8%	17.3%
Percent Middle-Income Families	24.7%	23.0%
Percent Upper-Income Families	38.2%	38.8%
Percent of Families Below Poverty	8.7%	10.2%
<i>Unemployment Summary</i>		

BANK ONE – LANSING / E. LANSING MSA #4040		
Assessment Characteristics	MSA	STATE
Total Population	432,674	9,295,297
Labor Force Population	231,816	4,554,160
Percent Unemployment	6.2%	8.2%
Unemployment Rate (Ingham County)**	2.7%	4.8%**
Unemployment Rate (Eaton County)**	2.4%	
Unemployment Rate (Clinton County)**	2.3%	
<i>Housing Summary</i>		
Total Housing Units	165,018	3,826,765
Percent Owner-Occupied Units	61.5%	63.0%
Percent Rental Units	33.5%	25.8%
Percent Vacant Units	4.9%	11.2%
Median Housing Value	\$64,271	\$60,062
Median Gross Rent	\$422	\$423

*1990 Census Data

**Michigan Department of Career Development 1999 Labor Statistics

The following table depicts the employment, by industry, of the three counties in the Lansing assessment area according to the Bureau of Economic Analysis, U.S. Department of Commerce; 1996.

Ingham County - Major Industries	
Industry	Employees
Manufacturing	24,851
Service Industry	64,906
State and Local Government	46,615
Eaton County	
Manufacturing	3,995
Service Industry	7,899
State and Local Government	5,642
Clinton County	
Manufacturing	2,983
Service Industry	5,108
State and Local Government	1,834

General Motors autos, 20,000 is the AA's largest employer. Other major employers include: the State of Michigan, 15,500 employees in Ingham County; Michigan State University, education, 8,834; and Intercept Security, security systems, 1,025.

Ingham County – Major Employers			
FIRM	LOCATION	EMPLOYEES	PRODUCT
State of Michigan**	Lansing	15,500	Government
Michigan State University**	East Lansing	12,000	Education
General Motors Corp Plant 6*	Lansing	7,000	Automobile bodies
General Motors Corp Plant 1*	Lansing	7,000	Chassis assembly

Ingham County – Major Employers			
FIRM	LOCATION	EMPLOYEES	PRODUCT
Ingham Regional Medical Center**	Lansing	3,000	Health care
Edward W Sparrow Hospital**	Lansing	2,600	Health care
Lansing Community College**	Lansing	2,400	Education
General Motors Corp Plant 5*	Lansing	2,000	Automotive engines
Eaton County			
General Motors Corp/Pit 3*	Lansing	3,000	Automobile parts
Meijer Inc.**	Lansing	1,880	Warehouse & dept store
General Motors Corp**	Lansing	1,000	Warehouse/storage
Auto-Owners Insurance Co.**	Lansing	900	Insurance
Care Free Windows Inc.*	Charlotte	500	Vinyl Windows
Magnesium Products of America*	Eaton Rapids	400	Automobile parts
Clinton County			
Federal Mogul Corp*	Saint Johns	550	Bushings & washers
Lear Corp*	Elsie	392	Manual & power seats
Saint Johns Public Schools**	Saint Johns	350	Education
Dana Corp*	Saint Johns	350	Piston ring machining
Demmer Corp*	Lansing	300	Tools, dies, jigs, fixtures

*Source: 1998 Harris Publishing Company Industrial Directory

**Source: Michigan Economic Development Corporation

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LANSING/E. LANSING MSA # 4040:

LENDING TEST - LANSING/ E. LANSING MSA #4040 - See Exhibit 93-104

Small business lending is considered satisfactory based on a good distribution among businesses of different revenue sizes. Lending to low- and moderate-income borrowers is excellent. The distribution of HMDA loans reflects adequate penetration in the assessment area; the vast majority of loans were made in middle- and upper-income census tracts.

Lending Activity:

BOM's lending activity reflects a good responsiveness to the credit needs in this assessment area.

Geographic Distribution:

The geographic distribution of the bank's originations in this assessment area is adequate.

Community Development Lending:

The bank originated community development loans at a very low level in this assessment area. One housing-related community development loan totaling \$43,000 in this assessment area. Community development lending in this assessment area is below the 0.9% deposit base derived from this assessment area.

INVESTMENT TEST - LANSING/ E. LANSING MSA #4040

The bank has a poor level of qualified community development investments/grants and the bank is not in a leadership position particularly in those not routinely provided by private investors. This is evident through the low level of investments, based on volume and dollar amount, in consideration of the available opportunities in the assessment area. Further, the bank has not made use of complex and innovative investments to support community development initiatives. Interviews with community representatives revealed that various opportunities exist for investment to promote community development by financial institutions.

SERVICE TEST – LANSING/E. LANSING MSA #4040 – See Exhibits 93-104

The bank's delivery systems, including alternative delivery systems, are accessible to essentially all portions of the bank's assessment area. The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. Also, services do not vary in a way that inconveniences any certain portion of the assessment area. In addition, the bank provides a relatively high level of community development services, particularly with an emphasis on education, affordable housing and small business development.

Retail Banking Services

The Lansing/E. Lansing MSA assessment area accounts for .9% of Bank One's total deposit base. A full-range of deposit services and consumer loan products are available at all branch locations.

METROPOLITAN AREAS
(Limited Review)**DESCRIPTION OF INSTITUTION'S OPERATIONS IN SAGINAW / BAY CITY/
MIDLAND MSA #6960:**

The Saginaw/Bay City/Midland MSA AA consists of Saginaw, Bay and Midland County's. According to 1990 Census Data the AA has a population of 399,320. The MSA has 109,208 (73.7%) family households, and the median family income is \$34,727, slightly lower than the State median of \$36,652. Of the family population,

22.7% is low-income; 16.1% is moderate-income; 22.0% is middle-income; and 39.2% is upper-income. The AA includes 103 census tracts: 12 low-income, 21 moderate-income, 54 middle-income and 16 upper-income. Low- and moderate-income tracts comprise 32.1% of the population.

Owner-occupied housing represents 72.7% of the housing stock, and has a median value of \$48,539. This is approximately 19.2% lower than the State median of \$60,062; however, 4.6% of the housing is vacant. The housing stock includes 72.5% single units, 9.6% 2- to 4-family units and 9.5% dwellings with five units or more. Existing housing has a median age of 49 years, and 32.4% of that stock was built before 1950.

BANK ONE - SAGINAW/BAY CITY/MIDLAND MSA #6960		
Assessment Characteristics	MSA	STATE
<i>Tract Summary</i>		
Total Number of Census Tracts	103	
Number of Low-Income Census Tracts	12	
Number of Moderate-Income Census Tracts	21	
Number of Middle-Income Census Tracts	54	
Number of Upper-Income Census Tracts	16	
<i>Income Summary</i>		
Median Family Income	\$34,727	\$36,652
Percent Low-Income Families	22.7%	20.9%
Percent Moderate-Income Families	16.1%	17.3%
Percent Middle-Income Families	22.0%	23.0%
Percent Upper-Income Families	39.2%	38.8%
Percent of Families Below Poverty	12.3%	10.2%
<i>Unemployment Summary</i>		
Total Population	399,320	9,295,297
Labor Force Population	188,448	4,554,160
Percent Unemployment	9.8%	8.2%
<i>Housing Summary</i>		
Total Housing Units	158,063	3,826,765
Percent Owner-Occupied Units	72.2%	63.0%
Percent Rental Units	23.2%	25.8%
Percent Vacant Units	4.6%	11.2%
Median Housing Value	\$48,539	\$60,062
Median Gross Rent	\$381	\$423

*1990 Censu Data

**Michigan Department of Career Development 1999 Labor Statistics

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SAGINAW / BAY CITY / MIDLAND MSA #6960:

LENDING TEST - SAGINAW/ BAY CITY/ MIDLAND MSA #6960 – See Exhibits 105-116

Overall, the distribution of loans reflects an excellent penetration among customers of different incomes and businesses of different sizes. The geographic distribution of business loans is good. However, there is low penetration of HMDA loans in low- and moderate-income census tracts. The bank has a good record of serving the credit needs of small businesses. An adequate level of community development loans was originated in this assessment area.

INVESTMENT TEST - SAGINAW/ BAY CITY/ MIDLAND MSA #6960

The bank has a poor level of qualified community development investments/grants and the bank is not in a leadership position particularly in those not routinely provided by private investors. This is evident through the low level of investments, based on volume and dollar amount. To some degree, limited investment opportunities are available in the assessment area; however, given the bank's size and technical expertise, the bank has not made use of complex and innovative investments to support community development initiatives.

SERVICE TEST - SAGINAW/ BAY CITY/ MIDLAND MSA #6960

The bank's delivery systems, including alternative delivery systems, are accessible to essentially all portions of the bank's assessment area. The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. Also, services do not vary in a way that inconveniences any certain portion of the assessment area.

APPENDIX A

SCOPE OF EXAMINATION			
<p>A risk-focused examination was conducted using guidelines established by the Board of Governors of the Federal Reserve System to determine the bank's level of compliance with consumer laws and regulations. The examination concentrated on areas that pose the greatest risk to the bank and its customers as well as assess compliance management processes that identify, monitor and manage these risks. While compliance with all statutes and regulations were reviewed, areas designated with low-risk exposure did not involve transaction testing. A regular examination was conducted to assess the bank's performance with respect to the Community Reinvestment Act (CRA). Bank policies, procedures, forms, and a sample of loan and deposit transactions were reviewed. The examination team interviewed individuals within the community and inspected bank records to determine the credit needs of the community and the bank's efforts to meet those needs.</p>			
TIME PERIOD REVIEWED:		JULY 1, 1998 to JANUARY 31, 2000	
FINANCIAL INSTITUTION BANK ONE, DETROIT, MICHIGAN			PRODUCTS REVIEWED SMALL BUSINESS REAL ESTATE CD LOANS CD INVESTMENTS CD SERVICES
AFFILIATE (s)	AFFILIATE RELATIONSHIP	STRUCTURE	PRODUCTS REVIEWED
Banc One CDC	Holding Company subsidiary	New business booked here.	Investments

Banc One Neighborhood Development Corporation	Holding Company subsidiary	Books all new small business investments.	Investments
NBD CDC	Holding Company subsidiary	Holds old Michigan market assets.	
NBD Neighborhood Revitalization Corporation	Holding Company subsidiary	To be collapsed.	
First Commerce CDC	Holding Company subsidiary	Holds old assets.	
First Chicago Leasing Corporation	Holding Company subsidiary	Bank One Capital Corp.	Marketing/Services

LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	COMMUNITY CONTACTS
State of Michigan	Full	14	40
Ann Arbor MSA #0440	Full	1	2
Benton Harbor MSA #0870	Limited	1	3
Detroit MSA #2160	Full	6	5
Flint MSA #2640	Full	1	3
Grand Rapids/Muskegon/ Holland MSA #3000	Full	2	2
Kalamazoo/Battle Creek MSA #3720	Limited	1	2

Lansing/E. Lansing MSA #4040	Limited	0	3
Saginaw/Bay City/ Midland MSA #6960	Limited	0	1
Non-Metropolitan Michigan	Full	0	0

APPENDIX B

SUMMARY OF STATE AND MULTISTATE MSA RATINGS

Assessment Area	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall Rating
State of Michigan	Outstanding	Outstanding	Outstanding	Outstanding
Ann Arbor MSA #0440	Outstanding	Needs to Improve	Outstanding	Satisfactory
Benton Harbor MSA #0870*				Satisfactory
Detroit MSA #2160	Outstanding	Outstanding	Outstanding	Outstanding
Flint MSA #2640	Outstanding	Low Satisfactory	High Satisfactory	Satisfactory
Grand Rapids/ Muskegon/Holland MSA #3000	High Satisfactory	Outstanding	High Satisfactory	Outstanding
Kalamazoo/Battle Creek MSA #3720*				Satisfactory
Lansing/E. Lansing MSA #4040*				Satisfactory
Saginaw/Bay City/Midland MSA #6960*				Satisfactory
Non-Metro Michigan	High Satisfactory	Outstanding	High Satisfactory	Satisfactory

The two AA's receiving "Outstanding" ratings overall represent approximately 83% of the banks deposit base.

*Limited Review

APPENDIX C

AA's	RANK	MKT. SHARE	DEPOSIT %	INVEST-MENT %	ATM's LMI %	BRANCH LMI %	LMI AREAS %
Ann Arbor	3rd	11.2	2.9	0.1	13.6	25.0	26.2
Benton Harbor	4th	9.0	0.9	0.1	40.0	40.0	22.6
Detroit	1st	23.6	76.5	49.2	20.3	18.4	35.0
Flint	2nd	30.3	5.9	2.1	22.4	26.7	31.9
Grand Rapids	3rd	11.2	6.7	40.4	17.0	19.4	26.8
Kalamazoo	10th	2.0	0.3	1.3	0.0	0.0	40.3
Lansing	12th	3.9	0.9	1.1	33.3	40.0	24.1
Saginaw	4th	10.1	1.7	0.2	40.0	23.1	32.0
Non-Metro	2nd	18.9	4.2	5.5	22.2	10.5	18.9
Overall	1st	16.6	\$16.1 B	\$31.2 M	18.6	21.1	31.7

APPENDIX D – Lending Exhibits

- Overall Bank Lending Exhibits:

Assessment Area Concentration

Exhibit 1

OVERALL BANK ASSESSMENT AREA LENDING Bank One, Michigan 1999								
	Inside Assessment Area				Outside Assessment Area			
	#	%	\$	%	#	%	\$	%
HMDA	27,570	95.7	2,519,224	98.8	1,245	4.3	30,702	1.2
Small Business	10,329	92.6	798,761	88.8	822	7.4	101,042	11.2
Totals	37,899	94.8	3,317,985	96.2	2,067	5.2	131,744	3.8

Exhibit 2

OVERALL BANK ASSESSMENT AREA LENDING Bank One, Michigan 2000								
	Inside Assessment Area				Outside Assessment Area			
	#	%	\$	%	#	%	\$	%
HMDA	17,608	96.6	1,432,653	98.7	623	3.4	18,887	1.3
Small Business	6,518	95.7	821,395	90.1	291	4.3	90,448	9.9
Totals	24,126	96.4	2,254,048	95.4	914	3.6	109,335	4.6

Geographic Distribution of Loans

Exhibit 3

OVERALL BANK HMDA-related Loans (#s)											
Year	Low		Moderate		Middle		Upper		NA		Total
	#	%	#	%	#	%	#	%	#	%	
1999	1,180	4.3	3,366	12.2	14,584	52.9	8,436	30.6	3	0.0	27,569
2000	822	4.7	2,316	13.2	9,394	53.3	5,074	28.8	2	0.0	17,608
Total	2,002	4.4	5,682	12.6	23,978	53.1	13,510	29.9	5	0.0	45,177

Exhibit 4

OVERALL BANK HMDA-related Loans (\$000s)											
Year	Low		Moderate		Middle		Upper		NA		Total
	\$	%	\$	%	\$	%	\$	%	\$	%	
1999	47,183	1.9	177,287	7.0	1,186,757	47.1	1,107,640	44.0	353	0.0	2,519,220
2000	33,608	2.3	116,688	8.1	668,514	46.7	613,512	42.9	331	0.0	1,432,653
Total	80,791	2.1	293,975	7.4	1,855,271	47.0	1,721,152	43.5	684	0.0	3,951,873

Exhibit 5

OVERALL BANK Small Business Loans (#s)											
	Low		Moderate		Middle		Upper		NA		Total
Year	#	%	#	%	#	%	#	%	#	%	
1999	597	5.8	1,310	12.7	5,260	51.0	3,155	30.5	7	0.0	10,329
2000	374	5.7	842	12.9	3,319	50.9	1,976	30.4	7	0.1	6,518
Total	971	5.8	2,152	12.8	8,579	50.9	5,131	30.5	14	0.0	16,847

Exhibit 6

OVERALL BANK Small Business Loans (\$000s)											
	Low		Moderate		Middle		Upper		NA		Total
Year	\$	%	\$	%	\$	%	\$	%	\$	%	
1999	49,030	6.2	109,776	13.8	394,099	49.3	245,192	30.7	664	0.0	798,761
2000	51,312	6.2	128,043	15.6	395,729	48.3	245,198	29.8	1,113	0.1	821,395
Total	100,342	6.2	237,819	14.7	789,828	48.7	490,390	30.3	1,777	0.1	1,620,156

Exhibit 7

All AAs	Owner-Occupied Units (Based on 1990 U. S. Census Data)		HMDA-Related Originations		% of Originations per 1,000 Owner-Occupied Units	
	Low-/Mod	Mid/Upper	Low-/Mod	Mid/Upper	Low-/Mod	Mid/Upper
2000	464,577	1,429,112	3,138	14,468	6.75	10.12
1999	464,577	1,429,112	4,546	23,020	9.78	16.11

Exhibit 8

1999 Census Tract Income Classification	No. of Census Tracts	% of Total Census Tracts	Loans in AA for MSAs		Aggregate in Market (MSAs)	
			No. Of Orig.	% Of Total Orig.	No. Of Orig.	% Of Total Orig.
Low – 0 to 49%	312	15.6	1,180	4.3	13,541	3.9
Moderate 50 to 79%	323	16.1	3,366	12.2	41,523	11.2
Middle 80 to 120%	911	45.5	14,588	52.9	182,102	52.4
Upper- > 120%	457	22.8	8,436	30.6	110,460	31.8
TOTAL	2,003	100.0	27,570	100.0	347,626	100.0

Borrower and Small Business Distribution of Loans

Exhibit 9

Small Business Lending Analysis				
Year	\$100,000 or Less		Sales Revenue < = \$1,000,000	
	No.	\$(000s)	No.	\$(000s)
1999	8,717	182,712	3,229	77,934
2000	4,828	124,831	1,797	182,165

Exhibit 10

Period	Revenue ≤ 1,000,000 No. / \$	Total No. / \$
--------	---------------------------------	-------------------

2000	1,797/182,165	6,518/821,466
1999	3,229/253,505	10,329/798,885
TOTAL	5,026/\$435,670	16,847/\$1,620,351

EXHIBIT 11

1999 Borrower Income Classification	No. of Families	% of Families	Loans in AA for MSAs		Aggregate in Market (MSAs)	
			No. Of Orig.	% Of Total Orig.	No. Of Orig.	% Of Total Orig.
Low – 0 to 49%	411,661	21.0	2,628	9.5	12,064	3.5
Moderate 50 to 79%	329,229	16.8	5,473	19.9	38,426	11.0
Middle 80 to 120%	448,638	22.9	6,755	24.5	179,946	51.8
Upper- > 120%	767,969	39.3	9,689	35.1	108,478	31.2
Income not Available			3,025	11.0	8,712	2.5
TOTAL	1,957,497	100.0	27,570	100.0	347,626	100.0

Flexible Lending Practices

Exhibit 12

BANK ONE Government-Sponsored Loan Programs		
TYPE OF LOAN PROGRAM	Number of Loans	Dollar Amount of Loans
Federal Programs		
Small Business Administration	107	\$25,900,000
Federal Housing Administration	420	\$31,900,000
Veterans Administration	63	\$6,200,000
TOTAL FEDERAL LOANS	590	\$64,000,000
State of Michigan Program		
Capital Access Program	713	\$37,900,000
TOTAL STATE LOANS	713	\$37,900,000
TOTAL LOCAL GOV. LOANS	1,303	\$101,900,000

- Full Review Exhibits

Detroit MSA #2160

The following tables show the distribution of the bank’s originations by type and geography for all of 1999 and the nine months ended September 30, 2000:

Exhibit 13

HMDA-related Loans (#s)											
Year	Low		Moderate		Middle		Upper		NA		Total
	#	%	#	%	#	%	#	%	#	%	#
1999	771	5.9	1,916	14.6	6,206	47.4	4,202	32.1	3	0.0	13,098
2000	551	6.0	1,384	15.0	4,491	48.8	2,775	30.2	2	0.0	9,203
Total	1,322	5.9	3,300	14.8	10,697	48.0	6,977	31.3	5	0.0	22,301

Exhibit 14

HMDA-related Loans (\$000s)

Year	Low		Moderate		Middle		Upper		NA		Total
	\$	%	\$	%	\$	%	\$	%	\$	%	\$
1999	28,539	2.4	100,844	8.2	481,670	39.3	613,871	50.1	353	0.0	1,225,277
2000	20,246	2.6	72,359	9.3	300,436	38.5	387,526	49.6	331	0.0	780,898
Total	48,785	2.4	173,203	8.6	782,106	39.0	1,001,397	50.0	684	0.0	2,006,175

Exhibit 15

Small Business Loans (#s)											
Year	Low		Moderate		Middle		Upper		NA		Total
	#	%	#	%	#	%	#	%	#	%	#
1999	326	6.0	739	13.5	2,509	45.9	1,888	34.6	3	0.0	5,465
2000	212	5.7	525	14.1	1,749	46.9	1,244	33.3	3	0.0	3,733
Total	538	5.9	1,264	13.8	4,258	46.3	3,132	34.0	6	0.0	9,198

Exhibit 16

Small Business Loans (\$000s)											
Year	Low		Moderate		Middle		Upper		NA		Total
	\$	%	\$	%	\$	%	\$	%	\$	%	\$
1999	29,951	6.8	66,765	15.1	193,004	43.6	151,856	34.4	626	0.1	442,202
2000	30,015	5.9	79,822	15.6	240,093	47.1	158,956	31.2	1,083	0.2	509,969
Total	59,966	6.3	146,587	15.4	433,097	45.5	310,812	32.7	1,709	0.1	952,171

The following chart shows the bank’s loans for all of 1999 and the nine-month period ended September 30, 2000 relative to potential real estate lending opportunities within the assessment area. The chart compares the bank’s originations in low- and moderate-income census tracts (L/M), and middle- and upper-income census tracts (non-L/M) to the number of owner-occupied units in those census tracts per 1,000 units:

Exhibit 16

Detroit MSA	Owner-Occupied Units (Based on 1990 U. S. Census Data)		HMDA-Related Originations		% of Originations per 1,000 Owner-Occupied Units	
	Low-/Mod	Mid/Upper	Low-/Mod	Mid/Upper	Low-/Mod	Mid/Upper
2000	291,054	749,905	1,935	7,266	6.65	9.69
1999	291,054	749,054	2,687	10,408	9.23	13.89

The distribution of all of the bank’s 1999 HMDA-related loans compared to market aggregate and the percentage of census tract types by income within the assessment area is included in the following table:

Exhibit 17

1999 HMDA-Related LOANS IN AA BY GEOGRAPHY INCOME AND AS A PERCENTAGE OF TOTAL LOANS IN COMPARISON TO AREA DEMOGRAPHICS AND 1998 AGGREGATE DATA				
Census Tract Income Classification	# of Census Tracts	% of Total Census Tracts	Bank One Within Detroit Assessment Area	Market Aggregate Within Detroit Assessment Area

			Number of Originations	Percentage of Total Originations	Number of Originations	Percentage of Total Originations
Low – 0 to 49%	216	19.0	771	5.9	9,516	4.6
Moderate – 50 to 79%	182	16.0	1,916	14.6	26,921	13.0
Middle – 80 to 119%	461	40.5	6,206	47.4	100,930	48.7
Upper - > 120%	279	24.5	4,202	32.1	70,061	33.7
Geo. Income not Available			3	0.0	0	0.0
Total	1,138	100.0	13,098	100.0	207,428	100.0

The following table compares the distribution of the bank’s 1999 HMDA-related loans within the assessment area, by borrower income, to the number and percentage of families within each type of geography and to aggregate lenders:

Exhibit 18

HMDA-related Loans (#s)											
Year	Low		Moderate		Middle		Upper		NA		Total
	#	%	#	%	#	%	#	%	#	%	#
1999	1,447	11.1	2,641	20.2	2,999	22.9	3,963	30.2	2,048	15.6	13,098
2000	1,086	11.8	1,927	20.9	2,139	23.2	2,830	30.8	1,221	13.3	9,203
Total	2,533	11.4	4,568	20.5	5,138	23.0	6,793	30.5	3,269	14.6	22,301

Exhibit 19

HMDA-related Loans (\$000s)											
Year	Low		Moderate		Middle		Upper		NA		Total
	\$	%	\$	%	\$	%	\$	%	\$	%	\$
1999	52,908	4.3	159,662	13.0	233,669	19.1	636,507	52.0	142,531	11.6	1,225,277
2000	36,299	4.7	99,171	12.7	137,742	17.6	413,168	52.9	94,518	12.1	780,898
Total	89,207	4.5	258,833	12.9	371,411	18.5	1,049,675	52.3	237,049	11.8	2,006,175

The following tables show the bank’s small business lending by loan size and borrower revenue for all of 1999 and the nine months ended September 30, 2000:

Exhibit 20

1999

Small Business Originations	Loan Amount			
	Less than \$100K	\$100K - \$250K	\$250K - \$1mil	Total
# of loans	4,583	406	476	5,465
# with revenues <= \$1 MM	1,250	180	119	1,549
% of loans	27.3%	44.3%	25.0%	28.3%
\$ of loans	94,437	72,087	275,678	442,202
\$ with revenues <= \$1 MM	35,528	30,744	65,416	131,680
% of loans	37.6%	42.6%	23.7%	29.8%

Exhibit 21

2000

Small Business Originations	Loan Amount			
	Less than \$100K	\$100K - \$250K	\$250K - \$1mil	Total
# of loans	2,703	381	649	3,733

# with revenues <= \$1 MM	708	109	117	934
% of loans	26.2%	28.6%	18.0%	25.0%
\$ of loans	72,442	70,902	366,625	509,969
\$ with revenues <= \$1 MM	26,432	19,041	60,807	106,280
% of loans	36.5%	26.9%	16.6%	20.8%

The following table compares the distribution of the bank’s 1999 HMDA-related loans within the assessment area, by borrower income, to the number and percentage of families within each type of geography and to aggregate lenders:

Exhibit 22

1999 HMDA-RELATED LOANS IN AA BY BORROWER INCOME AND AS A PERCENTAGE OF TOTAL LOANS IN COMPARISON TO AREA DEMOGRAPHICS AND 1999 AGGREGATE DATA						
Borrower Income Classification	# of Families	% of Total Families	Bank One Within Detroit Assessment Area		Market Aggregate Within Detroit Assessment Area	
			Number of Originations	Percentage of Total Originations	Number of Originations	Percentage of Total Originations
Low – 0 to 49%	240,518	22.0	1,447	11.1	8,561	4.1
Moderate – 50 to 79%	182,881	16.7	2,641	20.2	25,333	12.2
Middle – 80 to 119%	241,778	22.1	2,999	22.9	100,846	48.6
Upper - > 120%	427,687	39.1	3,963	30.2	68,369	33.0
Income not Available			2,048	15.6	4,319	2.1
Total	1,092,864	100.0	13,098	100.0	207,428	100.0

Grand Rapids/Muskegon/Holland MSA #3000

The following tables show the distribution of the bank’s loan originations by type and geography for all of 1999 and the nine-month period ended September 30, 2000:

Exhibit 23

HMDA-related Loans (#s)											
Year	Low		Moderate		Middle		Upper		NA		Total
	#	%	#	%	#	%	#	%	#	%	#
1999	113	2.5	372	8.0	2,770	60.0	1,364	29.5	0	0.0	4,619
2000	93	3.5	285	10.7	1,648	61.6	648	24.2	0	0.0	2,674
Total	206	2.8	657	9.0	4,418	60.6	2,012	27.6	0	0.0	7,293

Exhibit 24

HMDA-related Loans (\$000s)											
Year	Low		Moderate		Middle		Upper		NA		Total
	\$	%	\$	%	\$	%	\$	%	\$	%	\$
1999	5,611	1.3	20,793	4.7	238,299	54.0	176,356	40.0	0	0.0	441,059
2000	4,642	2.2	13,896	6.6	122,906	58.4	69,090	32.8	0	0.0	210,534

Total	10,253	1.6	34,689	5.3	361,205	55.4	245,446	37.7	0	0.0	651,593
-------	--------	-----	--------	-----	---------	------	---------	------	---	-----	---------

Exhibit 25

Small Business Loans (#s)											
	Low		Moderate		Middle		Upper		NA		Total
Year	#	%	#	%	#	%	#	%	#	%	#
1999	102	7.1	204	14.2	776	54.1	354	24.6	0	0.0	1,436
2000	62	8.1	129	16.9	418	54.5	157	20.5	0	0.0	766
Total	164	7.5	333	15.1	1,194	54.2	511	23.2	0	0.0	2,202

Exhibit 26

Small Business Loans (\$000s)											
	Low		Moderate		Middle		Upper		NA		Total
Year	\$	%	\$	%	\$	%	\$	%	\$	%	\$
1999	7,525	6.6	20,262	17.8	59,795	52.6	26,119	23.0	0	0.0	113,701
2000	5,137	5.1	25,179	24.9	50,780	50.2	20,046	19.8	0	0.0	101,142
Total	12,662	5.9	45,441	21.1	110,575	51.5	46,165	21.5	0	0.0	214,843

The following chart shows all of the bank’s 1999 and nine months ended September 30, 2000 lending relative to potential real estate lending opportunities within the assessment area. The chart compares the bank’s originations in low- and moderate-income census tracts (L/M), and middle- and upper-income census tracts (non-L/M) to the number of owner-occupied units in those census tracts per 1,000 units:

Exhibit 27

Grand Rapids MSA	Owner-Occupied Units (Based on 1990 U. S. Census Data)		HMDA-Related Originations		% of Originations per 1,000 Owner-Occupied Units	
	Low-/Mod	Mid/Upper	Low-/Mod	Mid/Upper	Low-/Mod	Mid/Upper
2000	42,141	154,840	378	2,296	8.97	14.83
1999	42,141	154,840	485	4,134	11.51	26.70

The distribution of all the bank’s 1999 HMDA-related loans compared to market aggregate and the percentage of census tract, by income, within the assessment area is included in the following table:

Exhibit 28

1999 HMDA-Related LOANS IN AA BY GEOGRAPHY INCOME AND AS A PERCENTAGE OF TOTAL LOANS IN COMPARISON TO AREA DEMOGRAPHICS AND 1998 AGGREGATE DATA				
Census Tract Income Classification	# of Census Tracts	% of Total Census Tracts	Bank One Within Grand Rapids Assessment Area	Market Aggregate Within Detroit Assessment Area

			Number of Originations	Percentage of Total Originations	Number of Originations	Percentage of Total Originations
Low – 0 to 49%	20	10.9	113	2.5	1,160	2.9
Moderate – 50 to 79%	29	15.8	372	8.0	4,017	10.0
Middle – 80 to 119%	100	54.6	2,770	60.0	24,407	61.9
Upper - > 120%	34	18.6	1,364	29.5	9,700	25.2
Geo. Income not Available						
Total	183	100.0	4,619	100	39,284	100.0

The following tables show the distribution of the bank's originations to borrowers of different income levels for all of 1999 and the nine-month period ended September 30, 2000:

Exhibit 29

HMDA-related Loans (#s)											
Year	Low		Moderate		Middle		Upper		NA		Total
	#	%	#	%	#	%	#	%	#	%	#
1999	366	7.9	971	21.0	1,213	26.3	1,866	40.4	203	4.4	4,619
2000	251	9.4	576	21.6	779	29.1	905	33.8	163	6.1	2,674
Total	617	8.5	1,547	21.2	1,992	27.3	2,771	38.0	366	5.0	7,293

Exhibit 30

HMDA-related Loans (\$000s)											
Year	Low		Moderate		Middle		Upper		NA		Total
	\$	%	\$	%	\$	%	\$	%	\$	%	\$
1999	14,507	3.3	59,384	13.5	96,772	21.9	257,138	58.3	13,258	3.0	441,059
2000	9,543	4.5	30,804	14.6	53,443	25.4	105,020	49.9	11,724	5.6	210,534
Total	24,050	3.7	90,188	13.8	150,215	23.1	362,158	55.6	24,982	3.8	651,593

The following tables show the bank's small business by loan size and borrower revenue for all of 1999 and the nine-month period ended September 30, 2000:

Exhibit 31**1999**

Small Business Originations	Loan Amount			
	Less than \$100K	\$100K - \$250K	\$250K - \$1mil	Total
# of loans	1,223	91	122	1,436
# with revenues <= \$1 MM	358	45	24	427
% of loans	29.3%	49.4%	19.7%	29.7%
\$ of loans	26,269	15,954	71,523	113,746
\$ with revenues <= \$1 MM	11,370	7,863	10,784	30,017
% of loans	43.3%	49.3%	15.1%	26.4%

Exhibit 32**2000**

Small Business Originations	Loan Amount
-----------------------------	-------------

	Less than \$100K	\$100K - \$250K	\$250K - \$1mil	Total
# of loans	555	80	131	766
# with revenues <= \$1 MM	167	18	19	204
% of loans	30.1%	22.5%	14.5%	26.6%
\$ of loans	13,480	14,025	73,665	101,170
\$ with revenues <= \$1 MM	5,141	2,911	9,624	17,676
% of loans	38.1%	20.8%	13.1%	17.5%

The following table compares the distribution of the bank’s 1999 HMDA-related loans within the assessment area, by borrower income, to the number and percentage of families within each type of geography and to aggregate lenders:

Exhibit 33

1999 HMDA-RELATED LOANS IN AA BY BORROWER INCOME AND AS A PERCENTAGE OF TOTAL LOANS IN COMPARISON TO AREA DEMOGRAPHICS AND 1999 AGGREGATE DATA						
Borrower Income Classification	# of Families	% of Total Families	Bank One Within Grand Rapids Assessment Area		Market Aggregate Within Detroit Assessment Area	
			Number of Originations	Percentage of Total Originations	Number of Originations	Percentage of Total Originations
Low – 0 to 49%	37,661	17.4	366	7.9	871	2.2
Moderate – 50 to 79%	38,578	17.9	971	21.0	3,262	8.3
Middle – 80 to 119%	57,447	26.6	1,213	26.3	25,043	63.7
Upper - > 120%	82,151	38.1	1,866	40.4	8,781	22.4
Income not Available			203	4.4	1,327	3.4
Total	215,837	100.0	4,619	100.0	39,284	100.0

Flint MSA #2640

The following tables show the distribution of the bank’s loan originations by type and geography for all of 1999 and the nine-month period ended September 30, 2000:

Exhibit 34

HMDA-related Loans (#s)									
Year	Low		Moderate		Middle		Upper		Total
	#	%	#	%	#	%	#	%	#
1999	101	4.3	246	10.5	994	42.2	1,013	43.0	2,354
2000	63	3.8	174	10.6	705	43.1	695	42.5	1,637
Total	164	4.1	420	10.5	1,699	42.6	1,708	42.8	3,991

Exhibit 35

HMDA-related Loans (\$000s)									
	Low		Moderate		Middle		Upper		Total
Year	\$	%	\$	%	\$	%	\$	%	\$
1999	2,567	1.6	8,981	5.6	58,508	36.2	91,642	56.6	161,698
2000	1,794	1.9	5,591	5.8	37,409	38.7	51,879	53.6	96,673
Total	4,361	1.7	14,572	5.7	95,917	37.1	143,521	55.5	258,371

Exhibit 36

Small Business Loans (#s)									
	Low		Moderate		Middle		Upper		Total
Year	#	%	#	%	#	%	#	%	#
1999	49	6.3	101	13.1	339	43.9	283	36.7	772
2000	32	6.7	41	8.6	228	47.1	180	37.6	481
Total	81	6.5	142	11.3	567	45.3	463	36.9	1,253

Exhibit 37

Small Business Loans (\$000s)									
	Low		Moderate		Middle		Upper		Total
Year	\$	%	\$	%	\$	%	\$	%	\$
1999	3,190	5.3	7,983	13.4	28,370	47.4	20,291	33.9	59,834
2000	4,217	7.6	4,200	7.5	23,086	41.3	24,406	43.6	55,909
Total	7,407	6.4	12,183	10.5	51,456	44.5	44,697	38.6	115,743

The following chart shows all of the bank's 1999 and nine months ended September 30, 2000 lending relative to potential real estate lending opportunities within the assessment area. The chart compares the bank's originations in low- and moderate-income census tracts (L/M), and middle- and upper-income census tracts (non-L/M) to the number of owner-occupied units in those census tracts per 1,000 units:

Exhibit 38

Flint MSA	Owner-Occupied Units (Based on 1990 U. S. Census Data)		HMDA-Related Originations		% of Originations per 1,000 Owner-Occupied Units	
	Low-/Mod	Mid/Upper	Low-/Mod	Mid/Upper	Low-/Mod	Mid/Upper
2000	27,513	100,372	237	1,400	8.6	13.95
1999	27,513	100,372	347	2,007	12.61	20.00

The distribution of all the bank's 1999 HMDA-related loans compared to market aggregate and the percentage of census tract, by income, within the assessment area is included in the following table:

Exhibit 39

1999 HMDA-Related LOANS IN AA BY GEOGRAPHY INCOME AND AS A PERCENTAGE OF TOTAL LOANS IN COMPARISON TO AREA DEMOGRAPHICS AND 1998 AGGREGATE DATA						
Census Tract Income Classification	# of Census Tracts	% of Total Census Tracts	Bank One Within Flint Assessment Area		Market Aggregate Within Flint Assessment Area	
			Number of Originations	Percentage of Total Originations	Number of Originations	Percentage of Total Originations
Lw - 0 to 49%	17	15.0	101	4.3	743	3.9
Moderate – 50 to 79%	19	16.8	246	10.5	2,384	12.6
Middle – 80 to 119%	49	43.4	994	42.2	8,639	45.6
Upper - > 120%	28	24.8	1,013	43.0	7,191	37.9
Total	113	100.0	2,354	100.0	18,957	100.0

The following tables show the distribution of the bank's originations to borrowers of different income levels for all of 1999 and the nine-month period ended September 30, 2000:

Exhibit 40

HMDA-related Loans (#s)											
Year	Low		Moderate		Middle		Upper		NA		Total
	#	%	#	%	#	%	#	%	#	%	#
1999	272	11.5	435	18.5	626	26.6	813	34.5	208	8.9	2,354
2000	167	10.2	321	19.6	402	24.6	610	37.2	137	8.4	1,637
Total	439	11.0	756	18.9	1,028	25.8	1,423	35.6	345	8.7	3,991

Exhibit 41

HMDA-related Loans (\$000s)											
Year	Low		Moderate		Middle		Upper		NA		Total
	\$	%	\$	%	\$	%	\$	%	\$	%	\$
1999	8,323	5.2	20,380	12.6	36,895	22.8	83,618	51.7	12,482	7.7	161,698
2000	4,827	5.0	13,089	13.5	20,947	21.7	48,645	50.3	9,165	9.5	96,673
Total	13,150	5.1	33,469	12.9	57,842	22.4	132,263	51.2	21,647	8.4	258,371

The following tables show the bank's small business by loan size and borrower revenue for all of 1999 and the nine-month period ended September 30, 2000:

Exhibit 42

1999

Small Business Originations	Loan Amount			
	Less than \$100K	\$100K - \$250K	\$250K - \$1mil	Total
# of loans	642	75	55	772
# with revenues <= \$1 MM	309	48	22	379
% of loans	48.1%	64.0%	40.0%	49.1%

\$ of loans	15,970	13,046	30,818	59,834
\$ with revenues <= \$1 MM	9,611	8,094	10,996	28,701
% of loans	60.2%	62.0%	35.7%	47.9%

Exhibit 43 2000

Small Business Originations	Loan Amount			
	Less than \$100K	\$100K - \$250K	\$250K - \$1mil	Total
# of loans	361	52	68	481
# with revenues <= \$1 MM	143	12	23	178
% of loans	39.6%	23.1%	33.8%	37.1%
\$ of loans	9,377	9,084	37,448	55,909
\$ with revenues <= \$1 MM	4,797	1,871	11,054	17,722
% of loans	51.1%	20.6%	29.5%	31.7%

The following table compares the distribution of the bank’s 1999 HMDA-related loans within the assessment area, by borrower income, to the number and percentage of families within each type of geography and to aggregate lenders:

Exhibit 44

1999 HMDA-RELATED LOANS IN AA BY BORROWER INCOME AND AS A PERCENTAGE OF TOTAL LOANS IN COMPARISON TO AREA DEMOGRAPHICS AND 1999 AGGREGATE DATA						
Borrower Income Classification	# of Families	% of Total Families	Bank One Within Flint Assessment Area		Market Aggregate Within Flint Assessment Area	
			Number of Originations	Percentage of Total Originations	Number of Originations	Percentage of Total Originations
Low – 0 to 49%	30,693	23.7	272	11.5	561	3.0
Moderate – 50 to 79%	18,975	14.6	435	18.5	2,151	11.3
Middle – 80 to 119%	27,850	21.5	626	26.6	8,832	46.6
Upper - > 120%	52,154	40.2	813	34.5	7,262	38.3
Income not Available			208	8.9	151	0.8
Total	129,672	100.0	2,354	100.0	18,957	100.0

ANN ARBOR MSA #0440

The following tables show the distribution of the bank’s originations by type and geography for all of 1999 and nine months ended September 30, 2000:

Exhibit 45

HMDA-related Loans (#s)									
Year	Low		Moderate		Middle		Upper		Total
	#	%	#	%	#	%	#	%	#
1999	19	1.2	140	9.1	890	57.8	491	31.9	1,540
2000	10	1.0	107	10.6	591	58.7	299	29.7	1,007
Total	29	1.1	247	9.7	1,481	58.2	790	31.0	2,547

Exhibit 46

HMDA-related Loans (\$000s)									
Year	Low		Moderate		Middle		Upper		Total
	\$	%	\$	%	\$	%	\$	%	\$
1999	2,744	1.4	12,623	6.5	92,863	48.1	85,000	44.0	193,230
2000	2,427	2.1	8,512	7.3	57,287	49.1	48,449	41.5	116,675
Total	5,171	1.7	21,135	6.8	150,150	48.5	133,449	43.0	309,905

Exhibit 47

Small Business Loans (#s)									
Year	Low		Moderate		Middle		Upper		Total
	#	%	#	%	#	%	#	%	#
1999	27	5.1	54	10.2	274	51.4	177	33.3	532
2000	18	5.2	39	11.1	172	49.1	121	34.6	350
Total	45	5.1	93	10.5	446	50.6	298	33.8	882

Exhibit 48

Small Business Loans (\$000s)									
Year	Low		Moderate		Middle		Upper		Total
	\$	%	\$	%	\$	%	\$	%	\$
1999	1,691	5.4	3,241	10.3	14,491	45.9	12,127	38.4	31,550
2000	3,196	8.9	5,948	16.5	11,957	33.2	14,961	41.4	36,062
Total	4,887	7.2	9,189	13.6	26,448	39.1	27,088	40.1	67,612

The following chart shows all of the bank’s 1999 and 2000 lending performance relative to potential real estate lending opportunities within the assessment area. The chart compares the bank’s originations in low- and moderate-income census tracts (L/M), and middle- and upper-income census tracts (non-L/M) to the number of owner-occupied units in those census tracts per 1,000 units:

Exhibit 49

Ann Arbor MSA	Owner-Occupied Units (Based on 1990 U. S. Census Data)		HMDA-Related Originations		% of Originations per 1,000 Owner-Occupied Units	
	Low-/Mod	Mid/Upper	Low-/Mod	Mid/Upper	Low-/Mod	Mid/Upper
2000	24,484	77,907	117	890	4.78	11.42

Ann Arbor MSA	Owner-Occupied Units (Based on 1990 U. S. Census Data)		HMDA-Related Originations		% of Originations per 1,000 Owner-Occupied Units	
	Low-/Mod	Mid/Upper	Low-/Mod	Mid/Upper	Low-/Mod	Mid/Upper
1999	24,484	77,907	159	1,381	6.50	17.73

The distribution of all the bank’s 1999 HMDA-related loans compared to market aggregate and the percentage of census tract types by income within the assessment area is included in the following table:

Exhibit 50

1999 HMDA-Related LOANS IN AA BY GEOGRAPHY INCOME AND AS A PERCENTAGE OF TOTAL LOANS IN COMPARISON TO AREA DEMOGRAPHICS AND 1998 AGGREGATE DATA						
Census Tract Income Classification	# of Census Tracts	% of Total Census Tracts	Bank One Within Ann Arbor Assessment Area		Market Aggregate Within Detroit Assessment Area	
			Number of Originations	Percentage of Total Originations	Number of Originations	Percentage of Total Originations
Low – 0 to 49%	11	10.7	19	1.2	258	1.1
Moderate – 50 to 79%	17	16.5	140	9.1	2,202	9.2
Middle – 80 to 119%	47	45.6	890	57.8	13,821	57.5
Upper - > 120%	28	27.2	491	31.9	7,733	32.2
Geo. Income not Available						
Total	103	100.0	1,540	100.0	24,014	100.0

The following tables show the distribution of the bank’s originations to borrowers of different income levels for all of 1999 and the nine-month period ended September 30, 2000:

Exhibit 51

HMDA-related Loans (#s)											
Year	Low		Moderate		Middle		Upper		NA		Total
	#	%	#	%	#	%	#	%	#	%	#
1999	108	7.0	273	17.7	433	28.1	586	38.1	140	9.1	1,540
2000	77	7.7	163	16.2	277	27.5	396	39.3	94	9.3	1,007
Total	185	7.3	436	17.1	710	27.9	982	38.5	234	9.2	2,547

Exhibit 52

HMDA-related Loans (\$000s)											
Year	Low		Moderate		Middle		Upper		NA		Total
	\$	%	\$	%	\$	%	\$	%	\$	%	\$
1999	4,338	2.3	21,142	10.9	46,039	23.8	107,955	55.9	13,756	7.1	193,230
2000	3,119	2.7	10,308	8.8	24,181	20.7	70,082	60.1	8,985	7.7	116,675
Total	7,457	2.4	31,450	10.2	70,220	22.7	178,037	57.4	22,741	7.3	309,905

The following tables show the bank's small business lending by loan size and borrower revenue for all of 1999 and the nine months ended September 30, 2000:

Exhibit 53 **1999**

Small Business Originations	Loan Amount			
	Less than \$100K	\$100K - \$250K	\$250K - \$1mil	Total
# of loans	467	38	27	532
# with revenues <= \$1 MM	67	16	12	95
% of loans	14.3%	42.1%	44.4%	17.9%
\$ of loans	7,652	7,011	16,906	31,569
\$ with revenues <= \$1 MM	1,900	3,082	6,045	11,117
% of loans	24.8%	44.0%	35.8%	35.2%

Exhibit 54 **2000**

Small Business Originations	Loan Amount			
	Less than \$100K	\$100K - \$250K	\$250K - \$1mil	Total
# of loans	272	39	39	350
# with revenues <= \$1 MM	65	12	8	85
% of loans	23.9%	30.8%	20.5%	24.3%
\$ of loans	6,536	7,014	22,527	36,077
\$ with revenues <= \$1 MM	2,526	1,871	4,630	9,027
% of loans	38.6%	26.7%	20.5%	25.0%

The following table compares the distribution of the bank's 1999 HMDA-related loans within the assessment area, by borrower income, to the number and percentage of families within each type of geography and to aggregate lenders:

Exhibit 55

1999 HMDA-RELATED LOANS IN AA BY BORROWER INCOME AND AS A PERCENTAGE OF TOTAL LOANS IN COMPARISON TO AREA DEMOGRAPHICS AND 1999 AGGREGATE DATA						
Borrower Income Classification	# of Families	% of Total Families	Bank One Within Ann Arbor Assessment Area		Market Aggregate Within Detroit Assessment Area	
			Number of Originations	Percentage of Total Originations	Number of Originations	Percentage of Total Originations
Low - 0 to 49%	15,921	16.5	108	7.0	160	0.7
Moderate - 50 to 79%	16,156	16.8	273	17.7	2,011	8.4
Middle - 80 to 119%	24,135	25.1	433	28.1	13,952	58.1
Upper - > 120%	40,012	41.6	586	38.1	7,474	31.1

1999 HMDA-RELATED LOANS IN AA BY BORROWER INCOME AND AS A PERCENTAGE OF TOTAL LOANS IN COMPARISON TO AREA DEMOGRAPHICS AND 1999 AGGREGATE DATA						
Borrower Income Classification	# of Families	% of Total Families	Bank One Within Ann Arbor Assessment Area		Market Aggregate Within Detroit Assessment Area	
			Number of Originations	Percentage of Total Originations	Number of Originations	Percentage of Total Originations
Income not Available			140	9.1	417	1.7
Total	96,224	100.0	1,540	100.0	24,014	100.0

NONMETROPOLITAN MICHIGAN

The following tables show the distribution of the bank’s loan originations by type and geography for all of 1999 and the nine-month period ended September 30, 2000:

Exhibit 56

HMDA-related Loans (#s)									
Year	Low		Moderate		Middle		Upper		Total
	#	%	#	%	#	%	#	%	#
1999	0	0.0	168	13.3	852	67.5	243	19.2	1,263
2000	0	0.0	105	13.1	574	71.8	121	15.1	800
Total	0	0.0	273	13.2	1,426	69.1	364	17.7	2,063

Exhibit 57

HMDA-related Loans (\$000s)									
Year	Low		Moderate		Middle		Upper		Total
	\$	%	\$	%	\$	%	\$	%	\$
1999	0	0.0	9,828	7.0	98,750	70.1	32,373	22.9	140,951
2000	0	0.0	4,172	5.7	56,350	76.8	12,874	17.5	73,396
Total	0	0.0	14,000	6.5	155,100	72.4	45,247	21.1	214,347

Exhibit 58

Small Business Loans (#s)									
Year	Low		Moderate		Middle		Upper		Total
	#	%	#	%	#	%	#	%	#
1999	0	0.0	47	7.5	449	72.0	128	20.5	624
2000	0	0.0	23	6.6	247	70.8	79	22.6	349
Total	0	0.0	70	7.2	696	71.5	207	21.3	973

Exhibit 59

Small Business Loans (\$000s)					
	Low	Moderate	Middle	Upper	Total

Year	\$	%	\$	%	\$	%	\$	%	\$
1999	0	0.0	5,121	10.5	33,684	68.7	10,211	20.8	49,016
2000	0	0.0	2,215	7.2	20,530	67.1	7,879	25.7	30,624
Total	0	0.0	7,336	9.2	54,214	68.1	18,090	22.7	79,640

The following chart shows all of the bank’s 1998 and nine months of 2000 HMDA-related loans relative to potential real estate lending opportunities within the assessment area. The chart compares the bank’s originations in low- and moderate-income census tracts (L/M), and middle- and upper-income census tracts (non-L/M) to the number of owner-occupied units in those census tracts per 1,000 units:

Exhibit 60

Non-Metro AA	Owner-Occupied Units (Based on 1990 U. S. Census Data)		HMDA-Related Originations		% of Originations per 1,000 Owner-Occupied Units	
	Low-/Mod	Mid/Upper	Low-/Mod	Mid/Upper	Low-/Mod	Mid/Upper
2000	19,277	89,766	105	695	5.45	7.74
1999	19,277	89,766	168	1,095	8.71	12.20

The distribution of all the bank’s 1999HMDA-related loans compared to market aggregate and the percentage of census tract types by income within the assessment area is included in the following table:

Exhibit 61

1999 HMDA-Related LOANS IN AA BY GEOGRAPHY INCOME AND AS A PERCENTAGE OF TOTAL LOANS IN COMPARISON TO AREA DEMOGRAPHICS AND 1999 AGGREGATE DATA						
Census Tract Income Classification	# of BNAs	% of Total BNAs	Bank One Within Non-Metro Assessment Area		Market Aggregate Within Non-Metro Assessment Area	
			Number of Originations	Percentage of Total Originations	Number of Originations	Percentage of Total Originations
Low - 0 to 49%	5	3.9	0	0.0	0	0.0
Moderate – 50 to 79%	19	15.0	168	13.3	688	8.7
Middle – 80 to 119%	88	69.3	852	67.5	5,505	70.1
Upper - > 120%	15	11.8	243	19.2	1,671	21.2
Total	127	100.0	1,263	100.0	7,864	100.0

The following tables show the distribution of the bank’s originations to borrowers of different income levels for all of 1999 and the nine-month period ended September 30, 2000:

Exhibit 62

HMDA-related Loans (#s)											
Year	Low		Moderate		Middle		Upper		NA		Total
	#	%	#	%	#	%	#	%	#	%	#
1999	31	2.4	144	11.4	265	21.0	784	62.1	39	3.1	1,263
2000	31	3.9	113	14.1	170	21.3	440	55.0	46	5.7	800
Total	62	3.0	257	12.5	435	21.1	1,224	59.3	85	4.1	2,063

Exhibit 63

HMDA-related Loans (\$000s)											
Year	Low		Moderate		Middle		Upper		NA		Total
	\$	%	\$	%	\$	%	\$	%	\$	%	\$
1999	952	0.7	6,747	4.8	18,166	12.9	111,793	79.3	3,293	2.3	140,951
2000	919	1.3	4,257	5.8	10,246	14.0	53,679	73.1	4,295	5.8	73,396
Total	1,871	0.9	11,004	5.1	28,412	13.3	165,472	77.2	7,588	3.5	214,347

The following tables show the bank's small business loans by loan size and borrower revenue from January 1, 1999 through September 30, 2000:

Exhibit 64**1999**

Small Business Originations	Loan Amount			
	Less than \$100K	\$100K - \$250K	\$250K - \$1mil	Total
# of loans	503	69	52	624
# with revenues <= \$1 MM	212	49	22	283
% of loans	42.1%	71.0%	42.3%	45.3%
\$ of loans	12,927	11,309	24,790	49,026
\$ with revenues <= \$1 MM	7,879	7,613	7,840	23,332
% of loans	60.9%	67.3%	31.6%	47.6%

Exhibit 65**2000**

Small Business Originations	Loan Amount			
	Less than \$100K	\$100K - \$250K	\$250K - \$1mil	Total
# of loans	284	32	33	349
# with revenues <= \$1 MM	121	9	11	141
% of loans	42.6%	28.1%	33.3%	40.4%
\$ of loans	7,770	5,695	17,165	30,630
\$ with revenues <= \$1 MM	4,186	1,487	5,114	10,787
% of loans	53.9%	26.1%	29.8%	35.2%

The following table compares the distribution of HMDA-related loans within the assessment area, by borrower income, to the number and percentage of families within each type of geography and to aggregate lenders:

Exhibit 66

1999 HMDA-RELATED LOANS IN AA BY BORROWER INCOME AND AS A PERCENTAGE OF TOTAL LOANS IN COMPARISON TO AREA DEMOGRAPHICS AND 1999 AGGREGATE DATA						
Borrower Income Classification	# of Families	% of Total Families	Bank One Within Non-Metro Assessment Area		Market Aggregate Within Nonj-Metro Assessment Area	
			Number of Originations	Percentage of Total Originations	Number of Originations	Percentage of Total Originations
Low – 0 to 49%	18,846	18.7	31	2.4	328	4.2
Moderate – 50 to 79%	18,819	18.6	144	11.4	1,005	12.8
Middle – 80 to 119%	23,342	23.1	265	21.0	1,553	19.7
Upper - > 120%	39,980	39.6	784	62.1	3,478	44.2
Income not Available			39	3.1	1,500	19.1
Total	100,987	100.0	1,263	100.0	7,864	100.0

Limited Scope Reviews

Exhibit 67

SUMMARY LIMITED SCOPE REVIEW			
Assessment Area	Lending Test	Investment Test	Service Test
Benton Harbor/St. Joseph	Below	Below	Consistent
Kalamazoo/Battle Creek	Below	Below	Below
Lansing/E. Lansing	Below	Below	Consistent
Saginaw/Midland/Bay City	Below	Below	Consistent

- Limited Review Exhibits

Benton Harbor MSA # 0870

Geographic Distribution of Loans

Exhibit 68

Benton Harbor MSA #0870 HMDA-related Loans (#s)											
Year	Low		Moderate		Middle		Upper		NA		Total
	#	%	#	%	#	%	#	%	#	%	#
1999	31	4.1	32	4.2	514	67.4	185	24.3	0	0.0	762
2000	32	7.3	23	5.3	284	65.0	98	22.4	0	0.0	437
Total	63	5.3	55	4.6	798	66.5	283	23.6	0	0.0	1,199

Exhibit 69

Benton Harbor MSA #0870 HMDA-related Loans (\$000s)											
Year	Low		Moderate		Middle		Upper		NA		Total
	\$	%	\$	%	\$	%	\$	%	\$	%	\$
1999	1,075	1.5	1,225	1.7	51,682	72.2	17,551	24.6	0	0.0	71,533

2000	1,079	3.2	1,028	3.0	24,997	73.7	6,833	20.1	0	0.0	33,937
Total	2,154	2.1	2,253	2.1	76,679	72.7	24,384	23.1	0	0.0	105,470

Exhibit 70

Benton Harbor MSA #0870 Small Business Loans (#s)											
	Low		Moderate		Middle		Upper		NA		Total
Year	#	%	#	%	#	%	#	%	#	%	#
1999	14	5.8	17	7.0	145	59.3	68	27.9	0	0.0	244
2000	9	6.7	11	8.2	78	57.7	37	27.4	0	0.0	135
Total	23	6.1	28	7.4	223	58.8	105	27.7	0	0.0	379

Exhibit 71

Benton Harbor MSA #0870 Small Business Loans (\$000s)											
	Low		Moderate		Middle		Upper		NA		Total
Year	\$	%	\$	%	\$	%	\$	%	\$	%	\$
1999	1,753	10.0	581	3.3	9,491	54.3	5,657	32.4	0	0.0	17,482
2000	2,428	17.4	1,838	13.1	6,775	48.4	2,960	21.1	0	0.0	14,001
Total	4,181	13.2	2,419	7.7	16,266	51.7	8,617	27.4	0	0.0	31,483

EXHIBIT 72

Benton Harbor MSA	Owner-Occupied Units (Based on 1990 U. S. Census Data)		HMDA-Related Originations		% of Originations per 1,000 Owner-Occupied Units	
	Low-/Mod	Mid/Upper	Low-/Mod	Mid/Upper	Low-/Mod	Mid/Upper
2000	4,033	38,419	63	699	15.62	18.19
1999	4,033	38,419	55	382	13.64	9.94

Exhibit 73

1999 HMDA-Related LOANS IN AA BY GEOGRAPHY INCOME AND AS A PERCENTAGE OF TOTAL LOANS IN COMPARISON TO AREA DEMOGRAPHICS AND 1998 AGGREGATE DATA						
Census Tract Income Classification	# of Census Tracts	% of Total Census Tracts	Bank One Within Benton Harbor Assessment Area		Market Aggregate Within Detroit Assessment Area	
			Number of Originations	Percentage of Total Originations	Number of Originations	Percentage of Total Originations
Low – 0 to 49%	8	15.1	31	4.1	306	4.8
Moderate – 50 to 79%	4	7.5	32	4.2	278	4.3
Middle – 80 to 119%	30	56.6	514	67.4	4,359	67.9
Upper - > 120%	11	20.8	185	24.3	1,473	23.0
Total	53	100.0	762	100.0	6,416	100.0

Borrower and Small Business Distribution of Loans

Exhibit 74

Benton Harbor MSA #0870 HMDA-related Loans (#s)											
	Low		Moderate		Middle		Upper		NA		Total
Year	#	%	#	%	#	%	#	%	#	%	#
1999	67	8.8	129	16.9	164	21.5	370	48.6	32	4.2	762
2000	48	11.0	94	21.5	118	27.0	153	35.0	24	5.5	437
Total	115	9.6	223	18.6	282	23.5	523	43.6	56	4.7	1,199

Exhibit 75

Benton Harbor MSA #0870 HMDA-related Loans (\$000s)											
	Low		Moderate		Middle		Upper		NA		Total
Year	\$	%	\$	%	\$	%	\$	%	\$	%	\$
1999	2,382	3.3	6,408	9.0	10,199	14.3	49,934	69.8	2,610	3.6	71,533
2000	1,554	4.6	5,254	15.5	6,630	19.5	17,431	51.4	3,068	9.0	33,937
Total	3,936	3.7	11,662	11.1	16,829	15.9	67,365	63.9	5,678	5.4	105,470

Exhibit 76

1999

Small Business Originations	Loan Amount			
	Less than \$100K	\$100K - \$250K	\$250K - \$1mil	Total
# of loans	204	20	20	244
# with revenues <= \$1 MM	71	7	5	83
% of loans	34.8%	35.0%	25.0%	34.0%
\$ of loans	4,291	3,396	9,807	17,494
\$ with revenues <= \$1 MM	2,520	1,040	1,753	5,313
% of loans	58.7%	30.6%	17.9%	30.4%

Exhibit 77

2000

Small Business Originations	Loan Amount			
	Less than \$100K	\$100K - \$250K	\$250K - \$1mil	Total
# of loans	102	18	15	135
# with revenues <= \$1 MM	33	9	3	45
% of loans	32.3%	50.0%	20.0%	33.3%
\$ of loans	2,664	3,411	7,928	14,003
\$ with revenues <= \$1 MM	1,545	1,619	988	4,152
% of loans	58.0%	47.5%	12.5%	29.6%

1999	3,100	7.3	5,523	13.0	12,842	30.1	21,155	49.6	0	0.0	42,620
2000	1,688	5.2	3,911	12.0	9,547	29.4	17,325	53.4	0	0.0	32,471
Total	4,788	6.4	9,434	12.6	22,389	29.8	38,480	51.2	0	0.0	75,091

Exhibit 82

Kalamazoo/Battle Creek MSA #3720 Small Business Loans (#s)											
	Low		Moderate		Middle		Upper		NA		Total
Year	#	%	#	%	#	%	#	%	#	%	#
1999	17	9.4	28	15.6	55	30.6	76	42.2	4	2.2	180
2000	15	14.0	10	9.4	39	36.5	39	36.4	4	3.7	107
Total	32	11.2	38	13.2	94	32.7	115	40.1	8	2.8	287

Exhibit 83

Kalamazoo/Battle Creek MSA #3720 Small Business Loans (\$000s)											
	Low		Moderate		Middle		Upper		NA		Total
Year	\$	%	\$	%	\$	%	\$	%	\$	%	\$
1999	2,377	16.9	1,036	7.4	4,986	35.4	5,627	40.0	38	0.3	14,064
2000	3,050	17.7	463	2.7	8,167	47.5	5,477	31.9	30	0.2	17,187
Total	5,427	17.4	1,499	4.8	13,153	42.1	11,104	35.5	68	0.2	31,251

Exhibit 84

Kalamazoo MSA	Owner-Occupied Units (Based on 1990 U. S. Census Data)		HMDA-Related Originations		% of Originations per 1,000 Owner-Occupied Units	
	Low-/Mod	Mid/Upper	Low-/Mod	Mid/Upper	Low-/Mod	Mid/Upper
1999	12,908	45,463	189	448	14.64	9.85
2000	12,908	45,463	117	335	9.06	7.34

Exhibit 85

1999 HMDA-Related LOANS IN AA BY GEOGRAPHY INCOME AND AS A PERCENTAGE OF TOTAL LOANS IN COMPARISON TO AREA DEMOGRAPHICS AND 1998 AGGREGATE DATA						
Census Tract Income Classification	# of Census Tracts	% of Total Census Tracts	Bank One Within Kalamazoo/Battle Creek Assessment Area		Market Aggregate Within Detroit Assessment Area	
			Number of Originations	Percentage of Total Originations	Number of Originations	Percentage of Total Originations
Low – 0 to 49%	13	19.4	65	10.2	527	5.2
Moderate – 50 to 79%	14	20.9	124	19.5	1,450	14.4
Middle – 80 to 119%	20	29.9	202	31.7	3,221	32.1
Upper - > 120%	20	29.9	246	38.6	4,847	48.3
Geo. Income not Available						

Total	67	100.0	637	100.0	10,045	100.0
-------	----	-------	-----	-------	--------	-------

Borrower and Small Business Distribution of Loans

Exhibit 86

Kalamazoo/Battle Creek MSA #3720 HMDA-related Loans (#s)											
	Low		Moderate		Middle		Upper		NA		Total
Year	#	%	#	%	#	%	#	%	#	%	#
1999	59	9.3	150	23.6	154	24.2	212	33.3	62	9.6	637
2000	26	5.7	102	22.6	111	24.6	176	38.9	37	8.2	452
Total	85	7.8	252	23.2	265	24.3	388	35.6	99	9.1	1,089

Exhibit 87

Kalamazoo/Battle Creek MSA #3720 HMDA-related Loans (\$000s)											
	Low		Moderate		Middle		Upper		NA		Total
Year	\$	%	\$	%	\$	%	\$	%	\$	%	\$
1999	2,186	5.1	7,911	18.6	10,305	24.2	18,556	43.5	3,662	8.6	42,620
2000	1,174	3.6	5,549	17.1	7,427	22.9	15,528	47.8	2,793	8.6	32,471
Total	3,360	4.5	13,460	17.9	17,732	23.6	34,084	45.4	6,455	8.6	75,091

Exhibit 88

1999

Small Business Originations	Loan Amount			
	Less than \$100K	\$100K - \$250K	\$250K - \$1mil	Total
# of loans	154	11	15	180
# with revenues <= \$1 MM	17	4	4	25
% of loans	11.0%	36.4%	26.7%	13.9%
\$ of loans	2,516	1,910	9,643	14,069
\$ with revenues <= \$1 MM	702	673	1,543	2,918
% of loans	27.9%	35.2%	16.0%	20.7%

Exhibit 89

2000

Small Business Originations	Loan Amount			
	Less than \$100K	\$100K - \$250K	\$250K - \$1mil	Total
# of loans	74	9	24	107
# with revenues <= \$1 MM	12	3	2	17
% of loans	16.2%	33.3%	8.3%	15.9%
\$ of loans	1,458	1,544	14,189	17,191

\$ with revenues < = \$1 MM	365	500	945	1,810
% of loans	25.0%	32.4%	6.7%	10.5

Exhibit 90

Comparison of Loans and Businesses in LMI Census Tracts Kalamazoo/Battle Creek MSA #3720			
# of Loans in LMI Census Tracts	% of Total Loans in LMI Census Tracts	# of Businesses in LMI Census Tracts	% of Total Business in LMI Census Tracts
70	24.4	2,051	31.2

Exhibit 91

Assessment Area	# of loans	\$ of loans	# of loans to small businesses	\$ of loans to small businesses
Kalamazoo	8 th	3 rd	10 th	4 th
Calhoun	5 th	5 th	12 th	5 th

Exhibit 92

1999 HMDA-RELATED LOANS IN AA BY BORROWER INCOME AND AS A PERCENTAGE OF TOTAL LOANS IN COMPARISON TO AREA DEMOGRAPHICS AND 1999 AGGREGATE DATA						
Borrower Income Classification	# of Families	% of Total Families	Bank One Within Kalamazoo/Battle Creek Assessment Area		Market Aggregate Within Detroit Assessment Area	
			Number of Originations	Percentage of Total Originations	Number of Originations	Percentage of Total Originations
Low – 0 to 49%	13,305	21.5	59	9.3	519	5.2
Moderate – 50 to 79%	9,828	15.9	150	23.6	1,363	13.6
Middle – 80 to 119%	13,375	21.6	154	24.2	3,151	31.4
Upper - > 120%	25,358	41.0	212	33.3	4,687	46.6
Income not Available			62	9.6	325	3.2
Total	61,866	100.0	637	100.0	10,045	100.0

Lansing/E. Lansing MSA #4040Geographic Distribution of Loans**Exhibit 93**

Lansing/E. Lansing MSA #4040 HMDA-related Loans (#s)											
Year	Low		Moderate		Middle		Upper		NA		Total
	#	%	#	%	#	%	#	%	#	%	#
1999	29	2.7	101	9.2	648	59.2	316	28.9	0	0.0	1,094
2000	10	2.1	47	9.7	328	67.6	100	20.6	0	0.0	485
Total	39	2.5	148	9.4	976	61.8	416	26.3	0	0.0	1,579

Exhibit 94

Lansing/E. Lansing MSA #4040 HMDA-related Loans (\$000s)											
Year	Low		Moderate		Middle		Upper		NA		Total
	\$	%	\$	%	\$	%	\$	%	\$	%	\$
1999	1,155	1.3	5,048	5.4	48,395	52.1	38,400	41.2	0	0.0	92,998
2000	947	3.0	2,139	6.6	20,874	64.9	8,213	25.5	0	0.0	32,173
Total	2,102	1.7	7,187	5.8	69,269	55.3	46,613	37.2	0	0.0	125,171

Exhibit 95

Lansing/E. Lansing MSA #4040 Small Business Loans (#s)											
Year	Low		Moderate		Middle		Upper		NA		Total
	#	%	#	%	#	%	#	%	#	%	#
1999	28	7.5	64	17.0	205	54.5	79	21.0	0	0.0	376
2000	13	5.2	32	12.8	138	55.2	67	26.8	0	0.0	250
Total	41	6.6	96	15.3	343	54.8	146	23.3	0	0.0	626

Exhibit 96

Lansing/E. Lansing MSA #4040 Small Business Loans (\$000s)											
Year	Low		Moderate		Middle		Upper		NA		Total
	\$	%	\$	%	\$	%	\$	%	\$	%	\$
1999	1,377	4.9	3,586	12.8	16,258	57.7	6,937	24.6	0	0.0	28,158
2000	2,431	9.3	3,766	14.3	13,143	50.0	6,944	26.4	0	0.0	26,284
Total	3,808	7.0	7,352	13.5	29,401	54.0	13,881	25.5	0	0.0	54,442

Exhibit 97

Lansing MSA	Owner-Occupied Units (Based on 1990 U. S. Census Data)		HMDA-Related Originations		% of Originations per 1,000 Owner-Occupied Units	
	Low-/Mod	Mid/Upper	Low-/Mod	Mid/Upper	Low-/Mod	Mid/Upper
2000	11,700	89,835	130	964	11.11	10.73
1999	11,700	89,835	57	428	4.87	4.76

Exhibit 98

1999 HMDA-Related LOANS IN AA BY GEOGRAPHY INCOME AND AS A PERCENTAGE OF TOTAL LOANS IN COMPARISON TO AREA DEMOGRAPHICS AND 1999 AGGREGATE DATA				
Census Tract Income Classification	# of Census Tracts	% of Total Census Tracts	Bank One Within Lansing/E. Lansing Assessment Area	Market Aggregate Within Detroit Assessment Area

			Number of Originations	Percentage of Total Originations	Number of Originations	Percentage of Total Originations
Low – 0 to 49%	10	8.6	29	2.7	556	2.9
Moderate – 50 to 79%	18	15.5	101	9.2	1,510	8.0
Middle – 80 to 119%	62	53.4	648	59.2	12,151	64.3
Upper - > 120%	26	22.4	316	28.9	4,676	24.8
Geo. Income not Available						
Total	116	100.0	1,094	100.0	18,893	100.0

Borrower and Small Business Distribution of Loans

Exhibit 99

Lansing/E. Lansing MSA #4040 HMDA-related Loans (#s)											
	Low		Moderate		Middle		Upper		NA		Total
Year	#	%	#	%	#	%	#	%	#	%	#
1999	75	6.9	196	17.9	295	27.0	377	34.5	151	13.7	1,094
2000	36	7.4	94	19.4	117	24.1	156	32.2	82	16.9	485
Total	111	7.0	290	18.4	412	26.1	533	33.8	233	14.7	1,579

Exhibit 100

Lansing/E. Lansing MSA #4040 HMDA-related Loans (\$000s)											
	Low		Moderate		Middle		Upper		NA		Total
Year	\$	%	\$	%	\$	%	\$	%	\$	%	\$
1999	3,033	3.3	11,462	12.3	22,936	24.7	45,165	48.6	10,402	11.1	92,998
2000	1,186	3.7	4,901	15.2	6,011	18.7	13,472	41.9	6,603	20.5	32,173
Total	4,219	3.4	16,363	13.1	28,947	23.1	58,637	46.8	17,005	13.6	125,171

Exhibit 101

1999

Small Business Originations	Loan Amount			
	Less than \$100K	\$100K - \$250K	\$250K - \$1mil	Total
# of loans	323	23	30	376
# with revenues <= \$1 MM	54	9	5	68
% of loans	16.7%	39.1%	16.7%	18.1%
\$ of loans	5,938	4,022	18,211	28,171
\$ with revenues <= \$1 MM	1,330	1,510	2,160	5,000
% of loans	22.4%	37.5%	11.9%	17.7%

Exhibit 102

2000

Small Business Originations	Loan Amount			
	Less than \$100K	\$100K - \$250K	\$250K - \$1mil	Total
# of loans	197	23	30	250
# with revenues <= \$1 MM	46	6	7	59
% of loans	23.3%	26.1%	23.3%	23.6%
\$ of loans	4,583	3,986	17,725	26,294
\$ with revenues <= \$1 MM	1,479	914	3,514	5,907
% of loans	32.3%	22.9%	19.8%	22.5%

Exhibit 103

Comparison of Loans and Businesses in LMI Census Tracts Lansing/E. Lansing MSA #4040			
# of Loans in LMI Census Tracts	% of Total Loans in LMI Census Tracts	# of Businesses in LMI Census Tracts	% of Total Business in LMI Census Tracts
137	21.9	2,052	18.2

Exhibit 104

1999 HMDA-RELATED LOANS IN A.A BY BORROWER INCOME AND AS A PERCENTAGE OF TOTAL LOANS IN COMPARISON TO AREA DEMOGRAPHICS AND 1999 AGGREGATE DATA						
Borrower Income Classification	# of Families	% of Total Families	Bank One Within Lansing/E. Lansing Assessment Area		Market Aggregate Within Detroit Assessment Area	
			Number of Originations	Percentage of Total Originations	Number of Originations	Percentage of Total Originations
Low – 0 to 49%	20,553	19.3	75	6.9	485	2.6
Moderate – 50 to 79%	18,958	17.8	196	17.9	1,359	7.2
Middle – 80 to 119%	26,268	24.7	295	27.0	12,168	64.4
Upper - > 120%	40,668	38.2	377	34.5	4,485	23.7
Income not Available			151	13.7	396	2.1
Total	106,447	100.0	1,094	100.0	18,893	100.0

Saginaw/Bay City/Midland MSA #6960

Geographic Distribution of Loans

Exhibit 105

Saginaw/Bay City/Midland Msa #6960 HMDA-related Loans (#s)											
Year	Low		Moderate		Middle		Upper		NA		Total
	#	%	#	%	#	%	#	%	#	%	#
1999	51	2.3	267	12.1	1,508	68.5	376	17.1	0	0.0	2,202
2000	27	3.0	112	12.2	630	68.8	146	16.0	0	0.0	915
Total	78	2.5	379	12.2	2,138	68.6	522	16.7	0	0.0	3,117

Exhibit 106

Saginaw/Bay City/Midland MSA #6960 HMDA-related Loans (\$000s)											
Year	Low		Moderate		Middle		Upper		NA		Total
	\$	%	\$	%	\$	%	\$	%	\$	%	\$
1999	2,392	1.6	12,422	8.3	103,748	69.2	31,292	20.9	0	0.0	149,854
2000	785	1.4	5,080	9.1	38,708	69.2	11,323	20.3	0	0.0	55,896
Total	3,177	1.5	17,502	8.5	142,456	69.3	42,615	20.7	0	0.0	205,750

Exhibit 107

Saginaw/Bay City/Midland MSA #6960 Small Business Loans (#s)											
Year	Low		Moderate		Middle		Upper		NA		Total
	#	%	#	%	#	%	#	%	#	%	#
1999	34	4.9	56	8.0	508	72.5	102	14.6	0	0.0	700
2000	13	3.8	32	9.2	250	72.0	52	15.0	0	0.0	347
Total	47	4.5	88	8.4	758	72.4	154	14.7	0	0.0	1,047

Exhibit 108

Saginaw/Bay City/Midland MSA #6960 Small Business Loans (\$000s)											
Year	Low		Moderate		Middle		Upper		NA		Total
	\$	%	\$	%	\$	%	\$	%	\$	%	\$
1999	1,166	2.7	1,201	2.8	34,020	79.6	6,367	14.9	0	0.0	42,754
2000	838	2.8	4,612	15.3	21,198	70.1	3,569	11.8	0	0.0	30,217
Total	2,004	2.7	5,813	8.0	55,218	75.7	9,936	13.6	0	0.0	72,971

Exhibit 109

Saginaw MSA	Owner-Occupied Units (Based on 1990 U. S. Census Data)		HMDA-Related Originations		% of Originations per 1,000 Owner-Occupied Units	
	Low-/Mod	Mid/Upper	Low-/Mod	Mid/Upper	Low-/Mod	Mid/Upper
2000	31,467	82,605	139	776	4.42	9.40
1999	31,467	82,605	318	1,884	10.11	22.81

Exhibit 110

1999 HMDA-Related LOANS IN AA BY GEOGRAPHY INCOME AND AS A PERCENTAGE OF TOTAL LOANS IN COMPARISON TO AREA DEMOGRAPHICS AND 1998 AGGREGATE DATA						
Census Tract Income Classification	# of Census Tracts	% of Total Census Tracts	Bank One Within Saginaw Assessment Area		Market Aggregate Within Detroit Assessment Area	
			Number of Originations	Percentage of Total Originations	Number of Originations	Percentage of Total Originations
Low – 0 to 49%	12	11.7	51	2.3	475	3.2
Moderate – 50 to 79%	21	20.4	267	12.1	2,073	14.1

Middle – 80 to 119%	54	52.4	1,508	68.5	9,069	61.6
Upper - > 120%	16	15.5	376	17.1	3,108	21.1
Total	103	100.0	2,202	100.0	14,725	100.0

Borrower and Small Business Distribution of Loans

Exhibit 111

Saginaw/Bay City/Midland MSA #6960 HMDA-related Loans (#s)											
Year	Low		Moderate		Middle		Upper		NA		Total
	#	%	#	%	#	%	#	%	#	%	#
1999	203	9.2	534	24.3	606	27.5	718	32.6	141	6.4	2,202
2000	85	9.3	200	21.9	239	26.1	324	35.4	67	7.3	915
Total	288	9.2	734	23.6	845	27.1	1,042	33.4	208	6.7	3,117

Exhibit 112

Saginaw/Bay City/Midland MSA #6960 HMDA-related Loans (\$000s)											
Year	Low		Moderate		Middle		Upper		NA		Total
	\$	%	\$	%	\$	%	\$	%	\$	%	\$
1999	7,027	4.7	27,917	18.6	40,465	27.0	66,086	44.1	8,359	5.6	149,854
2000	2,521	4.5	9,287	16.6	12,846	23.0	26,488	47.4	4,754	8.5	55,896
Total	9,548	4.6	37,204	18.1	53,311	25.9	92,574	45.0	13,113	6.4	205,750

Exhibit 113

1999

Small Business Originations	Loan Amount			
	Less than \$100K	\$100K - \$250K	\$250K - \$1mil	Total
# of loans	618	39	43	700
# with revenues <= \$1 MM	287	22	11	320
% of loans	46.4%	56.4%	25.6%	45.7%
\$ of loans	12,712	6,456	23,606	42,774
\$ with revenues <= \$1 MM	7,094	3,194	5,221	15,509
% of loans	55.8%	49.5%	22.1%	36.3%

Exhibit 114

2000

Small Business Originations	Loan Amount			
	Less than \$100K	\$100K - \$250K	\$250K - \$1mil	Total
# of loans	280	34	33	347
# with revenues <= \$1 MM	114	14	6	134
% of loans	40.7%	41.2%	18.2%	38.6%
\$ of loans	6,521	5,657	18,045	30,223
\$ with revenues <= \$1 MM	2,997	2,367	3,440	8,804

% of loans	46.0%	41.8%	19.1%	29.1%
------------	-------	-------	-------	-------

Exhibit 115

Comparison of Loans and Businesses in LMI Census Tracts Lansing/E. Lansing MSA #4040			
# of Loans in LMI Census Tracts	% of Total Loans in LMI Census Tracts	# of Businesses in LMI Census Tracts	% of Total Business in LMI Census Tracts
457	14.7%	628	6.3%

Exhibit 116

1999 HMDA-RELATED LOANS IN AA BY BORROWER INCOME AND AS A PERCENTAGE OF TOTAL LOANS IN COMPARISON TO AREA DEMOGRAPHICS AND 1999 AGGREGATE DATA						
Borrower Income Classification	# of Families	% of Total Families	Bank One Within Saginaw Assessment Area		Market Aggregate Within Detroit Assessment Area	
			Number of Originations	Percentage of Total Originations	Number of Originations	Percentage of Total Originations
Low - 0 to 49%	24,830	22.7	203	9.2	320	2.2
Moderate - 50 to 79%	17,625	16.1	534	24.3	1,768	12.0
Middle - 80 to 119%	23,993	22.0	606	27.5	9,783	66.4
Upper - > 120%	42,760	39.2	718	32.6	2,687	18.3
Income not Available			141	6.4	167	1.1
Total	109,208	100.0	2,202	100.0	14,725	100.0