



PUBLIC DISCLOSURE

August 31, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

TCF National Bank
Charter Number: 23253

2508 South Louise Avenue
Sioux Falls, South Dakota 57106

Office of the Comptroller of the Currency
Midsize Bank Supervision
425 S. Financial Place, Suite 1700
Chicago, IL 60605

NOTE: This document is an evaluation of this institution's 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, and should not 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

Overall CRA Rating.....	2
Description of Institution.....	3
Scope of the Evaluation.....	5
Discriminatory or Other Illegal Credit Practices Review.....	7
Multistate Metropolitan Statistical Area Rating.....	8
Illinois-Indiana-Wisconsin MMSA.....	8
State Rating.....	18
State of Arizona.....	18
State of Colorado.....	25
State of Michigan.....	34
State of Minnesota.....	42
State of South Dakota.....	55
State of Wisconsin.....	62
Appendix A: Scope of Examination.....	A-1
Appendix B: Summary of MMSA and State Ratings.....	B-1
Appendix C: Definitions and Common Abbreviations.....	C-1
Appendix D: Tables of Performance Data.....	D-1

Overall CRA Rating

Institution’s CRA Rating: This institution is rated **Outstanding**.

The following table indicates the performance level of TCF National Bank (TCF or Bank) with respect to the Lending, Investment, and Service Tests:

Performance Levels	TCF, National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	x		
High Satisfactory		x	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is primarily based on outstanding Lending Test rating in the Illinois-Indiana-Wisconsin Multistate Metropolitan Statistical Area (IL-IN-WI MMSA), the state of Minnesota, and the state of Michigan. In all of these rating areas TCF exhibited an excellent geographical and borrower distribution of loans. TCF community development (CD) loans were responsive to identified community needs.
- The Investment Test rating is primarily based on high satisfactory performance in the IL-IN-WI MMSA and outstanding performance in the state of Minnesota, and the state of Michigan. In the IL-IN-WI MMSA, TCF had a good level of CD investments as compared to allocated tier 1 capital. In the states of Minnesota and Michigan, TCF had an excellent level of CD investments as compared to tier 1 capital. TCF CD investments were responsive to identified community needs.
- The Service Test rating is primarily based on outstanding ratings in the IL-IN-WI MMSA, and the state of Minnesota, and a high satisfactory rating in the state of Michigan. Service delivery systems are readily accessible in the IL-IN-WI MMSA and the state of Minnesota and service delivery systems are accessible in the state of Michigan.

Lending in Assessment Area

An adequate percentage of the bank’s loans are in its assessment areas (AAs).

The bank originated and purchased 25.1 percent of its total loans inside the bank’s AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance

criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	15,613	32.9	31,849	67.1	47,462	3,519,507	38.3	5,659,547	61.7	9,179,054
Small Business	2,408	10.2	21,240	89.8	23,648	361,381	12.5	2,524,175	87.5	2,885,556
Small Farm	10	1.3	748	98.7	758	884	1.4	63,817	98.6	64,701
Total	18,031	25.1	53,837	74.9	71,868	3,881,772	32.0	8,247,539	68.0	12,129,311

Bank performance in lending inside their AA was considered in the geographical distribution of loans. This performance was given little weight when determining the overall rating. We gave little weight to this due to the fact that TCF has nationwide lending affiliates that originate loans that count towards the lending inside/outside of AA distribution calculation. Additionally, the bank's lending activity within their AAs was at least adequate in all full-scope AAs. Thus, the bank's performance in lending inside their AAs sufficiently met with their overall capacity to lend.

Description of Institution

TCF National Bank (TCF or the bank) is a midsize, full-service interstate bank with its main office located in Sioux Falls, South Dakota. TCF is a wholly-owned subsidiary of TCF Financial Corporation (TCFFC), a national bank holding company headquartered in Wayzata, Minnesota (now Detroit, Michigan). Affiliates of TCF under TCFFC include First of Huron Capital Trust and First Place Capital Trust, both headquartered in Wilmington, Delaware. TCF owns subsidiaries involved in commercial lending to borrowers outside the United States, consumer auto loans, inventory finance, life insurance, and joint ventures. Subsidiaries include TCF Commercial Finance LLC, TCF Inventory Finance Inc., TCF Investments Management Inc., TCF Agency Insurance Services Inc., and TCF Bank International Inc. Other notable affiliates in which TCF holds some ownership include Ludington West LLC, Larkin Parking Structure Condominium Association Inc., Pedcor Investments, and Mankato Townhomes LTD Partnership. TCF conducts commercial inventory and equipment financing and commercial leasing in all 50 states and, to a limited extent, in foreign countries. TCF Foundation, the philanthropic arm of TCF, provides charitable contributions to nonprofit organizations in education, human services, community development, affordable housing, and the arts. According to the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report dated June 30, 2019, TCF had deposits of \$19.3 billion. As of June 30, 2019, TCF's total assets were \$24.6 billion, net loans and leases were \$19.1 billion, and tier 1 capital was \$2.3 billion.

TCF is a full-service commercial bank with a focus on retail loan and deposit products and emphasis on customer convenience. TCF has an extensive branch network with some locations offering extended hours of operation, full-service supermarket branches, access to a sizeable automated teller machine (ATM) network, and digital banking channels. As of December 31, 2019, TCF operated 521 branch locations in eight states, consisting of 398 traditional branches (including staffed, seasonal, and drive-in branches), 120 supermarket branches, and 3 campus branches. TCF operated 236 branches in Michigan, 119 in Illinois, 86 in Minnesota, 32 in Colorado, 23 in Ohio, 17 in Wisconsin, 7 in Arizona, and one in South Dakota. TCF has a network of 686 deposit-taking ATMs.

As of June 30, 2019, net loans and leases represented 77.6 percent of TCF's assets. The loan portfolio, by dollar volume, consisted of 44.0 percent real estate loans, 33.2 percent commercial loans, 4.0 percent individual loans, 0.3 percent agricultural loans, and 15.6 percent other consumer and commercial loans and leases.

There are no known legal, financial, or other factors impeding TCF's ability to help meet credit needs in its AAs. TCF received a CRA rating of "Outstanding" at its last CRA evaluation dated December 31, 2016.

Scope of the Evaluation

Evaluation Period/Products Evaluated

TCF's evaluation period is January 1, 2017 through December 31, 2019. For the Lending Test we used the entire evaluation period to conclude on geographical and borrower distribution of loans. For all CD activities we used the evaluation period of August 8, 2017 through December 31, 2019 to evaluate performance. CD activities include all qualified CD loans, CD investments, and CD services.

TCF's Lending Test geographical and borrower distribution of loans was based on an assessment of HMDA and small loans to business. Home mortgage loans include all home purchase, home refinance, home improvement, and multifamily loans. We did not include small farm lending as part of this evaluation, due to the fact it is not a primary loan product in any of the bank's AAs. To be considered a primary loan product there must be at least 20 loans in an AA throughout an evaluation period.

With an evaluation period end date of December 31, 2019, qualifying activities performed in response to the significant impact of the Coronavirus Pandemic across the United States are not addressed in this evaluation. Bank qualifying activities will be considered in subsequent evaluations.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AA(s) within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) were combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state were combined and evaluated as a single area. These combined AAs have been evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating section for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings.

For our overall conclusions we gave the most weight to the state of Minnesota, the IL-IN-WI MMSA, and the state of Michigan, respectively. We gave the most weight to these rating areas due to the fact that they have the three largest bank-wide shares of deposits, home mortgage loans, small business loans, and branches. Combined, these three rating areas total 89.3 percent of deposits, 78.0 percent of HMDA loan originations, 74.8 percent of small business loan originations, and 83.1 percent of bank branches.

The MMSA and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each State and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Lending Test

For the geographic and borrower distribution, unless otherwise noted in the scope of a respective rating area, we gave more weight to the bank's HMDA lending performance. We gave more weight to the bank's performance in HMDA lending due to the fact that HMDA lending represents 86.6 percent of HMDA and small business loans originations and 89.1 percent of HMDA and small business loans volume throughout the evaluation period, within the bank's AAs.

For borrower distribution of small loans to businesses, TCF originates a majority of their small loans to businesses, 99.5 percent, through TCF Capital Solutions. TCF Capital Solutions is a nationwide business lender that does not use revenue to make its credit decisions in the majority of their loans, relying on other business factors instead. Revenues are not collected on loans less than \$350 thousand and therefore are reported as N/A for the income category. The bank does not have revenue information for over 60.0 percent of the small loans to businesses in their AAs. This business decision negatively impacts the bank's borrower distribution of small loans to businesses. Since there is no legal requirement for the bank to collect small business loan revenue information, we gave very little weight to small loans to businesses when determining borrower distribution ratings.

The bank also made significant CD lending outside their AA during the evaluation period. In total the bank originated 21 CD loans that benefitted the greater statewide or regional area, totaling 162.6 million. Of these loans, 16 were made to businesses constructing and renovating affordable housing totaling \$108.4 million. Four loans totaling \$21.2 million were made to businesses supporting small business economic development. One loan was made for \$32.9 million for revitalization and stabilization.

Investment Test

We considered investments TCF made outside of the bank's AAs because the bank was responsive to AA needs. During the evaluation period, TCF invested \$20.0 million in Low Income Housing Tax Credits (LIHTC) to support affordable housing needs in Florida. We also considered 90 prior period investments totaling \$25.5 million, which supported affordable housing needs in Illinois, Indiana, Iowa and Ohio. These investments consisted of LIHTCs, Mortgage Backed Securities (MBS), and equity funds.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution or any affiliate whose loans have been considered as part of the institution's lending performance has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

Multistate Metropolitan Statistical Area Rating

Illinois-Indiana-Wisconsin MMSA

CRA rating for the IL-IN-WI MMSA¹: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: High Satisfactory

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels exhibit good responsiveness to community credit needs;
- TCF exhibits excellent geographical and borrower distribution of loans;
- TCF has a low level of CD loans. CD loans are responsive to identified community needs and demonstrate complexity. CD lending had a neutral impact of the Lending Test rating;
- TCF has a significant level of qualified CD investments and grants. TCF CD investments are responsive to identified community needs and occasionally demonstrate complexity; and
- Service delivery systems are readily accessible to geographies and individuals of different income levels.

Description of Institution's Operations in IL-IN-WI MMSA

The bank's IL-IN-WI MMSA rating areas consists of the entire counties of Cook, Dekalb, DuPage, Kane, Kendall, Lake, McHenry, Will, and portions of Kankakee County in Illinois, Lake County in Indiana, and Kenosha County in Wisconsin. TCF exited the state of Indiana on October 31, 2017, when they removed their last deposit taking ATM. TCF had 125 bank branches and 182 deposit-taking ATMs in this AA. According to the June 30, 2019, FDIC Market Share Report, TCF had \$6.7 billion in deposits in the IL-IN-WI MMSA. The deposits in the IL-IN-WI MMSA account for 35.4 percent of TCF's bank wide deposits. Strong competition exists for financial services within the AA. The bank had a 1.6 percent deposit market share and ranked 12th out of 180 deposit-taking institutions, or among the top 6.7 percent of institutions in the AA. The five largest competitors, JPMorgan Chase Bank, National Association, BMO Harris Bank National Association, Bank of America, National Association, Fifth Third Bank, and The Northern Trust Company, have deposits totaling \$232.5 billion, representing 56.4 percent of the total deposit market share in the AA.

The bank's primary lending focus was on home mortgage loans. During the evaluation period, TCF originated 4,915 home mortgage loans totaling \$942.4 million within the IL-IN-WI MMSA. Home mortgage loans in the IL-IN-WI MMSA represented 31.5 percent of the bank wide home mortgage originations and 26.8 percent of the bank wide home mortgage loan volume. CRA small business loan originations and dollar volume in the AA represented 41.4 percent and 28.0 percent, respectively, of bank wide small business loan originations and dollar volume.

¹ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

The city of Chicago is a major economic center for the AA with economic drivers including financial services, logistics, and tourism. According to Moody's Analytics, top employers in the area include Advocate Health Care System, Northwestern Memorial Healthcare, Amita Health, and the University of Chicago. Significant exports of the city include computer and electronic products, chemicals, and transportation equipment. Educational attainment indicated that 66.0 percent of adults 25 and older in Chicago had completed some college or higher education, compared to 62.0 percent of adults in the entire US. The generation breakdown of Chicago is skewed younger with the largest age groups including Gen Z and Millennials. The population of Chicago has continued to decline, with a 2019 negative net migration of 53,134 residents. The percentage of families living below poverty level in the AA was 11.0 percent and 10.4 percent in 2017 and 2019, respectively. The unemployment rate for the AA was 5.8 percent in January 2017 and dropped throughout the evaluation period to 3.2 percent as of December 2019.

Community contacts conducted by the OCC and other regulatory entities indicated multiple banking and credit needs for the IL-IN-WI MMSA. One non-profit community contact who focuses on providing affordable housing solutions indicated the credit needs include access to affordable housing for LMI families displaced by gentrification, increased credit access for small businesses, and emergency personal loans that serve as alternatives to payday loans. Another community contact, a non-profit public housing agency, indicated a need for home improvement and rehabilitation loans for multifamily buildings, financial education and homebuyer counseling services for LMI borrowers, and increased outreach to underbanked LMI areas. Another community contacts that focuses on neighborhood revitalization indicated that economic conditions for LMI borrowers are stressed, considering reduced wages and employment opportunities.

Table A – Demographic Information of the Assessment Area						
Assessment Area: IL-IN-WI MMSA 2018-2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2,042	14.1	24.1	29.0	31.9	0.9
Population by Geography	8,778,060	10.1	23.9	31.6	34.1	0.3
Housing Units by Geography	3,485,631	10.4	22.9	31.6	34.8	0.3
Owner-Occupied Units by Geography	2,028,374	4.5	18.2	35.4	41.8	0.1
Occupied Rental Units by Geography	1,138,819	17.6	29.9	26.5	25.3	0.7
Vacant Units by Geography	318,438	22.0	27.9	25.6	24.0	0.5
Businesses by Geography	599,925	4.9	15.7	29.7	49.2	0.5
Farms by Geography	10,011	3.2	14.9	41.7	40.1	0.1
Family Distribution by Income Level	2,080,320	23.5	16.4	18.6	41.5	0.0
Household Distribution by Income Level	3,167,193	25.4	15.3	17.1	42.2	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		\$75,024	Median Housing Value			\$244,900
Median Family Income MSA - 20994 Elgin, IL		\$80,899	Median Gross Rent			\$1,050
Median Family Income MSA - 29404 Lake County-Kenosha County, IL-WI		\$87,137	Families Below Poverty Level			10.4%

Source: 2015 ACS and 2019 D&B Data

Due to rounding, totals may not equal 100.0%

(*) The NA category consists of geographies that have not been assigned an income classification.

Table A – Demographic Information of the Assessment Area						
Assessment Area: IL-IN-WI MMSA 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2,026	15.2	24.5	29.1	30.5	0.8
Population by Geography	8,651,140	10.5	24.0	31.7	33.4	0.3
Housing Units by Geography	3,467,446	11.0	23.1	31.6	34.0	0.3
Owner-Occupied Units by Geography	1,995,023	4.8	18.4	35.5	41.1	0.1
Occupied Rental Units by Geography	1,143,514	18.2	29.8	26.6	24.7	0.7
Vacant Units by Geography	328,909	23.6	28.3	25.0	22.7	0.4
Businesses by Geography	472,140	5.5	16.3	31.1	46.6	0.5
Farms by Geography	8,351	3.2	13.7	43.5	39.5	0.0
Family Distribution by Income Level	2,044,378	23.8	16.5	18.8	40.9	0.0
Household Distribution by Income Level	3,138,537	25.8	15.4	17.1	41.7	0.0
Median Family Income MSA - 16974 Chicago-Naperville-Arlington Heights, IL MD		\$75,350	Median Housing Value			\$234,363
Median Family Income MSA - 20994 Elgin, IL MD		\$79,687	Median Gross Rent			\$1,031
Median Family Income MSA - 23844 Gary, IN MD		\$64,075	Families Below Poverty Level			11.0%
Median Family Income MSA - 28100 Kankakee, IL MSA		\$63,716				
Median Family Income MSA - 29404 Lake County-Kenosha County, IL-WI MD		\$87,137				

Source: 2015 ACS and 2017 D&B Data
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification.

Scope of Evaluation in IL-IN-WI MMSA

The IL-IN-WI MMSA was analyzed as a full-scope AA. Within the IL-IN-WI MMSA HMDA lending accounted for 83.2 percent of total HMDA and small business loan originations and 88.6 percent of total HMDA and small business loan volume. All bank delineated AA's within this MMSA were combined and analyzed as the IL-IN-WI MMSA. There are two analysis period for the IL-IN-WI MMSA, 2017, and 2018 through 2019, due to TCF exiting operations in Indiana on October 31, 2017. We placed more weight on the bank's performance in geographic and borrower distribution of loans in 2018 through 2019, due to the fact that 75.2 percent of HMDA and small business loan originations occurred during this time period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN IL-IN-WI MMSA

LENDING TEST

The bank's performance under the Lending Test in the IL-IN-WI MMSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the IL-IN-WI MMSA is excellent.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
IL-IN-WI MMSA 2017	1,102	367	1	0*	1,470
IL-IN-WI MMSA 2018-2019	3,813	629	1	4	4,447

Dollar Volume of Loans (000's)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
IL-IN-WI MMSA 2017	\$157,107	\$40,940	\$16	0*	\$198,063
IL-IN-WI MMSA 2018-2019	\$785,331	\$80,171	\$16	\$23,059	\$888,577

*All CD loans included in 2018-2019 table.

According to the June 30, 2019, FDIC Deposit Market Share Report, TCF had \$6.7 billion in deposits in the IL-IN-WI MMSA with a 1.6 percent deposit market share. The bank's deposit market share ranked 12th out of 180 deposit-taking institutions within the MSA. The bank's deposit market share ranked in the top 6.7 percent for deposit market share in the AA.

According to 2019 peer mortgage data, the bank had a 0.7 percent market share of home mortgage loan originations. The bank's market share of home mortgage loans was weaker than their deposit market share. The bank ranked 35th out of 909 home mortgage lenders. The bank's home mortgage loan origination market share ranking was in the top 3.9 percent of all lenders in the AA. The bank's home mortgage market share ranking was stronger than their deposit market share ranking.

According to 2018 peer small business data, the bank had a 0.1 percent market share of small business loan originations. The bank's market share of small business loan originations was weaker than their deposit market share. The bank ranked 52nd out of 222 small business lenders in the AA. The bank's market share ranking was in the top 23.4 percent of all lenders originating small business loans. The bank's small business market share ranking was weaker than their deposit market share ranking.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the “MMSA” section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s home mortgage loan originations and purchases.

During the 2018 through 2019 evaluation period, the geographic distribution of home mortgage loans is excellent. The bank’s lending in low-income tracts as near to the percentage of owner-occupied housing units and exceeded aggregate industry distribution of home mortgage loans in low-income geographies. The bank’s lending in moderate-income tracts exceeded the percentage of owner-occupied housing units and the aggregate industry distribution of home mortgage loans in moderate-income geographies. The bank’s performance in 2017 was consistent with their performance from 2018 through 2019.

Small Loans to Businesses

Refer to Table Q in the “MMSA” section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s originations and purchases of small loans to businesses.

During the 2018 through 2019 evaluation period, the geographic distribution of small loans to businesses is excellent. The percentage of loans to small businesses in LMI geographies exceeded the percentage of businesses and aggregate industry distribution in those geographies. The bank’s performance in 2017 was consistent with their performance from 2018 through 2019.

Lending Gap Analysis

We reviewed supervisory data and other summary reports. We did not find any unexplained conspicuous gaps in the bank’s lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and business of different sizes.

Home Mortgage Loans

Refer to Table P in the “MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the institution’s home mortgage loan originations and purchases.

During the 2018 through 2019 evaluation period, the borrower distribution of home mortgage loans is excellent. The percentage of loans to low-income families was well below the percentage of low-income families and exceeded the aggregate industry distribution of home mortgage loans to those borrowers. The percentage of loans to moderate-income families exceeded the percentage of moderate-income families and aggregate industry distribution of home mortgage loans to those borrowers. The bank’s performance in 2017 was consistent with their performance from 2018 through 2019.

Small Loans to Businesses

Refer to Table R in the “MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the institution’s originations and purchases of small loans to businesses.

During the 2018 through 2019 evaluation period the borrower distribution of small loans to businesses is very poor.

The percentage of loans to small businesses was significantly below the percentage of small businesses and aggregate industry distribution of small loans to business.

Community Development Lending

The institution had a low level of CD loans. CD loans were responsive to community needs and exhibited complexity.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution’s level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

CD lending is adequate and had a neutral impact on the bank’s overall lending performance in the IL-IN-WI MMSA. The bank originated four CD loans totaling \$23.0 million, or 2.7 percent of allocated tier 1 capital. While CD lending volume was low, the bank was responsive to identified community needs in the AA. The bank partnered with municipalities to provide affordable housing solutions and provide needed community services. Additionally, the bank provided funding for CD loans whose projects were receiving LIHTCs. Additionally, the bank CD loans were innovative and complex. The majority of the CD loans, which totaled \$15.0 million, were for affordable housing projects. The remaining CD loan was for revitalization and stabilization.

Examples of the bank’s qualified CD lending activities in the AA include:

- TCF provided a total of \$8.0 million in credit facilities to an affordable housing program that was designed to provide long-term affordable financing for investor owned 1-4-unit buildings in Chicago neighborhoods that had suffered from foreclosure and abandonment during the Great Recession;
- A \$6.6 million loan for a project partnering with the City of Chicago to provide 44 affordable housing units for seniors and to help fund a new public library facility for the community; and
- A \$3.0 million LIHTC bridge loan to fund the rehabilitation of a 108-unit affordable housing complex.

Product Innovation and Flexibility

The institution makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. Flexible lending practices had a neutral impact on the bank’s overall Lending Test rating. Refer to the Overall CRA Rating section for details on bank-wide flexible lending programs.

INVESTMENT TEST

The institution’s performance under the Investment Test in IL-IN-WI MMSA is rated High Satisfactory.

Based on a full-scope review, the institution’s performance in the IL-IN-WI MMSA is good.

The institution has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits good responsiveness to credit and community economic development needs. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments and Grants										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
IL-IN-WI MMSA	60	\$17,544	108	\$18,209	168	99.4	\$35,753	99.4	0	\$0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The volume of qualified investments in the IL-IN-WI MMSA is good. During the evaluation period, TCF made 108 qualified investments and grants totaling \$18.2 million. In addition, the AA benefitted from the ongoing impact of 60 prior period investments totaling \$17.5 million. Total investments of \$35.8 million in the AA represent 4.2 percent of allocated tier 1 capital.

The institution exhibits good responsiveness to credit and community development needs. TCF’s investments were responsive to affordable housing needs. Some TCF CD investments exhibited complexity as detailed below.

Examples of investments made during the evaluation period include:

- TCF provided one equal equivalent investment (EQ2 - Community Loan Fund) for \$500 thousand that supported projects such as community facilities and social enterprises, lending programs to help stabilize LMI neighborhoods, and commercial real estate;
- TCF supported a need for affordable housing by providing a \$2.0 million investment in a Chicago-based Community Development Financial Institutions (CDFI). The Opportunity Investment Fund offers a new fund and loan product to create and preserve affordable units in strong housing markets;
- TCF continues to demonstrate responsiveness and leadership through the TCF Scholars Program. Within this AA, TCF invested \$467 thousand to support financial literacy education to LMI students;

- Two LIHTC bonds totaling \$7.9 million, to provide 44 units of affordable housing to various families. Of the 44 units, 30 will be designated for section 8 housing. This project is considered innovative and complex due to the multiple layers of public and private funding. TCF, with two other financial institutions, funded the LIHTC and the construction loan; and
- One LIHTC bond totaling \$5.0 million, to provide 108 units of affordable housing to various families. TCF was able to demonstrate complexity by providing the tax credit investment and also providing financing for the construction project.

SERVICE TEST

The institution’s performance under the Service Test in IL-IN-WI MMSA is rated Outstanding.

Based on a full-scope review, the institution’s performance in the IL-IN-WI MMSA is excellent.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution’s AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
IL-IN-WI MMSA	100.0	123	100.0	4.9	20.3	36.6	38.2	10.1	23.9	31.6	34.1

As of December 31, 2019, TCF has 123 branches located in the AA. Six branches are located in low-income geographies and 25 branches are located in moderate-income geographies. The percentage of branches located in low-income geographies is below the percentage of the population in low-income geographies. The percentage of branches in moderate-income geographies is near the population percentage in moderate-income geographies. TCF has 42 branches, representing 34.0 percent of total AA branches, located in middle- and upper-income geographies that are within one mile of, and serve customers residing in, LMI geographies. In total, customers living in LMI geographies visited these branches 273,960 times, representing 46.8 percent of total customer visits at these branches during the evaluation period. The total branches in LMI geographies combined with the nearby branches in middle- and upper-income geographies serving LMI individuals represents 59.3 percent of branches and exceeds the 34.0 percent of the population living in LMI geographies.

TCF operates 182 deposit-taking ATMs in the AA. Nine deposit-taking ATMs, representing 5.0 percent of the total, are located in low-income geographies and 31 deposit-taking ATMs, or 17.0 percent, are in moderate-income geographies. The percentage of ATMs in LMI geographies is comparable to the population percentage in those geographies.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
IL-IN-WI MMSA	2	5	0	0	-3	0

The institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, TCF closed one branch in a low-income geography and opened a new branch nearby in the same low-income geography. The branch was located in a grocery store. The grocery store closed and terminated TCF's lease. TCF made no changes in moderate-income geographies. TCF closed three branches in middle-income geographies due to insufficient business opportunities to support ongoing operations. TCF closed one branch in an upper-income geography and relocated operations to a new branch nearby in an upper-income geography.

Services, including where appropriate, business hours do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. The branches have similar business hours Monday through Saturday, regardless of the income level of the geography where the branch is located. There are also ten branches located in Jewel grocery stores that have Sunday business hours. These branches are distributed among different income level geographies, including LMI geographies.

TCF offers alternative delivery systems. Most notably, TCF offers a free digital banking platform that expands access to LMI geographies in the AA. Digital banking includes mobile and online banking, which provide the following services: bill pay, internal transfers, account-to-account transfers, budgeting, balance inquiries, and mobile deposits. TCF does not collect income information from customers as a requirement for enrolling in digital banking and therefore cannot provide data showing the impact of digital banking for LMI individuals. However, TCF was able to provide internal data showing the impact of the digital banking platform for LMI geographies during the evaluation period. In the AA, 39.2 percent of digital banking customers were located in LMI geographies. Additionally, 2.6 million transactions, representing 32.8 percent of total digital banking transactions, and 6.6 million digital banking sessions, representing 41.7 percent of total sessions, were conducted by customers living in LMI geographies. Digital banking usage by customers in LMI geographies compares favorably to demographic data that shows 34.0 percent of the population lives in LMI geographies.

In addition to deposit-taking ATMs and digital banking platforms mentioned above, TCF also offers a call center open six days per week and 24/7 telephone banking. However, bank management did not maintain information to determine their effectiveness in helping to meet the credit needs of LMI individuals. Therefore, these alternative delivery systems did not impact the assessment of retail delivery systems.

Community Development Services

The institution provides an adequate level of CD services.

In the AA, 20 employees provided 671 service hours to 14 different qualified community development organizations. The CD services supported affordable housing and community services to LMI individuals. Examples of TCF's CD services in the AA include, but are not limited to, the following:

- Ten employees provided 178 service hours focused on preparing LMI individuals for jobs in the financial services industry. TCF sponsored three bank visits for students during the evaluation period. Additionally, one employee served in a leadership role as a board director for this organization in 2018 and 2019; and
- Two employees provided 121 service hours for an affordable housing organization. The organization provides affordable housing for LMI families in the West Pullman and Greater Grand Crossing neighborhoods of Chicago. One bank employee is in a leadership role, serving on the finance committee. The other employee provides technical assistance for the organization's website.

State Rating

State of Arizona

CRA rating for the State of Arizona: Needs to Improve

The Lending Test is rated: Needs to Improve

The Investment Test is rated: Needs to Improve

The Service Test is rated: Needs to Improve

The major factors that support this rating include:

- Lending levels exhibit good responsiveness to community credit needs;
- The bank exhibits a poor geographic distribution of loans and a very poor borrower distribution of loans.
- TCF had an excellent level of CD loans as compared to allocated tier 1 capital. CD loans had a significantly positive impact on the Lending Test rating;
- TCF has a poor level of CD investments and grants; and
- Service delivery systems are reasonably accessible to geographies and individuals of different income levels.

Description of Institution's Operations in Arizona

As of December 31, 2019, TCF has one AA with the state of Arizona, the Phoenix-Mesa-Chandler MSA (Phoenix MSA). This AA is comprised of Maricopa County. This AA meets the requirements of the regulation and does not arbitrarily exclude LMI CTs. TCF had seven bank branches and seven deposit-taking ATMs in this AA. According to the June 30, 2019, FDIC Market Share Report, TCF had \$191.5 million in deposits in the Phoenix MSA. The deposits in the Phoenix MSA account for 1.0 percent of TCF's bank wide deposits. Strong competition exists for financial services within the AA. The bank had a 0.2 percent deposit market share and ranked 28th out of 62 deposit-taking institutions, or among the top 45.2 percent of institutions in the AA. The five largest competitors, JPMorgan Chase Bank, National Association, Wells Fargo Bank, National Association, Bank of America, National Association, Western Alliance Bank, and MUFG Union Bank, National Association, have deposits totaling \$83.3 billion, representing 77.2 percent of total deposit market share in the AA.

The bank's primary lending focus was on home mortgage loans. During the evaluation period, TCF originated 1,296 home mortgage loans totaling \$329.3 million within the Phoenix MSA. Home mortgage loans in the Phoenix MSA represented 8.3 percent of the total number of bank wide home mortgage originations and 9.4 percent of the total bank wide home mortgage loan dollar volume. CRA small business loan originations and dollar volume in the AA represent 8.5 percent and 24.2 percent, respectively, of bank wide small business loan originations and dollar volume.

The city of Phoenix is a major economic center for the AA with economic drivers including financial services and is a retiree destination. According to Moody's Analytics, top employers in the area include Banner Health System, Wal-Mart Stores Inc, Wells Fargo, and Arizona State University. Significant

exports of the city include computer and electronic products and transportation equipment. Educational attainment indicated that 65.0 percent of adults 25 and older in Phoenix had completed some college or higher education, compared to 62.0 percent of adults nationwide. The generation breakdown of Phoenix is skewed younger with the largest age groups including Gen Z and Millennials. The population of Phoenix has continued to grow, with a 2019 positive net migration of 77,664 residents. The percentage of families living below poverty level in the AA was 12.6 percent in 2019. The unemployment rate for the AA was 4.6 percent in January 2017 and dropped to 3.6 percent as of December 31, 2019.

Community contacts conducted by the OCC and other regulatory entities indicated multiple banking and credit needs for the MSA. These community contacts included a neighborhood stabilization program that seeks to improve the living conditions of LMI people. Additionally, a Phoenix area coalition that seeks to provide homeownership solutions and improve community services to LMI people. Credit needs and community development opportunities included development of affordable housing and workplace housing, start-up loans for small businesses, small dollar consumer loans to serve as an alternative to payday loans, increased access to affordable deposit accounts, and financial education being available to borrowers. Community contacts indicated that economic conditions including wages and employment opportunities have been steadily improving particularly for LMI borrowers; however, affordable housing is limited and housing inventory in general is constrained.

Table A – Demographic Information of the Assessment Area

Assessment Area: Phoenix MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	916	11.5	22.5	31.2	33.4	1.4
Population by Geography	4,018,143	11.1	22.9	31.3	34.4	0.3
Housing Units by Geography	1,668,555	9.8	23.4	33.3	33.4	0.1
Owner-Occupied Units by Geography	875,327	4.6	18.8	34.7	41.9	0.0
Occupied Rental Units by Geography	567,191	17.1	29.4	31.2	21.9	0.3
Vacant Units by Geography	226,037	11.8	25.6	33.2	29.3	0.2
Businesses by Geography	419,998	6.2	15.9	28.4	48.9	0.5
Farms by Geography	7,681	6.1	18.0	29.4	46.2	0.3
Family Distribution by Income Level	945,115	21.8	16.9	19.2	42.2	0.0
Household Distribution by Income Level	1,442,518	23.3	16.3	17.7	42.7	0.0
Median Family Income MSA - 38060 Phoenix-Mesa-Chandler, AZ MSA		\$63,686	Median Housing Value			\$203,811
			Median Gross Rent			\$993
			Families Below Poverty Level			12.6%

Source: 2015 ACS and 2019 D&B Data

Due to rounding, totals may not equal 100.0%

(*) The NA category consists of geographies that have not been assigned an income classification.

Scope of Evaluation in Arizona

In the state of Arizona, we analyzed the Phoenix MSA as a full-scope AA. Within the Phoenix MSA, HMDA lending accounted for 86.4 percent of total HMDA and CRA small business loan originations and 75.9 percent of HMDA and small business loan volume.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ARIZONA

LENDING TEST

The bank's performance under the Lending Test in Arizona is rated Needs to Improve.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Phoenix MSA is poor.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Phoenix MSA	1,296	204	1	2	1,503	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans* (000's)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State*	%State Deposits
Phoenix MSA	\$329,297	\$104,551	\$37	\$35,257	\$469,142	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

According to the June 30, 2019, FDIC Deposit Market Share Report, TCF had approximately \$191.5 million in deposits in the Phoenix MSA with a 0.2 percent deposit market share. The bank's deposit market share ranked 28th out of 62 deposit-taking institutions within the MSA. The bank's deposit market share ranked in the top 45.2 percent for deposit market share in the AA.

According to 2019 peer mortgage data, the bank had a 0.3 percent market share of home mortgage loan originations. The bank's market share of home mortgage loans was stronger than their deposit market share. The bank ranked 75th among 900 home mortgage lenders. The bank's home mortgage loan origination market share ranking was in the top 8.3 percent of all lenders in the AA. The bank's home mortgage market share ranking was stronger than their deposit market share ranking.

According to 2018 peer small business data, the bank had a 0.1 percent market share of small business loan originations. The bank's market share of small business loan originations was weaker than their deposit market share. The bank ranked 54th out of 195 small business lenders in the AA. The bank's

market share ranking was in the top 27.7 percent of all lenders originating small business loans. The bank's small business market share ranking was stronger than their deposit market share ranking.

Distribution of Loans by Income Level of the Geography

The bank exhibits a poor geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the state of Arizona section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans is very poor. The percentage of home mortgage loans to LMI geographies was significantly below the percentage of owner-occupied housing and aggregate industry distribution of home mortgage loans in those geographies.

Small Loans to Businesses

Refer to Table Q in the state of Arizona section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is excellent. The percentage of loans to small businesses in LMI geographies exceeded the percentage of businesses and aggregate industry distribution of small loans to businesses in those geographies.

Lending Gap Analysis

We reviewed supervisory data and other summary reports. We did not find any unexplained conspicuous gaps in the bank's lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a very poor distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P in the state of Arizona section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans is very poor. The percentage of loans to LMI borrowers was significantly below the percentage of LMI families and aggregate industry distribution of home mortgage loans to those borrowers.

Small Loans to Businesses

Refer to Table R in the state of Arizona section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The borrower distribution of small loans to businesses is very poor.

The percentage of loans to small businesses was significantly below the percentage of small business and aggregate industry distribution of small loans to businesses.

Community Development Lending

The institution is a leader in making CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

CD lending is excellent and had a significantly positive impact on the bank's overall lending performance in the Phoenix AZ MSA AA. The bank originated two CD loans totaling \$35.3 million. CD loans are equivalent to 17.3 percent of allocated tier 1 capital. CD lending is responsive to AA needs with one CD loan dedicated to economic development, and the other loan dedicated to affordable housing.

Examples of the bank's qualified CD lending activities in the AA include:

- TCF provided a \$10.3 million credit facility to support economic development in the Salt River Pima-Maricopa Indian Reservation; and
- A \$25.0 million loan to aid with the construction of a 257 multifamily/retail space in the City of Phoenix with designated affordable housing units.

Product Innovation and Flexibility

The institution makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. Flexible and innovative lending practices had a neutral impact on the bank's overall Lending Test rating. Refer to the Overall CRA Rating section for details on bank-wide flexible lending programs.

INVESTMENT TEST

The bank's performance under the Investment Test in Arizona is rated Needs to Improve.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Phoenix MSA is poor.

The institution has a poor level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits poor responsiveness to credit and community economic development needs. The institution does not use innovative and/or complex investments to support CD initiatives.

Qualified Investments and Grants										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Phoenix MSA	1	\$533	14	\$1,143	15	100.0	\$1,676	100.0	0	\$0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

During the evaluation period, TCF made 14 qualified investments and grants totaling \$1.1 million. In addition, the AA benefitted from the ongoing impact of one prior period investment totaling \$533 thousand. The total of \$1.7 million in CD investments represents 0.8 percent of allocated tier 1 capital.

The bank's qualified investments in the AA included two MBS totaling \$471 thousand containing mortgage loans that were extended to LMI borrowers throughout the AA.

TCF provided grants through the TCF Scholars Program. Within this AA, TCF invested \$127 thousand to support financial literacy education to LMI students. TCF's grants focused on community service initiatives.

SERVICE TEST

The bank's performance under the Service Test in Arizona is rated Needs to Improve.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Phoenix MSA is poor.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Phoenix MSA	100.0	7	100.0	0.0	14.3	28.6	57.1	11.1	22.9	31.3	34.4

As of December 31, 2019, TCF operates seven branches and seven deposit taking ATMs in the Phoenix AA. One branch and one deposit-taking ATM are located in a moderate-income geography and none are in low-income geographies. The percentage of branches and deposit-taking ATMs in LMI geographies was below the percentage of population in those geographies. However, TCF has four branches in middle- or upper-income geographies which are within one mile of, and serve customers that reside in, LMI geographies. TCF provided internal data showing customers living in LMI geographies visited

these branches a total of 14,655 times, representing 38.7 percent of total customer visits to these branches during the evaluation period. The total branches in LMI geographies combined with the nearby branches in middle- and upper-income geographies serving LMI individuals represents 71.4 percent of branches and exceeds the 34.0 percent of the population living in LMI geographies.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Phoenix MSA	0	0	0	0	0	0

TCF did not open or close any branches in the Phoenix AA during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. Bank branches have normal business hours and are open six days a week. Branch hours and services are consistent across the branches, regardless of the CT income level where the branch is located.

TCF offers alternative delivery systems. Most notably, TCF offers a free digital banking platform that expands access to LMI geographies in the AA. Digital banking includes mobile and online banking, which provide the following services: bill pay, internal transfers, account-to-account transfers, budgeting, balance inquiries, and mobile deposits. TCF does not collect customer income information from customers as a requirement for enrolling in digital banking and therefore cannot provide data showing the impact of digital banking for LMI individuals. However, TCF was able to provide internal data showing the impact of the digital banking platform for LMI geographies during the evaluation period. In the Phoenix AA, 34.6 percent of digital banking customers were located in LMI geographies. Additionally, 87.1 thousand transactions, representing 29.6 percent of total digital banking transactions, and 233.3 thousand digital banking sessions, representing 35.9 percent of total sessions, were conducted by customers living in LMI geographies. Digital banking usage by customers in LMI geographies compares well to demographic data that shows 34.0 percent of the population lives in LMI geographies.

In addition to deposit-taking ATMs and digital banking platforms mentioned above, TCF also offers a call center open six days per week and 24/7 telephone banking. However, bank management did not maintain information to determine their effectiveness in helping to meet the credit needs of LMI individuals. Therefore, these alternative delivery systems did not impact the assessment of retail delivery systems.

Community Development Services

The institution provides few, if any, CD services.

During the evaluation period, seven TCF employees provided 14 service hours to three qualified CD organizations benefiting the Phoenix AA. This performance is very poor based on the opportunities in the AA. TCF employees shared their financial expertise by teaching financial literacy courses targeted to LMI high school students.

State Rating

State of Colorado

CRA rating for the State of Colorado: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Outstanding

The major factors that support this rating include:

- TCF's lending levels reflect good responsiveness to community credit needs;
- TCF exhibits good geographical and borrower distribution of loans;
- TCF did not make any CD loans in the Denver CSA. CD lending performance had a negative impact on the Lending Test rating in Colorado;
- The institution has a significant level of qualified CD investments and grants, occasionally in a leadership position. TCF exhibits good responsiveness to community needs and occasionally demonstrates complexity in their CD investments; and
- Service delivery systems are readily accessible to geographies and individuals of different income levels. TCF provided a good level of CD services, sometimes in a leadership position.

Description of Institution's Operations in Colorado

As of December 31, 2019, the bank had two AAs within the state of Colorado. These AAs include the Denver-Aurora CSA (Denver CSA) and the Colorado Springs MSA. All the AAs meet the requirements of the regulation and do not arbitrarily exclude any LMI Census Tracts (CT). TCF offers a full range of loan and deposit products and services through 32 full-service branches and 34 deposit taking ATMs in the Colorado Springs MSA and the Denver CSA. According to the June 30, 2019, FDIC Deposit Market Share Report, TCF held \$1.1 billion in statewide deposits and ranked 15th in the state, representing 1.1 percent market share. During the evaluation period, 5.9 percent of total deposits and 10.4 percent of loans were from Colorado.

Denver CSA

The Denver CSA is comprised wholly of the Denver-Aurora-Lakewood MSA and a portion of the Boulder MSA. The Denver CSA consists of Boulder County, Adams County, Arapahoe County, Broomfield County, Denver County, Douglas County, and Jefferson County. Strong competition exists for financial services within the Denver CSA. According to the June 30, 2019, FDIC Deposit Market Share Report, TCF ranked 15th of the 70 depository financial institutions in the AA, with \$945.8 million in deposits and 1.0 percent market share. TCF has 24 full-service branches and 26 deposit taking ATMs in the AA. Competition includes large national banks, large regional banks and small state banks. The five largest competitors include: Wells Fargo Bank, National Association, FirstBank, US Bank, National Association, JPMorgan Chase Bank, National Association, and KeyBank, National Association. These

competitors have deposits totaling \$67.5 billion, representing 68.9 percent of total deposit market share. TCF’s deposits within the Denver CSA accounts for 4.9 percent of bank wide deposits.

The bank’s primary lending focus was on home mortgage loans. During the evaluation period, TCF originated 1,432 home mortgage loans totaling \$365.3 million within the Denver CSA. Home mortgage loans in the Denver CSA represented 9.2 percent of the total number of bank wide home mortgage originations and 10.4 percent of the total bank wide loan volume.

The Denver CSA is major economic center for the state of Colorado. Major economic drivers include government services, healthcare, tourism, and professional business services. According to Moody’s analytics, top area employers include University of Colorado Hospital, Children’s Hospital, United Airlines, Lockheed Martin, and Comcast. The population has increased throughout the evaluation period by approximately 3.7 percent. Throughout the evaluation period the cost of buying a single-family home has increased by 12.5 percent. The unemployment rate in January 2017 was 3.1 percent and as of December 2019 was 2.1 percent.

Community contacts conducted by the OCC and other regulatory entities indicated multiple banking and credit needs for the Denver CSA. Our community contacts included an economic development council that’s dedicated to the economic prosperity of the AA. We also utilized a contact with a statewide agency that endeavors to find solutions to provide affordable housing for LMI people. Credit needs and community development opportunities included construction of affordable housing, start-up financing for small businesses, reduction of homelessness, skilled workforce development, and rental housing for middle income residents. Community contacts indicated that economic conditions are stable but have issues including wages not meeting inflation, an aging population with reduced access to affordable housing, rental rates and housing prices sharply increasing, and a fast-growing population within the CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Denver-Aurora CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	673	8.3	23.9	33.6	33.0	1.2
Population by Geography	2,959,219	8.6	24.2	33.8	33.4	0.1
Housing Units by Geography	1,202,662	8.3	23.6	35.2	32.8	0.0
Owner-Occupied Units by Geography	716,247	4.5	18.8	35.1	41.5	0.0
Occupied Rental Units by Geography	425,829	14.3	31.6	35.3	18.8	0.0
Vacant Units by Geography	60,586	11.2	25.1	35.7	28.0	0.0
Businesses by Geography	405,007	6.3	19.5	32.8	41.2	0.3
Farms by Geography	7,745	7.3	19.4	32.8	40.1	0.4
Family Distribution by Income Level	715,893	21.5	17.4	20.3	40.8	0.0
Household Distribution by Income Level	1,142,076	23.8	16.4	17.9	41.9	0.0
Median Family Income MSA - 14500 Boulder, CO MSA		\$96,926	Median Housing Value			\$293,480
Median Family Income MSA - 19740 Denver-Aurora-Lakewood, CO MSA		\$80,820	Median Gross Rent			\$1,089
			Families Below Poverty Level			7.9%

Source: 2015 ACS and 2019 D&B Data

Due to rounding, totals may not equal 100.0%

(*) The NA category consists of geographies that have not been assigned an income classification.

Scope of Evaluation in Colorado

With the state of Colorado, we analyzed the Denver CSA as a full-scope AA. We combined applicable bank delineated MSAs for analysis into the Denver CSA. The Colorado Springs MSA was analyzed a limited-scope AA. Within the AAs in the state of Colorado, the Denver CSA accounted for 88.7 percent and 88.0 percent of HMDA and small business loan originations, respectively.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN COLORADO

LENDING TEST

The bank's performance under the Lending Test in Colorado is rated Low Satisfactory.

Conclusions for Area a Receiving Full-Scope Review

Based on a full-scope review, the bank's performance in the Denver CSA is good.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Colorado Springs MSA	182	32	0	1	215	11.4	17.1
Denver CSA	1,432	235	1	0	1,668	88.6	82.9

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Colorado Springs MSA	\$73,641	\$3,207	\$0	\$10,745	\$396,130	45.0	17.1
Denver CSA	\$365,253	\$30,877	\$50	\$0	\$483,773	55.0	82.3

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

According to the June 30, 2019, FDIC Deposit Market Share Report, TCF had \$946.8 million in deposits in the Denver CSA with a 1.0 percent deposit market share. The bank's deposit market share

ranked 15th out of 70 deposit-taking institutions within the Denver CSA. The bank's deposit market share ranked in the top 21.4 percent for deposit market share in the AA.

According to 2019 peer mortgage data, the bank had a 0.3 percent market share of home mortgage originations in the Denver CSA. The bank's market share of home mortgage loans was weaker than their deposit market share ranking. The bank ranked 67th of 724 home mortgage lenders. The bank's home mortgage loan origination ranking was in the top 7.6 percent of all lenders in the Denver CSA. The bank's home mortgage market share ranking was stronger than their deposit market share ranking.

According to 2018 peer small business data, the bank had a 0.1 percent market share of small business loan originations. The bank's market share of small business loan originations was weaker than their deposit market share. The bank ranked 59th of 212 small business lenders in the Denver CSA. The bank's market share ranking was in the top 27.8 percent of all lenders originating small business loans. The bank's small business market share ranking was weaker than their deposit market share ranking.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AAs.

Home Mortgage Loans

Refer to Table O in the state of Colorado section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage lending in LMI geographies is good. The percentage of home mortgage loans in low-income geographies exceeded the percentage of owner-occupied housing and the aggregate industry distribution of home mortgage loans to those geographies. The percentage of loans in moderate-income geographies is somewhat near to the percentage of owner-occupied housing and aggregate industry distribution of home mortgage loans in moderate-income geographies.

Small Loans to Businesses

Refer to Table Q in the state of Colorado section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

During the evaluation period, the distribution of small loans to businesses in LMI geographies is excellent. The proportions of the bank's small loans to businesses in LMI geographies exceeded the proportion of businesses and the aggregate industry distribution of small loans to businesses in those geographies.

Lending Gap Analysis

We reviewed supervisory data and other summary reports. We did not find any unexplained conspicuous gaps in the bank's lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P in the state of Colorado section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The bank's borrower distribution of home mortgage loans to LMI borrowers is good. The percentage of home mortgage loans to low-income borrowers was well below the proportion of low-income families. The percentage of home mortgage loans to low-income families exceeded the aggregate industry distribution of home mortgage loans to those borrowers. The percentage of home mortgage loans to moderate-income borrowers approximates the percentage of moderate-income families and was near to the aggregate industry distribution of home mortgage loans to those borrowers.

Small Loans to Businesses

Refer to Table R in the state of Colorado section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

During the evaluation period, the distribution of the bank's loans to small businesses by revenue is very poor. The percentage of small loans to businesses was well below the percentage of small businesses and the aggregate industry distribution of loans to those businesses.

Community Development Lending

The institution has made few, if any, CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank did not make any CD loans in the Denver CSA throughout the evaluation period. The bank's CD loan performance had a negative impact on the Lending Test rating in Colorado.

Product Innovation and Flexibility

The institution makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. Flexible and innovative lending practices had a neutral impact on the bank's overall Lending Test rating. Refer to the Overall CRA Rating section for details on bank-wide flexible lending programs.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Colorado Springs MSA is stronger than the bank's overall performance under the Lending Test in the full-scope area(s). The bank's performance in limited-scope AA's had a positive impact on the lending test rating.

Refer to Tables O through R in the state of Colorado section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Colorado is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review the bank's performance in the Denver CSA is good.

The institution has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits good responsiveness to credit and community economic development needs. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments and Grants										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Colorado Springs MSA	8	\$580	5	\$256	13	15.5	\$836	8.8	0	\$0
Denver CSA	21	\$2,412	60	\$6,172	81	83.5	\$8,584	91.1	0	0
Statewide	1	\$5	0	\$0	1	1.0	\$5	0.1	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Denver CSA

TCF had a good level of qualified investments and grants. During the evaluation period, TCF made 60 qualified investments and grants totaling \$6.2 million in the Denver CSA. In addition, the AA benefitted from the ongoing impact of 21 prior period investments totaling \$2.4 million. These qualified investments represent 4.5 percent of allocated tier 1 capital.

The institution exhibits good responsiveness to credit and community economic development needs. Some TCF CD investments exhibited complexity. Some noteworthy examples of CD investments and grants made during the evaluation period include:

- TCF made a \$5.8 million LIHTC investment to support the construction of a 49-unit affordable housing development in Denver, CO. This project was part of a larger redevelopment of a former hospital site by the Denver Urban Renewal Authority (DURA);
- To support financial literacy education for LMI students, TCF made two grants totaling \$38 thousand; and
- At the end of our evaluation period, there were two equal equity investments (EQ2) still outstanding with a book value of \$400 thousand. These EQ2 investments were made to two CDFIs to support affordable housing.

Investments – Colorado Statewide

When considering the investments made in the AAs in the state, along with this investment in the greater Colorado statewide area, this performance had a neutral impact on the overall Investment test rating in the state. TCF had one prior period CD investment in a MBS totaling \$5 thousand, which consisted of mortgage loans that were extended to LMI borrowers.

Conclusions for Area Receiving A Limited-Scope Review

Based on Limited-Scope Review, the bank’s performance under the Investment Test in the Colorado Springs MSA is consistent with the bank’s overall performance under the Investment Test in the full-scope area.

SERVICE TEST

The bank’s performance under the Service Test in Colorado is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on full-scope review, the bank’s performance in the Denver CSA is excellent.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution’s AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits % of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Branches Location of Branches by Income of Geographies (%)				Population % of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
	Colorado Springs MSA	17.1	8	25.0	12.5	12.5	37.5	37.5	4.7	26.8	39.7
Denver CSA	82.9	24	75.0	4.2	29.2	33.3	33.3	8.6	24.2	33.8	33.4

As of December 31, 2019, TCF operates 24 branches in the Denver CSA. One branch is located in a low-income geography and seven branches are located in a moderate-income geography. The percentage of branches in low-income geographies was well below the percentage of the population in those geographies. The percentage of branches in moderate-income geographies exceeded the percentage of the population in those geographies. Additionally, TCF has 12 branches in middle- or upper-income geographies which are within one mile of, and serve customers that reside in, LMI geographies. TCF provided internal data showing customers living in LMI geographies visited these branches a total of 48,458 times, representing 50.4 percent of total customer visits to these branches during the evaluation period. The total branches in LMI geographies combined with the nearby branches in middle- and

upper-income geographies serving LMI individuals represents 83.3 percent of branches and exceeds the population percentage living in LMI geographies.

Additionally, TCF operates 26 deposit-taking ATMs in the AA. One deposit-taking ATM, representing 3.9 percent of the total, is located in a low-income geography and eight deposit-taking ATMs, or 30.8 percent, are in moderate-income geographies

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Colorado Springs MSA	0	0	0	0	0	0
Denver CSA	0	2	0	0	-2	0

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. TCF did not open or close any branches in LMI geographies in the Denver AA during the evaluation period. TCF closed two branches in middle-income geographies due to business decisions based on lower activity that did not justify continued operation.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. Bank branches have normal business hours and are open six days a week. Branch hours and services are consistent across the branches, regardless of the income level of the geography where the branch is located.

TCF offers alternative delivery systems. Most notably, TCF offers a free digital banking platform that expands access to LMI geographies in the AA. Digital banking includes mobile and online banking, which provide the following services: bill pay, internal transfers, account-to-account transfers, budgeting, balance inquiries, and mobile deposits. TCF does not collect income information from customers as a requirement for enrolling in digital banking and therefore cannot provide data showing the impact of digital banking for LMI individuals. However, TCF was able to provide internal data showing the impact of the digital banking platform for LMI geographies during the evaluation period. In the Denver AA, 44.3 percent of digital banking customers were located in LMI geographies. Additionally, 343.6 thousand transactions, representing 38.9 percent of total digital banking transactions, and 958.5 thousand digital banking sessions, representing 46.3 percent of total sessions, were conducted by customers living in LMI geographies. Digital banking usage by customers in LMI geographies compares well to demographic data that shows 32.8 percent of the population lives in LMI geographies.

In addition to deposit-taking ATMs and digital banking platforms mentioned above, TCF also offers a call center open six days per week and 24/7 telephone banking. However, bank management did not maintain information to determine their effectiveness in helping to meet the credit needs of LMI individuals. Therefore, these alternative delivery systems did not impact the assessment of retail delivery systems.

Community Development Services

The institution provides a good level of CD services.

During the evaluation period, 30 TCF employees provided 556 service hours to six qualified CD organizations benefiting the Denver AA. CD service hours benefited organizations providing community services to LMI individuals and affordable housing. TCF CD services exhibited some leadership qualities. Examples of TCF's CD services in the AA include, but are not limited to, the following:

- Twenty-one TCF employees provided 460 hours teaching financial literacy courses targeted to LMI elementary and middle students in three Denver schools; and
- One employee provided 45 service hours by serving on the advisory committee to a CDFI providing affordable housing at 14 multifamily complexes around the Denver area.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Colorado Springs MSA is consistent with the bank's overall performance under the Service Test in the full-scope area.

State Rating

State of Michigan

CRA rating for the State of Michigan: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending activity exhibits adequate responsiveness to the credit needs of the community;
- TCF exhibits excellent geographical and good borrower distribution of loans;
- The institution has made a relatively high-level of CD loans. CD loans had a positive impact on the Lending Test rating;
- The institution has an excellent level of qualified CD investments and grants. The institution exhibits excellent responsiveness to credit and to community credit needs. The institution makes extensive use of innovative and/or complex investments; and
- Service delivery systems are accessible to geographies and individuals of different income levels.

Description of Institution's Operations in Michigan

As of December 31, 2019, TCF has one AA within the state of Michigan, the Detroit-Warren-Ann Arbor CSA (Detroit CSA). The AA consists of the entire counties of Lapeer, Livingston, Macomb, Oakland, St. Claire, Washtenaw, and Wayne. This AA meets the requirements of the regulation and does not arbitrarily exclude LMI CTs. TCF had 50 bank branches and 63 deposit-taking ATMs in this AA. According to the June 30, 2019, FDIC Deposit Market Share Report, TCF had \$3.6 billion in deposits in the Detroit CSA. The deposits in the Detroit CSA account for 18.7 percent of TCF's bank wide deposits. Strong competition exists for financial services within the AA. The bank had a 2.4 percent market share of deposits and ranked 10th out of 47 deposit-taking institutions, or among the top 21.3 percent of institutions in the AA. The five largest competitors, JPMorgan Chase Bank, National Association, Comerica Bank, Bank of America, National Association, PNC Bank, National Association, and Flagstar Bank, FSB, have deposits totaling \$109.0 billion, representing 72.5 percent of total deposit market share in the AA.

The bank's primary lending focus was on home mortgage loans. During the evaluation period, TCF originated 3,149 home mortgage loans totaling \$747.4 million within the Detroit CSA. Home mortgage loans in the Detroit CSA represented 20.2 percent of the total number of bank wide home mortgage originations and 21.2 percent of the total bank wide home mortgage loan dollar volume. CRA small business loan originations and dollar volume in the AA represent 23.8 percent and 27.5 percent, respectively, of bank wide small business loan originations and dollar volume.

The city of Detroit is a major economic center for the AA with economic drivers including manufacturing, medical services, and logistics. According to Moody’s Analytics, top employers in the area include General Motors Corporation, Ford Motor Company, the University of Michigan, and Chrysler Group LLC. Significant exports of the city include transportation equipment and machinery. Educational attainment indicated that 57.0 percent of adults 25 and older in Detroit had completed some college or higher education, compared to 62.0 percent of adults in the entire US. The generation breakdown of Detroit is skewed younger with the largest age groups including Gen Z and Millennials. The population of Detroit has continued to decline, with a 2019 negative net migration of 9,519 residents. The percentage of families living below poverty level in the AA was 12.4 percent in 2019. The unemployment rate for the AA was 5.5 percent in January 2017 and 4.0 percent as of December 2019.

Community contacts conducted by the OCC and other regulatory entities indicated multiple banking and credit needs for the CSA. We contacted a community housing agency that focuses on improving the lives of those living in poverty. We also utilized a contact from an Oakland County organization that focuses on economic development by promoting business growth through investments in small businesses. Credit needs and community development opportunities included home rehabilitation loans particularly for LMI families, investments in LMI neighborhoods to improve real estate values, small loans to small businesses, and financial education and counseling for both LMI and small business borrowers. Community contacts indicated that economic conditions are hampered by a lack of a skilled workforce within the CSA to foster local development. Job opportunities have strengthened with a lower unemployment rate, but the poverty rate has increased.

Table A – Demographic Information of the Assessment Area

Assessment Area: Detroit CSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,401	13.6	25.0	31.9	27.3	2.2
Population by Geography	4,650,508	10.6	23.3	34.3	31.3	0.5
Housing Units by Geography	2,040,498	12.3	24.9	33.7	28.7	0.5
Owner-Occupied Units by Geography	1,231,318	6.1	19.8	37.5	36.5	0.1
Occupied Rental Units by Geography	569,697	19.8	31.5	30.1	17.8	0.9
Vacant Units by Geography	239,483	26.1	35.2	23.1	14.4	1.2
Businesses by Geography	303,365	7.9	20.2	32.0	38.7	1.1
Farms by Geography	7,738	4.7	17.4	45.1	32.6	0.2
Family Distribution by Income Level	1,160,496	22.9	16.7	19.0	41.4	0.0
Household Distribution by Income Level	1,801,015	25.2	15.6	16.9	42.3	0.0
Median Family Income MSA - 11460 Ann Arbor, MI MSA		\$87,331	Median Housing Value			\$135,054
Median Family Income MSA - 19804 Detroit-Dearborn-Livonia, MI		\$52,733	Median Gross Rent			\$877
Median Family Income MSA - 47664 Warren-Troy-Farmington Hills, MI		\$76,739	Families Below Poverty Level			12.4%

Source: 2015 ACS and 2019 D&B Data

Due to rounding, totals may not equal 100.0%

(*) The NA category consists of geographies that have not been assigned an income classification.

Scope of Evaluation in Michigan

Within the state of Michigan, we analyzed the Detroit CSA as a full-scope AA. We combined applicable bank delineated AA's for analysis into the Detroit CSA. Within the Detroit CSA, HMDA lending accounted for 84.5 percent of total HMDA and small business loan originations and 86.2 percent of total HMDA and small business loan volume.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MICHIGAN

LENDING TEST

The bank's performance under the Lending Test in Michigan is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Detroit CSA is excellent.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Detroit CSA	3,149	574	5	4	3,732	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Detroit CSA	\$747,413	\$118,823	\$588	\$40,280	\$907,104	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

According to the June 30, 2019, FDIC Deposit Market Share Report, TCF had approximately \$3.6 billion in deposits in the Detroit CSA with a 2.4 percent deposit market share. The bank's deposit market share ranked 10th out of 47 deposit-taking institutions within the CSA. The bank's deposit market share ranked in the top 21.3 percent for deposit market share in the AA.

According to 2019 peer mortgage data, the bank had a 1.2 percent market share of home mortgage loan originations. The bank's market share of home mortgage loan originations was weaker than their deposit market share. The bank ranked 19th out of 641 home mortgage lenders. The bank's home mortgage loan origination market share ranking was in the top 3.0 percent of all lenders in the AA. The bank's home mortgage origination market share was stronger than their deposit market share rating.

According to the 2018 peer small business data, the bank had a 0.1 percent market share of small business loan originations. The bank's market share of small business loan originations was weaker than their deposit market share. The bank ranked 40th out of 161 small business lenders in the AA. The bank's market share ranking was in the top 24.8 percent of all lenders originating small business loans. The bank's small business market share ranking was near to their deposit market share ranking.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the state of Michigan section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans is excellent. The percentage of bank home mortgage loans in low-income geographies was well below the percentage of owner-occupied housing and exceeded the aggregate industry distribution of home mortgage loans to those geographies. The percentage of bank home mortgage loans in moderate-income geographies approximates the percentage of owner-occupied housing and exceeded the aggregate industry distribution of home mortgage loans to those geographies.

Small Loans to Businesses

Refer to Table Q in the state of Michigan section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The borrower distribution of small loans to businesses is excellent. The percentage of bank small loans to businesses in LMI geographies exceeded the percentage of businesses and the aggregate industry distribution of small loans to businesses in those geographies.

Lending Gap Analysis

We reviewed supervisory data and other summary reports. We did not find any unexplained conspicuous gaps in the bank's lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P in the state of Michigan section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans is excellent. The percentage of bank loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate industry distribution of home mortgage loans to those borrowers. The percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and the aggregate industry distribution of home mortgage loans to those borrowers.

Small Loans to Businesses

Refer to Table R in the state of Michigan section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The borrower distribution of small loans to businesses is very poor. The percentage of bank small loans to businesses was significantly below the percentage of businesses and the aggregate industry distribution of loans to those borrowers.

Community Development Lending

The institution has made a relatively high level of CD loans. CD loans had a positive impact on the Lending Test rating.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

TCF originated four CD loans totaling \$40.3 million. CD loans are equivalent to 7.3 percent of allocated tier 1 capital. TCF CD loans were responsive to economic development and affordable housing needs in the AA. Some of TCF's CD loans exhibited complexity.

Examples of the bank's qualified CD lending activities in the AA include:

- A \$25.0 million loan to assist with the revitalization of a 154-unit hotel in a distressed community. The project includes a restaurant and on-site retail shopping within a designated Opportunity Zone in the 2017 Tax Cuts and Jobs Act;
- A \$10.0 million loan to finance a project that is eligible for LIHTCs. The loan supports an affordable housing project with 64-units designated for LMI people; and
- A \$4.0 million loan to assist with the rehabilitation of a building in a moderate-income CT, which will revitalize the neighborhood, provide long-term employment opportunities, and affordable housing.

Product Innovation and Flexibility

The institution makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. Flexible and innovative lending practices had a neutral impact on the bank's overall Lending Test rating. Refer to the Overall CRA Rating section for details on bank-wide flexible lending programs.

INVESTMENT TEST

The bank's performance under the Investment Test in Michigan is rated Outstanding.

Conclusions for Area Receiving A Full-Scope Review

Based on a full-scope review, the bank’s performance in the Detroit CSA is excellent.

The institution has an excellent level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits excellent responsiveness to credit and to community credit needs. The institution made extensive use of innovative and/or complex investments to support CD initiatives.

Qualified Investments and Grants										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Detroit CSA	269	\$88,429	59	\$18,287	328	91.9	\$106,716	99.6	0	\$0
Statewide	29	\$392	0	\$0	29	8.1	\$392	0.4	0	\$0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

TCF has an excellent level of qualified investments, particularly those that are not routinely provided by private investors, occasionally in a leadership role. During the evaluation period, TCF made 59 grants and investments totaling \$18.3 million. In addition, the AA benefitted from the ongoing impact of 269 prior period investments that totaled \$88.4 million. The total investments of \$106.7 million in the AA represents 19.2 percent of allocated tier 1 capital.

TCF exhibits excellent responsiveness to credit and community development needs. The bank’s investments, donations, and grants were responsive to affordable housing and community service needs. TCF CD investment exhibited some complexity. The following are examples of investments supporting the AA:

- TCF made one investment in a LIHTC bond totaling \$3.4 million, to provide 52 units of low-income senior housing. Affordable housing was identified as a need in Detroit, MI. TCF was the sole investor in the renovation of this senior housing project in a low-income geography;
- TCF invested \$58 thousand through the TCF Financial Scholars Program; and
- TCF provided two grants totaling \$35 thousand to support a homeless shelter located in Ann Arbor, MI. TCF provided financial support to meet identified needs in this AA.

Investments – Michigan Statewide

When considering the investments made in all the AAs in the state, along with this investment in the greater Michigan statewide area, this performance had a positive impact on the overall Investment test rating in the state. TCF primarily invested in MBS which consisted of mortgage loans that were extended to LMI borrowers.

SERVICE TEST

The bank’s performance under the Service Test in Michigan is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Detroit CSA is good.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Detroit CSA	100.0	50	100.0	4.0	20.0	54.0	22.0	10.6	23.3	34.3	31.3

As of December 31, 2019, TCF has 50 branches located in the AA. Two branches are located in low-income geographies and ten branches are located in moderate-income geographies. The percentage of branches located in low-income geographies is significantly below the percentage of the population in low-income geographies. The percentage of branches in moderate-income geographies is below the population percentage in moderate-income geographies. TCF has 19 branches, representing 23.8 percent of total AA branches, located in middle- and upper-income geographies that are within one mile of, and serve customers residing in LMI geographies. In total, customers living in LMI geographies visited these branches 55,059 times, representing 26.2 percent of total customer visits at these branches during the evaluation period. The total branches in LMI geographies combined with the nearby branches in middle- and upper-income geographies serving LMI individuals represents 62.0 percent of branches and exceeds the 33.9 percent of the population living in LMI geographies.

TCF operates 63 deposit-taking ATMs in the AA. Three deposit-taking ATMs, representing 4.8 percent of the total, are located in low-income geographies and 10 deposit-taking ATMs, or 15.9 percent, are in moderate-income geographies. The percentage of ATMs in LMI geographies is comparable to the population percentage in those geographies.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Detroit CSA	0	3*	0	0	0	-2

*Branch closings in N/A CT

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, TCF closed one branch in a geography designated as unknown.

During the evaluation period, TCF closed two branches in upper-income geographies. TCF closed one branch in a grocery store and one branch on a university campus due to expiring leases. Bank management determined branch distribution in the area was sufficient to service existing customers. TCF did not open any new branches in the AA during the evaluation period.

Services, including where appropriate, business hours do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. The branches have similar hours of operation throughout the AA across all census tract income designations. Ten branches were completely closed on Saturdays, with three of the branches operating in LMI tracts. No branches operated on Sundays.

TCF offers alternative delivery systems. Most notably, TCF offers a free digital banking platform that expands access to LMI geographies in the AA. Digital banking includes mobile and online banking, which provide the following services: bill pay, internal transfers, account-to-account transfers, budgeting, balance inquiries, and mobile deposits. TCF does not collect customer income information from customers as a requirement for enrolling in digital banking and therefore cannot provide data showing the impact of digital banking for LMI individuals. However, TCF was able to provide internal data showing the impact of the digital banking platform for LMI geographies during the evaluation period. In the AA, 25.6 percent of digital banking customers were located in LMI geographies. Additionally, 757.6 thousand transactions, representing 20.9 percent of total digital banking transactions, and 1.8 million digital banking sessions, representing 28.2 percent of total sessions, were conducted by customers living in LMI geographies. Digital banking usage by customers in LMI geographies compares below the demographic data that shows 33.9 percent of the population lives in LMI geographies.

In addition to deposit-taking ATMs and digital banking platforms mentioned above, TCF also offers a call center open six days per week and 24/7 telephone banking. However, bank management did not maintain information to determine their effectiveness in helping to meet the credit needs of LMI individuals. Therefore, these alternative delivery systems did not impact the assessment of retail delivery systems.

Community Development Services

The institution provides an adequate level of CD services. During the evaluation period, 68 employees provided 735 service hours to five qualified CD organizations benefitting the Detroit AA. This performance is adequate based on the opportunities in the AA and positively impacted the overall Service Test conclusion for the AA. Examples of TCF's CD services in the AA include, but are not limited to, the following:

- Fifty-four employees served 582 hours providing educational courses on financial literacy and entrepreneurship, primarily to LMI schools; and
- One employee served 25 hours on the Board and Finance Committee of an organization providing shelter and social services to individuals experiencing homelessness.

State Rating

State of Minnesota

CRA rating for the State of Minnesota: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflect adequate responsiveness to community credit needs;
- TCF exhibits excellent geographic and borrower distribution of loans;
- TCF is a leader in providing CD loans. CD lending was responsive to identified needs and exhibited complexity. CD lending had a significantly positive impact on the Lending Test;
- The institution has an excellent level of qualified CD investment and grants. The institution exhibits excellent responsiveness to credit and community needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives; and
- Service delivery systems are readily accessible to geographies and individuals of different income levels. TCF is a leader in providing CD services.

Description of Institution's Operation in Minnesota

As of December 31, 2019, the bank had three AAs within the state of Minnesota. These AAs include Saint Louis County in the Duluth MSA, Blue Earth County in the Mankato MSA, and the Minneapolis - St. Paul CSA. All the AAs meet the requirements of the regulation and do not arbitrarily exclude any LMI CTs. TCF offers a full range of loan and deposit products and services through 86 full-service branches and 158 deposit taking ATMs in Minnesota. According to the June 30, 2019, FDIC Market Share Report, TCF held \$6.9 billion in statewide deposits and ranked 3rd in the state, representing 3.5 percent deposit market share. During the evaluation period, 35.7 percent of total deposits and 24.1 percent of total loans were in Minnesota.

Duluth MSA

The Duluth MSA is comprised of Saint Louis County within the Duluth MSA. Strong competition exists for financial services within the Duluth MSA. According to the June 30, 2019, FDIC Deposit Market Share Report, TCF ranked 16th of the 20 depository financial institutions in the AA, with \$37.3 million in deposits and 1.1 percent market share. TCF has a very limited presence in the AA with one full-service branch and three deposit taking ATMs. Competition includes large national banks, large regional banks and small state banks. The five largest competitors include: Wells Fargo Bank, National Association, US Bank, National Association, Republic Bank, Inc., American Bank of the North, and the North Shore Bank of Commerce. These competitors have deposits totaling \$2.5 billion, representing

72.3 percent of total deposit market share. TCF's deposits within the Duluth MSA accounts for 0.9 percent of bank wide deposits.

The bank's primary lending focus was on home mortgage loans. During the evaluation period, TCF originated 26 home mortgage loans totaling \$20.4 million within the Duluth MSA. Home mortgage loans in the Duluth MSA represented 0.2 percent of the total number of bank wide home mortgage originations and 0.6 percent of the total bank wide loan volume. In the Duluth MSA, HMDA loan originations represent 0.2 percent of total bank wide HMDA loans.

Community contacts conducted by the OCC and other regulatory entities indicated multiple banking and credit needs for the Duluth MSA. We utilized a community contact with an organization that partners with local businesses and community organizations to provide financial literacy, support small businesses, increase affordable housing solutions, and provide needed community services to LMI people. Credit needs and community development opportunities included affordable housing for LMI borrowers, increased credit access for small businesses, workforce development, and counseling for new homeowners. Community contacts indicated that economic conditions in general remain healthy; however, costs of housing remain expensive. Incomes within the MSA have remained stagnant and are lower than other areas of the state of Minnesota. Unemployment for the entire population is low, but minorities experienced a much higher unemployment rate. Many homes in the MSA require rehabilitation or repairs, given their age.

Table A – Demographic Information of the Assessment Area

Assessment Area: Duluth MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	67	9.0	22.4	47.8	19.4	1.5
Population by Geography	200,506	6.0	17.8	48.5	27.6	0.0
Housing Units by Geography	103,195	6.2	18.3	53.4	22.1	0.0
Owner-Occupied Units by Geography	60,095	2.1	14.9	55.5	27.5	0.0
Occupied Rental Units by Geography	24,450	18.3	30.6	36.0	15.1	0.0
Vacant Units by Geography	18,650	3.6	13.2	69.4	13.8	0.0
Businesses by Geography	14,889	8.0	23.3	44.9	23.8	0.0
Farms by Geography	386	3.1	10.6	54.7	31.6	0.0
Family Distribution by Income Level	49,768	19.9	17.0	22.9	40.2	0.0
Household Distribution by Income Level	84,545	25.8	15.5	17.1	41.6	0.0
Median Family Income MSA - 20260 Duluth, MN-WI MSA		\$64,033	Median Housing Value			\$150,063
			Median Gross Rent			\$684
			Families Below Poverty Level			9.5%

Source: 2015 ACS and 2019 D&B Data

Due to rounding, totals may not equal 100.0%

(*) The NA category consists of geographies that have not been assigned an income classification.

Minneapolis CSA

The Minneapolis-St. Paul CSA (Minneapolis CSA) is comprised of the Saint Cloud MSA and the Minneapolis-Saint Paul MSA. The counties included in the Minneapolis CSA are Anoka County, Benton County, Carver County, Dakota County, Hennepin County, Ramsey County, Scott County, Sherburne County, Stearns County, Washington County, and Wright County. Strong competition exists for financial services within the Minneapolis CSA. According to the June 30, 2019, FDIC Deposit Market Share Report, TCF ranked 3rd of the 143 depository financial institutions in the AA, with \$6.8 billion in deposits and 3.6 percent market share. TCF has 83 full-service branches and 152 deposit taking ATMs. Competition includes large national banks, large regional banks, and small state banks. The five largest competitors include: Wells Fargo Bank, National Association, US Bank, National Association, Bremer Bank, National Association, BMO Harris Bank, National Association, and Bank of America, National Association. These competitors have deposits totaling \$150.9 billion, representing 79.1 percent of total deposit market share. TCF's deposits within the Minneapolis MSA accounts for 35.2 percent of bank wide deposits.

The bank's primary lending focus was on home mortgage loans. During the evaluation period, TCF originated 4,037 home mortgage loans totaling \$890.0 million within the Minneapolis CSA. Home mortgage loans in the Minneapolis CSA represented 25.9 percent of the total number of bank wide home mortgage originations and 25.3 percent of the total bank wide loan volume. Within the Minneapolis CSA, HMDA, and CRA small business loan originations and loan volume represent 23.6 percent and 23.3 percent of total bank wide HMDA and CRA small business loans originations and loan volume, respectively.

Community contacts conducted by the OCC and other regulatory entities indicated multiple banking and credit needs for the Minneapolis CSA. We utilized several contacts dedicated to providing housing solutions for LMI people in the area. We also utilized contact that promote economic development through providing resources to small businesses. Credit needs and community development opportunities included workforce and affordable housing, increased access to commercial real estate lending to support retail/industrial/service development, startup loans for small businesses, talented workforce retention within the CSA, and mixed-use development. Community contacts indicated that economic conditions have strengthened, although businesses find it difficult to attract employees given the low unemployment rate. Housing prices have significantly risen, particularly for single family homes, making it more difficult to obtain affordable housing. There have been increased gentrification pressures on LMI neighborhoods with increased investment in infrastructure including public transportation.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Minneapolis CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	770	7.0	21.0	44.9	26.1	0.9
Population by Geography	3,363,022	5.7	18.2	47.0	28.8	0.3
Housing Units by Geography	1,368,118	5.3	19.0	47.9	27.4	0.3
Owner-Occupied Units by Geography	898,657	2.1	14.2	50.4	33.3	0.1
Occupied Rental Units by Geography	400,233	12.1	29.6	41.9	15.6	0.8
Vacant Units by Geography	69,228	8.4	21.2	49.4	20.4	0.7

Businesses by Geography	289,974	4.6	16.2	46.9	32.0	0.3
Farms by Geography	8,015	1.4	9.3	61.0	28.2	0.1
Family Distribution by Income Level	836,126	20.2	17.3	22.0	40.5	0.0
Household Distribution by Income Level	1,298,890	23.6	16.1	18.5	41.9	0.0
Median Family Income MSA - 33460 Minneapolis-St. Paul-Bloomington, MN- WI MSA		\$84,589	Median Housing Value			\$226,286
Median Family Income MSA - 41060 St. Cloud, MN MSA		\$69,359	Median Gross Rent			\$953
			Families Below Poverty Level			7.0%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Minnesota

Within the state of Minnesota, we conducted full-scope reviews on the Duluth MSA and Minneapolis CSA. We combined applicable bank delineated AA's for analysis into the Minneapolis CSA. We conducted a limited-scope review of the Mankato MSA. Within the AA's in Minnesota, HMDA lending accounted for 94.7 percent and 96.6 percent of HMDA and small business loan originations and loan volume. TCF did not originate at least 20 small business loans in either the Duluth MSA or the Mankato MSA, throughout the evaluation period, therefore they were not considered a primary loan product and were not analyzed as part of this evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MINNESOTA

LENDING TEST

The bank's performance under the Lending Test in Minnesota is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews the bank's performance in the Minneapolis CSA is excellent.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Duluth MSA	26	13	0	3	42	0.9	0.5
Mankato MSA	44	3	0	0	47	1.1	1.0
Minneapolis CSA	4,037	216	2	19	4,274	98.0	98.5

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Duluth MSA	\$20,488	\$1,780	\$0	\$3,968	\$26,236	2.5	0.5
Mankato MSA	\$5,792	\$324	\$0	\$0	\$6,116	0.6	1.0
Minneapolis CSA	\$889,930	\$29,764	\$193	\$101,792	\$1,021,679	96.9	98.5

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Duluth MSA

Lending levels reflect adequate responsiveness to AA credit needs. According to the June 30, 2019 FDIC Deposit Market Share Report, TCF had \$37.3 million in deposits in the Duluth MSA with a 1.1 percent deposit market share. The bank's deposit market share ranked 16th out of 20 deposit-taking institutions within the MSA. The bank's deposit market share ranked in the top 80.0 percent for deposit market share in the AA.

According to 2019 peer mortgage data, the bank had a 0.2 percent market share of home mortgage loan originations. The bank's market share of home mortgage loans was weaker than their deposit market share. The bank ranked 64th out of 291 home mortgage lenders in the AA. The bank's home mortgage origination market share ranking was in the top 22.0 percent of all home mortgage lenders in the AA. The bank's home mortgage loan market share ranking was stronger than their deposit market share ranking.

According to 2018 peer small business data, the bank had a 0.2 percent market share of small business loan originations. The bank's market share of small business loan originations was weaker than their deposit market share. The bank ranked 28th out of 65 small business lenders in the AA. The bank's market share ranking was in the top 43.1 percent of all lenders originating small business loans. The bank's small business market share ranking was stronger than their deposit market share ranking.

Minneapolis CSA

Lending levels reflect adequate responsiveness to community credit needs. According to the June 30, 2019, FDIC Deposit Market Share Report, TCF had \$6.8 billion in deposits in the Minneapolis CSA with a 3.6 percent deposit market share. The bank's deposit market share ranked 3rd out of 143 deposit-taking institutions within the CSA. The bank's deposit market share ranked in the top 2.1 percent for deposit market share in the AA.

According to 2019 peer mortgage data, the bank had a 1.1 percent market share of home mortgage loan originations. The bank's market share of home mortgage loans was weaker than their deposit market share. The bank ranked 19th out of 719 home mortgage lenders in the AA. The bank's home mortgage loan origination market share ranking was in the top 2.6 percent of all lenders in the AA. The bank's home mortgage loan market share ranking was near to their deposit market share ranking.

According to 2018 peer small business data, the bank had a 0.1 percent market share of small business loan originations. The bank's market share of small business loan originations was weaker than their deposit market share. The bank ranked 44th of 151 small business lenders in the AA. The bank's market

share ranking was in the top 29.1 percent of all lenders originating small business loans. The bank's small business market share ranking was weaker than their deposit market share ranking.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AAs.

Home Mortgage Loans

Refer to Table O in the state of Minnesota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Duluth MSA

The geographic distribution of home mortgage loans is good. The percentage of home mortgages in low-income geographies exceeded the percentage of owner-occupied housing and the aggregate industry distribution of home mortgages to those geographies. The percentage of home mortgages in moderate-income geographies was below the percentage of owner-occupied housing and near to the aggregate industry distribution of home mortgage loans to those geographies.

Minneapolis CSA

The geographical distribution of home mortgage loans is excellent. The percentage of home mortgage loans in low-income geographies exceeded the percentage of owner-occupied housing and was near to the aggregate industry distribution of home mortgages to those geographies. The percentage of home mortgages in moderate-income geographies exceeded the percentage of owner-occupied housing and the aggregate industry distribution of home mortgages to those geographies.

Small Loans to Businesses

Refer to Table Q in the state of Minnesota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Minneapolis CSA

The geographic distribution of small loans to business is excellent. The percentage of small loans to businesses in low-income geographies was near to the percentage of those businesses and exceeded the aggregate industry distribution of small loans to businesses in those geographies. The percentage of small loans to businesses in moderate-income geographies exceeded the percentage of small businesses and the aggregate industry distribution of small loans to businesses in those geographies.

Lending Gap Analysis

We reviewed supervisory data and other summary reports. We did not find any unexplained conspicuous gaps in the bank's lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P in the state of Minnesota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Duluth MSA

The borrower distribution of home mortgage loans is adequate. The percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families and exceeded the aggregate industry distribution of home mortgage loans to those borrowers. The percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families and the aggregate industry distribution of home mortgage loans to those borrowers.

Minneapolis CSA

The borrower distribution of home mortgage loans is excellent. The percentage of home mortgage loans to low-income families was near to the percentage of low-income families and exceeded the aggregate industry distribution of home mortgage loans to those borrowers. The percentage of home mortgage loans to moderate-income families exceeded the percentage of moderate-income families and the aggregate industry distribution of home loans to those borrowers.

Small Loans to Businesses

Refer to Table R in the state of Minnesota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Minneapolis CSA

During the evaluation period, the distribution of the bank's loans to small businesses by revenue is very poor. The proportion of loans was significantly below the percentage of small businesses and the aggregate industry distribution of loans to those businesses.

Community Development Lending

The institution is a leader in making CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Duluth MSA

The institution is a leader in providing CD loans in the Duluth MSA. CD lending had a significantly positive impact on the Lending Test rating in the Duluth MSA. TCF originated three CD loans totaling

\$4.0 million. CD loans are equivalent to 46.0 percent of allocated tier 1 capital in the AA. The bank's CD loans financed three multifamily properties that provided affordable rents for the LMI people, which was identified as a community need. The bank's CD loans were responsive to identified affordable housing needs.

Minneapolis CSA

The institution is a leader in making CD loans. CD lending had a significantly positive impact on the Lending Test rating. The bank originated 19 CD loans totaling \$101.8 million. These loans demonstrate good responsiveness to the needs of the AA. The bank's CD loans supported mainly affordable housing initiatives, which is an identified need in the AA. Other loans supported economic development, revitalization, and services to LMI individuals. TCF CD lending demonstrated complexity. Examples of the bank's qualified CD lending activities in the AA include:

- A \$39.4 million loan in two credit facilities to assist with the construction of a 180-unit affordable housing project within the bank's AA. The project qualifies for LIHTCs and exhibits complexity; and
- A \$38.2 million in credit facilities for construction financing for redevelopment of affordable housing units located in a moderate-income geography. The project includes three phases of housing with a market rate and senior citizen development as the first two phases to be followed by an affordable housing development. The project also includes the redevelopment of a commuter station along the North Star commuter line between downtown Minneapolis and Big Lake, MN.

Product Innovation and Flexibility

The institution makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. Flexible and innovative lending practices had a neutral impact on the bank's overall Lending Test rating. Refer to the Overall CRA Rating section for details on bank-wide flexible lending programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review the bank's performance under the Lending Test in the Mankato MSA is consistent with the bank's overall performance under the Lending Test in the full-scope areas.

Refer to Tables O through R in the state of Minnesota section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Minnesota is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Minneapolis CSA is excellent. The bank’s performance in the Duluth MSA is poor.

The institution has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits excellent responsiveness to credit and community needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Qualified Investments and Grants										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Duluth MSA	3	\$192	0	\$0	3	0.6	\$192	0.2	0	\$0
Mankato MSA	2	\$505	5	\$7	7	1.4	\$512	0.4	0	\$0
Minneapolis CSA	43	\$75,419	456	\$53,396	499	98.0	\$127,815	99.4	0	\$0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Duluth MSA

The institution has a poor level of qualified investments, particularly those that are not routinely provided by private investors, although rarely in a leadership position. During the evaluation period, TCF did not make any grants or investments in the Duluth MSA. TCF had three prior period investments totaling \$192 thousand. These prior period investments were MBS, where underlying mortgages were originated to LMI borrowers within the AA. Total qualified investments represent 2.2 percent of allocated tier 1 capital.

Minneapolis CSA

The institution has an excellent level of CD investments, particularly those not provided by private investors, often in a leadership position. During the evaluation period, TCF had 499 investments and grants totaling \$127.8 million. This includes 456 current period investments and grants totaling \$52.4 million. In addition, the AA benefitted from the ongoing impact of 43 prior period investments totaling \$75.4 million Total qualified investments represent 20.4 percent of allocated tier 1 capital.

TCF exhibits excellent responsiveness to credit and community development needs. The level of investments and grants were responsive to affordable housing and community service needs. TCF CD investments exhibited complexity. The following are examples of investments that help support affordable housing needs:

- TCF provided a \$1.0 million EQ2 renewal to a CDFI that supports a wide array of community development corporations and other non-profits. The CDFI provides loan fund capital to area non-profits and also provides educational programming to the non-profits;
- TCF invested in two multifamily affordable housing bond investments totaling \$22.0 million. The development is an extremely complex and high-profile development in the Twin Cities that is a direct response to address a homeless encampment in South Minneapolis. TCF provided a

CD loan to the development and was the individual investor in the City of Minneapolis housing bonds issued for this project;

- TCF invested \$27.3 million in bonds to support three affordable housing projects. One project provided 118 units of affordable housing in a moderate-income CT with TCF also providing the financing for the construction. The other two projects provided 126 units of affordable housing, with 72 units being targeted to LMI seniors. All units in the projects are eligible for LIHTC; and
- TCF provided grant support totaling \$50 thousand to an organization that develops affordable housing, workspaces and community facilities to support low-income artists. During the evaluation period, TCF has provided grant support, community development lending and board leadership to this organization.
- TCF invested \$266 thousand in a MBS, where the underlying mortgages were originated to LMI borrowers in the St. Cloud area.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank’s performance under the Investment Test in the Mankato MSA is consistent with the bank’s overall performance under the Investment Test in the full-scope areas.

SERVICE TEST

The bank’s performance under the Service Test in Minnesota is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Duluth MSA is adequate. The bank’s performance in the Minneapolis CSA is excellent.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution’s AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Duluth MSA	0.5	1	1.2	0.0	0.0	0.0	100.0	6.0	17.8	48.5	27.6
Mankato MSA	1.0	2	2.3	0.0	50.0	50.0	0.0	0.0	22.6	71.6	5.8
Minneapolis CSA	98.4	83	96.5	6.0	36.1	37.3	19.3	5.7	18.2	47.0	28.8

Duluth MSA

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution's AAs. As of December 31, 2019, TCF operates one branch in the AA. The branch is located in an upper-income geography but within one mile of, and serves customers that reside in, LMI geographies. TCF provided internal data showing customers living in LMI geographies visited the branch a total of 1,713 times, representing 19.4 percent of total customer visits to the branch during the evaluation period. The percentage of customer visits from LMI geographies is near the 23.8 percent of the population living in LMI geographies. TCF also operates three deposit-taking ATMs in the AA, all of which are located in upper-income geographies.

TCF offers alternative delivery systems. Most notably, TCF offers a free digital banking platform that expands access to LMI geographies in the AA. Digital banking includes mobile and online banking, which provide the following services: bill pay, internal transfers, account-to-account transfers, budgeting, balance inquiries, and mobile deposits. TCF does not collect income information from customers as a requirement for enrolling in digital banking and therefore cannot provide data showing the impact of digital banking for LMI individuals. However, TCF was able to provide internal data showing the impact of the digital banking platform for LMI geographies during the evaluation period. In the Duluth AA, 24.9 percent of digital banking customers were located in LMI geographies. Additionally, 11.3 thousand transactions, representing 25.9 percent of total digital banking transactions, and 27.0 thousand digital banking sessions, representing 29.3 percent of total sessions, were conducted by customers living in LMI geographies. Digital banking usage by customers in LMI geographies exceeds demographic data that shows 23.8 percent of the population lives in LMI geographies.

In addition to deposit-taking ATMs and digital banking platforms mentioned above, TCF also offers a call center open six days per week and 24/7 telephone banking. However, bank management did not maintain information to determine their effectiveness in helping to meet the credit needs of LMI individuals. Therefore, these alternative delivery systems did not impact the assessment of retail delivery systems.

Minneapolis CSA

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AAs. As of December 31, 2019, TCF operates 83 branches in the Minneapolis CSA. Five branches are located in low-income geographies and 30 branches are located in moderate-income geographies. The percentage of branches in LMI geographies exceeds the percentage of the population living in those geographies. The Minneapolis CSA has one branch located in an unknown income level CT. This branch is located in the CT bordering the University of Minnesota. In addition, there are 12 branches located in middle- or upper-income geographies which are within one mile of, and serve customers that reside in, LMI geographies. TCF provided internal data showing customers living in LMI geographies visited these branches a total of 81,390 times, representing 28.4 percent of total customer visits to these branches during the evaluation period. The total branches in LMI geographies combined with the nearby branches in middle- and upper-income geographies serving LMI individuals represents 56.6 percent of branches and exceeds the 23.9 percent of the population living in LMI geographies.

TCF also operates 152 deposit-taking ATMs in the AA. Fifteen deposit-taking ATMs, representing 9.9 percent of the total, are located in low-income geographies and 50 deposit-taking ATMs, or 32.9

percent, are in moderate-income geographies. The percentage of deposit-taking ATMs in LMI geographies exceeds the population percentage living in those geographies.

TCF offers alternative delivery systems. Most notably, TCF offers a free digital banking platform that expands access to LMI geographies in the AA. Digital banking includes mobile and online banking, which provide the following services: bill pay, internal transfers, account-to-account transfers, budgeting, balance inquiries, and mobile deposits. TCF does not collect income information from customers as a requirement for enrolling in digital banking and therefore cannot provide data showing the impact of digital banking for LMI individuals. However, TCF was able to provide internal data showing the impact of the digital banking platform for LMI geographies during the evaluation period. In the MSP AA, 24.5 percent of digital banking customers were located in LMI geographies. Additionally, 2.1 million transactions, representing 21.2 percent of total digital banking transactions, and 4.6 million digital banking sessions, representing 26.5 percent of total sessions, were conducted by customers living in LMI geographies. Digital banking usage by customers in LMI geographies is comparable to demographic data that shows 23.9 percent of the population lives in LMI geographies.

In addition to deposit-taking ATMs and digital banking platforms mentioned above, TCF also offers a call center open six days per week and 24/7 telephone banking. However, bank management did not maintain information to determine their effectiveness in helping to meet the credit needs of LMI individuals. Therefore, these alternative delivery systems did not impact the assessment of retail delivery systems.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Duluth MSA	0	0	0	0	0	0
Mankato MSA	0	0	0	0	0	0
Minneapolis CSA	1	4	0	-2	-1	0

Duluth MSA

TCF did not open or close any branches in the Duluth AA during the evaluation period.

TCF’s services and business hours in the Duluth AA do not vary in a way that inconveniences LMI geographies or individuals. The bank operates one branch in the AA, and it is open Monday through Friday with normal business hours.

Minneapolis CSA

To the extent changes have been made, the institution’s opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals in the Minneapolis CSA. During the evaluation period, TCF closed two branches in moderate-income geographies. One branch was closed due to insufficient business opportunities. The

other branch was located in a grocery store and closed because the lease expired. Management determined the branch was no longer needed. TCF management informed customers of nearby branches, digital banking solutions, and the call center to meet the customers' banking needs. TCF closed one branch in a middle-income geography due to insufficient business opportunities. TCF also closed one branch and opened one branch in an upper-income geography as the result of a branch relocation.

TCF's services and business hours in the Minneapolis CSA do not vary in a way that inconveniences LMI geographies or individuals. Sixty-seven TCF branches are traditional or in-store branches that operate six days a week with extended business hours during the weekdays. Twelve TCF branches are in-store branches located in Cub Foods that operate seven days a week with extended hours on the weekdays. Three branches operate Monday-Friday. There are no material differences in business hours or services based on the income level of the geography in which the branch is located. There is one seasonal branch located at the University of Minnesota with limited hours, but it is offset by TCF's full-service branch also located on the campus that operates five days a week with normal business hours.

Community Development Services

The institution is a leader in providing CD services.

Duluth MSA

The institution provides few if any CD services in the Duluth AA. TCF employees provided no service hours during the evaluation period to qualified CD organizations with the purpose of serving only areas in the Duluth AA.

Minneapolis CSA

The institution is a leader in providing CD services in the Minneapolis CSA. During the evaluation period, 82 employees provided 4,238 service hours to 51 qualified CD organizations benefiting the Minneapolis CSA. More specifically, employees provided 3,158 service hours to 38 organizations offering community services to LMI individuals, 940 service hours to 11 affordable housing organizations, and 140 hours to two organizations promoting economic development.

Examples of TCF's CD services in the AA include, but are not limited to, the following:

- Six employees provided 308 service hours to a CD organization by teaching financial literacy courses and providing free tax return preparation for LMI individuals;
- One employee provided 250 service hours by serving on the Board and various committees of an organization that provides affordable housing in LMI areas of St. Paul; and
- One employee provided 250 service hours by serving on the Board of an organization providing affordable healthcare services to children from LMI families in the metro area.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Mankato MSA is consistent with the bank's overall performance under the Service Test in the full-scope areas.

State Rating

State of South Dakota

CRA rating for the State of South Dakota: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Needs to Improve

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending activity exhibits excellent responsiveness to credit needs of the community;
- The bank exhibits a very poor geographic distribution and good borrower distribution of home mortgage loans;
- The bank did not make any CD loans. CD lending had a negative impact of the Lending Test;
- The institution has a poor level of qualified CD investments and grants;
- Delivery systems are accessible to individuals of different income levels.

Description of Institution's Operations in South Dakota

As of December 31, 2019, TCF has one AA within the state of South Dakota, the Sioux Falls MSA. The AA consists of the entire county of Minnehaha. This AA meets the requirements of the regulation and does not arbitrarily exclude LMI CTs. TCF had one bank branch and one deposit-taking ATM in this AA. According to the June 30, 2019, FDIC Market Share Report, TCF had \$3.8 million in deposits in the Sioux Falls MSA. The deposits in the Sioux Falls MSA account for 0.02 percent of TCF's bank wide deposits. Strong competition exists for financial services within the AA. The bank had a 0.01 percent market share of deposits and ranked 26th out of 26 deposit-taking institutions, or among the top 100 percent of institutions in the AA. The five largest competitors, Wells Fargo Bank, National Association, Citibank, National Association, First Premier Bank, Great Western Bank, and the First National Bank in Sioux Falls, have deposits totaling \$664.8 billion, representing 99.6 percent of total deposit market share in the AA. The bank's primary lending focus was on home mortgage loans. During the evaluation period, TCF originated 34 home mortgage loans totaling \$4.1 million within the Sioux Falls MSA. Home mortgage loans in the Sioux Falls MSA represented 0.2 percent of bank wide home mortgage loan originations and 0.1 percent of bank wide home mortgage loan volume.

The city of Sioux Falls is a major economic center for the AA with economic drivers including financial services and medical services. According to Moody's Analytics, top employers in the area include Sanford Health, Avera Health, and Sioux Falls School District. Significant exports of the city include food and kindred products, machinery, and transportation equipment. Educational attainment indicated that 66.0 percent of adults 25 and older in Sioux Falls had completed some college or higher education, compared to 62.0 percent of adults in the entire US. The generation breakdown of Sioux Falls is skewed younger with the largest age groups including Gen Z and Millennials. The population of Sioux Falls has

continued to grow, with a 2019 positive net migration of 2,307 residents. The percentage of families living below poverty level in the AA was 8.5 percent in 2019. The unemployment rate for the AA was 3.1 percent in January 2017 and 3.0 percent as of December 31, 2019.

Community contacts conducted by the OCC and other regulatory entities indicated multiple banking and credit needs for the Sioux Falls MSA. We utilized contacts from two municipal organizations dedicated to promoting economic development and supporting affordable housing initiatives in the AA. Credit needs and community development opportunities included more access to affordable starter homes for LMI families within urban Sioux Falls, housing repairs and rehabilitation for older properties, and increased commercial and agricultural lending. Community contacts indicated that economic conditions indicate a strong economy in urban Sioux Falls, but a problematic housing issue for LMI borrowers. Many residents reside in more affordable rural areas and commute to Sioux Falls. The rural economy has suffered from poor weather conditions, requiring some farmers to take second jobs.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Sioux Falls MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	42	0.0	40.5	42.9	16.7	0.0
Population by Geography	178,942	0.0	37.7	45.5	16.8	0.0
Housing Units by Geography	74,752	0.0	41.0	43.4	15.6	0.0
Owner-Occupied Units by Geography	44,644	0.0	28.3	50.6	21.1	0.0
Occupied Rental Units by Geography	25,496	0.0	61.3	32.2	6.4	0.0
Vacant Units by Geography	4,612	0.0	50.8	35.4	13.8	0.0
Businesses by Geography	16,799	0.0	48.8	35.7	15.6	0.0
Farms by Geography	702	0.0	14.2	62.4	23.4	0.0
Family Distribution by Income Level	44,325	21.0	19.3	24.2	35.5	0.0
Household Distribution by Income Level	70,140	24.1	19.1	19.2	37.6	0.0
Median Family Income MSA - 43620 Sioux Falls, SD MSA		\$72,948	Median Housing Value			\$148,825
			Median Gross Rent			\$716
			Families Below Poverty Level			8.5%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in South Dakota

Within the state of South Dakota, we conducted a full-scope review of the Sioux Falls MSA. Within the Sioux Falls MSA, HMDA lending accounted for 87.1 percent and 92.9 percent of HMDA and small business loan originations and loan volume respectively. TCF did not originate at least 20 small business loans in this AA throughout the evaluation period, therefore small business loans were not considered a primary loan product for analysis at this evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTH DAKOTA

LENDING TEST

The bank's performance under the Lending Test in South Dakota is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Sioux Fall MSA is adequate.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Sioux Falls MSA	34	5	0	0	39	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State*	%State Deposits
Sioux Falls MSA	\$4,077	\$308	0	\$0	\$4,385	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

According to the June 30, 2019, FDIC Deposit Market Share Report, TCF had \$3.84 million in deposits in the Sioux Falls MSA with a 0.01 percent deposit market share. The bank's deposit market share ranked 26th out of 26 deposit-taking institutions within the MSA. The bank's deposit market share ranked in the top 100.0 percent for deposit market share in the AA.

According to 2019 peer mortgage data, the bank had a 0.2 percent market share of home mortgage loan originations. The bank's market share of home mortgage loan originations was stronger than their deposit market share. The bank ranked 48th out of 185 home mortgage lenders. The bank's home mortgage loan origination market share ranking was in the top 25.9 percent of all lenders in the AA. The bank's home mortgage market share was stronger than their deposit market share ranking.

Distribution of Loans by Income Level of the Geography

The bank exhibits a very poor geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the state of South Dakota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans is very poor. There are no low-income geographies located in the Sioux Falls MSA. The percentage of home mortgage loans in moderate-income geographies was well below the percentage of owner-occupied units and the aggregate industry distribution of home mortgage loans in those geographies

Lending Gap Analysis

We reviewed supervisory data and other summary reports. We did not find any unexplained conspicuous gaps in the bank's lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P in the state of South Dakota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans is good. The percentage of bank home mortgage loans to low-income borrowers is well below the percentage of low-income families. The percentage of bank home mortgage loans to low-income borrowers was below the aggregate industry distribution of home mortgage loans to those families. The percentage of bank home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income borrowers and the aggregate industry distribution of home mortgage loans to those borrowers.

Community Development Lending

The institution has made few, if any, CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank did not make any CD loans in the Sioux Falls MSA. CD lending had a negative impact on the Lending Test rating.

Product Innovation and Flexibility

The institution makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. Flexible and innovative lending practices had a neutral impact on the bank's overall Lending Test rating. Refer to the Overall CRA Rating section for details on bank-wide flexible lending programs.

Refer to Tables O through R in the state of South Dakota section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank’s performance under the Investment Test in South Dakota is rated Needs to Improve.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review the bank’s performance in the Sioux Falls MSA is poor.

The institution has a poor level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors. The institution exhibits poor responsiveness to credit and community economic development needs. The institution rarely uses innovative and/or complex investments to support CD initiatives.

Qualified Investments and Grants										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Sioux Falls MSA	0	0	9	\$23,475	9	100.0	\$23,475	100.0	0	\$0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank made nine qualified CD grants totaling \$23 thousand. The CD grants were equivalent to 0.9 percent of allocated tier 1 capital.

The following are examples of investments supporting the AA:

- TCF provided two donations totaling \$20 thousand to Sioux Empire Housing Partnership, which supports affordable housing by providing first time homebuyer education, foreclosure prevention counseling; and
- TCF provided two donations totaling \$1.1 thousand to Sioux Empire United Way, which supports dozens of social services agencies that provide services to low and moderate-income households throughout Sioux Falls.

SERVICE TEST

The bank’s performance under the Service Test in South Dakota is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Sioux Falls MSA is adequate.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the institution’s AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Sioux Falls MSA	100.0	1	100.0	0.0	100.0	0.0	0.0	0.0	37.5	45.5	16.8

As of December 31, 2019, TCF has one branch located in the AA. The branch is located in a moderate-income geography. The percentage of branches in moderate-income geographies exceeded the percentage of the population in those geographies.

TCF operates one deposit-taking ATM in the AA. One deposit-taking ATM, representing 100.0 percent of the total, is located in a moderate-income geography. The percentage of deposit taking ATMs in moderate-income geographies exceeded the percentage of the population in those geographies.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Sioux Falls MSA	0	1	0	-1	0	0

To the extent changes have been made, the institution's opening and closing of branches has adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, TCF closed one branch in a moderate-income geography. The closed branch was part of the TCF Operations Center, which management decided to close and relocate its departments to existing offices in Minnesota and Illinois.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. The single branch operates a lobby and drive-through six days of the week, with both options being closed on Sundays.

TCF offers alternative delivery systems. Most notably, TCF offers a free digital banking platform that expands access to LMI geographies in the AA. Digital banking includes mobile and online banking, which provide the following services: bill pay, internal transfers, account-to-account transfers, budgeting, balance inquiries, and mobile deposits. TCF does not collect customer income information from customers as a requirement for enrolling in digital banking and therefore cannot provide data showing the impact of digital banking for LMI individuals. However, TCF was able to provide internal data showing the impact of the digital banking platform for LMI geographies during the evaluation period. In the AA, 51.7 percent of digital banking customers were located in LMI geographies. Additionally, 15.3 thousand transactions, representing 53.6 percent of total digital banking transactions,

and 35.0 thousand digital banking sessions, representing 51.8 percent of total sessions, were conducted by customers living in LMI geographies. Digital banking usage by customers in LMI geographies compares favorably to the demographic data that shows 37.5 percent of the population lives in LMI geographies.

In addition to deposit-taking ATMs and digital banking platforms mentioned above, TCF also offers a call center open six days per week and 24/7 telephone banking. However, bank management did not maintain information to determine their effectiveness in helping to meet the credit needs of LMI individuals. Therefore, these alternative delivery systems did not impact the assessment of retail delivery systems.

Community Development Services

The institution provides an adequate level of CD services. During the evaluation period, Sioux Falls TCF retail team members, including four retail team officers, provided 103 service hours to two qualified CD organizations benefitting the Sioux Falls AA. This performance is adequate based on the opportunities in the AA and positively impacted the overall Service test conclusion for the AA. Examples of TCF's CD services in the AA include:

- One employee served 87 hours as a Board member of an organization providing financial resources to LMI individuals including first-time homebuyer counseling and foreclosure prevention counseling; and
- Retail team members provided 16 service hours providing financial and entrepreneurial education to students at a predominantly LMI school.

State Rating

State of Wisconsin

CRA rating for the State of Wisconsin: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels exhibit adequate responsiveness to the credit needs of the community;
- The bank exhibits excellent geographic and borrower distribution of loans;
- The bank has made a low level of CD loans. CD lending had a negative impact on the Lending Test rating;
- The institution has an excellent level of qualified CD investment and grants. CD investments exhibit excellent responsiveness to community needs; and
- Service delivery systems are reasonably accessible to geographies and individuals of different income levels. The bank has a low level of CD services.

Description of Institution's Operations in Wisconsin

As of December 31, 2019, TCF has one AA within the state of Wisconsin, the Milwaukee-Racine-Waukesha CSA (Milwaukee CSA). The AA consists of the entire counties of Milwaukee, Racine, and Waukesha. This AA meets the requirements of the regulation and does not arbitrarily exclude LMI CTs. TCF had 13 bank branches and 16 deposit-taking ATM in this AA. According to the June 30, 2019, FDIC Market Share Report, TCF had \$724.4 million in deposits in the Milwaukee CSA. The deposits in the Milwaukee CSA account for 3.8 percent of TCF's bank wide deposits. Strong competition exists for financial services within the AA. The bank had a 1.2 percent market share of deposits and ranked 14th out of 41 deposit-taking institutions, or among the top 34.1 percent of institutions in the AA. The five largest competitors, US Bank National Association, BMO Harris Bank National Association, JPMorgan Chase Bank, National Association, Associated Bank, National Association, and Johnson Bank, have deposits totaling \$44.4 billion, representing 72.9 percent of total deposit market share in the AA.

The bank's primary lending focus was on home mortgage loans. During the evaluation period, TCF originated 498 home mortgage loans totaling \$141.2 million within the Milwaukee CSA. Home mortgage loans in the Milwaukee CSA represented 3.2 percent of the total number of bank wide home mortgage originations and 4.0 percent of the total bank wide home mortgage loan dollar volume. CRA small business loan originations and dollar volume in the AA represent 5.4 percent and 5.1 percent, respectively, of bank wide small business loan originations and dollar volume.

² statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

The city of Milwaukee is a major economic center for the AA with economic drivers including manufacturing and financial services. According to Moody's Analytics, top employers in the area include Aurora Health Care Inc, Ascension Wisconsin, and Froedtert Health. Significant exports of the city include machinery, computer and electronic products, and chemicals. Educational attainment indicated that 65.0 percent of adults 25 and older in Milwaukee had completed some college or higher education, compared to 62.0 percent of adults in the entire US. The generation breakdown of Milwaukee is skewed younger with the largest age groups including Gen Z and Millennials. The population of Milwaukee has continued to decline, with a 2019 negative net migration of 3,863 residents. The percentage of families living below poverty level in the AA was 12.2 percent in 2019. The unemployment rate for the AA was 4.2 percent in January 2017 and 3.2 percent as of December 31, 2019.

Community contacts conducted by the OCC and other regulatory entities indicated multiple banking and credit needs for the CSA. We utilized a contact from a nonprofit that seeks to improve the living conditions of the communities it serves. We also utilized a contact from an organization that seeks to improve the housing for LMI people by offering home purchase and affordable home renovation solutions. Credit needs and community development opportunities included flexible home purchase and renovation products for LMI borrowers, down payment and closing cost assistance for LMI borrowers, affordable housing for single- and multi-family units. Community contacts indicated a need for increased credit access to small businesses with startup loans, small dollar loans serving as alternatives to payday loans, support for workforce development, and support for anti-displacement efforts in residential neighborhoods. Community contacts indicated that economic conditions have improved since the recession a decade prior with increased housing inventory available. Older housing stock within LMI tracts in Milwaukee have prices that have not kept up with market prices and require rehabilitation or repairs. Educational attainment within the CSA is high and employment has remained stable.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Milwaukee-Racine-Waukesha CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	429	23.8	17.9	30.8	26.3	1.2
Population by Geography	1,544,707	17.8	17.7	32.7	31.8	0.1
Housing Units by Geography	661,840	17.1	18.0	34.2	30.6	0.1
Owner-Occupied Units by Geography	361,307	8.0	14.8	35.7	41.5	0.0
Occupied Rental Units by Geography	250,582	26.4	22.5	34.0	16.9	0.2
Vacant Units by Geography	49,951	36.0	18.7	23.9	21.1	0.4
Businesses by Geography	88,083	12.0	14.6	34.0	39.1	0.4
Farms by Geography	1,819	6.8	9.6	35.3	48.3	0.0
Family Distribution by Income Level	376,139	24.9	16.5	19.4	39.2	0.0
Household Distribution by Income Level	611,889	26.5	15.8	17.3	40.4	0.0
Median Family Income MSA - 33340 Milwaukee-Waukesha, WI MSA		\$71,764	Median Housing Value			\$177,018
Median Family Income MSA - 39540 Racine, WI MSA		\$68,728	Median Gross Rent			\$836
			Families Below Poverty Level			12.2%

Source: 2015 ACS and 2019 D&B Data

Due to rounding, totals may not equal 100.0%

(* The NA category consists of geographies that have not been assigned an income classification.

Scope of Evaluation in Wisconsin

Within the state of Wisconsin, we conducted a full-scope review of the Milwaukee CSA. We combined all applicable bank delineated AAs into the Milwaukee CSA for analysis at this evaluation. Within the Milwaukee CSA, HMDA lending accounted for 79.3 percent and 86.4 percent of all HMDA and small business loan originations and loan volume, respectively.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WISCONSIN

LENDING TEST

The bank's performance under the Lending Test in Wisconsin is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Milwaukee CSA is good.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Milwaukee CSA	498	130	0	1	629	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans* (000's)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Milwaukee CSA	\$141,179	\$22,079	\$0	\$2,000	\$165,258	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

According to the June 30, 2019, FDIC Deposit Market Share Report, TCF had \$724.4 million in deposits in the Milwaukee CSA with a 1.2 percent market share. The bank's deposit market share ranked 14th out of 41 deposit-taking institutions within the CSA. The bank's deposit market share ranked in the top 34.2 percent for deposit market share in the AA.

According to 2019 peer mortgage data, the bank had a 0.4 percent market share of home mortgage loan originations. The bank's market share of home mortgage loan originations was weaker than their deposit market share. The bank ranked 59th out of 506 home mortgage lenders. The bank's home mortgage loan

origination market share ranking was in the top 11.7 percent of all home mortgage lenders in the AA. The bank's home mortgage ranking was stronger than their deposit market share ranking.

According to 2018 peer small business data, the bank had a 0.1 percent market share of small business loan originations. The bank's market share of small business loan originations was weaker than their deposit market share. The bank ranked 42nd of 108 small business lenders in the AA. The bank's market share ranking was in the top 38.9 percent of all lenders originating small business loans in the AA. The bank's small business market share ranking was weaker than their deposit market share ranking.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the state of Wisconsin section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans is excellent. The bank's home mortgage lending in low-income geographies was below the percentage of owner-occupied housing units and exceeded aggregate industry distribution of home mortgage loans to those geographies. The bank's lending in moderate-income geographies exceeded the percentage of owner-occupied housing units and the aggregate industry distribution of home mortgage loans in those geographies.

Small Loans to Businesses

Refer to Table Q in the state of Wisconsin section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is excellent. The percentage of bank small loans to businesses in LMI geographies exceeded the percentage of businesses and the aggregate industry distribution of small loans to businesses in those geographies.

Lending Gap Analysis

We reviewed supervisory data and other summary reports. We did not find any unexplained conspicuous gaps in the bank's lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P in the state of Wisconsin section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans was excellent. The percentage of bank home mortgage loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate industry distribution of home mortgage loans to those borrowers. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families and the aggregate industry distribution of home mortgage loans to those families.

Small Loans to Businesses

Refer to Table R in the state of Wisconsin section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The borrower distribution of small loans to businesses is very poor. The percentage of bank loans was significantly below the percentage of businesses and the aggregate industry distribution of loans to those businesses

Community Development Lending

The institution has a low level of CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

CD lending is poor and had a negative impact on the bank's overall lending performance in the state of Wisconsin. The bank originated one CD loan totaling \$2.0 million. CD loans were equivalent to 1.9 percent of allocated tier 1 capital. The bank is responsive to AA needs. The purpose of the CD loan was affordable housing.

Product Innovation and Flexibility

The institution makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. Bank provided flexible products for home improvement loans. Innovative and flexible lending had a neutral impact on the Lending Test rating.

INVESTMENT TEST

The bank's performance under the Investment Test in Wisconsin is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Milwaukee CSA is excellent.

The institution has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments and Grants										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Milwaukee CSA	18	\$3,426	28	\$12,193	46	95.8	\$15,619	70.0	0	\$0
Statewide	1	\$30	1	\$6,662	2	4.2	46,692	30.0	0	\$0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The institution has an excellent level of CD investments and grants. During the evaluation period, TCF made 28 investments and grants totaling \$12.2 million. In addition, the AA benefitted from the ongoing impact of 18 prior period investments totaling \$3.4 million. Total investments of \$15.6 million in the AA represent 14.5 percent of allocated tier 1 capital.

TCF exhibits excellent responsiveness to community development needs. The level of investments and grants were responsive to affordable housing and community service needs. TCF CD investments exhibited complexity. Examples of investments made during the evaluation period include:

- Historic Tax Credit (HTC) and LIHTC bonds totaling \$11.7 million, to provide 72 units of affordable housing to LMI individuals. This project is considered complex due to the use of HTC and LIHTCs. This project repurposed an abandoned factory in a low-income CT;
- TCF provided two grants totaling \$60 thousand to a homeless shelter in Milwaukee, WI. This is part of a multi-year capital improvement plan. The shelter offers additional services that focus on financial counseling and job training on both a short- and long-term basis. In addition to the multi-year grants, TCF provided an additional \$8 thousand of support;
- TCF continues to demonstrate responsiveness and leadership through the TCF Scholars Program. Within this AA, TCF invested \$54 thousand to support financial literacy education to LMI students; and
- Two MBS totaling \$349 thousand containing loans that were extended to LMI borrowers in Racine, WI.

Investments –Statewide

When considering the investments made in the AA, along with this investment in the Wisconsin statewide area, this performance had a positive impact on the overall Investment test rating in the state. TCF invested \$6.7 million in a HTC & LIHTC project to provide 40 units of affordable housing to LMI individuals in Prairie Du Chien, WI.

SERVICE TEST

The bank's performance under the Service Test in Wisconsin is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Milwaukee CSA is adequate.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Milwaukee CSA	100.0	13	100.0	0.0	23.1	61.5	15.4	17.8	17.7	32.7	31.8

TCF operates 13 branches in the Milwaukee CSA, as of December 31, 2019. There are no branches in low-income geographies. TCF operates three branches in moderate-income geographies. The percentage of branches in moderate-income geographies exceeds the population percentage in those geographies. In addition, TCF has seven branches in middle- or upper-income geographies which are within one mile of, and serve customers that reside in, LMI geographies. TCF provided internal data showing customers living in LMI geographies visited these branches a total of 5,345 times, representing 7.6 percent of total customer visits to these branches during the evaluation period.

TCF operates 16 deposit-taking ATMs in the AA. There are no deposit-taking ATMs in low-income geographies. There are four deposit-taking ATMs in moderate-income geographies, representing 25.0 percent of total deposit-taking ATMs in the AA. The percentage of deposit-taking ATMs in moderate-income geographies exceeds the population percentage in moderate-income geographies.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Milwaukee CSA	0	0	0	0	0	0

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.

The bank did not open or close any branch in this AA throughout the evaluation period.

Services and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. Twelve of the bank branches have normal business hours and are open

six days a week. Hours and services at these branches are consistent, regardless of the income level of the geography where the branch is located. There is also one branch that has limited hours and is located at a senior living facility in the middle-income geography. This branch is open for three hours during three days per week.

TCF offers alternative delivery systems. Most notably, TCF offers a free digital banking platform that expands access to LMI geographies in the AA. Digital banking includes mobile and online banking, which provide the following services: bill pay, internal transfers, account-to-account transfers, budgeting, balance inquiries, and mobile deposits. TCF does not collect customer income information from customers as a requirement for enrolling in digital banking and therefore cannot provide data showing the impact of digital banking for LMI individuals. However, TCF was able to provide internal data showing the impact of the digital banking platform for LMI geographies during the evaluation period. In the Milwaukee CSA, 44.6 percent of digital banking customers were located in LMI geographies. Additionally, 306 thousand transactions, representing 39.9 percent of total digital banking transactions, and 759.2 thousand digital banking sessions, representing 47.4 percent of total sessions, were conducted by customers living in LMI geographies. Digital banking usage by customers in LMI geographies exceeds demographic data that shows 35.5 percent of the population lives in LMI geographies.

In addition to deposit-taking ATMs and digital banking platforms mentioned above, TCF also offers a call center open six days per week and 24/7 telephone banking. However, bank management did not maintain information to determine their effectiveness in helping to meet the credit needs of LMI individuals. Therefore, these alternative delivery systems did not impact the assessment of retail delivery systems.

Community Development Services

The institution provides a limited level of CD services.

During the evaluation period, 27 TCF employees provided 379 service hours to five qualified CD organizations benefiting the Milwaukee CSA. This performance is poor based on the opportunities in the AA and negatively impacted the overall Service Test conclusion for the AA. TCF employees shared their financial expertise by teaching financial literacy courses targeted to LMI high school students. Examples of TCF's CD services in the AA include, but are not limited to, the following:

- One employee served 232 hours on the Board of an organization operating homeless shelters in the Milwaukee area; and
- Nineteen employees provided 105 service hours by teaching financial literacy classes to LMI elementary students in Milwaukee.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and CSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	January 1, 2017 through December 31, 2019	
Bank Products Reviewed:	Home mortgage and small business loans Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
TCF Capital Solutions		Home mortgage loans, small business loans, CD loans, CD investments, and CD services.
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
Illinois-Indiana-Wisconsin MMSA	Full-scope	(Illinois) Cook, Dekalb, DuPage, Kane, <i>Kankakee*</i> , Kendall, Lake, McHenry, Will (Indiana) Lake**, and (Wisconsin) Kenosha
Arizona		
Phoenix-Mesa-Chandler MSA #38060	Full-scope	Maricopa County
Colorado		
Colorado Springs MSA #17820	Limited-scope	El Paso County
Denver-Aurora CSA	Full-scope	Adams, Arapahoe, Boulder, Broomfield, Denver, Douglass, and Jefferson Counties
Michigan		
Detroit-Warren- Ann Arbor CSA	Full-scope	Lapeer, Livingston, Macomb, Oakland, St. Claire, Washtenaw, and Wayne Counties
Minnesota		
Duluth MSA # 20260	Full-scope	St. Louis County
Mankato MSA # 31860	Limited-scope	Blue Earth County
Minneapolis-St. Paul CSA	Full-scope	Anoka, Benton, Carver, Dakota, Hennepin, Ramsey, Scott, Sherburne, Stearns, Washington, and Wright Counties
South Dakota		
Sioux Falls MSA #42620	Full-scope	Minnehaha County
Wisconsin		
Milwaukee-Racine-Waukesha CSA	Full-scope	Milwaukee, Waukesha, and Racine Counties

* *partial county.*

** *2017 only*

Appendix B: Summary of MMSA and State Ratings

RATINGS TCF National Bank				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
TCF National Bank	Outstanding	High Satisfactory	High Satisfactory	Outstanding
MMSA or State:				
IL-IN-WI MMSA	Outstanding	High Satisfactory	Outstanding	Outstanding
Arizona	Needs to Improve	Needs to Improve	Needs to Improve	Needs to Improve
Colorado	Low Satisfactory	High Satisfactory	Outstanding	Satisfactory
Michigan	Outstanding	Outstanding	High Satisfactory	Outstanding
Minnesota	Outstanding	Outstanding	Outstanding	Outstanding
South Dakota	Low Satisfactory	Needs to Improve	Low Satisfactory	Satisfactory
Wisconsin	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always

equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an

employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

MMSA (state): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rating Area: A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

tier 1 capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased loans are treated the same as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,

and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography –** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower -** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

2017

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Chicago-Naperville CSA	1,102	157,107	100.0	252,787	4.8	4.2	3.5	18.4	26.2	15.3	35.5	40.0	35.3	41.1	29.3	45.8	0.1	0.3	0.1
Total	1,102	157,107	100.0	252,787	4.8	4.2	3.5	18.4	26.2	15.3	35.5	40.0	35.3	41.1	29.3	45.8	0.1	0.3	0.1

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Chicago-Naperville CSA	1,102	157,107	100.0	252,787	23.8	14.6	6.0	16.5	38.5	16.6	18.8	24.6	21.0	40.9	18.3	40.4	0.0	4.0	16.0
Total	1,102	157,107	100.0	252,787	23.8	14.6	6.0	16.5	38.5	16.6	18.8	24.6	21.0	40.9	18.3	40.4	0.0	4.0	16.0

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data
 Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Chicago-Naperville CSA	367	40,940	100.0	183,538	5.5	4.4	4.3	16.3	19.6	16.7	31.1	38.4	32.5	46.6	37.6	46.2	0.5	0.0	0.3
Total	367	40,940	100.0	183,538	5.5	4.4	4.3	16.3	19.6	16.7	31.1	38.4	32.5	46.6	37.6	46.2	0.5	0.0	0.3

*Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data
 Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

2017

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Chicago-Naperville CSA	367	40,940	100.0	183,538	80.7	17.7	48.0	8.2	24.3	11.2	58.0
Total	367	40,940	100.0	183,538	80.7	17.7	48.0	8.2	24.3	11.2	58.0

*Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data
 Due to rounding, totals may not equal 100.0%*

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2018-19**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Chicago-Naperville CSA	3,813	785,331	100.0	300,555	4.5	3.6	3.4	18.2	20.2	14.5	35.4	33.3	33.9	41.8	42.9	48.1	0.1	0.1	0.1
Total	3,813	785,331	100.0	300,555	4.5	3.6	3.4	18.2	20.2	14.5	35.4	33.3	33.9	41.8	42.9	48.1	0.1	0.1	0.1

Source: 2015 ACS Census; 01/01/2018 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data
 Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2018-19**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Chicago-Naperville CSA	3,813	785,331	100.0	300,555	23.5	12.6	5.8	16.4	24.6	16.7	18.6	18.8	21.0	41.5	40.4	41.1	0.0	3.6	15.4
Total	3,813	785,331	100.0	300,555	23.5	12.6	5.8	16.4	24.6	16.7	18.6	18.8	21.0	41.5	40.4	41.1	0.0	3.6	15.4

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data
 Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2018-19**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Chicago-Naperville CSA	629	80,171	100.0	218,816	4.9	5.7	3.9	15.7	19.2	16.2	29.7	41.0	31.6	49.2	34.0	48.0	0.5	0.0	0.3
Total	629	80,171	100.0	218,816	4.9	5.7	3.9	15.7	19.2	16.2	29.7	41.0	31.6	49.2	34.0	48.0	0.5	0.0	0.3

*Source: 2019 D&B Data; 01/01/2018 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data
 Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2018-19	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Chicago-Naperville CSA	629	80,171	100.0	218,816	83.8	11.8	43.1	6.6	11.3	9.6	76.9	
Total	629	80,171	100.0	218,816	83.8	11.8	43.1	6.6	11.3	9.6	76.9	
<i>Source: 2019 D&B Data; 01/01/2018 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data</i> <i>Due to rounding, totals may not equal 100.0%</i>												

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-19**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Phoenix MSA	1,296	329,297	100.0	255,198	4.6	1.4	3.6	18.8	6.9	14.7	34.7	19.1	34.9	41.9	71.9	46.3	0.0	0.7	0.6
Total	1,296	329,297	100.0	255,198	4.6	1.4	3.6	18.8	6.9	14.7	34.7	19.1	34.9	41.9	71.9	46.3	0.0	0.7	0.6

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-19	
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Phoenix MSA	1,296	329,297	100.0	255,198	21.8	2.4	4.7	16.9	5.5	15.2	19.2	9.0	20.3	42.2	80.6	40.0	0.0	2.5	19.7	
Total	1,296	329,297	100.0	255,198	21.8	2.4	4.7	16.9	5.5	15.2	19.2	9.0	20.3	42.2	80.6	40.0	0.0	2.5	19.7	
<i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data</i> <i>Due to rounding, totals may not equal 100.0%</i>																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-19**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Phoenix MSA	204	32,133	100.0	104,551	6.2	23.5	6.9	15.9	17.6	16.5	28.4	23.0	26.8	48.9	34.3	49.3	0.5	1.5	0.6
Total	204	32,133	100.0	104,551	6.2	23.5	6.9	15.9	17.6	16.5	28.4	23.0	26.8	48.9	34.3	49.3	0.5	1.5	0.6

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data
 Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-19**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Phoenix MSA	204	32,133	100.0	104,551	89.7	11.3	46.2	3.5	29.9	6.9	58.8
Total	204	32,133	100.0	104,551	89.7	11.3	46.2	3.5	29.9	6.9	58.8

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data
 Due to rounding, totals may not equal 100.0%*

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-19**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Colorado Springs MSA	182	73,641	11.3	50,869	3.3	2.7	2.5	20.7	22.5	18.2	42.2	34.1	44.9	33.8	40.7	34.4	0.0	0.0	0.0
Denver-Aurora CSA	1,432	365,253	88.7	217,693	4.5	5.4	4.4	18.8	16.3	18.4	35.1	28.8	34.7	41.5	49.5	42.4	0.0	0.0	0.0
Total	1,614	438,894	100.0	268,562	4.3	5.1	4.1	19.1	17.0	18.4	36.4	29.4	36.6	40.2	48.5	40.9	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data
 Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-19**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Colorado Springs MSA	182	73,641	19.2	50,869	20.4	8.8	5.5	18.5	24.2	17.8	20.3	23.6	22.2	40.8	40.7	30.5	0.0	2.7	24.1
Denver-Aurora CSA	1,432	365,253	88.7	217,693	21.5	7.9	5.7	17.4	17.2	18.1	20.3	14.7	22.8	40.8	58.2	37.6	0.0	1.9	15.8
Total	1,614	438,894	100.0	268,562	21.3	8.0	5.7	17.6	18.0	18.0	20.3	15.7	22.7	40.8	56.3	36.3	0.0	2.0	17.3

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data,
 Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-19**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Colorado Springs MSA	32	3,207	12.0	14,605	7.2	12.5	7.6	23.2	31.3	22.7	33.0	28.1	33.2	36.4	28.1	36.5	0.2	0.0	0.1
Denver-Aurora CSA	235	30,877	88.0	92,731	6.3	13.2	7.5	19.5	22.1	20.2	32.8	30.6	31.5	41.2	34.0	40.5	0.3	0.0	0.3
Total	267	34,084	100.0	107,336	6.4	13.1	7.5	20.0	23.2	20.6	32.8	30.3	31.7	40.5	33.3	39.9	0.3	0.0	0.3

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data.
 Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-19**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Colorado Springs MSA	32	3,207	12.0	14,605	90.2	12.5	52.5	2.8	9.4	7.0	78.1
Denver-Aurora CSA	235	30,877	88.0	92,731	90.1	7.7	48.2	3.5	28.9	6.4	63.4
Total	267	34,084	100.0	107,336	90.1	8.2	48.8	3.4	26.6	6.5	65.2

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data
Due to rounding, totals may not equal 100.0%*

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-19**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Detroit-Warren-Ann Arbor CSA	3,149	747,413	100.0	173,809	6.1	3.5	2.7	19.8	18.1	14.7	37.5	39.9	39.1	36.5	38.3	43.5	0.1	0.3	0.1
Total	3,149	747,413	100.0	173,809	6.1	3.5	2.7	19.8	18.1	14.7	37.5	39.9	39.1	36.5	38.3	43.5	0.1	0.3	0.1

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-19**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Detroit-Warren-Ann Arbor CSA	3,149	747,413	100.0	173,809	22.9	13.2	9.8	16.7	23.6	19.8	19.0	20.6	23.1	41.4	38.7	36.2	0.0	4.0	11.1
Total	3,149	747,413	100.0	173,809	22.9	13.2	9.8	16.7	23.6	19.8	19.0	20.6	23.1	41.4	38.7	36.2	0.0	4.0	11.1

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-19**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Detroit -Warren -Ann Arbor CSA	574	118,823	100.0	96,754	7.9	12.7	6.9	20.2	26.1	19.2	32.0	31.0	31.9	38.7	27.9	41.1	1.1	2.3	0.9
Total	574	118,823	100.0	96,754	7.9	12.7	6.9	20.2	26.1	19.2	32.0	31.0	31.9	38.7	27.9	41.1	1.1	2.3	0.9

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-19**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Detroit-Warren-Ann Arbor CSA	574	118,823	100.0	96,754	84.0	19.5	46.3	6.5	36.2	9.4	44.3
Total	574	118,823	100.0	96,754	84.0	19.5	46.3	6.5	36.2	9.4	44.3

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data
 Due to rounding, totals may not equal 100.0%*

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-19**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Duluth MSA	26	20,488	0.6	5,998	2.1	3.8	3.7	14.9	11.5	13.2	55.5	57.7	48.9	27.5	26.9	34.2	0.0	0.0	0.0
Mankato MSA	44	5,792	1.1	2,092	0.0	0.0	0.0	12.0	22.7	15.0	80.1	75.0	79.3	7.9	2.3	5.7	0.0	0.0	0.0
Minneapolis - St Paul CSA	4,037	889,930	98.3	166,954	2.1	2.3	2.4	14.2	18.2	13.8	50.4	50.6	49.8	33.3	28.9	34.0	0.1	0.1	0.1
Total	4,107	916,210	100.0	175,044	2.0	2.3	2.4	14.2	18.2	13.8	51.2	50.9	50.1	32.5	28.6	33.7	0.0	0.0	0.1

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data,

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-19**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Duluth MSA	26	20,488	1.4	5,998	19.9	7.7	7.0	17.0	11.5	18.0	22.9	23.1	23.4	40.2	53.8	36.1	0.0	3.8	15.5
Mankato MSA	44	5,792	2.3	2,092	20.9	22.7	9.8	17.6	31.8	20.2	22.9	31.8	22.4	38.5	11.4	28.6	0.0	2.3	19.0
Minneapolis-St Paul CSA	4,037	889,930	98.3	166,954	20.2	16.8	7.3	17.3	27.5	21.0	22.0	25.8	22.3	40.5	27.3	33.4	0.0	2.6	16.0
Total	4,107	916,210	100.0	175,044	20.2	16.8	7.4	17.2	27.5	20.9	22.1	25.8	22.3	40.4	27.3	33.4	0.0	2.6	16.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data
 Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-19**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Duluth MSA	13	1,780	5.6	2,781	8.0	0.0	8.1	23.3	23.1	23.3	44.9	53.8	42.4	23.8	23.1	26.2	0.0	0.0	0.0
Mankato MSA	3	324	1.3	1,065	0.0	0.0	0.0	27.2	0.0	28.2	67.9	100.0	65.7	5.0	0.0	6.1	0.0	0.0	0.0
Minneapolis - St. Paul CSA	216	29,764	93.1	70,059	4.6	4.2	4.1	16.2	20.4	15.4	46.9	57.4	48.4	32.0	18.1	32.0	0.3	0.0	0.2
Total	232	31,868	100.0	73,905	4.7	3.9	4.2	16.7	20.3	15.9	47.1	57.8	48.5	31.2	18.1	31.4	0.3	0.0	0.2

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-19**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Duluth MSA	13	1,780	5.6	2,781	80.6	7.7	54.4	5.7	0.0	13.6	92.3
Mankato MSA	3	324	1.3	1,065	79.2	0.0	49.2	6.7	0.0	14.1	100.0
Minneapolis-St. Paul CSA	216	29,764	93.1	70,059	86.2	16.7	52.9	5.7	32.4	8.1	50.9
Total	232	31,868	100.0	73,905	85.8	15.9	52.9	5.7	30.2	8.5	53.9

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data,
Due to rounding, totals may not equal 100.0%*

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-19**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Sioux Falls MSA	34	4,077	100.0	9,010	0.0	0.0	0.0	28.3	8.8	21.5	50.6	50.0	52.5	21.1	41.2	26.0	0.0	0.0	0.0
Total	34	4,077	100.0	9,010	0.0	0.0	0.0	28.3	8.8	21.5	50.6	50.0	52.5	21.1	41.2	26.0	0.0	0.0	0.0

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-19**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Sioux Falls MSA	34	4,077	178.9	9,010	21.0	8.8	11.8	19.3	38.2	23.8	24.2	17.6	23.0	35.5	20.6	28.3	0.0	14.7	13.1
Total	34	4,077	178.9	9,010	21.0	8.8	11.8	19.3	38.2	23.8	24.2	17.6	23.0	35.5	20.6	28.3	0.0	14.7	13.1

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-19**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Sioux Falls MSA	5	308	100.0	3,726	0.0	0.0	0.0	48.8	60.0	50.0	35.7	40.0	32.9	15.6	0.0	17.1	0.0	0.0	0.0
Total	5	308	100.0	3,726	0.0	0.0	0.0	48.8	60.0	50.0	35.7	40.0	32.9	15.6	0.0	17.1	0.0	0.0	0.0

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data,
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-19**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Sioux Falls MSA	5	392	100.0	3,726	83.5	20.0	51.3	5.7	20.0	10.7	60.0
Total	5	392	100.0	3,726	83.5	20.0	51.3	5.7	20.0	10.7	60.0

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data
 Due to rounding, totals may not equal 100.0%*

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-19**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Milwaukee-Racine-Waukesha CSA	498	141,179	100.0	57,100	8.0	5.4	4.0	14.8	21.7	12.4	35.7	45.0	34.8	41.5	27.9	48.7	0.0	0.0	0.0
Total	498	141,179	100.0	57,100	8.0	5.4	4.0	14.8	21.7	12.4	35.7	45.0	34.8	41.5	27.9	48.7	0.0	0.0	0.0

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-19**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Milwaukee-Racine-Waukesha CSA	498	141,179	100.0	57,100	24.9	14.9	7.1	16.5	31.3	18.0	19.4	23.5	22.3	39.2	27.9	40.6	0.0	2.4	12.0
Total	498	141,179	100.0	57,100	24.9	14.9	7.1	16.5	31.3	18.0	19.4	23.5	22.3	39.2	27.9	40.6	0.0	2.4	12.0

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data
 Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-19**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Milwaukee-Racine-Waukesha CSA	130	22,970	100.0	27,079	12.0	14.6	9.1	14.6	20.8	12.5	34.0	38.5	33.8	39.1	26.2	44.3	0.4	0.0	0.4
Total	130	22,970	100.0	27,079	12.0	14.6	9.1	14.6	20.8	12.5	34.0	38.5	33.8	39.1	26.2	44.3	0.4	0.0	0.4

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data,
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-19**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Milwaukee -Racine-Waukesha CSA	130	22,970	100.0	27,079	80.7	10.0	43.9	8.2	36.2	11.2	53.8
Total	130	22,970	100.0	27,079	80.7	10.0	43.9	8.2	36.2	11.2	53.8

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data
 Due to rounding, totals may not equal 100.0%*