PUBLIC DISCLOSURE

3/1/2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Capital Bank, National Association
Charter Number: 23850

2275 Research Blvd., Suite 600
Rockville, Maryland 20850

Office of the Comptroller of the Currency

400 7th Street S.W.
Washington, DC 20291

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.

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Overall CRA Rating

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

The Lending Test is rated: Outstanding.
The Community Development Test is rated: Outstanding.

The major factors that support this rating include:

The Lending Test rating is based on the bank's record of performance in meeting credit needs of its assessment area (AA):

- The bank's loan-to-deposit (LTD) ratio is more than reasonable given the bank's size, financial condition, and business strategy;
- The bank originated a majority of its loans within its AA;
- The geographic distribution of loans reflects excellent distribution throughout the AA;
- The bank's distribution of loans to borrowers of different incomes and businesses of different sizes is excellent;
- The bank offered several innovative and/or flexible loan programs that addressed affordable housing and small business lending needs in the AA.

The Community Development (CD) Test rating is based on the aggregate assessment of the bank's CD activities for loans, investments, and services in the bank's AA:

- The bank's CD activities demonstrate an excellent responsiveness to the credit needs of its AA.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is more than reasonable.

The bank's quarterly net LTD ratio averaged 98.9 percent over the past 13 calendar quarters from December 31, 2017 to December 31, 2020. The ratio ranged from a quarterly low of 93.2 percent as of March 31, 2020, to a quarterly high of 104.8 percent as of September 30, 2018. The ratio is calculated on a bank-wide basis. The quarterly average net LTD ratio for a peer group of six similarly situated institutions with assets ranging from $675.2 million to $1.8 billion was 94.2 percent over the same period. The peer group's ratio ranged from a quarterly low of 90.1 percent to a quarterly high of 97.4 percent during that time period. The bank's average LTD ratio compares favorably to comparable institutions located in the same AA.

The bank sells a large volume of its home mortgage loans in the secondary market, and these sold loans are not reflected in the bank's LTD ratio. During the three-year review period, the bank sold nearly 4,278 mortgage loans totaling $1.4 billion.

Lending in Assessment Area

A majority of the bank's loans are inside its AA.

The bank originated and purchased 57.3 percent of its total loans inside the bank's AA 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.

Of the HMDA-reportable loans originated during the review period, 56.8 percent by number and 63.9 percent by dollar amount were inside the AA. The number of loans outside of the bank's AA is due to the bank's mortgage banking activities that results in a significant number of applications from outside of the AA. Loans made outside of the bank's AA through the loan production offices (LPOs) are consistent with the bank's business and lending strategy and the bank has adequately addressed the needs of its AA.

The substantial majority of the bank's business lending by number and dollar volume of loans occurred within the bank's AA. Based on a sample of 56 business loans originated during the evaluation period, 93.9 percent by number, and 95.5 percent by dollar volume were originated within the bank's delineated AA. It should be noted that only a sample of the small business loans was included in the analysis while the entire universe of HMDA-reportable loans was considered. This analysis had a neutral impact on the overall geographic distribution of lending by income level of geography.

Table D - Lending Inside and Outside of the Assessment Area

Loan Category	Number of Loans				Total	Dollar Amount of Loans $(000s)				Total
	Inside		Outside			Inside		Outside		
	#	%	#	%	#	$	%	$	%	$(000s)
Home Mortgage	2,456	56.8	1,865	43.2	4,321	979,070	63.9	553,051	36.1	1,532,121
Small Business	52	93.9	4	7.1	56	44,851	95.5	2,113	4.5	46,964
Total	**2,508**	**57.3**	**1,869**	**42.7**	**4,377**	**1,023,921**	**64.8**	**555,164**	**35.2**	**1,579,085**

Source: Bank Data
Due to rounding, totals may not equal 100.0%

Description of Institution

Capital Bank, National Association (CBNA, bank, or institution) is a federally chartered interstate community bank headquartered in Rockville, Maryland. The bank is a wholly owned subsidiary of Capital Bancorp, Inc., a one-bank holding company also located in Rockville, Maryland. Capital Bancorp, Inc. is traded on the NASDAQ Global Market under the symbol CBNK. The bank does not have any operating subsidiaries or affiliates. The bank has two nationwide consumer lending brands; Capital Bank Home Loan (CBHL) and OpenSky Secured Credit Card (OpenSky). The CBHL division originates conventional and government guaranteed residential mortgage loans for sale into the secondary market with servicing rights released. The OpenSky division provides secured credit cards to underbanked customers striving to rebuild their credit scores.

The bank's AA consists of a portion of the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA Combined Statistical Area (CSA). The AA, which is based on the location of the bank's offices, and contiguous communities, includes:

- Washington-Arlington-Alexandria, DC-VA-MD-WV Multistate MSA 47900:
    - Frederick-Gaithersburg-Rockville, Metropolitan Division #23224:

- Montgomery and Frederick Counties, Maryland (MD).
- Washington-Arlington-Alexandria, DC-VA-MD-WV Metropolitan Division #47894:
  - Washington, District of Columbia (D.C.); Calvert, Charles, Prince George's Counties, Maryland; Arlington, Clarke, Culpeper, Fairfax, Fauquier, Loudoun, Prince William, and Stafford Counties, Virginia; Alexandria, Fairfax, Falls Church, Manassas, and Manassas Park Cities, Virginia.
- Baltimore-Columbia-Towson, MD Metropolitan Statistical Area (MSA) #12580:
  - Baltimore, Anne Arundel, Carroll, Harford, Howard, and Queen Anne's Counties; and Baltimore City, Maryland.

The OCC combined all the AA geographies into a single delineated rating area for this evaluation, which will be referred to as the Washington-Baltimore-Arlington MCSA AA. The AA meets the requirements of the CRA and does not arbitrarily exclude any low- or moderate-income geographies.

In addition to its headquarters, the bank operates five full-service banking offices, three in Maryland, one in Washington, D.C., and one in Virginia. The Maryland branches are located in Montgomery and Howard Counties in the cities of Bethesda, Rockville, and Columbia. In January 2018, the bank opened its Virginia branch located in Fairfax County in the city of Reston. Two branches are located in upper-income geographies, two in middle-income geographies, and one in a moderate-income geography. There are no branches in low-income geographies within the AA. All branches, except the Reston, Virginia branch, are equipped with automatic teller machines (ATMs). In addition, one stand-alone ATM is located at Revitz House, an independent living facility for seniors located in Rockville, Maryland. The bank relocated its executive office from 1 Church Street, Rockville, Maryland 20850 to 2275 Research Boulevard, Rockville, Maryland 20850, effective May 10, 2018. The bank did not close any branches, and no merger or acquisition activities occurred since the previous evaluation. The bank also operates five loan production offices (LPOs), of which two are located in Maryland, one in Virginia, one in Washington D.C., and one is located outside of the bank's AA in Rehoboth Beach, Delaware.

The bank offers a full range of deposit and loan products and services to businesses and consumers. Residential mortgage loans and loans to small businesses are the primary loan products assessed in this evaluation. Branch hours of operations are comparable to other local financial institutions. The bank's website https://capitalbankmd.com, provides additional information on its services.

As of December 31, 2019, the bank had total assets of $1.4 billion and tier 1 capital of $114.6 million. Net loans and leases of $1.1 billion, net of the allowance for loan and lease losses (ALLL) and deferred costs and fees, represented 85.7 percent of total assets. The loan portfolio consisted of 83.7 percent real estate loans, 12.5 percent commercial loans, 3.8 percent individual loans, and less than one percent other loans and leases.

There are no financial or legal impediments to hinder CBNA's ability to help meet the credit needs of the communities it services. The bank received a "Satisfactory" rating during its last Intermediate Small Bank (ISB) CRA evaluation dated December 4, 2017.

Innovative and/or Flexible Lending Products

CBNA utilized several innovative and/or flexible loan products that addressed the needs of low- and moderate-income (LMI) borrowers, geographies, and small businesses during the evaluation period. The use of these programs contributed positively to the bank's lending performance. The following is a summary of the flexible loan products that were available during the evaluation period:

Residential Lending Programs

- *Federal Home Loan Bank (FHLB) of Atlanta's Affordable Housing Program (AHP) Homeownership Set-Aside (FLHB AHP Set-Aside Program):* This program offers grant funding to assist LMI borrowers with a down payment, closing costs, counseling, or rehabilitation assistance in connection with the purchase or rehabilitation of an owner-occupied home. Homebuyers must have income that is less than or equal to 80 percent of the county area median income or the state median family income for the area, adjusted for family size as published annually by the Department of Housing and Urban Development (HUD), whichever is higher.

- *Baltimore CityLIFT Program:* This is a down payment assistance program funded by Wells Fargo Foundation in collaboration with NeighborWorks America. The program provides down payment assistance to homebuyers at or below 120 percent of the area median income for Baltimore City. The program offers a zero percent interest rate and is forgivable 20 percent each year for five years. Potential participants are required to complete homebuyer education administered by a HUD-approved housing counseling agency. The grant will cease, and the prorated balance will become due, payable upon demand, if the property is sold, refinanced, transfer of title, foreclosure, or other default occurs within the first five years.

- *Community Development Block Grant (CDBG):* CDBG is a HUD program that provides down payment and closing cost assistance to LMI homebuyers purchasing a home in Baltimore City. Homebuyers must earn a homeownership counseling certificate before making an offer. The program provides $5,000 for first-time homebuyers with a household income at or below 80 percent of area median income.

- *Home Purchase Assistance Program (HPAP):* The HPAP program provides interest free loans and closing cost assistance to LMI individuals and families purchasing a single family, condominium, or cooperative unit in Washington, D.C. The loan is subordinate to a private first trust mortgage. The program provides a maximum of $80,000 in gap financing assistance and an additional $4,000 in closing cost assistance to homebuyers at or below 80 percent of the area median income. The loan is deferred until the property is sold, refinanced to take out equity, or is no longer the primary residence. The payments are deferred for five years with a 40-year principal only repayment period for moderate-income borrowers who earn between 80 percent and 110 percent area median income.

- *Howard County DreamMaker Loan:* This program is offered through the Howard County Department of Housing and Community Development (DHCD). The program provides up to $15,000 assistance to be used towards a down payment and or closing cost for first-time homebuyers with incomes up to 100 percent of the Howard County median income, adjusted for family size. Applicants are required to complete homebuyer education prior to closing on the loan. The loan is deferred until resale, refinance, or default.

- *Maryland Mortgage Program (MMP):* This program is offered through the Maryland DHCD. MMP provides down payment and closing cost assistance to first-time homebuyers in Maryland who have not owned a home in the past three years. The first-time homebuyer requirement does not apply for homebuyers purchasing in targeted areas, veterans using their exemption for the first time, or borrowers using flex loan products (without mortgage credit certificates). The annual household income of borrowers cannot exceed specified limits based generally on area median income, family size, location of the residence in a targeted area, and housing costs.

- *Prince George's County Pathway to Purchase Program:* This program provides home purchase assistance to eligible first-time homebuyers to purchase owner occupied or vacant residential properties anywhere in Prince George's County. Home purchase assistance includes down payment, and/or mortgage principal reduction costs, and/or closing costs. Applicants must have gross annual household incomes at or below 80 percent of the area median, adjusted for family size, and must attend an eight-hour housing counseling class provided by a HUD Certified housing counseling agency and receive a Certificate of Completion. It is a zero percent interest loan program that must be paid back when the home is sold, transferred, or ceases to be the primary residence of the homebuyer.

- *Virginia Housing (VHDA) Down Payment Assistance Grant:* This program is funded through the net earnings of Virginia Housing and is part of their commitment to strengthen homeownership opportunities for Virginia residents. The program provides eligible first-time homebuyers with funds needed for their down payment. All loans have maximum income and sales price limits and/or loan limits, which vary based on the geographic area in which the home is located. The first-time homebuyer restriction does not apply if the property is located in areas of Economic Opportunity.

Small Business Administration (SBA) Lending Programs

- *SBA 504 Loan Program:* This program provides approved small businesses with long-term, fixed-rate financing used to acquire fixed assets for expansion or modernization. The program is administered through nonprofit Certified Development Companies (CDCs). CDCs are certified and regulated by the SBA, and work with SBA and participating lenders to provide financing to small businesses, which in turn, accomplishes the goal of community economic development.

- *SBA 7a Loan Program:* This program supports small businesses that need capital to make short- and long-term investments. The program provides term loans up to $5 million, with an SBA guaranty between 75 and 85 percent, depending on loan size. Small businesses that meet SBA size eligibility standards benefit from long-term financing, a fixed maturity, and no prepayment penalties.

- *Small Business Plus! Program:* This program is a partnership with local community banks to boost lending to local small businesses and spur job creation in Montgomery County, Maryland. Through this program, Montgomery County, Maryland places deposits with community banks to generate jobs for the benefit of County residents, while providing the County with a competitive rate of return on those deposits.

See the Lending Test section in the MMSA rating area for details on usage of these programs.

Scope of the Evaluation

Evaluation Period/Products Evaluated

CBNA was evaluated under the ISB examination procedures. The ISB procedures include a Lending Test and a CD Test. The Lending Test evaluates the bank's record of meeting the credit needs of the bank's AA through its lending activities. The CD Test evaluates the bank's responsiveness to CD needs in its AA through qualified CD lending, investments, and services.

Based on examiner discussions with bank management and review of the bank's business strategy, CBNA's primary loan products were residential (home) mortgage loans and loans to small businesses. The evaluation period for home mortgage loans and loans to small businesses was January 1, 2017 through December 31, 2019. The CD activities evaluation period was from December 4, 2017, the date of the bank's last CRA evaluation, through December 31, 2019.

The bank is a HMDA reporter; therefore, the OCC considered all home mortgage loans reported on the bank's HMDA Loan Application Registers (LARs). The HMDA data was tested and found to be reliable. The bank is not required to report small business loan data; therefore, examiners reviewed a sample of 56 business loans totaling $47 million originated or purchased within the bank's AA. The sample is considered representative of the bank's performance during the evaluation period. The bank's lending performance is compared to 2015 American Community Survey (ACS) census data for mortgages and 2019 Dun and Bradstreet (D&B) data for loans to small businesses. Peer data was taken from the aggregate HMDA information for HMDA reporting financial institutions that reported lending activity within the AA. The bank's small business loans were compared to the aggregate of all lenders in the bank's AA reporting small business loans pursuant to the CRA.

The interim census activity updated income, population, and housing information, and resulted in changes to the income designations in some geographies. The impact of the 2015 ACS changes became effective January 1, 2017. The bank's AA was not impacted by this change; therefore, the OCC performed a combined analysis of the bank's data from January 1, 2017 through December 31, 2019.

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 the subsequent evaluation. No affiliate activity was included in this analysis.

Refer to the table in appendix A for more information on the scope of review.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating 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 the MMSA rating. All of the interstate branches fall within the same MMSA; therefore, the conclusions formed, and ratings assigned are based on a full-scope review of the bank's single AA. Refer to the "Scope" section under MMSA rating section for details regarding how the areas were weighted in arriving at the respective rating.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 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 AA 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 Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution 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

Washington- Baltimore-Arlington MCSA AA

CRA rating for the Washington- Baltimore-Arlington MCSA[1]: Outstanding.

The Lending Test is rated: Outstanding.
The Community Development Test is rated: Outstanding.

The major factors that support this rating include:

- Excellent geographic distribution of loans in the AA;
- Excellent distribution of lending to borrowers of different income levels and businesses of different sizes in the AA;
- Extensive use of innovative and/or flexible loan programs to help meet credit needs in the AA;
- Excellent responsiveness to the CD needs through CD activities in the AA.

[1] *This rating reflects performance within the MMSA. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.*

Description of Institution's Operations in Washington- Baltimore-Arlington MCSA AA

CBNA provides products and services in the MMSA through its main office and five full-service branches located in Washington, D.C., Maryland (MD), and Virginia. There have been no changes to the bank's AA since the previous evaluation. The bank's AA includes portions of the Washington-Arlington-Alexandria, DC-VA-MD-WV MSA, the Frederick-Gaithersburg-Rockville, Metropolitan Division, and the Baltimore-Columbia-Towson, MD MSA. All are within the larger Washington-Baltimore-Arlington, DC-MD-VA-WV-PA CSA. The composition of the AA is fully detailed in the Description of Institution section and in appendix A of this evaluation.

The AA is a competitive market for financial services. According to the June 30, 2019 Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, there were 75 financial institutions within the bank's AA that operated 1,491 full-service branches with aggregate deposits of $261.4 billion. CBNA ranked 24th with less than one percent deposit market share. The largest competitors within the AA were E*TRADE Bank with 15.6 percent market share, Bank of America, N.A. with 14.6 percent market share, Capital One, N.A. with 13.9 percent market share, and SunTrust Banks, Inc. with 10.7 percent market share.

There is a high level of competition for home mortgage loans among banks, credit unions, and non-depository mortgage lenders in the bank's AA. According to the most recent 2019 Peer Mortgage Data, there were 863 HMDA reporters who originated or purchased $140.5 billion home mortgage loans within the bank's AA. CBNA ranked 76th with a market share of 0.3 percent. The top five lenders were Wells Fargo Bank N.A., Quicken Loans, SunTrust Banks, Inc., PennyMac Loan Services LLC, and Navy Federal Credit Union, who held a combined market share of 20.8 percent in the AA. Competition is also high for small business lending. In 2019, 938 lenders reported 546,071 small business loans originated or purchased in the bank's AA. The top five small business loan reporters in 2019 were Wells Fargo N.A., Navy Federal Credit Union, Quicken Loans, Bank of America, N.A., and SunTrust Banks, Inc. CBNA is not required to publicly report small business lending data. As a result, the bank is not captured on the small business lending market share report.

According to the November 2019 Moody's Analytics, the economic drivers in the Washington-Arlington-Alexandria, DC-VA-MD-WV MSA were high per capita income and an educated workforce, being a major center for computer systems design and technology-related professional services, and a popular tourist destination. In the long term, Amazon's new headquarters will help grow the technology industry and further diversify the Washington economy. There is upside potential that Washington could attract some venture capital away from New York, Boston, or Philadelphia. The strengths of the Frederick-Gaithersburg-Rockville Metropolitan Division were an established presence in biotech, pharmaceuticals, and medical research; high per capita income; a highly skilled and well-educated workforce; and lower business costs than those in neighboring Washington metro divisions. Noted weaknesses are dependence on government spending, a very high cost of living, and home equity has not yet fully recovered. The strengths of the Baltimore-Columbia-Towson, MD MSA included established and well-funded medical research centers, a growing cybersecurity industry, and strong transportation and distribution industries. The weaknesses included above-average living and business costs, few public transportation links with Washington D.C., and below-average population growth.

Community Contacts

To gain a better understanding of local economic conditions and community needs, examiners reviewed four existing community contacts conducted in the prior twelve months. The identified community needs in the AA included affordable housing, small business lending, support for revitalization and stabilization activities, and better access to traditional banking services; second chance bank accounts, in which the bank waives extra fees to allow customers with blemished credit to open bank accounts; securitized credit cards, in which the bank issues credit cards collateralized by bank deposits from customers to help customers reestablish credit; and mortgage products with down payment and closing cost assistance. Examiners also reviewed information from a recent interagency CRA listening session of community development organizations. Among other things, the identified credit needs of the AA were affordable housing, access to credit for small businesses, neighborhood revitalization, financial coaching, board services and technical assistance, and homebuyer's education.

Demographic Data

There were 3,329,931 housing units located in the AA, of which 59.3 percent of units were owner-occupied, 33.2 percent were rental units, and 7.5 percent were vacant. Notably, only 4.1 percent of owner-occupied units were located in low-income geographies. This limits the opportunities to originate residential mortgage loans in these geographies. There were 2,018,129 families in the AA, of which 22 percent were low-income and 17 percent were moderate-income, 20 percent were middle-income, and 41.2 percent were upper income. Approximately 6.3 percent of families had incomes below poverty level.

According to 2019 D&B data, there were approximately 801,062 non-farm businesses operated in the AA. Approximately 98 percent of the businesses had revenues less than $1 million, approximately 4.8 percent had revenues greater than $1 million, and revenue was not reported for 8 percent of the businesses. Approximately 4.9 percent of businesses were located in low-income geographies, 17.6 percent were located in moderate-income geographies, 36.1 percent were located in middle-income geographies, and 40.8 percent were located in upper-income geographies. Service industries represented the largest portion of businesses at 47 percent; followed by nonclassifiable establishments at 18.3 percent, retail trade at 9.4 percent; and finance, insurance, and real estate at 8.5 percent. In addition, 64.1 percent of businesses had four or fewer employees, and 91.2 percent operated from a single location. Additionally, 87.2 percent of businesses had gross annual revenues of $0.5 million or less, indicating that the majority of businesses in the AA were very small.

The following tables provide a summary of the demographics that includes housing and business information for the MMSA.

Table A – Demographic Information of the Assessment Area Assessment Area: Washington- Baltimore-Arlington MCSA AA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	1,981	10.8	21.5	34.4	31.7	1.7
Population by Geography	8,463,009	8.8	21.1	35.7	33.7	0.6
Housing Units by Geography	3,329,931	9.7	21.4	35.8	32.8	0.4
Owner-Occupied Units by Geography	1,975,002	4.1	16.8	38.5	40.5	0.1
Occupied Rental Units by Geography	1,106,096	17.3	28.8	32.0	21.1	0.8
Vacant Units by Geography	248,833	20.5	24.6	30.7	23.5	0.6
Businesses by Geography	801,062	4.9	17.6	36.1	40.8	0.6
Farms by Geography	14,919	2.6	16.5	41.2	39.5	0.1
Family Distribution by Income Level	2,018,129	22.0	16.8	20.1	41.2	0.0
Household Distribution by Income Level	3,081,098	23.6	16.1	18.3	42.0	0.0
Median Family Income MSA - 12580 Baltimore-Columbia-Towson, MD MSA		$87,788	Median Housing Value			$367,348
Median Family Income MSA - 23224 Frederick-Gaithersburg-Rockville, MD		$112,655	Median Gross Rent			$1,435
Median Family Income MSA - 47894 Washington-Arlington-Alexandria, DC-VA-MD-WV		$106,105	Families Below Poverty Level			6.3%

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.

When looking at housing affordability, the MCSA has a very high cost of living that makes homeownership for most LMI persons difficult to obtain. The table below illustrates housing affordability calculations for the MSAs and Metropolitan Division included in the bank's AA. The monthly mortgage payment calculations assume a 30-year mortgage with a 5.0 percent interest rate, but does not account for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses. The maximum low-income and maximum moderate-income annual income calculations are based on 50 percent and 80 percent of the 2019 FFIEC adjusted median family income in each Metropolitan Division or MSA, respectively. As the table illustrates, both low- and moderate-income borrowers would be challenged to afford the median home price in the Washington MSA and Frederick Metropolitan Division. However, in the Baltimore MSA, low-income borrowers would be challenged to afford the median home price, but moderate-income borrowers would be able to qualify.

Furthermore, there was a very limited number of owner-occupied-units available in the bank's LMI geographies. The population within the low-income geographies was 746,198; however, there were just 80,205 owner-occupied units. The population within the moderate-income geographies was 1,782,311; however, there were only 332,019 owner-occupied units.

2019 Housing Affordability									
MD/MSA Name	**2019 Updated MFI**	**Maximum Low- Income Annual Income**	**Maximum Affordable Mortgage Amount**	**Maximum Monthly Mortgage Payment**	**Maximum Moderate- Income Annual Income**	**Maximum Affordable Mortgage Amount**	**Maximum Monthly Mortgage Payment**	**2019 Median Home Sales Price***	**Mortgage Payment Based on Sales Price**
Washington MSA	114,700	57,350	267,081	1,263	91,760	427,330	2,294	470,000	2,523
Frederick MD	123,600	61,800	287,805	1,545	98,880	460,488	2,472	468,500	2,515
Baltimore MSA	101,000	50,500	235,181	1,263	80,800	376,289	2,020	299,950	1,610

*Source – National Association of Realtors 2019 median home sales price of existing single-family homes for Metropolitan Areas.

Scope of Evaluation in Washington-Baltimore-Arlington MCSA AA

The OCC conducted a full-scope review of the Washington-Baltimore-Arlington MCSA. There are no limited-scope areas to review. All of the AA geographies are combined, analyzed, and presented as one AA for purposes of this evaluation. Based on the bank's strategic plan, and discussions with management, the OCC determined that during the evaluation period, the bank's primary areas of lending focus were home mortgage and business loans. Both loan categories were weighted equally in evaluating performance.

Refer to the table in appendix A for a complete description of the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WASHINGTON-BALTIMORE-ARLINGTON MCSA AA.

The bank's performance under the Lending Test in the Washington- Baltimore-Arlington MCSA AA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Washington- Baltimore-Arlington MCSA AA is excellent. CBNA's use of innovative and/or flexible programs had a positive impact on conclusions under the Lending Test.

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the Washington- Baltimore-Arlington MCSA 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.

The percentage of home mortgage loans in low-income geographies significantly exceeded the percentage of owner-occupied housing units and was significantly stronger than the aggregate distribution. The percentage of home mortgage loans originated in moderate-income geographies exceeded the percentage of owner-occupied housing units as well as the percentage of aggregate lending.

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.

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

Lending Gap Analysis

OCC examiners reviewed summary reports and AA maps detailing the bank’s lending activity to identify any gaps in the geographic distribution of loans. No unexplained conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to individuals of different income levels and businesses given the product lines offered by the bank.

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 bank’s home mortgage loan originations and purchases.

Based on an analysis of the demographic data and considering the performance context factors discussed earlier in this report, the overall borrower distribution of home mortgage loans was excellent. The OCC considered the high median housing value compared to income that constrains affordability of homeownership for LMI individuals.

The distribution of home mortgage loans to low-income borrowers lagged the percentage of low-income families within the AA. While this performance was below the percentage of low-income families in the AA, it exceeded the aggregate level of lending. Within the AA, 6.3 percent of families were below the poverty level and may find it difficult to qualify for a home loan. The distribution of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families within the AA and the aggregate lending percentage.

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 bank’s originations and purchases of small loans to businesses.

The borrower distribution of small loans to businesses is reasonable. The percentage of loans to businesses with gross annual revenue of $1 million or less was below the percentage of those businesses. The percentage of loans to businesses with gross annual revenues of $1 million or less exceeded the aggregate industry distribution of loans to those businesses.

Innovative and/or Flexible Lending Programs

The bank participated in several innovative and/or flexible programs that support affordable housing for LMI individuals and economic development for small businesses. The bank's use of these programs had a positive impact on its Lending Test performance. During the evaluation period, the bank facilitated 489 housing grants totaling $13 million through affordable housing programs and 120 loans totaling $96.9 million through SBA lending programs.

The table below illustrates loans originated or activity conducted through the bank's innovative and/or flexible lending programs offered during the evaluation period:

CBNA Flexible Lending Programs		
Loan Program	**Number of Grants**	**Dollar Amount of Grants**
Residential Lending Programs		
Home Purchase Assistance Program (HPAP)	182	9,972,285
FLHBA AHP Set-Aside Program	235	1,302,411
Baltimore CityLIFT Program	35	679,000
Maryland Mortgage Program (MPP)	27	960,656
PG County Pathway to Purchase Program	4	50,000
Community Development Block Grant (CDBG) Program	3	15,000
VHDA Down Payment Assistance Grant Program	2	17,125
Howard County DreamMaker Program	1	15,000
Total Grants	**489**	**13,011,477**
Small Business Administration (SBA) Lending Programs		
	Number of Loans	**Dollar Amount of Loans**
SBA 504 Loan Program	9	45,997,024
SBA 7a Loan Program	58	15,159,805
Small Business Plus! Program	53	35,768,460
Total SBA Loans	**120**	**96,925,289**

Responses to Complaints

There were no consumer complaints regarding the bank's CRA performance or complaints indicating illegal or discriminatory lending practices during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the Washington-Baltimore-Arlington MCSA is rated Outstanding.

Based on a full-scope review, the bank exhibits excellent responsiveness to community development needs in the MCSA through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AA.

Number and Amount of Community Development Loans

Refer to the Community Development (CD) Loan table below for the facts and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	$(000's)	% of Total $
Washington- Baltimore-Arlington MCSA AA	12	100	50,463	100

During the evaluation period, the bank originated 10 CD loans totaling $27.4 million in the AA, and two loans for $23.1 million that benefited the broader statewide or regional area. The OCC considered CD loans that benefited the broader statewide and regional area as the bank has effectively met the credit needs of the AA. These loans demonstrated excellent responsiveness to identified needs in the area, particularly economic development and affordable housing.

Examples of qualifying CD loans include the following:

- Nine loans totaling approximately $46 million promoting economic development under the SBA 504 loan program. These loans provide approved small businesses with long-term, fixed rate financing used to purchase fixed assets for expansion or modernization.

- A $1.8 million loan to refinance a 14-unit apartment building located in a low-income geography that is master leased to a nonprofit organization that provides transitional and permanent supportive housing for homeless women. In addition to housing, the organization offers educational guidance, employment counseling, life and parenting skills training, advocacy, and case management.

Number and Amount of Qualified Investments

The Qualified Investment Table, shown below, set forth the information and data used to evaluate the bank's level of qualified CD investments. This table includes all CD investment, including prior period investments that remain outstanding as of the examination date.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Washington-Baltimore-Arlington MCSA AA	0	0	7	28	7	100	28	100	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, the bank provided seven charitable contributions totaling $28 thousand to organizations that provide supportive services to LMI individuals and families within the bank’s AA. The bank did not purchase any CD investments during the evaluation period. There were no prior investments to consider.

Extent to Which the Bank Provides Community Development Services

CD services represent adequate responsiveness to CD needs and opportunities in the Washington-Baltimore-Arlington MCSA AA. Bank employees provided approximately 127 service hours to six different qualifying organizations during the evaluation period. The organizations supported community services for LMI individuals and affordable housing in the AA.

Examples of qualifying activities include the following:

- A vice president served as a board member for a nonprofit organization devoted to providing basic services including housing, healthcare, homecare, education, and emergency assistance for the most vulnerable of Montgomery County residents.

- Bank employees provided first-time homebuyer classes in conjunction with a CD organization that provides assistance to LMI first-time homebuyers.

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 MSA(s) and non-MSA(s) 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:	01/01/2017 to 12/31/2019 Lending Test 12/04/2017 to 12/31/2019 CD Activities	
Bank Products Reviewed:	Home Mortgage Loans Small Business Loans Community Development Loans, Investments, and Services	
Affiliate(s)	**Affiliate Relationship**	**Products Reviewed**
None	Not Applicable	Not Applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	**Type of Exam**	**Other Information**
MMSA(s)		
Washington- Baltimore-Arlington MCSA AA	Full-scope	**Frederick-Gaithersburg-Rockville, Metropolitan Division #23224:** Montgomery and Frederick Counties, Maryland **Washington-Arlington-Alexandria, DC-VA-MD-WV MD #47894:** Washington, District of Columbia; Calvert, Charles, and Prince George's Counties, Maryland; Arlington, Clarke, Culpeper, Fairfax, Fauquier, Loudoun, Prince William, and Stafford Counties, Virginia; Alexandria, Fairfax, Falls Church, Manassas, and Manassas Park Cities, Virginia. **Baltimore-Columbia-Towson, MD Metropolitan Statistical Area (MSA) #12580:** Baltimore, Anne Arundel, Carroll, Harford, Howard, and Queen Anne's Counties, Maryland; Baltimore City, Maryland.

Appendix B: Summary of MMSA and State Ratings

RATINGS Capital Bank National Association			
Overall Bank:	**Lending Test Rating***	**CD Test Rating**	**Overall Bank/State/ Multistate Rating**
Capital Bank, National Association	Outstanding	Outstanding	Outstanding
MMSA or State:			
Washington-Baltimore-Arlington MCSA AA	Outstanding	Outstanding	Outstanding

(*) The Lending Test and Community Development Test carry equal weight 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 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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**.**

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 are treated 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 arrogate 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 O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2017-19
	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
Assessment Area:	#	$	% 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	
CBNA AA	2,456	979,070	100.0	366,407	4.1	15.3	3.7	16.8	18.0	15.4	38.5	32.6	39.2	40.5	33.9	41.6	0.1	0.2	0.1	
Total	**2,456**	**979,070**	**100.0**	**366,407**	**4.1**	**15.3**	**3.7**	**16.8**	**18.0**	**15.4**	**38.5**	**32.6**	**39.2**	**40.5**	**33.9**	**41.6**	**0.1**	**0.2**	**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	
CBNA AA	2,456	979,070	100.0	366,407	22.0	11.4	7.4	16.8	23.6	18.0	20.1	21.7	21.2	41.2	33.3	33.2	0.0	10.1	20.2	
Total	**2,456**	**979,070**	**100.0**	**366,407**	**22.0**	**11.4**	**7.4**	**16.8**	**23.6**	**18.0**	**20.1**	**21.7**	**21.2**	**41.2**	**33.3**	**33.2**	**0.0**	**10.1**	**20.2**	

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
CBNA AA	52	44,851,131	100	219,017	4.8	9.6	4.2	17.5	21.2	16.8	36.0	15.4	35.9	40.9	53.9	42.6	0.7	--	0.4
Total	**52**	**44,851,131**	**100**	**219,017**	**4.8**	**9.6**	**4.2**	**17.5**	**21.2**	**16.8**	**36.0**	**15.4**	**35.9**	**40.9**	**53.9**	**42.6**	**0.7**	**--**	**0.4**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2019 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
CBNA AA	52	44,851,131	100	219,017	84.5	73.1	49.0	6.0	26.9	9.5	--
Total	**52**	**44,851,131**	**100**	**219,017**	**84.5**	**73.1**	**49.0**	**6.0**	**26.9**	**9.5**	**--**

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