



## **PUBLIC DISCLOSURE**

January 6, 2020

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Eastbank, National Association  
Charter Number 18431

183 Centre Street  
New York, NY 10013

Office of the Comptroller of the Currency

343 Thornall Street, Suite 610  
Edison, NJ 08837

**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 **Satisfactory**.

**The lending test is rated: Satisfactory.**

The major factors that support this rating include:

- Eastbank, National Association's (Eastbank or bank) performance in the state of New York is satisfactory;
- The Lending Test rating is based on the bank's performance in the state of New York, which contains Eastbank's entire Assessment Area (AA).

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's loan-to-deposit (LTD) ratio is reasonable. Eastbank's quarterly average LTD ratio over the 18 quarters since the prior CRA evaluation was 71.97 percent. During this period, Eastbank's performance ranged from a low of 64.16 percent on June 30, 2015 to a high of 79.57 percent on June 30, 2019.

Eastbank's average LTD ratio compares favorably in relation to that of peer banks. The average quarterly LTD ratio is reasonable compared to other financial institutions of similar size and AAs. The LTD ratio for peer banks over the same 18 quarters averaged 76.00 percent and ranged from a low of 18.93 percent to a high of 135.29 percent.

### Lending in Assessment Area

A majority of the bank's loans are outside its AA. The bank originated and purchased 49.5 percent of its total loans inside the AA during the evaluation period. The bank maintains two branches and operates largely as a referral bank within the Asian-American community. Bank management reports the Asian-American community, including a material portion of its customer base, has begun moving into portions of Brooklyn due to increasing housing and commercial rental costs within the Chinatown neighborhood of Manhattan. Eastbank does not have a branch in Brooklyn, so it has not been included in the AA. This change, coupled with the bank's relationship-based business model, explains the increase in loans being originated outside the AA. This analysis is performed at the bank level, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. See the table below for more details regarding the bank's lending in the AA.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business	49	49.5	50	50.5	99	34,824	51.4	32,935	48.6	67,759

*Source: Evaluation Period: 1/1/2017 - 12/31/2019 Bank Data  
Due to rounding, totals may not equal 100.0*

## Description of Institution

Eastbank is a \$177.85 million minority-owned depository institution headquartered in the Chinatown neighborhood of Manhattan, New York. The bank was founded in 1984 by a group of Chinese community and business leaders to provide credit and banking services to the Asian-American community of New York City. The bank is wholly owned by Eastbank Corporation (EBC), a single-bank holding company and has a wholly owned subsidiary, EB America Inc., which own Roosevelt Realty Development Corporation. The bank's community reinvestment performance is not impacted by either the holding company or the subsidiaries.

Eastbank currently maintains two branches located in major and historic Asian-American communities of New York City: the main office in Chinatown as well as a secondary location in the Flushing neighborhood of Queens, New York. These two branches are the basis for the bank's AA of Lower Manhattan and Flushing, New York. For additional detail on the AA, please refer to *Table A – Demographic Information of the Assessment Area*. There are no other branches or deposit taking ATMs and there have been no branch openings or closing since the previous CRA performance evaluation. Further, there has been no merger or acquisition activity during the period since the previous CRA evaluation.

Eastbank operates in the highly competitive financial services market of New York City with a niche focus on the Asian-American community. The bank's business strategy is to develop long-term customer relationships and generate new business through referrals. According to the June 30, 2019 FDIC Deposit Market Share report, Eastbank ranks 84<sup>th</sup> of 107 deposit-taking institutions located within its AA, with \$139.32 million in deposits and a 0.01 percent market share. JPMorgan Chase Bank, NA currently retains the largest market share with \$496 billion in deposits and a 40.44 percent market share. The Bank of New York Mellon and Goldman Sachs Bank USA rank second and third in market share, holding 10.12 and 8.3 percent, respectively.

As of September 30, 2019, Eastbank reported total assets of \$177.85 million. Net loans and leases totaled \$109.28 million, or 61.4 percent of total assets and tier 1 capital was \$33.72 million. The bank offers a variety of non-complex and traditional loan and deposit products, such as commercial, residential, and industrial real estate lending as well as demand deposit, checking, and savings accounts.

The bank's primary lending product is commercial real estate, representing 51.63 percent of net loans and leases, or \$56.42 million as of September 30, 2019. Multi-family and residential lending comprise 45.9 percent of the loan portfolio. In addition, Commercial and Industrial (C&I) and Construction and Development (C&D) loans are offered, but do not comprise a significant proportion of the loan portfolio. Please refer to the table below for details regarding the composition of the bank's loan portfolio as of September 30, 2019.

Loan Type	Percentage of Loan Portfolio
Non-Farm, Non-Residential Commercial Real Estate	51.63%
Multi-Family	28.72%
1-4 Family Residential	17.18%
Commercial and Industrial	1.44%
Construction and Development	1.03%

There are no legal, financial, or other impediments affecting the bank's ability to help meet the credit needs of the communities it serves. Further, Eastbank received a rating of "satisfactory" in the previous CRA evaluation, dated August 10, 2015.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

We completed a review of Eastbank's CRA performance using Small Bank CRA examination procedures, which includes a lending test. The lending test evaluates the bank's record of meeting the credit needs of the bank's AAs through its lending activities. The bank's lending performance for 2017-2019 were evaluated on a combined basis.

### **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.

Eastbank defines its Lower Manhattan and Flushing, New York AA as parts of Queens and New York Counties, which are part of the New York-Wayne-White Plains, NY-NJ MD #35644, which is in turn part of the New York-Northern New Jersey-Long Island, NY-NJ-PA Metropolitan Statistical Area (MSA) #36620. The bank's AA does not arbitrarily exclude low- or moderate-income geographies and meets regulatory requirements. The OCC completed a full-scope review of the AA.

### **Ratings**

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings. Eastbank's only AA is within a single MSA and operates entirely within the state of New York. The overall rating is based solely on the full scope review of the bank's performance in the State of New York.

## **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.

## State Rating

### State of New York

#### CRA rating for the State of New York: Satisfactory

**The Lending Test is rated:** Satisfactory

- The Bank's LTD ratio is reasonable;
- The overall distribution of loans by gross annual revenue of the borrowers in the AA is excellent;
- The overall distribution of loans across AA geographies of different income levels, including LMI census tracts, is excellent;
- Eastbank originated a majority of loans outside of its AA, which was offset by the excellent distribution patterns in its lending within the AA; and
- There were no CRA-related complaints during the evaluation period.

#### Description of Institution's Operations in New York

Eastbank is headquartered in Manhattan, New York and maintains two branches within the New York-Wayne-White Plains, NY-NJ Metropolitan Division (MD). Eastbank offers a variety of products and services, focusing primarily on commercial real estate, as well as small- to medium-size business lending in their highly competitive financial services market.

The OCC reviewed the interview transcripts with community development organizations that serve small businesses as well as low- and moderate-income areas. These interviews took place during the evaluation period. Interviewed organizations included those on the Comptroller's Community Development tour in New York City. The New York City community contacts indicated a need for senior housing development and limiting the displacement of existing low-income residents. The contacts also stated a general need for affordable housing in the counties Eastbank serves. Another general community need was for arts and youth programs. Some contacts also noted a need to improve financial literacy in the community.

## Lower Manhattan and Flushing, NY

**Table A – Demographic Information of the Assessment Area**

Assessment Area: Eastbank Lower Manhattan and Flushing, NY

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	183	8.7	16.4	14.8	56.3	3.8
Population by Geography	844,815	11.0	17.1	13.4	57.0	1.5
Housing Units by Geography	455,920	8.3	13.0	11.1	65.7	1.9
Owner-Occupied Units by Geography	112,837	2.1	11.1	15.8	69.4	1.6
Occupied Rental Units by Geography	281,781	11.7	14.7	10.1	61.6	2.0
Vacant Units by Geography	61,302	4.1	8.8	7.5	77.9	1.7
Businesses by Geography	192,251	3.5	9.0	4.7	75.4	7.4
Farms by Geography	689	2.2	9.6	7.1	77.4	3.8
Family Distribution by Income Level	161,774	25.9	12.6	12.3	49.3	0.0
Household Distribution by Income Level	394,618	24.6	10.9	12.4	52.2	0.0
Median Family Income MSA - 35614 New York-Jersey City-White Plains, NY-NJ		\$67,560	Median Housing Value			\$734,141
			Median Gross Rent			\$1,851
			Families Below Poverty Level			12.1%

Source: 2015 ACS Census 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 New York

The OCC evaluated Eastbank's Community Reinvestment Act performance using the Small Bank evaluation procedures. These procedures included a Lending Test, which evaluates the bank's performance in serving the credit needs of its AA through its lending activities. Eastbank's lending performance focused on business loan data from January 1, 2017 to December 31, 2019.

### LENDING TEST

The bank's performance under the lending test in the state of New York is rated satisfactory.

Based on a full scope review, the bank's performance in the state of New York is excellent.

### Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the state of New York.

### ***Small Loans to Businesses***

Refer to Table Q in the State of New York 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.

#### **2017-2019**

The distribution of the bank's small loans to businesses in LMI geographies is excellent. The proportion of loans in low-income geographies significantly exceeded both the proportion of businesses and the aggregate distribution of loans in low-income geographies. The proportion of loans in moderate-income geographies is less than both the proportion of businesses and the aggregate distribution of loans in moderate-income geographies.

### ***Lending Gap Analysis***

The OCC performed a lending gap analysis that included an analysis of maps showing the distribution of branches, applications, and loans. The OCC did not identify any unexplained conspicuous lending gaps in the state of New York. The analysis had a neutral impact on the overall geographic distribution in the state of New York.

## **Distribution of Loans by Income Level of the Borrower**

The bank exhibits excellent distribution of loans to businesses of different sizes given the product lines offered by the bank.

### ***Small Loans to Businesses***

Refer to Table R in the "State of New York" section of Appendix D for the facts and data used evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

#### **2017-2019**

The distribution of the bank's small business lending by revenue is excellent. The proportion of loans made to businesses with annual revenues less than or equal to \$1 million was comparable to the proportion of business in the AA with revenues less than \$1 million and significantly exceeded the aggregate distribution of loans to those businesses.

### **Responses to Complaints**

The bank did not receive any CRA-related complaints during the evaluation period.

## Appendix A: Scope of Examination

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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 non-MSAs 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.”

<b>Time Period Reviewed:</b>	01/01/17 to 12/31/19	
<b>Bank Products Reviewed:</b>	Small business	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	N/A	N/A
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State of New York</b>		
Lower Manhattan and Flushing, NY	Full-scope	Partial Queens and Partial New York Counties

## Appendix B: Summary of MSA and State Ratings

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RATINGS		Eastbank, National Association	
Overall Bank:		Lending Test Rating	
Eastbank		Satisfactory	
MMSA or State:			
State of New York		Satisfactory	

## Appendix C: Definitions and Common Abbreviations

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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

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### 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 30<sup>th</sup> 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. The table also presents aggregate peer data for the years the data is available. 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 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
Lower Manhattan and Flushing, NY	49	34,824	100	70,987	3.5	67.3	6.8	9.0	2.0	5.5	4.7	0.0	5.8	75.4	30.6	76.0	7.4	0.0	5.9
<b>Total</b>	<b>49</b>	<b>34,824</b>	<b>100</b>	<b>70,987</b>	<b>3.5</b>	<b>67.3</b>	<b>6.8</b>	<b>9.0</b>	<b>2.0</b>	<b>5.5</b>	<b>4.7</b>	<b>0.0</b>	<b>5.8</b>	<b>75.4</b>	<b>30.6</b>	<b>76.0</b>	<b>7.4</b>	<b>0.0</b>	<b>5.9</b>

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

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>												<b>2017-19</b>
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Businesses with Revenues &lt;= 1MM</b>			<b>Businesses with Revenues &gt; 1MM</b>		<b>Businesses with Revenues Not Available</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	
Lower Manhattan and Flushing, NY	49	34,824	100.0	70,987	80.8	81.6	44.5	11.1	4.1	8.1	14.3	
<b>Total</b>	<b>49</b>	<b>34,824</b>	<b>100.0</b>	<b>70,987</b>	<b>80.8</b>	<b>81.6</b>	<b>44.5</b>	<b>11.1</b>	<b>4.1</b>	<b>8.1</b>	<b>14.3</b>	
<i>Source: 2019 D&amp;B Data; 01/01/2017 - 12/31/2019 Bank Data; 2017 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0</i>												