Office of the
Comptroller of the Currency
Washington, DC 20219

LARGE BANK

PUBLIC DISCLOSURE

July 8, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

MUFG Union Bank, N.A.
Charter Number: 21541

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New York, NY 10020

Office of the Comptroller of the Currency

Large Bank Supervision
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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 (LMI) 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.**

This evaluation considered the bank's business model of retail branches in California, Oregon, and Washington and the commercial branch activities in the states of New York, Georgia, Illinois, and Texas. The Office of the Comptroller of the Currency (OCC) performed a Large Bank Retail Evaluation of the retail branch states for the full evaluation period and for 2015 and 2016 in the commercial branch states. The bank entered into a Strategic Plan agreement with the OCC in early 2017, so the OCC assessed the bank's performance set forth in the Strategic Plan applicable to the commercial branch states for 2017 and 2018. The OCC blended the performance of these evaluations to arrive at the Overall CRA Rating. **Note:** Appendix C contains definitions and common abbreviations for terms used in this evaluation.

The following table indicates the performance level of MUFG Union Bank, N.A. (MUB) with respect to the Lending, Investment, and Service Tests:

	MUFG Union Bank N. A. Performance Tests		
Performance Levels	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment areas (AAs).
- Excellent geographic distribution of home mortgage and small business loan originations and purchases across all states.
- The bank is a leader in making community development (CD) loans. CD lending performance had a significant positive impact on the Lending Test rating.
- Excellent level of qualified CD investments and grants, particularly those that are not routinely provided by private investors, often with the bank in a leadership position.
- The bank exhibits good responsiveness to credit and community economic development needs, including significant use of innovative and complex investments to support CD initiatives. MUB was a leader in financing affordable housing projects, including construction, take-out, and affordable housing tax credit investments.

- The Service Test rating is based on the bank's branch distribution in the retail branch states combined with the commercial branch states. The OCC also considered MUB's record of opening and closing branches and alternative delivery services that impact low-to-moderate (LMI) populations. Retail banking services are accessible to geographies and individuals of different income levels within the AAs.

Lending in Assessment Area

A substantial majority of the bank's loans are in its AAs.

The bank originated and purchased 99 percent of its total loans inside the bank's AAs during the evaluation period. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

MUB Lending Inside and Outside of the Assessment Area

Loan Category	Number of Loans				Total #	Dollar Amount of Loans $(000s)				Total $(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		$	%	$	%	
Home Mortgage	65,111	99%	730	1%	65,841	42,898,679	99%	412,788	1%	43,311,467
Small Business	50,220	99%	330	1%	50,550	3,966,582	99%	34,984	1%	4,001,566
Small Farm	855	94%	58	6%	913	79,856	89%	9,851	11%	89,707
Consumer	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Total	116,186	99%	1,118	1%	117,304	46,945,117	99%	457,623	1%	47,402,740

MUB's inside/outside ratio is excellent. The table above indicates the bank's significant commitment to the delineated geographies for all loan products. The defined assessment areas are reasonable and do not exclude any LMI areas or reflect any illegal discrimination. MUB's inside/outside ratio had a neutral effect on the distribution of lending by income level of geography.

Description of Institution

MUB is an interstate full service commercial bank that operates in seven states. MUB is headquartered in New York, New York, with the main banking office in San Francisco, California. MUB is the primary subsidiary of MUFG Americas Holdings Corporation (MUAH). MUAH is a Federal Reserve-supervised intermediate holding company (IHC), under MUFG Bank, Ltd. (MUBL) (95.1 percent ownership) and Mitsubishi UFJ Financial Group, Inc. (MUFG) (4.9 percent ownership), with approximately $170 billion in assets. MUFG is one of the world's largest financial organizations with total assets of approximately $2.8 trillion, as of December 31, 2018. MUB's total assets for years ending 2017 and 2018 were $119 billion and $131 billion respectively. MUB's tier 1 capital levels for years ending 2017 and 2018 were $14.0 billion and $13.3 billion, respectively.

As of December 31, 2018, MUB operated 348 full-service branches within its AAs in seven-states. MUB has retail operations in California, Oregon, and Washington and has commercial bank operations in Georgia, Illinois, New York, and Texas. MUB has its most significant presence in California with 319 branches for gathering deposits and originating loans in the state. MUB's commercial bank branches only serve commercial clients and do not offer any retail products or services.

MUB operates one commercial bank branch each in Atlanta, Georgia; Chicago, Illinois; and New York, New York; and two commercial bank branches in Texas, one in Dallas and one in Houston. As noted, MUB's commercial bank branches do not offer retail products, such as consumer deposit accounts, retail credit accounts, residential mortgages, or small business loans (i.e., credit facilities of $1 million or less). These branches were established to exclusively provide commercial banking services, such as corporate treasury management, foreign exchange, interest rate risk management, custody, government services, and corporate and institutional trust to large businesses and corporations. They primarily compete with large complex banking organizations and other specialized corporate service providers.

Notwithstanding the absence of retail customers, the branches face competition for business and corporate deposit customers from a broader pool of institutions. Given the challenge of meeting its CRA obligation due to its limited specialized operations in the commercial branch states, MUB established a formal Community Reinvestment Act 2017-2021 Strategic Plan (Strategic Plan) for those states. The Strategic Plan, effective as of March 1, 2017, commits $375 million in CD loans and investments over a five-year period (2017-2021). The Strategic Plan establishes specific goals for the Atlanta-Sandy Springs-Roswell, GA metropolitan statistical area (MSA), the Chicago-Naperville-Arlington Heights, IL metropolitan division (MD), the New York-Jersey City-White Plains-Wayne, NY-NJ MD, the Dallas-Plano-Irving, TX MD, and the Houston-Woodlands-Sugar Land MSA.

There are no legal or financial factors impeding the bank's ability to help meet credit needs in its AAs. The prior evaluation by the OCC of MUB's CRA performance was in July 2015, when the bank received an "Outstanding" rating.

Scope of the Evaluation

The OCC evaluated MUB under both the Large Bank Retail CRA evaluation guidelines and the Strategic Plan guidelines established for the commercial branch states of Georgia, Illinois, New York, and Texas. From January 1, 2015 to February 28, 2017, the OCC evaluated all AAs under the Large Bank Retail tests. Beginning March 1, 2017, the OCC evaluated applicable portions of the bank under the large bank CRA tests or Strategic Plan as described below.

Evaluation Period/Products Evaluated – Retail Evaluation

This evaluation considered MUB's Home Mortgage Disclosure Act (HMDA)-reportable loans (home purchase, home improvement and home refinance), CD loans, small loans to businesses, small loans to farms, CD investments, and CD services. The evaluation of the CD activities considered the calendar years 2015 to 2018 for the three retail states and the period of January 1, 2015 to February 28, 2017, for the retail portion of the commercial branch states.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same 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 section for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Evaluation Period/Products Evaluated – CRA Strategic Plan Evaluation

In evaluating the bank's performance under the Strategic Plan, the OCC reviewed CD lending and CD investment activities from March 1, 2017 through December 31, 2018. This 22-month period encompasses the first two plan years as applied to the bank's commercial branch operations in the states of Georgia, Illinois, New York, and Texas.

Ratings

Under the retail performance evaluation, the OCC rated the bank's overall CRA performance by blending the state ratings. The State of California was a significant driver of the rating based on the deposit concentration of nearly 90 percent. For the four commercial branch states under the Strategic Plan criteria for March 1, 2017 through December 31, 2018, the OCC compared MUB's performance to the performance goals set within the Strategic Plan for that period. After arriving at separate evaluation assessments at the retail and Strategic Plan level for each state, the OCC combined the performance to arrive at an overall Performance Evaluation Rating for the full four-year period considering the performance context within the bank's AA.

The OCC assigned the most weight to the Large Bank Retail evaluation with performance in the order of significance being California, Washington, and the commercial branch states. The OCC then weighted the bank's Strategic Plan performance and blended these ratings into one. The OCC considered minimum satisfactory performance in all rating areas to arrive at the overall blended rating.

Under the Strategic Plan, CRA regulations require MUB to specify measurable goals for helping to meet the credit needs of the AAs or areas covered by the Strategic Plan. Evaluation of MUB's performance under the Strategic Plan is based on the established dollar volume goals for both CD lending and investment in each commercial market AA and sets percentage thresholds for satisfactory and outstanding performance. The Strategic Plan anticipated a 2:1 ratio of CD lending to investment activity. The Strategic Plan allows for flexibility in how the dollar funding is ultimately distributed between CD loans and investment and allows for the aggregation of the loans and investments over multiple years in meeting its established goals. The Strategic Plan does not establish any goals related to CD services but instead envisions providing CD service-related activities through funding to CD organizations.

The aggregate commitment under the Strategic Plan calls for approximately $375 million over the five-year period with total annual allocations for each of the five commercial branches. These goals have been established based upon projected deposits associated with each market. The specific goals as contained in the Strategic Plan are as follows:

Commercial Branch Service Markets CRA Strategic Plan Goals ($000's)

Commercial Branch Market	Anticipated CRA Exam Period (2015-2017)	Future Exam Period(s) (2018-2021)				Aggregate Totals
	2017	2018	2019	2020	2021	
Atlanta, GA	$2,000	$6,000	$9,000	$17,500	$25,500	$60,000
Chicago, IL	$2,000	$6,000	$9,000	$17,500	$25,500	$60,000
New York, NY	$7,500	$10,000	$14,500	$26,500	$41,500	$100,000
Dallas. TX	$12,000	$13,500	$19,500	$21,000	$34,000	$100,000
Houston, TX	$6,500	$7,500	$11,000	$12,000	$18,000	$55,000
Aggregate Goals	$30,000	$43,000	$63,000	$94,500	$144,500	$375,000

MUB established percentage benchmarks to measure performance specific to dollar amount goals as illustrated below:

CRA Rating Parameters

Percent of Dollar Goals	Performance Rating
75% up to 95%	Low satisfactory
95% up to 105%	High satisfactory
Greater than 105%	Outstanding

According to the Strategic Plan, each commercial branch AA will be assigned a performance rating based on the extent the established area goal was achieved using the parameters outlined above. Performance levels falling below 75 percent of the assessment area goal will be considered needs to improve. The purpose of the Strategic Plan is to produce ratings to be incorporated in the overall MUB CRA Performance Evaluation. In the event an overall rating for the Strategic Plan is warranted, the state ratings will be rolled up to an overall CRA rating for the aggregate commercial markets based on a point system using the interagency large bank CRA performance test rating methodology. Each state rating will be assigned points based on its performance relative to goals with outstanding performance assigned 20 points, high satisfactory assigned 16 points, low satisfactory assigned 11 points, and needs to improve performance allocated 0 points. The composite rating for the aggregate commercial markets will be based on the average of the points assigned to each state and rating category within which the points fall. In Texas, the state rating will be determined based on the percent of the reinvestment dollars in the combined AAs relative to the aggregate goal for the two markets.

The Strategic Plan does not specifically require the use of innovative or complex investment or that the bank demonstrate a leadership role in developing or administering CD initiatives, but the Strategic Plan allows for the application of qualitative factors that may enhance the quantitative rating. For example, an AA's quantitative rating could be elevated based on the qualitative factors, such as a response that:

- Goes beyond that of, or not routinely provided by, others, e.g., nonprofit specialty services including financing to address gaps in funding and financial management of operations.
- Promotes systemic investment or increases responsiveness of others, e.g., leverage expertise in low income housing tax credits (LIHTC) to promote development of affordable housing for LMI individuals.
- Employs innovation or flexibility to respond to critical needs, such as contributions to a loan fund that helps alleviate the mortgage availability gap for LMI households that have, in part, been exacerbated by heightened regulation.

Discriminatory or Other Illegal Credit Practices Review

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

CRA rating for the State: **Outstanding**
The Lending Test is rated: **Outstanding**
The Investment Test is rated: **Outstanding**
The Service Test is rated: **High Satisfactory**

The major factors that support this rating include:

- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of the bank's home mortgage and small business loan originations and purchases is excellent.
- MUB is a leader in making CD loans. CD lending performance had a significant positive impact on the Lending Test rating.
- The bank has an excellent level of qualified CD investments and grants, particularly those that are not routinely provided by private investors, often in a leadership position.
- The bank makes significant use of innovative and/or complex investments to support CD initiatives. MUB is a leader in creating complex investments combined with development loans and low-income housing tax credits.
- MUB's branch distribution in California is good. Retail banking services are accessible to geographies and individuals of different income levels within the AAs. MUB's branch opening and closing policy considers LMI population impact and alternative delivery systems.
- MUB community development services are good.

Description of Institution's Operations in California

MUB delineated the following AAs within California

MSA	County
Los Angeles–Long Beach–Anaheim MSA	Los Angeles, Orange
San Diego-Carlsbad MSA	San Diego
San Francisco-Oakland-Hayward MSA	Alameda, Contra Costa, San Francisco, San Mateo, Marin
Sacramento-Roseville-Arden-Arcade MSA	El Dorado, Placer, Sacramento, Yolo
Bakersfield MSA	Kern
El Centro MSA	Imperial
Fresno MSA	Fresno
Hanford-Corcoran MSA	Kings
Madera MSA	Madera
Modesto MSA	Stanislaus
Oxnard-Thousand Oaks-Ventura MSA	Ventura
Redding MSA	Shasta
Riverside-San Bernardino-Ontario MSA	Riverside, San Bernardino
Salinas MSA	Monterey
San Jose-Sunnyvale-Santa Clara MSA	San Benito, Santa Clara
San Luis Obispo-Paso Robles-Arroyo Grande MSA	San Luis Obispo
Santa Cruz-Watsonville MSA	Santa Cruz

Santa Maria-Santa Barbara MSA	Santa Barbara
Santa Rosa MSA	Sonoma
Stockton – Lodi MSA	San Joaquin
Vallejo-Fairfield	Solano
Visalia-Porterville MSA	Tulare
Yuba City MSA	Sutter, Yuba
CA Non-MSA	Inyo, Mono

Of these 24 assessment areas, four received full scope reviews: Los Angeles-Long Beach-Anaheim MSA (Los Angeles AA), Sacramento-Roseville-Arden-Arcade MSA (Sacramento AA), San Diego-Carlsbad MSA (San Diego AA), and San Francisco-Oakland-Hayward MSA (San Francisco AA). These areas accounted for the largest portion of the lending and deposits amongst the AAs. California represents the largest rated area by deposits. In the State of California, MUB had $78.9 billion of deposits, representing 75.0 percent of adjusted deposits. The OCC adjusted deposits to reflect a depositor's address. For example, large corporate deposits are centrally booked in LA, but adjusted to the corporate operations address. MUB ranked fourth among 206 financial institutions in the state with a 5.4 percent market share. The bank originated and purchased approximately $46 billion reported loans during the evaluation period. MUB extended eighty-five percent of the $46 billion for California home mortgage loans. The remaining 15 percent included small loans to business and community development loans.

Los Angeles AA

MUB had $43.7 billion in deposits and ranked fourth amongst 121 financial institutions in the Los Angeles AA with 8.15 percent market share. Bank of America, N.A., Wells Fargo Bank, N.A., and JPMorgan Chase Bank, N.A. ranked in the top three with a market share of 18.81, 14.72 and 12.63 percent respectively. MUB operated 107 branch offices and 158 ATMs in the MSA AA during the evaluation period. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies.

San Diego AA

MUB had $11.1 billion in deposits and ranked fourth amongst 53 financial institutions in the San Diego AA market with a 12.4 percent market share. Wells Fargo Bank, N.A., Bank of America, N.A., and JPMorgan Chase Bank N.A. ranked in the top three with market shares of 22.6, 15.5, and 14 percent respectively. MUB operated 55 branch offices and 99 ATMs in the MSA AA during the evaluation period. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies.

San Francisco AA

MUB had $9.1 billion in deposits and ranked eighth amongst 69 financial institution in the San Francisco AA with a 2.5 percent market share. Bank of America, N.A., Wells Fargo Bank, N.A., and First Republic Bank ranked in the top three with market shares of 32.2, 20.7, and 9.1 percent respectively. MUB operated 32 branch offices and 37 ATMs in the MSA AA during the evaluation period. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies.

Sacramento AA

MUB had $2.3 billion in deposits and ranked fifth amongst 38 financial institutions in the Sacramento AA with a 4.4 percent market share. Wells Fargo Bank, N.A., US Bank N.A., and Bank of America, N.A. ranked in the top three with market shares of 23.3, 18.7, and 17.2 percent respectively. MUB operated eight branch offices and 10 ATMs in the MSA AA during the evaluation period. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies.

Demographic and Economic Data by Assessment Area

Los Angeles AA

The Los Angeles AA is one of the most populous areas in the US with significant house affordability issues. The median housing value of $516 thousand is eight times the median family income in Los Angeles and six times the median family income in Anaheim. Median gross rents significantly increased over the four-year evaluation period limiting rental affordability and causing increased homelessness. The following table provides a summary of the demographics that includes housing and business information for the Los Angeles AA.

Table A – Demographic Information of the Assessment Area

Assessment Area: Los Angeles-Long Beach-Anaheim MSA AA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2,929	9.1	28.0	25.9	35.1	1.8
Population by Geography	13,154,457	8.6	28.9	26.9	35.0	0.6
Housing Units by Geography	4,541,360	7.5	25.8	26.2	40.1	0.4
Owner-Occupied Units by Geography	2,082,030	2.7	17.6	27.5	52.2	0.1
Occupied Rental Units by Geography	2,190,392	12.0	33.7	25.1	28.4	0.7
Vacant Units by Geography	268,938	8.0	24.6	24.4	42.2	0.8
Businesses by Geography	995,930	5.0	19.3	25.3	48.5	2.0
Farms by Geography	10,825	3.5	18.5	28.0	49.1	0.8
Family Distribution by Income Level	2,913,538	24.4	16.3	17.0	42.3	0.0
Household Distribution by Income Level	4,272,422	25.6	15.5	16.1	42.8	0.0
Median Family Income MSA - 11244 Anaheim-Santa Ana-Irvine, CA MD		$86,003	Median Housing Value			$515,607
Median Family Income MSA - 31084 Los Angeles-Long Beach-Glendale, CA MD		$62,703	Median Gross Rent			$1,353
			Families Below Poverty Level			13.0%

Source: 2010 U.S. Census & 2015 ACS Census and 2018 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.

For the Los Angeles AA, the OCC used information from Moody's Analytics, the American Community Survey (ACS), Bureau of Labor and Statistics (BLS), Los Angeles Economic Development Corporation (LAECD), Southern California Association of Governments (SCAG), and Census Bureau data. There are significant differences within the MDs that make up the MSA; therefore, the economic information is presented by MD (Los Angeles and Orange Counties).

Los Angeles-Long Beach-Glendale, CA MD

During the review period, the unemployment rate for the Los Angeles-Long Beach-Glendale MD dropped to a record low. Per BLS, the average annual unemployment rate decreased from 6.6 percent in 2015 to 4.2 percent in 2018. This was slightly less than the state annual averages of 6.2 percent and 4.1 percent, for the same period. However, the area's average annual unemployment rates were higher than the national annual average unemployment rates of 5.3 percent for 2015 and 3.6 percent for 2018. The population was 10,163,500 as of 2017 and ranked the second largest metro area in the country. Over one in four Californians live in Los Angeles County. There are 88 cities and 125 unincorporated areas in the county.

According to Moody's Analytics, the Los Angeles-Long Beach-Glendale MD has completed its cyclical recovery. The area has moved into the late-cycle phase of its expansion. Employment growth lags the state and national averages, with gains decelerating or flat across all wage tiers. The result has been to help accelerate wage growth as employers compete for qualified workers. The major economic drivers are tourism, logistics, and high-tech industries. Economic strengths include: strong growth in the tech cluster which has led to the creation of more jobs and investment than previously expected; global links through entertainment, tourism and fashion; and the deep port at San Pedro Harbor which enables Los Angeles to handle the mega-ships that other ports cannot. At the same time high housing and business costs are hindering growth and it is expected the population will continue to dip rather than grow slowly. The largest industries in the area are education and health services; professional and business services; government; leisure and hospitality services; and retail trade. The top five employers are the University of California Los Angeles, Kaiser Permanente, University of Southern California, Northrop Grumman Corp., and Providence Health Systems. The economic expansion will decelerate in 2019. Labor shortages will continue, as will limited real estate supply. These two factors will ensure income growth and high real estate prices, which in turn will continue to drive out-migration in the county.

While the opinions differ on the impact that housing affordability will have on the economic prosperity for the region, it is clear that housing affordability is a real problem, with societal and economic consequences including a rise in homelessness and out-migration. According to the Los Angeles Economic Development Corporation's 2019 Economic Forecast and Industry outlook, the current median household income to median house price ratio is approximately 8.5. Los Angeles is at the vanguard of California's housing shortage emergency. Over 57 percent of renter households in the MSA are considered rent burdened. This means that these households spend one third or more of their income on housing costs. Almost one third of renters spend over half of their income on rental costs. The likelihood of buying and owning a home and accruing equity in the county is increasingly unlikely (it is estimated that only 24 percent of households could afford a home purchase if homes were available). Homelessness in the county has been a growing problem, with many causes. For the working poor, working homelessness is a result of housing unaffordability. The housing crisis poses the greatest long-term threat to local economic mobility and bottom-up prosperity.

Anaheim-Santa Ana-Irvine, CA MD

The Anaheim-Santa Ana-Irvine MD (Orange County) unemployment rate was at a cyclical low. According to the BLS, the average annual unemployment rate for the area decreased from 4.0 percent in 2015 to 2.7 percent in 2018, which was well below the state and national annual averages for the same period. The population in the county was 3,190,400 as of 2017 and ranks the third most populous county in the state.

According to Moody's Analytics, the economy was well-diversified, with a highly trained, well-educated labor force. Orange County, like Los Angeles, is in the late expansion phase of the economic cycle. For the first time in over a decade job growth is meaningfully below the national average and wage growth has become muted. Causes include a drop-in manufacturing, traffic congestion, no room for growth in cargo and air travel, an abundance in low-wage jobs and an overvaluation of single-family housing. The largest industries in the area included professional and business services; leisure and hospitality services; education and health services; government; and manufacturing. The area's top five employers are Disneyland Resort, The Walt Disney Co., University of California Irvine, St. Joseph Health, and Kaiser Permanente. As in Los Angeles, Orange County is experiencing a net out-migration due to housing and business costs. An example cited by Moody's is the announcement of Yamaha Motors headquarters relocation out of the region. Despite these challenges, the economic drivers for county of tourism, high tech, and health care remain solid.

As in other parts of California, the high cost of housing and a low supply of housing units overall presents a challenge for the county. According to the SCAG, prices for both owner and rental units continue to reach new highs and has significant negative consequences including the out-migration noted above and an exacerbation of the existing traffic problems. The median price of a home in 2018 reached $725,000. Using that figure, the current median household income to median house price ratio is approximately 8.4. It is estimated that only 20 percent of households could afford a home purchase if homes were available, which is just slightly better than Los Angeles. Orange County has the highest cost of living in Southern California.

Community Contacts

Examiners reviewed community contacts conducted during the evaluation that pertained to the Los Angeles AA. The contacts represent interviews with community development organizations and a group listening session with attendees including Community Development Financial Institutions (CDFIs), religious development organizations, community housing organizations, and various other nonprofits. The groups interviewed mentioned overall the most critical needs for the LMI constituents they serve include: housing all along the continuum (from transitional homeless shelter, permanent supportive, affordable rental, affordable homeownership, and innovative housing types); access to credit for small businesses (microenterprise, start-ups, and larger small businesses); technical assistance for businesses; and support for consumer financial education. Additionally, capacity building in the non-profit sector, affordable first-time home buyer programs, youth education and workforce training programs, affordable checking and Individual Development Accounts (IDA), and investments in CDFIs were mentioned as important needs and opportunities in which banks could engage.

San Diego AA

The following table provides a summary of the demographics that includes housing and business information for the San Diego AA.

Table A – Demographic Information of the Assessment Area

Assessment Area: San Diego-Carlsbad

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	628	9.7	22.6	32.5	34.1	1.1
Population by Geography	3,223,096	8.9	23.6	32.5	34.7	0.3
Housing Units by Geography	1,180,806	7.7	21.7	34.2	36.5	0.0
Owner-Occupied Units by Geography	579,079	2.8	15.1	35.5	46.6	0.0
Occupied Rental Units by Geography	515,078	13.1	28.8	32.8	25.2	0.0
Vacant Units by Geography	86,649	7.6	22.8	33.8	35.8	0.0
Businesses by Geography	254,233	5.5	15.2	35.1	44.0	0.2
Farms by Geography	5,135	3.8	17.6	38.6	40.1	0.0
Family Distribution by Income Level	731,328	23.6	16.9	17.8	41.7	0.0
Household Distribution by Income Level	1,094,157	24.8	15.7	17.1	42.4	0.0
Median Family Income MSA - 41740 San Diego-Carlsbad, CA MSA		$75,179	Median Housing Value			$458,248
			Median Gross Rent			$1,404
			Families Below Poverty Level			10.6%

Source: 2010 U.S. Census & 2015 ACS Census and 2018 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.

For the San Diego AA, the OCC used data from Moody's Analytics, the RWJ Foundation, San Diego Housing Commission, BLS data, ACS, and US Census. Per the BLS, the average annual unemployment rate decreased from 4.7 percent in 2015 to a 3.1 percent in 2018. This was less than the state annual averages of 6.2 percent and 4.1 percent, for the same period. The San Diego AA average annual unemployment rates were also lower than the national annual average unemployment rates of 5.3 percent for 2015 and 3.6 percent for 2018.

According to Moody's Analytics, the AA's major employers are Marine Corps Base Camp Pendleton, University of California San Diego, Naval Base San Diego, Naval Base Coronado (including North Island Naval Air Station), and Sharp HealthCare. The economy in the region is in the mid-expansion phase. Defense, high tech, and tourism are the main economic drivers in the AA. The region is growing jobs, but the pace has slowed. Professional, scientific and technical services, healthcare, manufacturing and government are the main sources of job growth. Major tech companies are located in the AA, such as Qualcomm and General Atomics. Labor costs in this sector are less than the Bay Area which is an attraction. However, high business and living costs have driven an out-migration trend for the past four years.

Housing affordability in the AA is poor. According to the San Diego Housing Commission's 2017 report, 50 percent of AA households cannot find a market–rate rental they can afford, and 60 percent cannot afford home ownership. That homeownership figure rises to 70 percent for moderate income households. The high cost of housing is affecting all LMI households negatively. According to the RWJ Foundation County Health Ranking, 21 percent of the AA households are severely housing cost burdened which means they must spend 50 percent or more of their household income on housing. The median home price in 2017 for the AA was approximately $563,800. Using that figure, the current median household income to median house price ratio is 7.5 times.

Community Contacts

Examiners reviewed community contacts conducted during the evaluation period that pertained to the San Diego AA. The contacts represent interviews with community development organizations. The organizations indicated that there is a severe shortage of subsidized and unsubsidized affordable housing in the region. The County is very diverse ethnically and linguistically and has many unbanked and underbanked people. Accessing credit and banking services is a challenge for these individuals and small businesses. In addition to affordable housing, affordable loan products and financial literacy and credit building education are needed. Small businesses (especially early stage and micro businesses) need access to banking, technical assistance, and credit. Working with technical assistance providers and funding these activities is another community development need in the AA.

San Francisco AA

The San Francisco-Oakland-Hayward MSA contains 960 census tracts, of which 11.8 percent are low-income 21.2 percent are moderate-income, 30.6 percent are middle-income, 34.6 percent are upper-income and 1.7 percent are NA. The following table provides a summary of the demographics that includes housing and business information for the AA.

Table A – Demographic Information of the Assessment Area

Assessment Area: San Francisco-Oakland-Hayward MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	980	11.8	21.2	30.6	34.6	1.7
Population by Geography	4,528,894	11.2	21.6	33.1	33.6	0.5
Housing Units by Geography	1,763,363	11.1	20.8	32.5	35.1	0.6
Owner-Occupied Units by Geography	890,161	4.6	16.9	34.5	43.9	0.1
Occupied Rental Units by Geography	770,060	17.9	25.1	30.5	25.4	1.0
Vacant Units by Geography	103,142	16.1	21.5	30.1	31.2	1.2
Businesses by Geography	365,607	11.4	17.1	29.4	41.3	0.8
Farms by Geography	5,189	7.1	18.3	33.9	40.7	0.1
Family Distribution by Income Level	1,046,725	24.4	16.0	18.1	41.5	0.0
Household Distribution by Income Level	1,660,221	26.3	14.7	16.1	42.9	0.0
Median Family Income MSA - 36084 Oakland-Hayward-Berkeley, CA MD		$93,822	Median Housing Value			$648,815
Median Family Income MSA - 41884 San Francisco-Redwood City-South San Francisco, CA		$103,742	Median Gross Rent			$1,526
Median Family Income MSA - 42034 San Rafael, CA MD		$121,130	Families Below Poverty Level			7.4%

Source: 2010 U.S. Census & 2015 ACS Census and 2018 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.

For the San Francisco AA, the OCC used information from Moody's Analytics, the ACS, BLS, Marin Economic Forum, Kiplinger, East Bay Economic Development Alliance, and Census Bureau data. The economic information is presented by MD (Oakland, San Francisco, and San Rafael).

Oakland-Hayward-Berkeley

The Oakland-Hayward-Berkeley MD is comprised of Alameda and Contra Costa counties. During the review period, the unemployment rate for the Oakland-Hayward-Berkeley MD dropped to a record low. Per the BLS, the average annual unemployment rate decreased from 4.3 percent in 2015 to 2.8 percent in 2018. This was significantly less than the state annual averages of 6.2 percent and 4.1 percent, for the same period. The area's average annual unemployment rates were also lower than the national annual average unemployment rates of 5.3 percent for 2015 and 3.6 percent for 2018. The population in the MD was 2,816,978 as of 2018.

According to Moody's Analytics, the MD (also known as the East Bay) is well into the late expansion phase of the business cycle, with job growth slowing to just under two percent year over year, down from nearly five percent in 2016. Escalating costs will moderate growth trends. A tight labor market is boosting wages, but is also creating cost pressures. Some net out-migration is likely a new trend. Recently, companies such as Pandora, Localwise, and the Raiders sports team either have or are in the process of relocating. Even with high living and business costs, including escalating housing costs, the MD is an attractive and more affordable alternative to San Francisco, with some employers relocating employees or headquarters into the area. The top five employers are the University of California Berkeley, Safeway Inc., Kaiser Permanente, Tesla, and Chevron Corp.

According to the East Bay Economic Development Alliance (EBDA), traffic congestion and high housing costs are a result of the lack of needed sustained housing production throughout the Bay Area including the East Bay. Due to the economic success in the region, fierce competition for housing close to employment centers results in longer commutes for LMI income residents and has pushed homeownership out of reach for many households. According to the EBDA, the median home price for the East Bay in 2018 was $738,330. Using that figure, the current median household income to median house price ratio is approximately 7.9. As of 2017, 30 percent of households in Alameda County and 32 percent of households in Contra Costa County were rent burdened, which means these households spend over 30 percent of their household income on housing.

San Francisco-Redwood City-South San Francisco

This San Francisco-Redwood City-South San Francisco MD is made up of San Francisco and San Mateo counties. During the review period, the unemployment rate for the MD dropped to a record low. Per the BLS, the average annual unemployment rate decreased from 3.1 percent in 2015 to 2.1 percent in 2018. This was significantly less than the state annual averages of 6.2 percent and 4.1 percent, for the same period. The area's average annual unemployment rates were also lower than the national annual average unemployment rates of 5.3 percent for 2015 and 3.6 percent for 2018.

According to Moody's, the economy of San Francisco-Redwood City-South San Francisco MD is on firm ground, but in the late expansion phase of the economic cycle. Job growth has slowed, particularly in business, professional, and information services. There is strong demand for commercial space which continues to fuel construction. Low unemployment is driving income growth; however, the high cost of living has outpaced the growth in salaries, reducing the standard of living even for high income earners. As with the East Bay, the economic success in the region and fierce competition for housing close to employment centers results in longer commutes for lower and moderate-income residents and has pushed homeownership out of reach for many households. The out-migration of residents in the MD has tempered its expansion. According to the Kiplinger report, the median home price for the MD in 2018 was $860,000. Using that figure, the current median household income to median house price ratio is approximately 8.3. The technology industry is a major economic driver for the MD, as well as finance, medical sciences and health related fields. The top five employers are the University of California San Francisco, Genentech, Wells Fargo, Oracle Corp., and Salesforce.com Inc.

San Rafael

The San Rafael MD is comprised of Marin County. During the review period, the unemployment rate for the MD dropped the lowest rate in the region. Per the BLS, the average annual unemployment rate decreased from 3.2 percent in 2015 to 1.9 percent in 2018. This was significantly less than the state annual averages of 6.2 percent and 4.1 percent, for the same period. The area's average annual unemployment rates were also lower than the national annual average unemployment rates of 5.3 percent for 2015 and 3.6 percent for 2018. The population in the MD was 260,955 according to ACS data. It is the least populous part of the MSA.

By all accounts the county is wealthier than its neighbors. The housing and labor markets are on a good foundation. The high cost of housing and long commute times for workers presents challenges for the local area. The MD also relies heavily on the Bay area employers and employment centers. The median home price for the MD in 2018 was $1.01 million. Using that figure, the current median household income to median house price ratio is approximately 8.9 times. The largest industries in the county are Professional, Science and Technical Services, Health Care, and Education.

Community Contacts

Examiners reviewed community contacts conducted during the evaluation and that pertained to the San Francisco-Oakland-Hayward MSA. The contacts represent interviews with individual organizations and a group listening session. The groups interviewed mentioned overall the most critical needs for the LMI income constituents they serve include housing and support for small businesses. Regarding housing, the issues facing LMI household are both cost and supply. The housing crisis is impacting very LMI families. Homelessness has increased because of the rapidly escalating rents. The high cost of housing is making it very difficult for cities to house police, fire, teachers and other critical public service providers. Other community development needs are small business micro loan products, technical assistance funding, affordable and responsible lending products to combat high cost online lending programs (for microenterprise, start-ups and larger small businesses), and support for consumer financial education (such as financial literacy and Volunteer Income Tax Assistance (VITA)). Additionally, operational funding for the non-profit sector, and investments in CDFIs were mentioned as important needs and opportunities in which banks could engage.

Sacramento AA

The table below provides a summary of the demographics that includes housing and business information for the AA.

Table A – Demographic Information of the Assessment Area

Assessment Area: Sacramento-Roseville Arden Arcade

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	486	9.5	23.7	33.1	33.1	0.6
Population by Geography	2,221,525	9.3	23.5	33.2	33.9	0.1
Housing Units by Geography	881,401	9.0	22.9	34.9	33.0	0.2
Owner-Occupied Units by Geography	471,937	4.5	18.3	34.9	42.2	0.0
Occupied Rental Units by Geography	325,198	14.8	29.7	33.9	21.1	0.4
Vacant Units by Geography	84,266	11.9	22.5	38.3	26.8	0.5
Businesses by Geography	144,724	9.3	20.6	31.2	36.9	1.9
Farms by Geography	3,828	4.9	17.7	34.9	42.1	0.4
Family Distribution by Income Level	529,877	23.6	16.3	18.3	41.8	0.0
Household Distribution by Income Level	797,135	25.4	15.5	17.1	42.0	0.0
Median Family Income MSA - 40900 Sacramento--Roseville--Arden-Arcade, CA MSA		$71,829	Median Housing Value			$293,578
			Median Gross Rent			$1,103
			Families Below Poverty Level			11.5%

Source: 2010 U.S. Census & 2015 ACS Census and 2018 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.

For the Sacramento AA, the OCC used data from Moody’s Analytics, the Brookings Institute, California Budget and Policy Center, BLS data, ACS, and US Census. Per the BLS, the average annual unemployment rate decreased from 5.3 percent in 2015 to a 3.5 percent in 2018 – the lowest rate in decades for this area. This was less than the state annual averages of 6.2 percent and 4.1 percent, for the same period. The Sacramento AA average annual unemployment rates were on par with the national annual average unemployment rates of 5.3 percent for 2015 and 3.6 percent for 2018.

According to Moody’s Analytics, the AA’s major employers are University of California Davis, UC Davis Health, Kaiser Permanente, Sutter Health, Dignity Health, and Intel Corp. The economy in the region is in the mid-expansion phase. The economy is considered strong and growing, with net job additions and payroll employment outpacing the West and National averages. Strengths include its position in the Central Valley, but near the Bay Area, which attracts both tech and agricultural investment. It has lower living and business costs than the Bay Area and a growing population trend that is robust for both

California and US standards. The largest industries in the MSA are Health and Social Assistance, Public Administration, and Retail Trade. According to a recent report by Brookings, the Sacramento AA has some economic weaknesses that should be addressed to ensure its future prosperity. While the region is productive and relatively prosperous, the dynamics in the region are changing. Employers are demanding workers with higher education and technology skills. Available jobs will continue to require higher skilled workers.

As the region becomes more racially diverse, it must close the educational attainment gap within its own home-grown population rather than relying on importing well educated workers from outside the region and the state. According to this report, 34 percent of the AA residents live in struggling families. These are defined as households that do not earn enough to cover their basic household expenses. Housing affordability is an issue statewide. The Sacramento AA also has its affordability challenges. While median rents and home prices are significantly lower than the Bay Area, median incomes are also lower. The California Budget & Policy Center reports that 19.9 percent of households are housing cost burdened, which is defined as having to pay more than 30 percent on household income for housing. Another 18.1 percent are severely housing cost burdened, which is defined as having to pay 50 percent or more of household income for housing. The median home price in 2018 for the AA was approximately $294 thousand. Using that figure, the current median household income to median house price ratio is 4.1.

Community Contacts

Examiners reviewed community contacts with nonprofits including Community Development Corporations conducted during the evaluation period that pertained to the Sacramento AA. The contacts represent interviews with individual organizations. The organizations indicated that affordable housing is a critical need in the AA. For LMI households, affordable rental housing production is needed and therefore investments and lending to develop the housing is also critical. Long commutes for workers was another challenge that is a direct result of the lack of affordable housing near employment centers. Other community development needs are small business loans, especially micro-loans, along with other small business lending products, and technical assistance.

Scope of Evaluation in California

The rating for the State of California is based on a full-scope evaluation of the bank's performance in the full scope areas of Los Angeles, San Diego, San Francisco, and Sacramento. The OCC placed more weight on the lending performance in Los Angeles, as the bank conducted a substantial majority of its activities in California in this assessment area. The OCC placed the least weight on the bank's performance in Sacramento as a small percentage of the bank's activities are in this assessment area. The OCC also considered performance in the limited scope areas, as described in appendix A.

The evaluation for 2015-2018 focused on HMDA, small business lending, CD loans, qualified investments, and retail and CD services. Loans reported pursuant to the HMDA and CRA data collection requirements for 2015-2018 were included in the review. The review included both loan originations and purchases. All aggregate lending data used in the analysis is from 2015-2018. Information from recently completed community contacts in these AAs, along with performance context provided by the bank, was considered.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CALIFORNIA

LENDING TEST

The bank’s performance under the Lending Test in California is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Los Angeles AA, San Diego AA, and San Francisco AA is excellent. Performance in the Sacramento AA is adequate.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs. MUB’s lending activities in California are commensurate with local deposit gathering volumes, considering the economy, interest rate environment, and competition during the evaluation period. The following Lending Activity tables illustrate the number and dollar volume of loans in each AA. The figures are referenced throughout this section.

Number of Loans*

Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Los Angeles	23,412	21,114	44	345	44,915	42.90%	40.89%
Sacramento	1,038	1,202	46	9	2,295	1.20%	2.43%
San Diego	7,022	9,860	67	145	17,094	11.55%	16.18%
San Francisco	11,975	3,791	10	163	15,939	21.53%	15.58%
Bakersfield	396	667	39	12	1,114	0.29%	1.04%
El Centro	109	169	22	1	301	0.07%	0.55%
Fresno	674	1,505	84	16	2,279	0.60%	1.55%
Hanford-Corcoran	78	188	45	3	314	0.05%	0.20%
Madera	91	135	46	1	273	0.07%	0.15%
Modesto	148	184	91	0	423	0.15%	0.27%
Oxnard-Thousand Oaks-Ventura	1,604	1,365	42	23	3,034	2.49%	2.16%
Redding	46	128	2	2	178	0.10%	0.11%
Riverside-San Bernardino-Ontario	2,760	3,104	28	27	5,919	3.26%	6.17%
Salinas	690	658	15	9	1,372	0.98%	1.32%
San Jose-Sunnyvale-Santa Clara	5,152	1,733	24	27	6,936	9.49%	4.64%
San Luis Obispo-Paso Robles-Arroyo Grande	188	264	14	6	472	0.26%	0.39%
Santa Cruz-Watsonville	402	284	12	5	703	0.64%	0.51%
Santa Maria-Santa Barbara	1,417	969	30	39	2,455	2.55%	2.85%
Santa Rosa	305	126	5	10	446	0.58%	0.25%
Stockton-Lodi	840	212	53	3	1,108	0.75%	0.29%
Vallejo-Fairfield	158	77	3	2	240	0.16%	1.32%
Visalia-Porterville	316	428	86	3	833	0.16%	0.64%
Yuba City	35	71	33	1	140	0.04%	0.14%
California Non-MSA	75	180	0	7	262	0.13%	0.37%

Dollar Volume of Loans $(000's)*

Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Los Angeles	$16,953,868	$1,815,550	$1,826	$977,998	$19,749,242	41.19%	40.89%
Sacramento	$437,670	$94,884	$3,785	$13,966	$550,305	2.10%	2.43%

San Diego	$4,216,323	$658,688	$2,728	$437,301	$5,315,040	15.68%	16.18%
San Francisco	$8,905,950	$370,446	$488	$633,650	$9,910,534	14.62%	15.58%
Bakersfield	$63,191	$39,826	$1,872	$30,554	$135,443	1.02%	1.04%
El Centro	$13,873	$18,341	$1,328	$6	$33,548	0.28%	0.55%
Fresno	$1123,638	$86,217	$3,328	$64,115	$277,298	2.09%	1.55%
Hanford-Corcoran	$11,969	$7,648	$1,610	$561	$21,788	0.29%	0.20%
Madera	$18,286	$7,494	$5,445	$8	$31,233	0.25%	0.15%
Modesto	$34,928	$16,423	$19,303	$0	$70,654	0.25%	0.27%
Oxnard-Thousand Oaks-Ventura	$939,502	$80,717	$2,398	$122,469	$1,145,086	2.78%	2.16%
Redding	$8,255	$6,600	$26	$33,000	$47,881	0.16%	0.11%
Riverside-San Bernardino-Ontario	$1,126,390	$234,424	$1,550	$139,566	$1,501,930	5.43%	6.17%
Salinas	$387,403	$50,703	$246	$11,509	$449,861	1.26%	1.32%
San Jose-Sunnyvale-Santa Clara	$3,935,966	$127,351	$964	$303,002	$4,367,283	6.36%	4.64%
San Luis Obispo-Paso Robles-Arroyo Grande	$100,113	$18,370	$698	$1,031	$120,212	0.43%	0.39%
Santa Cruz-Watsonville	$246,431	$13,358	$2,330	$32,443	$294,562	0.64%	0.51%
Santa Maria-Santa Barbara	$950,773	$64,633	$1,127	$157,397	$1,173,930	2.25%	2.85%
Santa Rosa	$208,937	$10,076	$116	$49,158	$268,287	0.41%	0.25%
Stockton-Lodi	$291,080	$17,327	$13,461	$23,544	$345,412	1.02%	0.29%
Vallejo-Fairfield	$64,358	$5,811	$337	$2,501	$73,007	0.22%	1.32%
Visalia-Porterville	$42,416	$22,278	$6,803	$25	$71,522	0.76%	0.64%
Yuba City	$6,424	$3,630	$7,840	$46	$17,940	0.13%	0.14%
CA Non-MSA	$26,239	$7,266	$0	$25,208	$58,713	0.24%	0.37%

Los Angeles AA

Lending levels reflect good responsiveness to AA credit needs when considering the bank's deposits and competition as reflected in the tables above.

Based on the June 30, 2018 Summary of Deposit Market Share Report, MUB ranked fourth out of 121 depository institutions with a deposit market share of 8.15 percent. Bank of America, N.A. ranked first in deposits with an 18.81 percent market share.

In overall HMDA lending, MUB ranked seventh out of 868 lenders with a 2.18 percent market share. Wells Fargo Bank, N.A. ranked first in the market with a 9.39 percent market share, JPMorgan Chase Bank, N.A. ranked second with a 6.39 percent market share, and Bank of America N.A. ranked third with 4.18 percent market share. Although MUB's HMDA market share is lower than its deposit market share, lending competition was significantly stronger than the competition for deposits in the AA. There are 868 HMDA lenders in the AA. In contrast, there are 121 depository institutions in the AA.

In small loans to businesses, MUB ranked ninth out of 243 lenders with a market share of 0.89 percent. The top lender was American Express, FSB with a market share of 23.66 percent, Chase Bank USA, N.A. ranked second with a market share of 14.23 percent, and Bank of America, N.A. ranked third with a market share of 13.13 percent. The top small business lender, American Express, FSB, is a nationwide lender that has a significant small business credit card portfolio, as do the other top lenders in this this AA.

San Diego AA

Lending levels reflect good responsiveness to AA credit needs, after considering the bank's deposits and strong competition.

Based on the June 30, 2018 Summary of Deposit Market Share Report, MUB ranked fourth out of 53 depository institutions with a 12.45 percent market share in the AA. Wells Fargo Bank, N.A. ranked first with a 22.57 percent market share.

In overall HMDA lending, MUB ranked 11th out 726 lenders with a 1.67 percent market share. Wells Fargo Bank, N.A. ranked first in the market with a 9.74 percent market share, JPMorgan Chase Bank, N.A. ranked second with a 5.79 percent market share, and Caliber Home Loans, Inc. ranked third with 3.55 percent market share. Although MUB's HMDA market share is lower than its deposit market share, lending competition was significantly stronger than the competition for deposits in the AA. There are 726 HMDA lenders in the AA, many without a depository presence. The non-depository lenders do not have the overhead that the depository lenders have, which affords them a competitive advantage in pricing over traditional banks.

In small loans to businesses, MUB ranked tenth out of 157 lenders with a market share of 1.88 percent. The top lender was American Express, FSB with a market share of 18.65 percent. Chase Bank, USA, N.A. ranked second with a market share of 14.54 percent and Citibank, N.A. ranked third with a market share of 12.39 percent. The top lenders have significant small business credit card portfolios.

San Francisco AA

Lending levels reflect good responsiveness to AA credit needs.

Based on the June 30, 2018 Summary of Deposit Market Share Report, MUB ranked eighth out of 69 depository institutions with a 2.46 percent market share in the AA. Bank of America, N.A. ranked first with a 32.19 percent market share.

In overall HMDA lending, MUB ranked sixth out of 714 lenders with a 2.81 percent market share. Wells Fargo Bank, N.A. ranked first in the market with a 12.03 percent market share, JPMorgan Chase Bank, N.A. ranked second with a 7.4 percent market share, and Bank of America, N.A. ranked third with 5.29 percent market share. Although MUB's HMDA market share is lower than its deposit market share, lending competition was significantly stronger than the competition for deposits in the AA. There are 714 HMDA lenders in the AA, many without a depository presence. In contrast, there are 69 depository institutions in the AA and MUB ranks sixth as recognized by the good performance in this AA.

In small loans to businesses, MUB ranked 12th out of 184 lenders with a market share of 0.45 percent. The top lender was American Express, FSB with a market share of 19.46 percent, Chase Bank USA, N.A. ranked second with a market share of 19.14 percent, and Bank of America, N.A. ranked third with a market share of 12.62 percent. The top lenders have significant small business credit card portfolios.

Sacramento AA

Lending levels reflect adequate responsiveness to AA credit needs, after considering the bank's deposits and strong competition with 665 lenders and only 38 depository institutions. MUB lending was comparable to their deposit taking activity with the percentage of state loans of 2.10 percent versus 2.43 percent of deposits.

Based on the June 30, 2018 Summary of Deposit Market Share Report, MUB ranked fourth out of 38 depository institutions with a 4.40 percent market share in the AA. Wells Fargo Bank, N.A. ranked first with a 23.33 percent market share.

In overall HMDA lending, MUB ranked 66th out of 655 lenders with a 0.25 percent market share. Wells Fargo Bank, N.A. ranked first in the market with a 10.27 percent market share, Finance of America Mortgage LL ranked second with a 4.8 percent market share, and Quicken Loans ranked third with a 4.02 percent market share. Mortgage companies have increased competition for traditional banks due to lower overhead and more flexible lending standards. Although MUB's HMDA market share is lower than its deposit market share, lending competition was significantly stronger than the competition for deposits in the AA. There are 655 HMDA lenders in the AA, many without a depository presence. In contrast, there are 38 depository institutions in the AA.

In small loans to businesses, MUB ranked 15th out of 134 lenders with a market share of 0.40 percent. The top lender was American Express, FSB with a market share of 14.09 percent. Chase Bank USA, N.A. ranked second with a market share of 12.83 percent and Citibank, N.A. ranked third with a market share of 12.58 percent. The top lenders have significant small business credit card portfolios.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its full-scope areas.

The geographic distribution of home mortgage loans in the Los Angeles AA, San Diego AA, and San Francisco AA is excellent, and in the Sacramento AA is adequate.

The geographic distribution of small loans to businesses in the Los Angeles AA and San Francisco AA is excellent. The distribution in the San Diego AA and Sacramento AA is good.

The geographic distribution of small loans to farms in the Sacramento AA is good, and in the Los Angeles AA and the San Diego AA is adequate.

Los Angeles AA

The bank exhibits an excellent geographic distribution of loans in the Los Angeles AA.

Home Mortgage Loans

Refer to Table O in the State of California 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. Based on the data in Table O, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is excellent.

- For 2015-2016, the bank's proportion of home mortgage loans in LMI geographies equals the proportion of low income and exceeds the proportion of moderate-income owner-occupied housing units in LMI geographies and exceeds the aggregate distribution of loans in those geographies.

- The bank's performance for 2017-2018 is consistent with the bank's performance for 2015-2016.

Small Loans to Businesses

Refer to Table Q in the State of California 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. Based on the data in Table Q, the bank's overall geographic distribution of small loans to businesses for this evaluation is excellent.

- For both the 2015-2016 and 2017-2018 time period, there was a small proportion of businesses located in low-income geographies. Therefore, the OCC considered middle income geographies as having more weight compared to other geographies.

- Performance for the 2015-2016 period is excellent. The proportion of the bank's small loans to businesses in LMI geographies approximates the proportion of businesses located in those geographies and exceeds the aggregate distribution of loans in those geographies.

- Combined performance for the 2017-2018 period is excellent. The proportion of the bank's small loans to businesses exceeds the proportion of businesses in low income tracts and approximates the proportion of businesses in moderate income tracts.

Small Loans to Farms

Refer to Table S in the State of California 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 farms. Based on the data in Table S, the bank's overall geographic distribution of small farm loans for this evaluation is adequate.

- For 2015-2016, the proportion of the bank's small farm loans in LMI geographies is below both the proportion of small farm loans located in those geographies and the aggregate distribution of loans in those geographies.

- There were too few loans for 2017-2018 to allow for a meaningful analysis. Therefore, the conclusion is based on performance in 2015-2016.

Lending Gap Analysis

The OCC reviewed summary reports to analyze MUB's geographic lending patterns throughout the AA and did not identify any unexplained conspicuous lending gaps.

San Diego AA

The bank exhibits an excellent geographic distribution of loans in this AA. The OCC weighted home mortgage more heavily based on the number of home mortgage originations and purchases relative to the number of small businesses and limited number of small farms.

Home Mortgage Loans

Refer to Table O in the State of California 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. Based on the data in Table O, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is excellent.

- For both the 2015-2016 time period and the 2017-2018 time period, there was a very small proportion of owner-occupied housing units located in low-income geographies. Additionally, only a small proportion of the population resides in low-income geographies.

- For 2015-2016, the proportion of home mortgage loans in both LMI geographies exceeds both the proportion of owner-occupied housing units and the aggregate distribution of loans in those geographies.

- The bank's performance for 2017-2018 is consistent with the bank's performance for 2015-2016.

Small Loans to Businesses

Refer to Table Q in the State of California 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. Based on the data in Table Q, the bank's overall geographic distribution of small loans to businesses for this evaluation is good.

- For both the 2015-2016 time period and the 2017-2018 time period, there was a small proportion of businesses located in low-income geographies.

- For 2015-2016, the proportion of the bank's small loans to businesses in low-income geographies is near to the proportion of businesses located in those geographies and exceeds the aggregate distribution of loans in those geographies. The proportion of the bank's small loans to businesses in moderate-income geographies approximates the proportion of businesses located in those geographies and exceeds the aggregate distribution of loans in those geographies.

- Performance for 2017-2018 is weaker than the performance for 2015-2016. This is due to poorer distribution and aggregate lending performance in low-income geographies, and this had an impact on the combined conclusion.

Small Loans to Farms

Refer to Table S in the State of California 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 farms. Based on the data in Table S, the bank's overall geographic distribution of small farm loans for this evaluation is adequate.

- For 2015-2016, no small farm loans were originated or purchased in low-income geographies. The proportion of the bank's small farm loans in moderate-income geographies exceeds both the proportion of small farm loans located in those geographies and the aggregate distribution of loans in those geographies.

- There were too few loans for 2017-2018 to allow for a meaningful analysis.

Lending Gap Analysis

The OCC reviewed summary reports to analyze MUB's geographic lending patterns throughout the AA and did not identify any unexplained conspicuous lending gaps.

San Francisco AA

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

Home Mortgage Loans

Refer to Table O in the State of California 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. Based on the data in Table O, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is excellent.

- For both the 2015-2016 time period and the 2017-2018 time period, there was a very small proportion of owner-occupied housing units located in low-income geographies. Additionally, only a small proportion of the population resides in low-income geographies.

- For 2015-2016, the proportion of home mortgage loans in both LMI geographies exceeds both the proportion of owner-occupied housing units in those geographies and the aggregate distribution of loans in those geographies.

- The bank's performance for 2017-2018 is similar to the bank's performance for 2015-2016 in LMI geographies and slightly below the aggregate as compared to 2015-16. This had a neutral influence on the combined conclusion.

Small Loans to Businesses

Refer to Table Q in the State of California 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. Based on the data in Table Q, the bank's overall geographic distribution of small loans to businesses for this evaluation is excellent.

- For both the 2015-2016 time period and the 2017-2018 time period, there was a small proportion of businesses located in low-income geographies.

- For 2015-2016, the proportion of the bank's small loans to businesses in both LMI geographies exceeds both the proportion of businesses located in those geographies and the aggregate distribution of loans in those geographies.

- Performance for 2017-2018 is consistent with the performance for 2015-2016.

Small Loans to Farms

Refer to Table S in the State of California 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 farms. Based on the data in Table S, the bank's overall geographic distribution of small farm loans for this evaluation is adequate.

- For 2015-2016, the proportion of the bank's small farm loans in low-income geographies exceeds both the proportion of small farm loans located in those geographies and the aggregate distribution of loans in those geographies.

- No small farm loans were originated or purchased in low or moderate income geographies in 2017-2018.

Lending Gap Analysis

The OCC reviewed summary reports to analyze MUB's geographic lending patterns throughout the AA and did not identify any unexplained conspicuous lending gaps.

Sacramento AA

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

Home Mortgage Loans

Refer to Table O in the State of California 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. Based on the data in Table O, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is adequate.

- For both the 2015-2016 and 2017-2018 time periods, there was a very small proportion of owner-occupied housing units located in low-income geographies. Additionally, only a small proportion of the population resides in low-income geographies. Therefore, more weight was assigned to the moderate-income geographies.

- For 2015-2016, the proportion of home mortgage loans in low-income geographies is significantly below the proportion of owner-occupied housing units in low-income geographies and well below the aggregate distribution of loans in those geographies. The proportion of home mortgage loans in moderate-income geographies is well below the proportion of owner-occupied housing units in moderate-income geographies and below the aggregate distribution of loans in those geographies.

- The bank's performance for 2017-2018 is stronger than the bank's performance for 2015-2016. The stronger distribution in both LMI geographies and stronger aggregate lending performance in low-income geographies positively influenced the combined conclusion.

Small Loans to Businesses

Refer to Table Q in the State of California 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. Based on the data in Table Q, the bank's overall geographic distribution of small loans to businesses for this evaluation is good.

- For 2015-2016, the proportion of the bank's small loans to businesses in low-income geographies exceeds both the proportion of businesses located in those geographies and the aggregate distribution of loans in those geographies. The proportion of the bank's small loans to businesses in moderate-income geographies equals the proportion of businesses located in those geographies and exceeds the aggregate distribution of loans in those geographies.

- Performance for 2017-2018 is weaker than the performance for 2015-2016. This is due to poorer distribution and aggregate lending performance in both LMI geographies, and this had an impact on the combined conclusion.

Small Loans to Farms

Refer to Table S in the State of California section of appendix D for the facts and data used to evaluate the geographic distribution of MUB's originations and purchases of small loans to farms. There were too few loans for 2015-2018 to allow for a meaningful analysis.

Lending Gap Analysis

The OCC reviewed summary reports to analyze MUB's geographic lending patterns throughout the AA and did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

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

The borrower distribution of home mortgage loans in the Sacramento AA and the San Diego AA is good. In the Los Angeles AA, it is adequate. In the San Francisco AA, it is poor.

The borrower distribution of small loans to businesses in the Los Angeles AA and the San Diego AA is good. In the Sacramento AA and San Francisco AA, it is adequate.

The borrower distribution of small loans to farms in the Los Angeles AA, the Sacramento AA and the San Diego AA is good. In the San Francisco AA, there are too few loans to provide for meaningful analysis.

Los Angeles AA

The bank exhibits adequate distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the bank. The HMDA lending was weighted substantially more than the small business lending, and farm lending was not material to the bank's lending in the Los Angeles AA.

Home Mortgage Loans

Refer to Table P in the State of California 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 the data in Table P, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is adequate.

- The housing costs in relation to the median family incomes in the AA, and the affordability challenges for LMI families, discussed under the demographic data, were considered in our evaluation. The OCC placed more emphasis on the bank's performance in comparison to the aggregate percentage of all reporting lenders.

- According to the National Association of Realtors (NAR) National Qualifying Income study for Metro areas, with 10 percent down, it would take income of $122,676 to afford a median priced home as of the first quarter of 2019. Based on the 2015 ACS Median Family Income, a low-income family would earn $31,352 or less and a moderate-income family would earn no more than $50,162 in the Los Angeles-Long Beach-Glendale, CA MD, and a low-income family would earn $43,002 or less and a moderate-income family would earn no more than $68,802 in the Anaheim-Santa Ana-Irvine, CA MD, making it very difficult for LMI families to purchase a home. Given the affordability challenges, the OCC placed more emphasis on aggregate performance than demographic performance.

- For 2015-2016, the proportion of loans to low-income borrowers is near to the aggregate distribution of loans to those borrowers and is significantly below the proportion of low-income families. The proportion of loans to moderate-income borrowers exceeds the aggregate distribution of loans to those borrowers and is significantly below the proportion of moderate-income families.

- Performance for 2017-2018 is consistent with the performance for 2015-2016.

Small Loans to Businesses

Refer to Table R in the State of California section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses. Based on the data in Table R, the OCC concluded the distribution of the bank's originations and purchases of small loans to businesses by revenue is good.

- The OCC placed more emphasis on the bank's performance in comparison to the aggregate percentage of all reporting lenders because the small business percentages include micro-businesses that don't qualify for traditional small business loans. Some of the small businesses that wouldn't typically qualify for bank lending are borrowing through the community development corporations. Additionally, the OCC considered the competition from the larger financial institutions in the AA that dominate the market and originate small business loans through credit cards.

- For 2015-2016, the bank's distribution of small loans to businesses with revenues of $1 million or less exceeds the aggregate distribution of loans to those businesses and is well below the percentage of small businesses located in the AA.

- Performance for 2017-2018 is weaker than the performance for 2015-2016. This is due to poorer aggregate lending performance but was not enough to affect the combined conclusion.

Small Loans to Farms

Refer to Table T in the State of California section of appendix D for the facts and data used to evaluate the borrower distribution of MUB's originations and purchases of small loans to farms. Based on the data in Table T, the OCC concluded the distribution of small farm loans is good.

- For 2015-2016, the bank's lending to small farms with revenues of $1 million or less was below the percentage of small farms located in the AA, but exceeds the aggregate distribution of lending to those small farms.

- There were too few loans for 2017-2018 to allow for a meaningful analysis.

San Diego AA

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

Home Mortgage Loans

Refer to Table P in the State of California 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 the data in Table P, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is good.

- The housing costs in relation to the median family incomes in the AA, and the affordability challenges for LMI families, discussed under the demographic data, were considered in our evaluation. The OCC placed more emphasis on the bank's performance in comparison to the aggregate percentage of all reporting lenders.

- According to the NAR National Qualifying Income study for Metro areas, with 10 percent down, it would take income of $138,642 to afford a median priced home as of the first quarter of 2019. Based on the 2015 ACS Median Family Income, a low-income family would earn $37,590 or less and a moderate-income family would earn no more than $60,143, making it difficult for LMI families to purchase a home. Given the affordability challenges, the OCC placed more emphasis on aggregate performance than demographic performance.

- For 2015-2016, the proportion of loans to low-income borrowers significantly exceeds the aggregate distribution of loans to those borrowers and is significantly below the proportion of low-income families. The proportion of loans to moderate-income borrowers exceeds the aggregate distribution of loans to those borrowers and is well below the proportion of moderate-income families.

- Performance for 2017-2018 is consistent with the performance for 2015-2016.

Small Loans to Businesses

Refer to Table R in the State of California section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses. Based on the data in Table R, the OCC concluded the distribution of the bank's originations and purchases of small loans to businesses by revenue is good.

- The OCC placed more emphasis on the bank's performance in comparison to the aggregate percentage of all reporting lenders because the small business percentages include micro-businesses that don't qualify for traditional small business loans. Additionally, the OCC considered the competition from the larger financial institutions in the AA that dominate the market and originate small business loans through credit cards.

- For 2015-2016, the bank's distribution of small loans to businesses with revenues of $1 million or less exceeds the aggregate distribution of loans to those businesses and is well below the percentage of small businesses located in the AA.
- Performance for 2017-2018 is significantly below the performance for 2015-2016.

Small Loans to Farms

Refer to Table T in the State of California section of appendix D for the facts and data used to evaluate the borrower distribution of MUB's originations and purchases of small loans to farms. Based on the data in Table T, the OCC concluded the distribution of small farm loans is good.

- For 2015-2016, the bank's lending to small farms with revenues of $1 million or less was below the percentage of small farms located in the AA but exceeds than the aggregate's lending to those small farms.

- There were too few loans for 2017-2018 to allow for a meaningful analysis.

San Francisco AA

The bank exhibits adequate distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by MUB.

Home Mortgage Loans

Refer to Table P in the State of California 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 the data in Table P, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is adequate.

- The housing costs in relation to the median family incomes in the AA, and the affordability challenges for LMI families, discussed under the demographic data, were considered in our evaluation. The OCC placed more emphasis on the bank's performance in comparison to the aggregate percentage of all reporting lenders.

- According to the NAR National Qualifying Income study for Metro areas, with 10 percent down, it would take income of $207,964 to afford a median priced home as of the first quarter of 2019. Based on the 2015 ACS Median Family Income, a low-income family would earn $46,911 or less and a moderate-income family would earn no more than $75,058 in the Oakland-Hayward-Berkeley, CA MD. A low-income family would earn $51,871 or less and a moderate-income family would earn no more than $82,994 in the San Francisco-Redwood City-South San Francisco, CA MD. And a low-income family would earn $60,565 or less and a moderate-income family would earn no more than $96,904 in the San Rafael, CA MD, making it difficult for LMI families to purchase a home in the San Francisco AA. Given the affordability challenges, the OCC placed more emphasis on aggregate performance than demographic performance.

- For 2015-2016, the proportion of loans to low-income borrowers is significantly below the proportion of low-income families, and well below the aggregate distribution of loans to those borrowers. The proportion of loans to moderate-income borrowers is significantly below the proportion of moderate-income families, and below the aggregate distribution of loans to those borrowers.

- Performance for 2017-2018 is stronger than the performance for 2015-2016. This is due to stronger distribution and aggregate lending performance to moderate-income borrowers but was not enough to affect the combined conclusion.

Small Loans to Businesses

Refer to Table R in the State of California section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses. Based on the data in Table R, the OCC concluded the distribution of the bank's originations and purchases of small loans to businesses by revenue is adequate.

- The OCC placed more emphasis on the bank's performance in comparison to the aggregate percentage of all reporting lenders because the small business percentages include micro-businesses that don't qualify for traditional small business loans. Additionally, the OCC considered the competition from the larger financial institutions in the AA that dominate the market and originate small business loans through credit cards.

- For 2015-2016, the bank's distribution of small loans to businesses with revenues of $1 million or less is well below the percentage of small businesses located in the AA but exceeds the aggregate distribution of loans to those businesses.

- Performance for 2017-2018 is weaker than the performance for 2015-2016. This is due to poorer aggregate lending performance, and this had an impact on the combined conclusions.

Small Loans to Farms

Refer to Table T in the State of California section of appendix D for the facts and data used to evaluate the borrower distribution of MUB's originations and purchases of small loans to farms. There were too few loans for 2015-2018 to allow for a meaningful analysis.

Sacramento AA

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

Home Mortgage Loans

Refer to Table P in the State of California 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 the data in Table P, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is good.

- The housing costs in relation to the median family incomes in the AA, and the affordability challenges for LMI families, discussed under the demographic data, were considered in our evaluation. The OCC placed more emphasis on the bank's performance in comparison to the aggregate percentage of all reporting lenders.

- According to the NAR National Qualifying Income study for Metro areas, with 10 percent down, it would take income of $80,502 to afford a median priced home as of the first quarter of 2019. Based on the 2015 ACS Median Family Income, a low-income family would earn $35,915 or less and a moderate-income family would earn no more than $57,463, making it difficult for LMI families to purchase a home. Given the affordability challenges, the OCC placed more emphasis on aggregate performance than demographic performance.

- For 2015-2016, the proportion of loans to low-income borrowers significantly exceeds the aggregate distribution of loans to those borrowers and is significantly below the proportion of low-income families. The proportion of loans to moderate-income borrowers is near to the aggregate distribution of loans to those borrowers, and well below the proportion of moderate-income families.

- Performance for 2017-2018 is stronger than the performance for 2015-2016. This is due to stronger distribution to LMI borrowers but was not enough to affect the combined conclusion.

Small Loans to Businesses

Refer to Table R in the State of California section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses. Based on the data in Table R, the OCC concluded the distribution of the bank's originations and purchases of small loans to businesses by revenue is adequate.

- The OCC placed more emphasis on the bank's performance in comparison to the aggregate percentage of all reporting lenders because the small business percentages include micro-businesses that don't qualify for traditional small business loans. Additionally, the OCC considered the competition from the larger financial institutions in the AA that dominate the market and originate small business loans through credit cards.

- For 2015-2016, the bank's distribution of small loans to businesses with revenues of $1 million or less exceeds the aggregate distribution of loans to those business and is well below the percentage of small businesses located in the AA.

- Performance for 2017-2018 is weaker than the performance for 2015-2016. This is due to poorer aggregate lending performance and had an impact on the combined conclusion.

Small Loans to Farms

Refer to Table T in the State of California section of appendix D for the facts and data used to evaluate the borrower distribution of MUB's originations and purchases of small loans to farms. Based on the data in Table T, the OCC concluded the distribution of small farm loans is good.

- For 2015-2016, the bank's lending to small farms with revenues of $1 million or less was below the percentage of small farms located in the AA but exceeds than the aggregate's lending to those small farms.

- There were too few loans for 2017-2018 to allow for a meaningful analysis.

Community Development Lending

CD lending had a significant positive effect on the Lending Test conclusion for the Los Angeles AA, the San Diego AA, and the San Francisco AA. MUB was a leader in making CD loans in these full-scope areas based on the combination of volume, responsiveness, and complexity.

Los Angeles AA

MUB is a leader in making CD loans in the Los Angeles AA.

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

The level of CD lending in the Los Angeles AA is excellent. MUB made 345 CD loans in the Los Angeles AA for a total of $978 million, which represents 20.06 percent of the allocated Tier 1 Capital. The CD loans were responsive to the identified needs in the AA, including $647 million (66.10 percent) for affordable housing, $195 million (19.99 percent) for community services, $127 million (12.95 percent) for economic development, and $9 million (0.96 percent) for revitalization/stabilization. CD lending performance had a significant positive impact on the Lending Test rating.

Examples of CD loans in the AA include:

- MUB provided a $14.2 million loan for 48-unit apartment building designated for homeless veterans, with half of the units specifically reserved for chronically homeless households. Comprehensive services are provided onsite to homeless and at-risk veterans, which include rental assistance, sobriety support, individual and group counseling, peer support, and job assistance for veterans who have a financial need, are seniors, or have a medically certified disability.

- MUB originated a $44.5 million line of credit to an organization that provides social services to LMI disabled adults, children and families in Orange/Santa Ana, CA and surrounding geographies. This is one out of 21 Regional Centers in California. The organization works as a central coordinating agency and ensures the LMI disabled population receives services, support, and access to all resources to live productively in their communities.

- MUB continues to renew a $30 million bond credit facility to a non-profit that was created 27 years ago by a consortium of California financial institutions to finance permanent loans for low-income housing apartments.

San Diego AA

MUB is a leader in making CD loans in the San Diego AA.

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

The level of CD lending in the San Diego AA is excellent. MUB originated 145 CD loans in the San Diego AA for a total of $437.3 million, which represents 22.67 percent of the allocated Tier 1 Capital. Total loans of $437 million were responsive to the identified needs in the AA, including $286 million (65.44 percent) for affordable housing, $132 million (30.08 percent) for community services, $11 million (2.49 percent) for economic development, and $9 million (1.99 percent) for revitalization/stabilization. CD lending performance had a significant positive impact on the Lending Test rating.

Examples of CD loans in the AA include:

- MUB provided a tax-exempt $20 million loan for the acquisition and rehabilitation of an apartment community located in the City of San Diego, California. The project consists of 93 units for low-income families with 83 units restricted at 60 percent of AMI and ten units at 50 percent. The project provides a variety of onsite services including, social services consisting of after school programs, computer resources, food pantry, career building, recreation programs, and job readiness activities.

- MUB provided two lines of credit totaling $90 million for community action agency that provides social services to LMI disabled adults, children and families. One hundred percent of recipients are low-income and public-benefit recipients and rely on Social Security Income to cover living expenses.

- MUB extended and renewed a total of $5.1 million in working capital lines of credit to a private nonprofit community clinic dedicated to providing and improving the overall health and well-being of the underserved and poorer communities within their footprint. The borrower offers comprehensive primary care, dental, counseling and family support services.

San Francisco AA

MUB is a leader in making CD loans in the San Francisco AA.

The Lending Activity Tables on at the beginning of this section set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending in the San Francisco AA is excellent. MUB originated 163 CD loans in the San Francisco AA for a total of $634 million which represents 34.11 percent of the allocated Tier 1 Capital. The CD loans were responsive to the identified needs in the AA, including $442 million (61.99 percent) for affordable housing, $177 million (34.92 percent) for community services, $12 million (2.47 percent) for economic development, and $2.6 million (0.62 percent) for revitalization/stabilization.

CD lending performance had a significant positive impact on the Lending Test rating.

Examples of CD loans in the AA include:

- MUB provided a $41 million loan for a LIHTC apartment development in Oakland, California. The project consists of a 94-unit housing apartment project restricted to between 30 percent and 60 percent of AMI. The target population will be low-income families who wish to live in an urban setting with easy access to public transit and commercial services.

- MUB provided a $25.7 million construction loan component for a LIHTC project in Pleasanton, California. The 131-unit project will serve 130 low-income senior households plus one property manager.

- MUB provided two loans totaling $350 thousand to local San Francisco Foundation that provides social services to LMI populations such as substance abuse services, behavioral health and wellness programs, domestic violence classes, and teen health clinic in the Bay View neighborhood in San Francisco.

Sacramento AA

MUB made an adequate level of CD loans in the Sacramento AA.

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

The level of CD lending in the Sacramento AA is adequate. MUB originated nine CD loans in the Sacramento AA for a total of $14 million which represents 4.82 percent of the allocated Tier 1 Capital. The CD loans were responsive to the identified needs in the AA, including $13.8 million (98.60 percent) for affordable housing, $168 thousand (1.20 percent) for community services, and $28 thousand (0.20

percent) for economic development. CD lending performance had a neutral impact on the Lending Test rating.

Examples of CD loans in the AA include:

- MUB provided a $12.1 million loan for an affordable housing development. The project consists of 76-units for low-income families restricted to between 30 percent and 60 percent area median income (AMI). The project is located within the West Sacramento Bridge / Triangle District, which is a revitalizing urban infill neighborhood, and represents the first phase of a multi-phase development anticipated to offer 175 new housing units to the area.

- MUB provided a $110 thousand loan for community services to benefit LMI individuals, which provided mental and physical health services to LMI Asian adults/youth population in Sacramento and surrounding geographies. One hundred percent of the recipients are low-income and public-benefit recipients.

Product Innovation and Flexibility

The bank makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. Innovative or flexible loan programs were effective in helping the bank address community credit needs. The bank originated limited number of loans under these programs. MUB’s innovative and flexible lending programs had a neutral impact on the Lending Test. In the State of California, MUB extended 503 Small Business Administration (SBA), Economic Opportunity Mortgage (EOM) mortgages totaling $160.5 million and 319 HomeReady program loans totaling $73.7 million.

Los Angeles AA

The bank makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. Innovative or flexible loan programs offered were effective in helping the bank address community credit needs. The bank originated limited number of loans under these programs. MUB’s innovative and flexible lending programs had a neutral impact on the Lending Test. During the evaluation period, MUB sponsored 59 Workforce Initiative Subsidy for Homeownership (WISH) grants totaling $747 thousand, 284 EOM loans totaling $86.9 million, and 125 HomeReady mortgages totaling $31.5 million.

San Diego AA

The bank makes limited use of innovative and/or flexible lending practices to serve AA credit needs. Innovative or flexible loan programs were effective in helping the bank address community credit needs. The bank originated limited number of loans under these programs. MUB’s innovative and flexible lending programs had a neutral impact on the Lending Test. During the evaluation period, MUB extended 48 EOM loans totaling $10 million and 120 HomeReady mortgages totaling $28.9 million. MUB also sponsored 15 WISH grants totaling $165 thousand.

San Francisco AA

The bank makes limited use of innovative and/or flexible lending practices to serve AA credit needs. Innovative or flexible loan programs were effective in helping the bank address community credit needs. MUB's innovative and flexible lending programs had a neutral impact on the Lending Test. During the evaluation period, MUB extended 169 EOM loans totaling $63.2 million and 44 HomeReady mortgages totaling $13.2 million. MUB also sponsored six Workforce Initiative Subsidy for Homeownership (WISH) grants totaling $75 thousand.

Sacramento AA

The bank makes limited use of innovative and/or flexible lending practices to serve AA credit needs. Innovative or flexible loan programs offered were effective in helping the bank address community credit needs. The bank originated a limited number of loans under these programs. MUB's innovative and flexible lending programs had a neutral impact on the Lending Test. During the evaluation period, MUB extended two EOM loans totaling $340 thousand and 30 HomeReady mortgages totaling $6.4 million. MUB also sponsored three WISH Grants totaling $39 thousand.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope areas did not impact the Lending Test rating for the state California. Based on limited-scope reviews, the bank's performance under the Lending Test in the Bakersfield AA, El Centro AA, Fresno AA, Madera AA, Oxnard-Thousand Oaks-Ventura AA, Riverside-San Bernardino-Ontario AA, Santa Cruz-Watsonville AA, Santa Maria-Santa Barbara AA, Stockton-Lodi AA, and Visalia-Porterville AA is consistent with the bank's overall performance under the Lending Test in the full-scope areas.

In the Hanford-Corcoran AA, Modesto AA, Redding AA, San Jose-Sunnyvale-Santa Clara AA, and the San Luis Obispo-Paso Robles-Arroyo Grande AA is weaker than the bank's overall performance under the Lending Test in the full-scope areas and considered good.

In the Salinas AA, Santa Rosa, Vallejo-Fairfield AA, Yuba City AA, and the California non MSA AA is weaker than the bank's overall performance under the Lending Test in the full-scope areas and considered adequate.

Refer to Tables O through V in the State of California section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Los Angeles AA, Sacramento-Roseville-Arden-Arcade and the San Francisco AA is excellent, and in the San Diego AA the performance is good.

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

- The bank exhibits good responsiveness to credit and community economic development needs.
- The bank makes significant use of innovative and/or complex investments to support CD initiatives.
- MUB is a leader creating complex investments combined with development loans and Low-income housing tax credits.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Los Angeles	98	$86,420	1,496	$285,301	1,594	37.63	$371,721	34.80	43	$7,306
Sacramento-Roseville-Arden-Arcade	15	$9,189	118	$16,795	133	3.14	$25,984	2.43	5	$177
San Diego-Carlsbad	24	$13,058	387	$106,895	411	9.70	$119,953	11.23	11	$1,145
San Francisco-Oakland-Hayward	54	$59,177	851	$224,286	905	21.36	$283,463	26.54	25	$4,492
Bakersfield	1	$1,174	14	$83	15	0.35	$1,257	0.12	0	$0
El Centro	2	$20	9	$35	11	0.26	$55	0.01	0	$0
Fresno	4	$137	84	$8,665	88	2.08	$8,802	0.82	1	$541
Hanford-Corcoran	1	$16	2	$11	3	0.07	$27	0.00	0	$0
Madera	2	$8	5	$23	7	0.17	$31	0.00	0	$0
Modesto	0	$0	4	$23	4	0.09	$23	0.00	0	$0
Oxnard-Thousand Oaks-Ventura	7	$5,454	196	$17,031	203	4.79	$22,485	2.10	5	$123
Redding	0	$0	6	$25	6	0.14	$25	0.00	0	$0
Riverside-San Bernardino-Ontario	43	$12,895	223	$16,041	266	6.28	$28,936	2.71	4	$816

Salinas	3	$4,545	102	$8,681	105	2.48	$13,226	1.24	2	$1,012
San Jose-Sunnyvale-Santa Clara	6	$648	78	$36,791	84	1.98	$37,439	3.50	3	$250
San Luis Obispo-Paso Robles-Arroyo Grande	4	$544	20	$120	24	0.57	$664	0.06	1	$62
Santa Cruz-Watsonville	2	$6,814	30	$20,592	32	0.76	$27,406	2.57	0	$0
Santa Maria-Santa Barbara	5	$2,269	256	$105,182	261	6.16	$107,451	10.06	14	$1,226
Santa Rosa	4	$8,254	29	$3,540	33	0.78	$11,794	1.10	0	$0
Stockton-Lodi	4	$1,977	14	$515	18	0.42	$2,492	0.23	2	$802
Vallejo-Fairfield	7	$1,300	7	$ 29	14	0.33	$1,329	0.12	0	$0
Visalia-Porterville	4	$1,872	9	$187	13	0.31	$2,059	0.19	1	$161
Yuba City	1	$1,561	1	$6	2	0.05	$1,567	0.15	0	$0
California Non-MSA	0	$ 0	4	$27	4	0.09	$27	0.00	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 bank's financial reporting system.

Los Angeles AA

MUB's performance under the Investment Test for Los Angeles AA is excellent. The current and prior period investments dollar volume represents 7.63 percent of tier 1 capital allocated to the AA. The OCC considered both the volume and qualitative factors to arrive at this conclusion.

Over 97% of the dollar amount of investments in the Los Angeles were in tax credits and investments focused on affordable housing, which is a primary need in the AA.

Examples include:

MUB made $13 million in donations during the current period to organizations that had missions to support affordable housing, home ownership counseling, small business technical assistance, and to organizations that provide support to the children of LMI families that promote social, emotional and academic support for them. MUB also paid excess interest on Interest on lawyer Trust Accounts (IOLTA) of more than $415 thousand that benefit LMI individuals.

In 2015, MUB committed to purchasing $29 million of tax credit equity LIHTC to finance the construction of 100 affordable housing units for low-income families. An existing vacant commercial property will be demolished to allow the construction of the housing units. Rents will be restricted to families whose income ranges between 30-60 percent AMI. Educational and social services will be provided in the community room of the project. Life Steps has been identified to provide social services to the residents, classes will include computer training, job training, English as a second language (ESL) classes, health nutrition programs, and parenting classes. This investment provides affordable housing and promotes community services to LMI individuals.

In 2018, MUB committed to purchasing nearly $13 million of tax credit equity via LIHTC to finance the development of a 76-unit permanent supportive housing project for formerly homeless veterans. Rents will be structured for veterans who earn up to 30 percent of the AMI. All tenants will receive subsidized rental vouchers from HUD-Veterans Affairs Supportive Housing (VASH). This investment supports affordable housing for low- or moderate-income individuals.

Another investment made during the period includes a project with Ironwood Mezzanine Fund IV to support the Performance Team LLC in El Segundo, CA. This investment promotes economic development that helped to create and retain 1,400 jobs with the Los Angeles, MSA.

San Diego AA

MUB's performance under the Investment Test for San Diego-Carlsbad-San Marco MSA is good due to their commitment and dollars focused on affordable housing a primary need in the assessment area. The current and prior period investments dollar volume represents 6.22 percent of tier 1 capital allocated to the AA.

Over 98 percent of the dollar amount of investments in the San Diego-Carlsbad were in LIHTC that focused on affordable housing. MUB paid $85 thousand in excess interest on IOLTA that will benefit LMI individuals.

Examples include:

MUB made over $4.7 million in donations in the current period, of which $1 million represented multi-year commitments to support counseling and small business technical assistance in the assessment area.

MUB made a $12.96 million equity investment and $13.52 million construction loan to construct a 53-unit mixed-use affordable housing development for qualified veteran and homeless households located in San Diego. The project will include 3500 square feet of commercial space on the ground floor and rental units will be restricted to 30-50 percent AMI for the assessment area.

San Francisco AA

MUB's performance under the Investment Test for San Francisco AA is excellent due to their commitment and dollars focused on affordable housing a primary need in the assessment area. The current and prior period investments dollar volume represents 15.26 percent of tier 1 capital allocated to the AA.

Over 97 percent of the dollar amount of investments in the San Francisco-Oakland-Hayward MSA were in LIHTC that focused on affordable housing. MUB paid $95 thousand in excess interest on IOLTA that will benefit LMI individuals.

Examples include:

MUB made over $8.8 million in donations in the current period, with $900 thousand in multi-year commitments to support home ownership counseling and small business technical assistance in the assessment area. This investment promotes community services.

In 2016, MUB committed to purchase a $20.6 million tax credit equity to finance the construction of 130 senior LMI apartments. Then in December 2017, bank financed another phase of the construction (Phase II) by contributing an additional $11.4 million tax credit equity for an additional 53 senior LMI units. Rental rates are restricted to 30-60 percent of the AMI with 50 units layered with Project Based Section 8 subsidies. Both investments directly addressed the critical need of affordable housing for the assessment area.

Sacramento AA

MUB's performance under the Investment Test for Sacramento-Arden-Arcade-Roseville MSA is excellent due to their commitment and dollars focused on affordable housing a primary need in the assessment area. The current and prior period investments dollar volume represents 8.98 percent of tier 1 capital allocated to the AA.

Over 98 percent of the dollar amount of investments in the Sacramento AA were in LIHTC that focused on affordable housing. MUB paid $62 thousand in excess interest on IOLTA that will benefit LMI individuals

Examples include:

MUB made over $826 thousand in donations in the current period, of which $25 thousand represented multi-year commitments to support counseling and small business technical assistance in the assessment area.

In 2015, MUB committed to purchase a $15.8 million tax credit equity to finance new construction of an affordable housing 78-unit apartment complex for low income households in the West Sacramento Bridge District/Triangle District. Seventy-seven of the apartment units, will be restricted to 30-60 percent of the AMI for the assessment area. This is the first phase of a two-phase project and master plan to revitalize an urban neighborhood by transforming it from a light industrial to high density commercial and residential uses.

The bank made a minor contribution of $1,800 in the Clearinghouse CDFI. During the current period four projects were funded by the CDFI to assist financing of group homes for a non-profit corporation focused on residential and education treatment of special needs or abused children.

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Oxnard-Thousand Oaks-Ventura, Salinas, Santa Maria-Santa Barbara, Santa Cruz-Watsonville, Santa Rosa, Stockton-Lodi, Yuba City and California Non-MSA AAs consistent with the bank's overall performance under the Investment Test in the full-scope areas.

The AAs of Bakersfield-Delano, El Centro, Fresno, Madera, Hanford-Corcoran, Modesto, Redding, Riverside-San Bernardino-Ontario, San Jose-Sunnyvale-Santa Clara, San Louis Obispo-Paso Robles-Arroyo Grande, Vallejo-Fairfield, Visalia-Porterville AAs was weaker than the bank's overall performance under the Investment Test in the full-scope areas. The weaker AAs were primarily due to lower volume of investments in both the current and prior periods, which did not have any impact on the overall performance for the State of California.

Refer to the Qualified Investment Table in the State of California section of this report for the facts and data used to evaluate the bank's level of qualified investments for each of the assessment areas.

SERVICE TEST

The bank's performance under the Service Test in California is rated High Satisfactory

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in each of the four full scope AAs is good. In addition to the locations of the branches in the table, the OCCconsidered branches within one mile accessible to LMI census tracts. Performance in limited-scope assessment areas had a neutral influence on the state rating.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the bank's AAs. The following table illustrates the distribution of branches in the bank's assessment areas.

Distribution of Branch Delivery System												
Assessment Area	Deposits	Branches						Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography				
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Los Angeles	40.89	107	33.54	3.0	15.0	25.0	56.0	8.58	28.93	26.90	35.00
Sacramento	2.43	8	2.51	0	50	13	25	9.33	23.46	33.18	33.93
San Diego	16.18	55	17.24	7	18	40	35	8.89	23.56	32.53	34.69
San Francisco	15.58	32	10.03	6.0	25.0	16.0	53.0	11.23	21.61	33.10	33.58
Bakersfield	1.04	7	2.19	14	0	29	57	9.68	23.27	31.77	33.00
El Centro	0.55	2	0.63	0	50	0	50	0.00	41.49	26.37	29.68
Fresno	1.55	11	3.45	0	55	18	27	1.55	11	3.45	0
Hanford-Corcoran	0.20	1	0.31	0	100	0	0	0.20	1	0.31	0
Madera	0.15	1	0.31	0	100	0	0	0.15	1	0.31	0
Modesto	0.27	2	0.63	0	50	0	50	0.27	2	0.63	0
Oxnard-Thousand Oaks-Ventura	2.16	13	4.08	8	46	38	8	2.16	13	4.08	8
Redding	0.11	1	0.31	0	100	0	0	0	15	31	34
Riverside-San Bernardino-Ontario	6.17	25	7.84	16	28	28	28	5.35	27.64	35.44	31.19
Salinas	1.32	8	2.51	0	13	25	63	3.09	25.97	35.99	32.12
San Jose-Sunnyvale-Santa Clara	4.64	17	5.33	6	29	53	12	9.30	22.26	36.30	31.99

San Luis Obispo-Paso Robles-Arroyo Grande	0.39	2	0.63	0	100	0	0	0.00	13.81	65.77	14.84
Santa Cruz-Watsonville	0.51	3	0.94	0	33	67	0	5.58	25.37	40.32	28.74
Santa Maria-Santa Barbara	2.85	13	4.08	0	31	15	54	12.21	25.77	29.27	32.03
Santa Rosa	0.25	1	0.31	0	0	0	100	0.00	27.05	52.28	20.67
Stockton-Lodi	0.29	2	0.63	50	50	0	0	8.37	22.25	35.03	34.35
Vallejo-Fairfield	1.32	1	0.31	0	0	100	0	5.60	26.59	37.06	29.17
Visalia-Porterville	0.64	4	1.25	0	25	25	50	2.44	33.58	31.92	31.91
Yuba City	0.14	1	0.31	0	0	100	0	3.99	23.59	34.35	38.08
Non-MSA CA AAs	0.37	2	0.63	0	0	50	50	0.00	8.63	34.78	56.59

Distribution of Branch Openings/Closings

Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upper	NA
Los-Angeles-Long Beach-Anaheim CA MSA	3	9	- 1	- 2	- 3	0	
Sacramento-Roseville-Arden-Arcade CA	0	1	0	0	0	- 1	
San Diego-Carlsbad	0	3	- 1	0	0	- 2	
San Francisco-Oakland-Hayward CA MSA	0	7	- 1	- 1	- 3	- 2	
Bakersfield	0	1	0	0	0	- 1	
El Centro	0	1	0	0	- 1	0	
Fresno	0	2	0	0	- 1	- 1	
Hanford-Corcoran	0	1	0	0	0	- 1	
Madera	0	0	0	0	0	0	
Modesto	0	0	0	0	0	0	
Oxnard-Thousand Oaks-Ventura	0	1	0	0	- 1	0	
Riverside-San Bernardino-Ontario	0	3	0	- 1	0	- 2	
Salinas	0	0	0	0	0	0	
San Jose-Sunnyvale-Santa Clara	0	1	- 1	0	0	0	
San Luis Obispo-Paso Robles-Arroyo Grande	0	2	0	- 1	0	- 1	
Santa Cruz-Watsonville	0	0	0	0	0	0	
Santa Maria-Santa Barbara	0	5	0	0	0	- 5	
Santa Rosa	0	0	0	0	0	0	
Stockton-Lodi	0	0	0	0	0	0	
Vallejo-Fairfield	0	0	0	0	0	0	

Visalia-Porterville	0	0	0	0	0	0	
Yuba City	0	0	0	0	0	0	
Non-MSA CA	0	0	0	0	0	0	

Los Angeles AA

As of December 31, 2018, MUB operates 107 branches and 168 ATMs in the Los Angeles AA. Of the 107 branches, 100 are full-service traditional locations, three are in-store full service locations, and four are high-school full service locations. There are three branches in lower-income geographies, 16 branches in moderate-income geographies, 27 branches in middle-income geographies, 60 branches in upper-income geographies and one branch in unknown income classification geography. The branch distribution in low-income geographies is significantly below the percent of the population in low-income geographies and the distribution of branches in moderate-income geographies is significantly below the percent of the population in moderate-income geographies in the AA. When considering 35 branches that directly border a branch within a 1-mile radius and serves LMI geographies, the bank's distribution significantly improves accessibility. MUB's customer analysis provide the OCC with detailed mapping of the low-income customers using the nearby branches.

The bank's branch closing has adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank closed one branch within a low-income geography, three branches within moderate-income geographies, three within middle-income geographies, and two within upper-income geographies since the last evaluation. The proximity of the nearest accessible branches was within 4 miles to 8 miles of the closed branches in low-income and moderate-income geographies.

Examiners also considered the bank's alternative delivery systems (ADS), including ATMs, online, and mobile banking in evaluating accessibility to the bank's products and services. Based on customer usage, ADS had a positive impact on the accessibility of the bank's retail delivery systems to LMI individuals and geographies. The LMI customer usage exceeded LMI demographics when comparing LMI total customers relative to LMI customer usage of online, mobile bill pay, mobile check deposits and ATM usage.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. While there are slight variations in opening or closing times, generally, branches are open Monday through Friday from 9:00 am to 5:00 pm. The campus branches hours are tailored to the open hours of the high school campus. Two branches in low-income geographies and five branches in moderate-income geographies offer Saturday hours. All MUB services are available at the full-service branches and all delivery systems discussed bank-wide are available in this AA.

San Diego AA

As of December 31, 2018, MUB operates 55 branches and 107 ATMs in the San Diego AA. All branches are full-service locations. There are four branches in lower-income geographies, ten branches in moderate-income geographies, 22 branches in middle-income geographies and 19 branches in upper-income geographies. The branch distribution in low-income geographies is near to the percent of the population in low-income geographies and the distribution of branches in moderate-income geographies is near to the percent of the population in moderate-income geographies in the AA. When considering 16 branches that directly border a branch within a 1-mile radius and serves LMI geographies, the bank's distribution improves accessibility. MUB's customer analysis provide the OCC with detailed mapping of the low-income customers using the nearby branches.

The bank's branch closing has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank closed one branch within a low-income geography, one within a middle-income geography, and one within an upper-income geography since the last evaluation. The proximity of the nearest accessible branch was within 2 miles of the closed branch in the low-income geography.

Examiners also considered the bank's ADS, including ATMs, online, and mobile banking in evaluating accessibility to the bank's products and services. Based on customer usage, ADS had a positive impact on the accessibility of the bank's retail delivery systems to LMI individuals and geographies. The LMI customer usage exceeded LMI demographics.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. Most branches are open Monday through Friday from 9:00 am to 5:00 pm. One in-store branch location is open 10 am to7:00 pm.

One branch in a low-income geography and five branches in moderate-income geographies offer Saturday hours. All MUB services are available at the full-service branches and all delivery systems discussed bank-wide are available in this AA.

San Francisco AA

As of December 31, 2018, MUB operates 32 branches and 37 ATMs in the San Francisco AA. All branches are full-service locations. There are two branches in lower-income geographies, eight branches in moderate-income geographies, five branches in middle-income geographies and 17 branches in upper-income geographies. The branch distribution in low-income geographies is below the percent of the population in low-income geographies and the distribution of branches in moderate-income geographies exceeds the percent of the population in moderate-income geographies in the AA. When considering nine branches that directly border a branch within a 1-mile radius and serves LMI geographies, the bank's distribution improves accessibility. MUB's customer analysis provide the OCC with detailed mapping of the low-income customers using the nearby branches.

The bank's branch closing has adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank closed two branches within low-income geographies, one branch within moderate-income geography, one within middle-income geography, and three within upper-income geographies since the last evaluation. The proximity of the nearest accessible branches were within 1 mile to 10 miles of the closed branches in low-income and moderate-income geographies.

Examiners also considered the bank's ADS, including ATMs, online, and mobile banking in evaluating accessibility to the bank's products and services. Based on customer usage, ADS had a positive impact on the accessibility of the bank's retail delivery systems to LMI individuals and geographies. The LMI customer usage exceeded LMI demographics.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. All branches are open Monday through Friday from 9:00 am to 5:00 pm. Three branches in moderate-income geographies offer Saturday hours. All MUB services are available at the full-service branches and all delivery systems discussed bank-wide are available in this AA.

Sacramento AA

As of December 31, 2018, MUB operates eight branches and 10 ATMs in the Sacramento-Roseville-Arden-Arcade CA MSA AA. All branches are full-service locations. There are four branches in moderate-income geographies, one branch in middle-income geography, two branches in upper-income geographies, and one branch in unknown income classification geography.

The branch distribution in low-income geographies is significantly below the percent of the population in low-income geographies and the distribution of branches in moderate-income geographies exceeds the percent of the population in moderate-income geographies in the AA. When considering three branches that directly border a branch within a 1-mile radius and serves LMI geographies, the bank's distribution improves accessibility. MUB's customer analysis provide the OCC with detailed mapping of the low-income customers using the nearby branches.

The bank's branch closing has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank closed one branch within an upper-income geography since the last evaluation.

Examiners also considered the bank's ADS, including ATMs, online, and mobile banking in evaluating accessibility to the bank's products and services. Based on customer usage, ADS had a positive impact on the accessibility of the bank's retail delivery systems to LMI individuals and geographies. The LMI customer usage exceeded LMI demographics.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. All branches are open Monday through Friday from 9:00 am to 5:00 pm. Two branches in moderate-income geographies offer Saturday hours. All MUB services are available at the full-service branches and all delivery systems discussed bank-wide are available in this AA.

Community Development Services

Los Angeles AA

The bank provides an excellent level of CD services.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 1,274 CD service activities to 143 organizations since the last evaluation, logging a total of 7,205 qualified hours within this AA. A majority (72 percent) of the bank's assistance was to organizations that provide community services to LMI individuals and families. Other activities targeted affordable housing (25 percent), economic development (2 percent), and stabilize revitalize (less than 1 percent). The following are examples of CD services provided in this AA:

- MUB staff actively participates in a program which provides down payment assistance grants to first-time home buyers. The team is responsible for approving the grant prior to closing, funding the grant at closing, and assembling the paperwork to be reimbursed by the program.

- MUB staff also manages the previously mentioned programs, which provide catalytic grants to community non-profits and affordable housing developers.

Sacramento AA

The bank provides a good level of CD services.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 122 CD service activities to 12 organizations since the last evaluation, logging a total of 485 qualified hours within this AA. A majority (47 percent) of the bank's assistance was to organizations that provide community services to LMI individuals and families, 35 percent targeted affordable housing, and 18 percent targeted economic development. The following are examples of CD services provided in this AA:

- MUB staff actively participates in a program which provides down payment assistance grants to first-time home buyers. The team is responsible for approving the grant prior to closing, funding the grant at closing, and assembling the paperwork to be reimbursed by the program.

- MUB staff also manages the previously mentioned programs, which provide catalytic grants to community non-profits and affordable housing developers.

San Diego AA

The bank provides an adequate level of CD services.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 390 CD service activities to 49 organizations since the last evaluation, logging a total of 2,211 qualified hours within this AA. A majority (63 percent) of the bank's assistance was to organizations that provide community services to LMI individuals and families. Other activities targeted affordable housing (27 percent) and economic development (9 percent). The following are examples of CD services provided in this AA:

- MUB staff actively participates in a program which provides down payment assistance grants to first-time home buyers. The team is responsible for approving the grant prior to closing, funding the grant at closing, and assembling the paperwork to be reimbursed by the program.

- MUB staff also manages the previously mentioned programs, which provide catalytic grants to community non-profits and affordable housing developers.

San Francisco AA

The bank provides an excellent level of CD services.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 461 CD service activities to 50 organizations since the last evaluation, logging a total of 2,844 qualified hours within this AA. A majority (53 percent) of the bank's assistance was to organizations that provide community services to LMI individuals and families. Other activities targeted affordable housing (30 percent), economic development (16 percent), and stabilize revitalize (1 percent). The following are examples of CD services provided in this AA:

- MUB staff actively participates in a program which provides down payment assistance grants to first-time home buyers. The team is responsible for approving the grant prior to closing, funding the grant at closing, and assembling the paperwork to be reimbursed by the program.

- MUB staff also manages the previously mentioned programs, which provide catalytic grants to community non-profits and affordable housing developers.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the limited scope AAs is consistent with the bank's overall performance under the Service Test in the full-scope area with respect to branch distributions.

The level of CD services in the Bakersfield AA, El Centro AA, Hanford-Corcoran AA, Madera AA, Modesto AA, Oxnard-Thousand Oaks-Ventura AA, Riverside-San Bernardino-Ontario AA, Salinas AA, Santa Maria-Santa Barbara AA, and CA Non-MSA AA is consistent with full-scope AAs. The level of CD services in the Fresno AA and the Stockton-Lodi AA is stronger than full-scope AAs. The level of CD services in the Redding AA, San Jose-Sunnyvale-Santa Clara AA, San Luis Obispo-Paso Robles-Arroyo Grande AA, Santa Cruz-Watsonville AA, Santa Rosa AA, Vallejo-Fairfield AA, Visalia-Porterville AA, and Yuba City AA is weaker than in full-scope AAs.

The Service Test in the limited scope AAs is slightly stronger than the bank's overall performance under the Service Test in the full-scope area due to stronger branch distribution in LMI geographies and higher level of CD services. This performance in the limited scope areas does not impact the overall rating given the limited number of branches in these AAs relative to the number of branches in full-scope AAs.

State Rating

State of Georgia

Combined CRA rating for the State: Satisfactory
The Lending Test is rated: **High Satisfactory**
The Investment Test is rated: **High Satisfactory**
The Service Test is rated: **Low Satisfactory**

The major factors that support this rating include:

- Based on the data in the tables and performance context considerations for the 2015-2016 evaluation period, the overall geographic distribution of the bank's home mortgage and small business loan originations and purchases is good.
- The bank has an adequate level of qualified CD investment and grants, although rarely in a leadership position.
- MUB branch distribution in Georgia is adequate. The bank's branch in this rating area only receives deposits from commercial customers. The OCC considered the commercial nature of the bank's operations during our analysis.
- The Strategic Plan performance for the 2017-2018 evaluation period exceeds the Outstanding goals when aggregating actual advances, unfunded commitments, and statewide advances.

Scope of Evaluation in Georgia

The rating for the State of Georgia is based on a full-scope evaluation of the bank's performance in the Atlanta, MD AA (Atlanta AA) under the retail test for 2015 and 2016 combined with the Strategic Plan performance for 2017 and 2018. The OCC gave equal weight to the two tests considering the performance context and the bank's business model for these commercial branch states.

The evaluation for 2015 and 2016 focused on HMDA, small business lending, CD loans, qualified investments, and retail and CD services. In 2017 MUB received approval from the OCC to operate part of its AA's under the Strategic Plan for CRA, which include the Atlanta AA. The Strategic Plan for 2017 and 2018 was focused on community development loans and qualified investments. Loans reported pursuant to the HMDA and CRA data collection requirements for 2015-2016 were included in the review. The review included both loan originations and purchases. All aggregate lending data used in the analysis is from 2015-2016. The OCC considered information from recently completed community contacts in the Georgia AAs along with performance context provided by MUB.

Description of Institution's Operations in Georgia

The OCC delineated one AA in the State of Georgia, Atlanta MD AA, which is a subset of the Atlanta-Sandy Springs-Roswell MSA and received full scope review. The bank originated and purchased approximately $16 million of total reported loans during the evaluation period. MUB has one branch located in Georgia with a primary purpose of making commercial loans under a commercial branch business model. The OCC considered this business model in assessing the bank's CRA performance for 2015 through February 28, 2017 at which point the bank's Strategic Plan went into effect. The OCC assessed MUB's Strategic Plan separately and combined the results to arrive at a CRA rating for the rating area.

The Atlanta AA consists of the counties as described in the table below. MUB had a 0.01 percent deposit market share in the Atlanta AA according to the FDIC 2018 Market Share Report. MUB had $1.1 billion of deposits representing 1.25 percent of MUB's adjusted deposits for the Atlanta AA. Corporate deposits were adjusted to where the funds were deployed vs the home office.

MUB delineated the following AAs within Georgia (see table below)

MSA	**County**
Atlanta-Sandy Springs-Roswell MD (Partial)	Clayton, Cobb, DeKalb, Douglas, Fulton, Gwinnett[1]

Demographic and Economic Data

The Atlanta AA table provides a summary of the demographics that includes housing and business information for the Atlanta AA. Median housing value is three times median income, but six times for low-income individuals. Median rents suggest rental housing is unaffordable for many low-income individuals. More than 40 percent of the geographic area of the AA is considered low or moderate-income and consist of more than 35 percent of the population.

Table A – Demographic Information of the Assessment Area

Assessment Area: GA-Atlanta-Sandy Springs-Roswell

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	652	14.6	26.7	23.2	34.4	1.2
Population by Geography	3,682,355	10.3	26.3	27.5	35.3	0.4
Housing Units by Geography	1,494,741	11.4	26.8	26.0	35.6	0.2
Owner-Occupied Units by Geography	777,008	4.7	20.5	29.6	45.3	0.0
Occupied Rental Units by Geography	548,850	18.2	33.8	22.2	25.4	0.4
Vacant Units by Geography	168,883	20.7	32.8	21.8	24.5	0.2
Businesses by Geography	365,896	7.2	21.7	26.0	44.3	0.8
Farms by Geography	5,482	5.6	20.8	30.9	42.5	0.2
Family Distribution by Income Level	850,175	23.9	16.3	17.1	42.6	0.0
Household Distribution by Income Level	1,325,858	24.4	16.5	17.2	42.0	0.0
Median Family Income MSA - 12060 Atlanta-Sandy Springs-Roswell, GA MSA		$67,322	Median Housing Value			$195,279
			Families Below Poverty Level			12.8%
			Median Gross Rent			$1,014

Source: 2010 U.S. Census & 2015 ACS Census and 2018 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.

For the Atlanta AA, the OCC used data from the U.S. Economic Development Administration, 2010 U.S. Census, and the BLS data. The AA's major employers are Delta Air Lines Inc., Walmart Stores Inc., Home Depot Inc., and Emory University according to Moody's Analytics. Based on BLS data the Atlanta AA annual unemployment rate for 2018 was 3.8 percent. According to the January 2019 Moody's Analytics report the Atlanta AA is a leader in the South, despite a gradual slowing in the pace of growth in the last two years. Hiring in the large business/professional services industry has been even stronger since mid-2017 than reported by the establishment survey, according to the Quarterly Census of Employment and Wages. The inability of renters to purchase homes has bid-up prices rendering more units unaffordable. Builders have found it more profitable to focus on high-priced homes, limiting the supply of affordable housing. Current employment numbers indicate a stronger Atlanta economy, but the metro area will create fewer jobs in 2019 as costs rise and supply constraints intensify. Most industries will fall short of their earlier gains but will be better than the U.S. average. Longer term, an educated workforce, steady in-migration, and other assets such as a well-established logistics hub will keep Atlanta ahead of the U.S. in job and income gains.

Community Contacts

Examiners reviewed two community contacts for the exam period. One community housing contact stated that the economic conditions in the Atlanta area are improving but many families and neighborhoods continue to struggle with the aftermath of underwater home values and disinvestment. The contact said there is ample opportunity for local financial institutions to assist in the affordable housing programs offered by the organization. Affordable housing program-related investments were mentioned as a critical source of funding as it was rotating capital that allowed the organization to acquire properties it needed to purchase for rehabilitation purposes. The second contact stated that quality housing stock is rising due to gentrification limiting affordability for LMI buyers.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN GEORGIA

LENDING TEST – Retail Evaluation Period

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Atlanta AA is good. MUB did not originate CD loans during the retail Lending Test evaluation period (January 1, 2015 to February 28, 2017), which had a negative impact to the Lending Test rating.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs when considering the bank's deposits and limited presence in this AA. There are no retail branches and only one commercial branch in this AA.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Atlanta AA	94	3	0	0	97	100%	100%

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only from January 1, 2015 through December 31, 2016.

Dollar Volume of Loans $(000's)*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Atlanta AA	$16,358	$39	$0	$0	$16,397	100%	100%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only from January 1, 2015 through December 31, 2016.

Based on the June 30, 2016, Summary of Deposit Market Share Report, MUB ranked 83rd out of 91 depository institutions with less than one percent of market share in the AA. SunTrust Bank ranked first with 27.81 percent of the market share. Wells Fargo Bank N.A. ranked second with 18.7 percent, and Bank of America N.A. ranked a close third with 18.6 percent. Based on the June 30, 2018, Summary of Deposit Market Share Report, MUB ranked 80th out of 89 depository institutions with less than a one percent market share in the AA. SunTrust Bank ranked first with a 27.26 percent market share. In overall HMDA lending, MUB ranked 321out of 746 lenders with a 0.01 percent market share. Wells Fargo Bank, N.A. ranked first in the market with a 9.93 percent market share and Quicken Loans ranked second with a 5.16 percent market share. The number and dollar volume of small loans to businesses was too low to register a market share. Due to the low market share, the OCC did not consider market share as a significant measure of performance for any of the loan products.

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the Atlanta AA.

Home Mortgage Loans

Refer to Table O in the State of Georgia 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. Based on the data in Table O, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is excellent.

- For 2015-2016, the proportion of home mortgage loans in both LMI geographies exceeds both the proportion of owner-occupied housing units in those geographies and the aggregate distribution of loans in those geographies.

Lending Gap Analysis

The OCC reviewed the tables to analyze MUB's geographic lending patterns throughout the Atlanta AA and did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P in the State of Georgia 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 the data in Table P, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is excellent.

- The housing costs in relation to the median family incomes in the AA, and the affordability challenges for low-income families, which was discussed under the demographic data, were considered. The OCC placed more emphasis on the bank's performance in comparison to the aggregate percentage of all reporting lenders.

- For 2015-2016, the proportion of low-income families exceeds the aggregate distribution of loans to those borrowers and is well below the proportion of low-income families in the AA. The proportion of loans to moderate-income borrowers exceeds both the proportion of moderate-income families and the aggregate distribution of loans to those borrowers.

Community Development Lending

The bank has made no CD loans in the Atlanta AA during the retail evaluation period. The level of CD lending in the Atlanta AA is very poor. CD lending performance had a negative impact on the Lending Test rating due lack of activity.

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

Product Innovation and Flexibility

The bank makes no use of innovative and/or flexible lending practices to serve the Atlanta AA credit needs. No loans were originated under innovative and/or flexible lending programs. This had a neutral impact on the Lending Test rating for the State of Georgia.

INVESTMENT TEST

MUB's performance under the Investment Test in Georgia for 2015-2016 is rated High Satisfactory. This is primarily due to MUB's community economic development investments that created over 300 jobs in the statewide and regional areas.

Conclusions for Area Receiving Full-Scope Review

Based on a full-scope review, the bank performance in the Atlanta AA is good.

The bank has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

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

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Atlanta AA	15	$1,722	10	$753	25	75.76	$2,475	81.33	2	$438
Georgia Statewide Investments	6	$471	2	$97	8	24.24	$568	18.67	1	$31

* "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 bank's financial reporting system.

Examples of investments include:

- In 2013, MUB made their initial investment to promote economic development in the Atlanta AA; during the current period (2015) MUB made an additional investment. The company is a provider of industrial cleaning and maintenance service which is anticipated to create 336 jobs in the area.

- In 2015, MUB made one investment in the Atlanta AA. This investment also supports community and economic development for the Atlanta AA. The number of jobs this will create is not known.

- 2016 MUB made three Bank Enterprise Award (BEA) Program Grants for the Atlanta AA that totaled $72 thousand. BEA grants are made to economically distressed area to support revitalization.

- MUB made seven donations to the Atlanta AA during 2015-2016 that totaled $99.5 thousand or 100 percent of the donations made to the Atlanta AA and 90 percent of the total donations for the state. Most of the donations are made to the Boys and Girls Clubs of America and Boys and Girls Clubs of Metro Atlanta. Both with missions to support disadvantaged youths in low income areas.

- MUB made one statewide donation during 2015-2016 that totaled $10 thousand or 10 percent of the donations made in the state.

SERVICE TEST

The bank's performance under the Service Test in Georgia for 2015-2016 is rated Low Satisfactory.

Conclusions for Area Receiving Full-Scope Review

Based on the full-scope review, the bank's performance in the Atlanta AA is adequate.

Retail Banking Services

Service delivery systems are unreasonably inaccessible to significant portions of the AA, particularly LMI geographies and/or LMI individuals.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Atlanta-Sandy Springs-Roswell	100	1	100	0	0	0	1	14.6	26.7	23.2	34.4

Distribution of Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upper	NA
Atlanta-Sandy Springs-Roswell	0	0	0	0	0	0	

MUB operated one branch in an upper-income geography in the Atlanta AA. The branch is part of the bank's strategy to serve commercial customers only for lending and deposits. The branch is not accessible to the public for retail transactions. The hours and services are not considered accessible. The AA does not have any ATMs or alternate delivery service activities to meet the retail needs within the AA. The bank did not open or close any branches in the AA, and this had a neutral impact on the Service Test rating. While the bank did not have a retail branch presence, management took a proactive approach and created a strategic plan to address needs within the community based on their business model.

Community Development Services

The bank provides a very poor level of CD services.

Bank records show that employees did not provide their financial or job-specific expertise and/or technical assistance in 2015 or 2016 within the AA.

STRATEGIC PLAN PERFORMANCE

State of Georgia

CRA Rating for the Strategic Plan in Georgia: Outstanding

The major factors that support this rating include:

- Aggregate CD activities between March 1, 2017 and December 31, 2018, exceeded goals for outstanding performance in the Atlanta AA.

- In consideration of new investment commitments entered into by the bank during the evaluation period, MUB's actual advances and legally binding commitments to make future advances towards CD investments exceeded goals for outstanding performance.

- MUB's CD lending did not meet goals for satisfactory performance.

- The bank exhibits adequate responsiveness to community credit needs via occasional use of innovative or complex qualified investments in addressing identified needs.

Conclusions About Performance

Summary

MUB's CD performance in the Atlanta AA is rated "Outstanding". MUB's aggregate level of CD activities exceeded goals for outstanding performance in the Atlanta AA during the evaluation period. While CD lending did not meet the goals for satisfactory performance, investments in the AA exceeded goals for outstanding performance to mitigate the shortfall in CD lending.

In consideration of new investment commitments entered into by the bank during the evaluation period, MUB's actual advances and future commitments towards CD investments exceeded goals for outstanding performance. MUB made $4.7 million in four investments and 20 grants and committed to make future advances totaling $4.6 million within the AA. Since the bank adequately served the needs of the AA, MUB also received consideration for $336,000 in advances towards investments in the state serving a broader statewide or regional area that includes the bank's AAs.

MUB's CD lending did not meet goals for satisfactory performance. The bank did not grant any CD loans in the Atlanta AA as anticipated in the Strategic Plan.

The bank exhibits adequate responsiveness to community credit needs via occasional use of innovative or complex qualified investments in addressing identified needs.

Qualified Investments

Commercial Branch Service Markets CRA Strategic Plan Goals ($000's)										
Commercial Branch Market Atlanta, Georgia	Exam Period (2017-2018)									
Review Period Total										
	Goal	Current Actual Advances	Current Advances as % of Goal	Current + Unfunded Commitments			Current + Unfunded Commitments + Statewide			Preliminary Rating Based on Plan Specifications
				Unfunded	Adv+Unfund	% of Goal	Statewide Advances	Current+ Unfund+ Statewide	% of Goal	
2017-2018 Aggregate CD Totals	$8,000	$4,668	**58%**	$4,588	$9,256	**116%**	**$336**	$9,592	120%	**Outstanding**
~ Loans	*$5,360*	*$0*	*0%*	*na*	*$0*	*0%*	*$0*	*$0*	*0%*	*Needs to Improve*
~ Investments	*$2,640*	*$4,668*	*177%*	*$4,588*	*$9,256*	*351%*	*$336*	*$9,592*	*363%*	*Outstanding*
2017										
	Goal	Current Actual Advances	Current Advances as % of Goal	Actual to Goal Excess/**(Gap)**			Current + Statewide			Prelim Rating
							Statewide Advances	Current + Statewide	% of Goal	
2017 CD Totals	$2,000	**$2,866**	**143%**	**$866**			**$336**	**$3,202**	160%	**Outstanding**
~ Loans	*$1,340*	***$0***	*0%*	*($1,340)*			*$0*	*$0*	*0%*	*Needs to Improve*
~ Investments	*$660*	***$2,866***	*434%*	*$2,206*			*$336*	*$3,202*	*485%*	*Outstanding*
2018										
	Goal	Current Actual Advances	Current Advances as % of Goal	Actual to Goal Excess/**(Gap)**			Current + Statewide			Prelim Rating
							Statewide Advances	Current + Statewide	% of Goal	
2018 CD Totals	$6,000	**$1,802**	**30%**	**($4,198)**			**$0**	**$1,802**	30%	**Needs to Improve**
~ Loans	*$4,020*	***$0***	*0%*	*($4,020)*			*$0*	*$0*	*0%*	*Needs to Improve*
~ Investments	*$1,980*	***$1,802***	*91%*	*($178)*			*$0*	*$1,802*	*91%*	*Low Satisfactory*

- During the evaluation period, MUB advanced $1.7 million towards a community investment fund with direct benefit in the Atlanta AA. These advances are part of a larger investment by the bank in a broader statewide or regional area (BSRA) that includes the bank's AAs. This investment vehicle provides 12 direct investments in Atlanta. The fund supports three multifamily projects providing 235 affordable rental housing units to LMI individuals, seven home mortgage loans to LMI borrowers, and two loans for economic development in the AA.

- MUB funded $940 thousand during the review period and has an unfunded but binding commitment to advance an additional $1.1 million in future period capital calls in a LIHTC fund. Proceeds of this LIHTC will be used for rehabilitation of two multifamily projects providing 541 affordable rental housing units for LMI individuals.

- During the evaluation period, MUB advanced $235 thousand in a Small Business Investment Company (SBIC) fund with direct benefit in the Atlanta AA. These advances are part of a larger investment by the bank in the BSRA that includes the bank's AAs. This investment vehicle provides one direct investment in Atlanta. This fund supports small business development.

- MUB advanced $1.5 million during the evaluation period and has an unfunded but binding commitment to advance an additional $3.5 million in a housing rehabilitation fund. The purpose of the fund is to purchase and renovate homes, then sell the homes or offer them as rent-to-own opportunities to qualifying LMI individuals. All homebuyers and lease-to-own participants are required to undergo initiative-provided housing and credit counseling.

- MUB made 20 grants totaling $333 thousand in the AA.

Broader Statewide or Regional Area/Nationwide

One of MUB's investments also benefited other communities in the State of Georgia. During the evaluation period, MUB advanced $336 thousand towards a community investment fund with direct benefit in the BSRA. These advances provided home purchase financing for four LMI borrowers in counties within the Atlanta AA that are not included in the bank's delineated AA in Georgia.

CD Lending

During the evaluation period, MUB did not grant any CD loans in the AA. Given the single commercial branch operation in Atlanta and competition of CD loans in the AA, MUB was unable to compete for the available opportunities and did not have the resources to create its own opportunity.

State Rating

State of Illinois

Combined CRA rating for the State: Satisfactory
The Lending Test is rated: Outstanding
The Investment Test is rated: Satisfactory
The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Based on the data in the tables and performance context considerations discussed below, both the geographic and borrower distribution of the bank's home mortgage loan originations and purchases is excellent.

- The bank's CD lending performance in the retail test as well as the Strategic Plan is good and had a positive impact on the Lending Test rating.

- MUB's investment performance is adequate. MUB had satisfactory performance during the Retail Test however the bank did not meet the goals for Satisfactory performance in the Strategic Plan.

- MUB branch distribution in Illinois is adequate. The bank's branch in this rating area only receives deposits from commercial customers. The OCC considered the commercial nature of the bank's operations during our analysis.

- The Strategic Plan performance for the 2017-2018 evaluation period exceeds the Outstanding goals when aggregating actual advances, unfunded commitments and statewide advances.

Description of Institution's Operations in Illinois

MUB delineated one AA in Illinois, the Chicago MD, consisting of the following Counties, Cook, DuPage, Grundy, Kendall, McHenry and Will which is a subset of the Chicago-Naperville-Arlington Heights MSA (Chicago AA) and received a full scope review. MUB had a 0.04 percent deposit market share in the Chicago AA. MUB had $806 million of allocated deposits representing 1 percent of adjusted deposits. The bank originated and purchased approximately $96 million of total reported loans during the evaluation period. MUB has one branch location in Chicago with a primary purpose of making commercial loans to businesses.

Demographic and Economic Data

The Chicago AA table provides a summary of the demographics that includes housing and business information for the Chicago AA. Median housing value is more than three times median income, but more than six and a half times low-income, but more than four times moderate-income, indicating a limited proportion of owner-occupied units are affordable to LMI individuals. Median rents suggest rental housing is unaffordable for many low-income residents.

Table A – Demographic Information of the Assessment Area

Assessment Area: Chicago-Naperville-Arlington Heights

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,759	15.1	23.6	28.4	32.1	0.8
Population by Geography	7,328,470	10.9	23.1	31.0	34.7	0.3
Housing Units by Geography	2,950,748	11.2	22.2	30.7	35.6	0.4
Owner-Occupied Units by Geography	1,672,168	4.9	17.5	34.8	42.7	0.2
Occupied Rental Units by Geography	999,013	18.3	28.7	25.7	26.6	0.7
Vacant Units by Geography	279,567	23.7	26.9	24.2	24.7	0.5
Businesses by Geography	415,405	5.2	15.4	29.6	49.1	0.6
Farms by Geography	6,431	3.2	13.4	40.0	43.4	0.1
Family Distribution by Income Level	1,721,302	23.8	16.2	18.4	41.5	0.0
Household Distribution by Income Level	2,671,181	25.7	15.2	16.9	42.2	0.0
Median Family Income MSA - 16974 Chicago-Naperville-Arlington Heights, IL MD		$75,350	Median Housing Value			$246,384
			Median Gross Rent			$1,052
			Families Below Poverty Level			10.8%

Source: 2010 U.S. Census & 2015 ACS Census and 2018 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.

Chicago is an important financial center in the U.S. and in the world, a large transportation, logistics and warehousing center, a major tourist destination, and has a growing high-tech sector. Chicago also is an important center of higher education, with many leading universities. Moody's Analytics reports that the segments of the Chicago economy providing the most employment are Professional and Business Services, Education and Health Services, and Government. Large private-sector employers include Advocate Health Care System, the University of Chicago, JP Morgan Chase Bank N.A., Northwestern Memorial Healthcare, United Continental Holdings (United Airlines), and Walgreens Company. The federal government also is a large employer in the area.

Job-rich areas also are found in the north and west suburbs, which are included in the Chicago AA. Fewer jobs are found in LMI communities, particularly in areas of the City of Chicago south and west of downtown, in some southern suburbs. Several initiatives in the region, to which banks have provided loans, investments, and services address this disparate concentration of employment by increasing the number of businesses and jobs in LMI communities, by improving the skills of LMI residents, by encouraging investments in affordable housing near public transportation facilities, and by providing affordable and employer-assisted housing proximate to job centers.

The annual unemployment rate in the Chicago area was 4.3 percent in 2018 compared to 5.1 percent from 2017. Chicago will recapture its edge over the rest of Illinois in coming quarters as private services break higher and manufacturing growth slows. As the U.S. expansion winds down and consumers rein in spending, the Chicago economy will hit a rough patch as well. Longer term, Chicago will stay a step behind its peers and the nation because of its poor population trends and state and local fiscal pressures.

Community Contacts

Examiners reviewed two existing community contacts made during the exam period. One contact stated that gentrification in the west and south sides of the city are displacing LMI individuals as an ongoing issue as businesses and LMI households are priced out of the market due to rising rents. There is a decline in bank lending to small businesses, especially loans of $100 thousand or less to borrowers in LMI areas. Needs identified as supporting partnerships and referrals, finance community development projects and various affordable housing including 1-4 family rehab projects. A second contact cited a continued need for affordable housing as a huge credit need within the City of Chicago. A new City ordinance requires those in receipt of Tax Increment Financing (TIF) funds to set aside ten percent for low-income individuals or create low income housing within a mile radius or put $250 thousand into a fund for low income housing development as an attempt to integrate individuals of varying incomes within the City.

Scope of Evaluation in Illinois

The rating for the State of Illinois is based on a full-scope evaluation of the bank's performance in the Chicago AA. The rating for the State of Illinois is based on a full-scope evaluation of the bank's performance in the Chicago AA under the retail test for 2015 and 2016 combined with the Strategic Plan performance for 2017 and 2018. The OCC gave equal weight to the two tests considering the performance context and the bank's business model for these commercial branch states.

The evaluation for 2015 and 2016 focused on HMDA, small business lending, CD loans, qualified investments, and retail and CD services. In 2017 MUB received approval from the OCC to operate part of its AA's under the Strategic Plan which include the Chicago AA. Under the plan for 2017 and 2018 were focused on community development loans and qualified investments. Loans reported pursuant to the HMDA and CRA data collection requirements for 2015-2016 were included in the review. The review included both loan originations and purchases. All aggregate lending data used in the analysis is from 2015-2016. Information from recently completed community contacts in this AA along with performance context provided by the bank was also reviewed and considered.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Illinois

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs when considering the bank's deposits and limited presence in this AA. There are no retail branches in this AA, and only one commercial branch in this AA.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Chicago-Naperville-Arlington Heights AA	101	8	0	1	110	100%	100%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only from January 1, 2015 through December 31, 2016.

Dollar Volume of Loans $(000's)*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Chicago-Naperville-Arlington Heights AA	$96,406	$86	$0	$75,000	$171,492	100%	100%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only from January 1, 2015 through December 31, 2016.

Based on the June 30, 2018 Summary of Deposit Market Share Report, MUB ranked 98th out of 154 depository institutions with a 0.04 percent market share in the AA. In overall HMDA lending, MUB ranked 279 out of 833 lenders with a 0.02 percent market share. The number and dollar volume of small loans to businesses was too low to register a market share. Due to the low market share, the OCC did not consider market share as a significant measure of performance.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O in the State of Illinois 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. Based on the data in Table O, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is excellent.

- For 2015-2016, the proportion of home mortgage loans in both LMI geographies exceeds both the proportion of owner-occupied housing units in those geographies and the aggregate distribution of loans in those geographies.

Lending Gap Analysis

The OCC reviewed summary reports to analyze MUB's geographic lending patterns throughout the AA and did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P in the State of Illinois 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 the data in Table P, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is excellent.

- The housing costs in relation to the median family incomes in the AA, and the affordability challenges for low-income families, which was discussed under the demographic data, were considered. The OCC placed more emphasis on the bank's performance in comparison to the aggregate percentage of all reporting lenders.

- For 2015-2016, the proportion of low-income families exceeds the aggregate distribution of loans to those borrowers and is below the proportion of low-income families in the AA. The proportion of loans to moderate-income borrowers exceeds both the proportion of moderate-income families and the aggregate distribution of loans to those borrowers.

Community Development Lending

The bank has made a relatively high level of CD loans in Chicago AA.

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

The level of CD lending in the Chicago AA is good. MUB originated one CD loan in the Chicago AA for a total of $75 million, which represents 60.22 percent of the allocated Tier 1 Capital. Although this is a high level relative to allocated Tier 1 Capital, MUB's performance is good considering the bank's limited presence, competition in the AA, and only one loan was originated over the evaluation period. The community development loan was responsive to an identified need for revitalization and stabilization in the AA. CD lending performance had a positive impact on the Lending Test rating.

- MUB provided in a $75 million loan participation to a project targeted for the redevelopment of the historical Navy Pier. The project provided revitalization and jobs to the community and includes a high-rise hotel complex.

Product Innovation and Flexibility

The bank makes no use of innovative and/or flexible lending practices in order to serve AA credit needs. No loans were originated under innovative and/or flexible lending programs. This has a neutral impact on the Lending Test rating

INVESTMENT TEST

MUB's performance under the Investment Test in Illinois is rated Satisfactory for the 2015-2016 assessment period. This assessment is primarily attributed to the performance in the Chicago AA and a small investment in statewide initiatives that address the critical needs of economic development in areas of disparate treatment and affordable housing.

Conclusions for Area Receiving Full-Scope Review

Based on a full-scope review, the bank's performance in the Chicago AA is adequate. The bank has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

Qualified Investments

Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Chicago-Napier-Arlington Heights IL	4	$500	15	$1,280	19	73.08	$1,780	91.00	4	$3,128
Illinois Statewide Investments	2	$115	5	$61	7	26.92	$176	9.00	1	$65

* "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 bank's financial reporting system.

- MUB made only one statewide investment in 2015-2016 to promote economic development outside the assessment area.
- MUB made four statewide donations totaling $20 thousand split equally between Junior Achievement of Central Illinois and SOS Children's Village. Junior Achievement provides community services to LMI individuals in Central Illinois and SOS promote community services to children of LMI families that have been neglected, abandoned or abused.

SERVICE TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Chicago AA is adequate.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Chicago-Napier-Arlington Heights IL	100	1	100	0	0	0	1	10.9	23.1	31.0	34.7

Distribution of Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upper	NA
Chicago-Napier-Arlington Heights IL	0	0	0	0	0	0	

MUB operated one branch in an upper-income geography in the Chicago AA. The branch is part of the bank’s strategy to serve only commercial customers for lending and deposits. The branch is not accessible to the public for retail transactions. The hours and services are not considered accessible. The AA does not have any ATMs or alternate delivery service activities to meet the retail needs within the AA. The bank did not open or close any branches in the AA and this had a neutral impact on the Service Test rating. While the bank did not have a retail branch presence, management took a proactive approach and created a strategic plan to address needs within the community based on their business model.

Community Development Services

The bank provides a very poor level of CD services.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for one CD service activity to one organization in 2015 and 2016, logging a total of 17 qualified hours within this AA. A bank employee taught financial literacy for the clients of an organization that provides hardworking people with the financial resources and opportunities they need to move up the economic ladder. They provide free tax return preparation, college financial aid application assistance, and practical money management workshops.

Strategic Plan State Rating

State of Illinois

CRA Rating for Illinois: Outstanding

The major factors that support this rating include:

- Aggregate CD activities between March 1, 2017 and December 31, 2018, exceeded goals for outstanding performance in the Chicago AA.

- CD lending exceeded goals for outstanding performance.

- CD investments did not meet goals for satisfactory performance.

The bank exhibits good responsiveness to community credit needs via occasional use of innovative or complex CD loans and Qualified investments.

Conclusions About Strategic Plan Performance

Summary

MUB's CD performance in the Chicago AA is rated "Outstanding". MUB's aggregate level of CD activities exceeded goals for outstanding performance in the Chicago AA during the evaluation period. While CD investments did not meet the goals for satisfactory performance, CD lending in the AA exceeded goals for outstanding performance to mitigate the shortfall in investments.

MUB's CD lending exceeded goals for outstanding performance. MUB granted one CD loan totaling \$21.0 million within the AA. MUB's CD investments did not meet goals for satisfactory performance. MUB made four investments and 29 grants, totaling \$1.6 million in investments within the AA. In consideration of aggregate CD activities, the bank adequately served the needs of the AA. As such, MUB received consideration for \$17,000 in advances towards investments in the state serving a broader statewide or regional area that includes the bank's AAs.

The bank exhibits good responsiveness to community credit needs via occasional use of innovative or complex CD loans and qualified investments.

Qualified Investments

Commercial Branch Service Markets CRA Strategic Plan Goals ($000's)											
Commercial Branch Market Chicago, Illinois	Exam Period (2017-2018)										
Review Period Total											
		Current Period Advances and Commitments						Current Period + Statewide			
	Goal	Current Actual Advances	Current Unfunded Commitments	Current Advances + Commitments	% of Goal	Actual to Goal Excess/(Gap)	Preliminary Rating Based on Plan Specifications	Statewide Advances	Current Advances/ Commitments + Statewide	% of Goal	Based on Plan Specifications
2017-2018 Aggregate CD Totals	**$8,000**	**$22,564**	**$0**	**$22,564**	**282%**	**$14,564**	**Outstanding**	**$17**	**$22,581**	**282%**	**Outstanding**
~ Loans	*$5,360*	*$21,000*	*na*	*$21,000*	*392%*	*$15,640*	*Outstanding*	*$0*	*$21,000*	*392%*	*Outstanding*
~ Investments	*$2,640*	*$1,564*	*$0*	*$1,564*	*59%*	*($1,076)*	*Needs to Improve*	*$17*	*$1,581*	*60%*	*Needs to Improve*
2017											
		Current Period Advances and Commitments						Current Period + Statewide			
	Goal	Current Actual Advances	Current Unfunded Commitments	Current Advances + Commitments	% of Goal	Actual to Goal Excess/(Gap)	Preliminary Rating Based on Plan Specifications	Statewide Advances	Current Advances/ Commitments + Statewide	% of Goal	Based on Plan Specifications
2017 CD Totals	**$2,000**	**$645**	**$0**	**$645**	**32%**	**($1,355)**	**Needs to Improve**	**$17**	**$662**	**33%**	**Needs to Improve**
~ Loans	*$1,340*	*$0*	*na*	*$0*	*0%*	*($1,340)*	*Needs to Improve*	*$0*	*$0*	*0%*	*Needs to Improve*
~ Investments	*$660*	*$645*	*$0*	*$645*	*98%*	*($15)*	*High Satisfactory*	*$17*	*$662*	*100%*	*Outstanding*
2018											
		Current Period Advances and Commitments						Current Period + Statewide			
	Goal	Current Actual Advances	Current Unfunded Commitments	Current Advances + Commitments	% of Goal	Actual to Goal Excess/(Gap)	Preliminary Rating Based on Plan Specifications	Statewide Advances	Current Advances/ Commitments + Statewide	% of Goal	Based on Plan Specifications
2018 CD Totals	**$6,000**	**$21,919**	**$0**	**$21,919**	**365%**	**$15,919**	**Outstanding**	**$0**	**$21,919**	**365%**	**Outstanding**
~ Loans	*$4,020*	*$21,000*	*na*	*$21,000*	*522%*	*$16,980*	*Outstanding*	*$0*	*$21,000*	*522%*	*Outstanding*
~ Investments	*$1,980*	*$919*	*$0*	*$919*	*46%*	*($1,061)*	*Needs to Improve*	*$0*	*$919*	*46%*	*Needs to Improve*

- During the evaluation period, MUB advanced $87 thousand towards a community investment fund with direct benefit in the Chicago AA. The advance is part of a larger investment by the bank in a BSRA that includes the bank's AA. This investment vehicle provides one direct investment in Chicago. The fund supported one home mortgage loan to LMI borrowers.

- MUB advanced $195 thousand in a structured equity fund for the support of a small business in the AA. The advance is part of a larger investment by the bank in the BSRA. This investment vehicle provides one direct investment in the AA. The Fund's emphasis is supporting companies located in LMI geographies or companies employing individuals residing in LMI geographies.

- During the evaluation period, MUB advanced $278 thousand in a SBIC security with direct benefit in the AA. The advance is part of a larger investment by the bank in the BSRA. This investment vehicle provides one direct investment in the AA.

- During the evaluation period, MUB advanced $657 thousand in a SBIC security with direct benefit in the AA. The advance is part of a larger investment by the bank in the BSRA. This investment vehicle provides one direct investment in the AA.

- MUB made 2 grants totaling $346 thousand in the AA.

Broader Statewide or Regional Area/Nationwide

One of MUB's investments also benefited other communities in the State of Illinois. During the evaluation period, MUB advanced $17 thousand towards an equity fund supporting economic development in the BSRA that includes the bank's AA. This advance support job creation in a community outside the bank's delineated AA in Illinois.

CD Lending

In August 2018, MUB participated in a large syndicated transaction for the refinancing of a 256-unit affordable housing apartment project located in Park Ridge, Illinois. The bank's portion of this $70 million transaction was $21 million. Fifty-seven percent (147) of the 256 residential units are subject to a HUD contract with 76 units restricted for seniors and 71 units restricted for low-income families.

State Rating

State of New York

Combined CRA rating for the State: Satisfactory
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Based on the data in the tables and performance context considerations discussed below, both the geographic and borrower distribution of the bank's home mortgage loan originations and purchases is excellent.

- The bank is a leader in making CD loans and CD lending performance had a significant positive impact on the Lending Test rating.

- MUB has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors. MUB exceeded performance goals for outstanding performance during the Strategic Plan evaluation period as well.

- MUB branch distribution in New York is very adequate. The bank's branch in this rating area only receives deposits from commercial customers. The OCC considered the commercial nature of the bank's operations during our analysis.

Description of Institution's Operations in New York

MUB delineated one AA within New York the New York MD consisting of the following Counties Bronx, Kings, New York, Orange, Queens, Richmond, Rockland, and Westchester which is a subset of the New York Multi-State MSA aka New York-New Jersey City-White Plains NY Partial MSA (New York AA) and received a full scope review. MUB had a 0.02 percent deposit market share in the New York AA.

MUB had $1.6 billion of allocated deposits representing 1.4 percent of adjusted deposits. The bank originated and purchased approximately $258 million of total reported loans during the evaluation period. MUB has one branch location located in New York with a primary purpose of making commercial loans to businesses.

Demographic and Economic Data

The table below provides a summary of the demographics that includes housing and business information for the New York AA. Median housing value is over seven times low income indicating a limited proportion of owner-occupied units affordable to LMI. Median rents suggest rental housing is unaffordable for many low-income residents.

Table A – Demographic Information of the Assessment Area

Assessment Area: New York New Jersey City-White Plains

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2,311	15.4	27.2	28.4	26.1	2.9
Population by Geography	9,122,815	19.3	28.4	24.6	27.3	0.3
Housing Units by Geography	3,665,770	17.2	26.2	23.9	32.4	0.3
Owner-Occupied Units by Geography	1,145,641	……………………………………	17.8	32.0	45.7	0.2
Occupied Rental Units by Geography	2,191,970	24.5	30.9	20.1	24.2	0.3
Vacant Units by Geography	328,159	13.4	24.3	20.8	41.1	0.3
Businesses by Geography	576,098	10.8	19.8	20.1	46.6	2.7
Farms by Geography	4,076	5.3	13.3	21.1	59.3	1.0
Family Distribution by Income Level	2,028,839	31.4	15.9	15.8	36.9	0.0
Household Distribution by Income Level	3,337,611	31.4	14.5	15.3	38.9	0.0
Median Family Income MSA - 35614 New York-Jersey City-White Plains, NY-NJ MD		$72,047	Median Housing Value			$522,123
			Families Below Poverty Level			16.8%
			Median Gross Rent			$1,339

Source: 2010 U.S. Census & 2015 ACS Census and 2018 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.

For the New York AA, the OCC used data from the U.S. Economic Development Administration , 2010 U.S. Census, and the BLS data. The AA's major employers are Northwell Health, JP Morgan Chase N.A., New York City Health and Hospitals Corp., and the University of Rochester according to Moody's Analytics. The annual New York AA unemployment rate for 2018 was at 4.3 percent. According to the January 2019 Moody's Analytics report the New York AA is in a late expansion phase. The New York AA is struggling to shift into a higher gear because of sluggish job growth, and wage gains below the national pace. There is a steady labor force participation which points to upward for information and education and healthcare employment. Single-family house price growth was the strongest in more than a decade for most of 2018 but home sales have slowed amid uncertainty surrounding the new tax law and a stubborn foreclosure overhang. New York's economy will push forward in 2019, but its trajectory will be unimpressive compared with recent years and that of the nation. High cost of housing is pushing resident's else-where and softer financial markets will lead to below-average performance.

Community Contacts

Examiners reviewed two nonprofit community contacts for the evaluation period. One contact identified needs for additional bank branches in the area to provide an alternative to check cashers. A need for direct grants for down payment assistance to low-income individuals was also identified as a need. Another concern is the recent trend of landlord's increasing rents within the legal limits on apartments as leases expire. This poses an issue as tenants may not be able to afford the new rent value. The contact noted that the Bronx is seeing record-high value for housing units which exacerbates the affordable housing challenges facing the lower-income population in the area.

Another contact stated that there is a need for more attractive first-time homebuyer loan programs and low interest rate home improvement and affordable and flexible student loan programs.

Scope of Evaluation in New York

The rating for the State of New York is based on a full-scope evaluation of the bank's performance in the New York AA. The rating for the State of New York is based on a full-scope evaluation of the bank's performance in the New York AA under the retail test for 2015 and 2016 combined with the Strategic Plan performance for 2017 and 2018. The OCC gave equal weight to the two tests considering the performance context and the bank's business model for these commercial branch states.

The evaluation for 2015 and 2016 focused on HMDA, small business lending, CD loans, qualified investments, and retail and CD services. In 2017 MUB received approval from the OCC to operate part of its AA's under the Strategic Plan which include the New York AA. Under the plan for 2017 and 2018, the OCC focused on community development loans and qualified investments. Loans reported pursuant to the HMDA and CRA data collection requirements for 2015-2016 were included in the review. The review included both loan originations and purchases. All aggregate lending data used in the analysis is from 2015-2016. from recently completed community contacts in this AA along with performance context provided by the bank was also reviewed and considered.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs when considering the bank's deposits and limited presence in this AA. There are no retail branches in this AA.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
New York-New Jersey-White Plains AA	95	10	0	3	108	100%	100%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only from January 1, 2015 through December 31, 2016.

Dollar Volume of Loans $(000's)*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
New York-New Jersey-White Plains AA	$106,145	$821	0	$151,180	$258,146	100%	100%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only from January 1, 2015 through December 31, 2016.

Based on the June 30, 2018 Summary of Deposit Market Share Report, MUB ranked 80th out of 136 depository institutions with a 0.02 percent market share in the AA. In overall HMDA lending, MUB ranked 264th out of 517 lenders with a 0.02 percent market share. The number and dollar volume of small loans to businesses was too low to register a market share. Due to the low market share, the OCC did not consider market share as a significant measure of performance.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O in the State of New York 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. Based on the data in Table O, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is excellent.

- For 2015-2016, the proportion of home mortgage loans in both LMI geographies exceeds both the proportion of owner-occupied housing units in those geographies and the aggregate distribution of loans in those geographies.

Lending Gap Analysis

The OCC reviewed summary reports to analyze MUB's geographic lending patterns throughout the AA and did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P in the State of New York 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 the data in Table P, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is excellent.

- The housing costs in relation to the median family incomes in the AA, and the affordability challenges for low-income families, which was discussed under the demographic data, were considered. The OCC placed more emphasis on the bank's performance in comparison to the aggregate percentage of all reporting lenders.

- For 2015-2016, the proportion of loans to low-income families exceeds the aggregate distribution of loans to those borrowers and is well below the proportion of low-income families in the AA. The proportion of loans to moderate-income borrowers exceeds both the proportion of moderate-income families and the aggregate distribution of loans to those borrowers.

Community Development Lending

The bank is a leader in making CD loans in the New York AA.

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

The level of CD lending in the New York AA is excellent, considering the bank's limited presence, strong competition, and responsiveness of the CD loans originated in the AA. MUB originated three CD loans in the New York AA for a total of $151 million, which represents 61.56 percent of the allocated Tier 1 Capital. The CD loans were responsive to the identified needs in the AA. CD lending performance had a significant positive impact on the Lending Test rating.

Examples of CD loans in the AA include:

- MUB provided a $66.5 million construction loan to finance the construction of a seven-story, Leadership in Energy and Environmental Design (LEED)-Silver medical office building to serve New York City employees and their families. It will also provide emergency care to low-income individuals and families located within the East New York Redevelopment Plan. The operator of the medical office building operates within Health Insurance Plan (HIP) of Greater New York. HIP derives most of its income from Medicaid and other programs that benefit low-income wage earners in New York.

- MUB provided a $44.7 million construction loan for an eight-story mixed-use commercial and residential building with 169 rentable units located in a moderate-income census tract. The organization directly invests in viable New York City neighborhoods, including those affected by Superstorm Sandy.

Product Innovation and Flexibility

The bank makes no use of innovative and/or flexible lending practices in order to serve AA credit needs. No loans were originated under innovative and/or flexible lending programs. This has a neutral impact on the Lending Test rating.

INVESTMENT TEST

Based on a full-scope review, the bank performance in the New York AA is Outstanding for the 2015-2016 assessment period.

The bank has an excellent level of qualified CD investments and grants, although rarely in a leadership position.

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

Conclusion for Area Receiving Full-Scope Review

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
New York-Jersey City-White Plains NY Part	6	$6,406	174	$3,584	180	96.77	$9,990	96.26	4	$4,558
New York Statewide Investments	2	$57	4	$331	6	3.23	$388	3.74	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 bank's financial reporting system.

Examples of investments include:

- MUB made three investments in the New York AA in the current period totaling $1.9 million. One of the investments was for affordable housing and two were for community development.

- MUB made 171 donations in the 2015-2016 assessment period totaling $1.6 million in the New York AA to entities that provide or assist in obtaining affordable housing, community development, community services, or have initiatives that provide stabilization. Donations include donations with several certified CDFI micro-lenders that are sanctioned SBA lenders, and two Local Initiative Support Corporations (LISC), Neighborhood and Housing development organizations, and community services for training low and moderate individuals to improve their ability to obtain and sustain employment.

- MUB made two BEA grants in 2015-2016 totaling $35 thousand in the New York AA.

SERVICE TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the New York AA is adequate.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
New York-Jersey City-White Plains NY Part	100	1	100	0	0	0	1	19.3	28.4	24.6	27.3

Distribution of Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upper	NA

New York-Jersey City-White Plains NY Part	0	0	0	0	0	0	0

MUB operated one branch in an upper-income geography in the New York AA. The branch is part of the bank's strategy to serve commercial customers only for lending and deposits. The branch is not accessible to the public for retail transactions. The hours and services are not considered accessible. The AA does not have any ATMs or alternate delivery service activities to meet the retail needs within the AA. The bank did not open or close any branches in the AA, and this had a neutral impact on the Service Test rating. While the bank did not have a retail branch presence, management took a proactive approach and created a strategic plan to address needs within the community based on their business model.

Community Development Services

The bank provides a significant level of CD services considering the bank's commercial presence in this AA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 64 CD service activities to five organizations in 2015 and 2016 logging a total of 194 qualified hours within this AA. All the bank's assistance was to organizations that provide community services to LMI individuals and families. The following are examples of CD services provided in this AA:

- One MUB team member provided 25 hours of Board service and technical assistance to a nonprofit that provides social, recreational, and educational activities including entitlements and financial counseling.

- A MUB team member provided 96 hours to an organization that promotes Community Economic Development targeted to assist LMI persons and geographies. The mission of this nonprofit is to help disadvantaged youth and adults recognize their own self-worth and advance towards self-sufficiency and financial security through job training, academic reinforcement, improved life skills, job placement, and support services.

Strategic Plan State Rating

State of New York

CRA Rating for New York: Outstanding

The major factors that support this rating include:

- Aggregate CD activities between March 1, 2017 and December 31, 2018, exceeded goals for outstanding performance in the New York AA.

- CD investments exceeded goals for outstanding performance.

- CD lending exceeded goals for outstanding performance.

The bank exhibits good responsiveness to community credit needs via significant use of innovative or complex qualified investments and CD loans.

Conclusions About Performance

Summary

MUB's CD performance in the New York AA is rated "Outstanding". MUB's aggregate level of CD activities exceeded goals for outstanding performance in the New York AA during the evaluation period. Both the bank's CD lending and investments in the AA exceeded goals for outstanding performance.

CD lending exceeded goals for outstanding performance. MUB granted one CD loan with a qualifying portion totaling $18.4 million within the AA.

CD investments exceeded goals for outstanding performance. The bank's investment activity includes six investments and 173 grants, totaling $8.6 million within the AA. In consideration of aggregate CD activities, the bank adequately served the needs of the AA. As such, MUB received consideration for $545,000 in advances towards an investment in the state serving a BSRA that includes the bank's AAs.

The bank exhibits good responsiveness to community credit needs via significant use of innovative or complex qualified investments and CD loans.

Qualified Investments

Commercial Branch Service Markets CRA Strategic Plan Goals ($000's)											
Commercial Branch Market **New York, New York**	Exam Period (2017-2018)										
Review Period Total											
		Current Period Advances and Commitments						Current Period + Statewide			
	Goal	Current Actual Advances	Current Unfunded Commitments	Current Advances + Commitments	% of Goal	Actual to Goal Excess/(Gap)	Preliminary Rating Based on Plan Specifications	Statewide Advances	Current Advances/ Commitments + Statewide	% of Goal	Based on Plan Specifications
2017-2018 Aggregate CD Totals	**$17,500**	**$27,043**	**$0**	**$27,043**	**155%**	**$9,543**	**Outstanding**	**$545**	**$27,588**	**158%**	**Outstanding**
~ Loans	*$11,725*	*$18,448*	*na*	*$18,448*	*157%*	*$6,723*	*Outstanding*	*$0*	*$18,448*	*157%*	*Outstanding*
~ Investments	*$5,775*	*$8,595*	*$0*	*$8,595*	*149%*	*$2,820*	*Outstanding*	*$545*	*$9,140*	*158%*	*Outstanding*
2017											
		Current Period Advances and Commitments						Current Period + Statewide			
	Goal	Current Actual Advances	Current Unfunded Commitments	Current Advances + Commitments	% of Goal	Actual to Goal Excess/(Gap)	Preliminary Rating Based on Plan Specifications	Statewide Advances	Current Advances/ Commitments + Statewide	% of Goal	Based on Plan Specifications
2017 CD Totals	**$7,500**	**$22,282**	**$3**	**$22,282**	**297%**	**$14,782**	**Outstanding**	**$422**	**$22,704**	**303%**	**Outstanding**
~ Loans	*$5,025*	*$18,448*	*na*	*$18,448*	*367%*	*$13,423*	*Outstanding*	*$0*	*$18,448*	*367%*	*Outstanding*
~ Investments	*$2,475*	*$3,834*	*$0*	*$3,834*	*155%*	*$1,359*	*Outstanding*	*$422*	*$4,256*	*172%*	*Outstanding*
2018											
		Current Period Advances and Commitments						Current Period + Statewide			
	Goal	Current Actual Advances	Current Unfunded Commitments	Current Advances + Commitments	% of Goal	Actual to Goal Excess/(Gap)	Preliminary Rating Based on Plan Specifications	Statewide Advances	Current Advances/ Commitments + Statewide	% of Goal	Based on Plan Specifications
2018 CD Totals	**$10,000**	**$4,761**	**$0**	**$4,761**	**48%**	**($5,239)**	**Needs to Improve**	**$123**	**$4,884**	**49%**	**Needs to Improve**
~ Loans	*$6,700*	*$0*	*na*	*$0*	*0%*	*($6,700)*	*Needs to Improve*	*$0*	*$0*	*0%*	*Needs to Improve*
~ Investments	*$3,300*	*$4,761*	*$0*	*$4,761*	*144%*	*$1,461*	*Outstanding*	*$123*	*$4,884*	*148%*	*Outstanding*

- During the evaluation period, MUB advanced $5.6 million in a real estate tax credit fund with direct benefit in the New York AA. These advances are part of a larger investment by the bank in a BSRA investment vehicle with two direct investments in the New York AA. The fund supports the rehabilitation of two multifamily projects and the preservation of 147 affordable rental housing units for LMI individuals and families.

- During the evaluation period, MUB advanced $789 thousand towards a community investment fund with direct benefit in the New York AA. These advances are part of a larger investment by the bank in a BSRA investment vehicle with three direct investments in the New York AA. The fund supports two multifamily projects providing 370 affordable rental housing units to LMI individuals and one loan for economic development in the AA.

- MUB advanced $261 thousand towards a structured-equity in a SBIC fund with direct benefit in the New York AA. These advances are part of a larger investment by the bank in the BSRA that includes the bank's AA. This investment vehicle provides two direct investments in the New York AA. This fund supports small business development.

- MUB advanced $68 thousand towards an SBIC fund with direct benefit in the New York AA. This advance is part of a larger investment by the bank in the BSRA that includes the bank's AA. This investment vehicle provides one direct investment in the New York AA. This fund supports small business development.

- MUB made 173 grants totaling $1.8 million in the AA.

Broader Statewide or Regional Area/National

- During the evaluation period, MUB advanced $237 thousand in an SBIC fund with benefit in other communities in the State of New York. These advances are part of a larger investment by the bank in the BSRA that includes the bank's AA. This investment vehicle provides one direct investment in a community within the larger New York-Newark-Jersey City Multi-State MSA. This fund supports small business development.

- MUB advanced $188 thousand towards an SBIC fund with direct benefit in other communities in the State of New York. This advance is part of a larger investment by the bank in the BSRA that includes the bank's AA. This investment vehicle provides one direct investment in a community within the larger New York-Newark-Jersey City Multi-State MSA. This fund supports small business development.

- MUB advanced $120 thousand towards an SBIC fund with direct benefit in other communities in the State of New York. This advance is part of a larger investment by the bank in the BSRA that includes the bank's AA. This investment vehicle provides one direct investment within a community outside of the bank's delineated AA. This fund supports small business development.

CD Lending

In December 2017, MUB provided financing for a Direct Bond Purchase vehicle for the refinance of construction bonds secured by a 254-unit multifamily rental apartment building in New York. Of the 254 residential rental units, 43 units are designated for low-income households and eight units are designated for very low-income households. The pro-rata shares of the total loan amount designated for affordable housing is $18.4 million.

State Rating

State of Oregon

CRA rating for the State: **Satisfactory**

The Lending Test is rated: **Outstanding**
The Investment Test is rated: **High Satisfactory**
The Service Test is rated: **Satisfactory**

The major factors that support this rating include:

- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution and borrower distribution of the bank's home mortgage and small business loan originations and purchases is good.

- CD loans were effective in addressing community credit needs. The bank was a leader in originating CD loans, which had a significant positive effect on the Lending Test rating.

Description of Institution's Operations in Oregon

The OCC delineated two AAs in the State of Oregon, Portland MD which is a subset of the Portland-Vancouver-Hillsboro MSA (Portland AA) and received a full scope review and the Salem MSA received a limited scope review. The bank originated and purchased approximately $485 million during the evaluation period. MUB has three branch locations in Oregon with two located in Portland and one in Salem.

The Portland AA consists of the following Counties Clackamas, Columbia, Multnomah, Washington and Yamhill which is a subset of the Portland-Vancouver-Hillsboro MSA and received full scope review. MUB had a 0.67 percent deposit market share in the Portland MD according to the FDIC 2018 Market Share. MUB had $487 million of allocated deposits representing 0.57 percent of adjusted deposits for the Portland MD.

Demographic and Economic Data

The table below provides a summary of the demographics that includes housing and business information for the Portland AA. A very small portion of tracts, with a very small proportion of population are low-income. A small portion of owner-occupied units are in low-income census tracts. A very small portion of small businesses are located in low-income census tracts. Median housing value is over four times low-income indicating a limited proportion of occupied units affordable to LMI.

Table A – Demographic Information of the Assessment Area

Assessment Area: MUB Portland-Vancouver-Hillsboro

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	261	1.9	25.3	40.2	31.4	1.1
Population by Geography	1,207,245	2.0	27.9	40.9	29.0	0.3
Housing Units by Geography	509,950	1.9	26.0	41.1	30.6	0.4
Owner-Occupied Units by Geography	282,938	0.9	21.9	42.9	34.3	0.1
Occupied Rental Units by Geography	196,038	3.5	31.8	38.5	25.3	0.9
Vacant Units by Geography	30,974	1.8	26.4	41.4	30.0	0.5
Businesses by Geography	122,129	1.4	20.1	37.4	37.1	4.1
Farms by Geography	3,164	1.0	15.7	49.2	32.9	1.2

Family Distribution by Income Level	284,872	22.2	17.3	20.1	40.4	0.0
Household Distribution by Income Level	478,976	26.1	16.2	17.7	40.0	0.0
Median Family Income MSA - 38900 Portland-Vancouver-Hillsboro, OR-WA MSA		$73,089	Median Housing Value			$303,986
			Median Gross Rent			$1,009
			Families Below Poverty Level			9.8%

Source: 2010 U.S. Census & 2015 ACS Census and 2018 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.

For the Portland, AA the OCC used data from the U.S. Economic Development Office, 2010 U.S. Census, and the BLS data. The AA's major employers are Intel Corp, Providence Health Systems, Oregon Health & Science University, Legacy Health System and Nike Inc. according to Moody's Analytics. The Portland AA unemployment rate for 2018 was at 3.8 percent. According to the February 2019 Moody's Analytics report the Portland, AA is advancing at an above-average pace, robust population growth allows for stronger job gains as workforce expands.

The Portland diverse economy will help it weather economic disruptions from more restrictive fiscal and monetary policy better than most, though weaker trade is a bigger concern for the metro area. Portland has a highly educated workforce, strong population trends, and an increasing number of tech firms making it a regional tech hub and an above-average long-term performer. Manufacturing has had a surge and in 2018 despite a shift from semiconductor to cloud- computing. Not all markets face the same conditions, for example a long-time brewing company ceased production citing the intense competition from the local and national craft beer market. The market has gain population year over year and many of these are young professionals who will expand the population as their families grow.

Community Contacts

One nonprofit contact stated that the economic conditions continue to improve in the Portland area causing real estate prices and rent to increase year over year making affordable housing an increasing issue causing more homelessness. There is a general need for banking and credit services in the market with a need to focus financial education on youth in transitional housing and LMI individuals according to the contact.

Scope of Evaluation in Oregon

The rating for the State of Oregon is based on a full-scope evaluation of the bank's performance in the Portland AA.

The evaluation for 2015-2018 focused on HMDA, small business lending, CD loans, qualified investments, and retail and CD services. Loans reported pursuant to the HMDA and CRA data collection requirements for 2015-2018 were included in the review. The review included both loan originations and purchases. All aggregate lending data used in the analysis is from 2015-2018. Information from recently completed community contacts in these AAs along with performance context provided by the bank was considered.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OREGON

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Portland-Vancouver-Hillsboro AA is excellent.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs when considering the bank's deposits, competition and limited market presence.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Portland-Vancouver-Hillsboro AA	814	214	3	20	1,051	92.19%	85.36%
Salem AA	38	49	0	2	89	7.81%	14.64%

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

Dollar Volume of Loans $(000's) *							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Portland-Vancouver-Hillsboro AA	$421,700	$32,256	$83	$20,243	$474,282	98.82%	85.36%
Salem AA	$6,881	$3,559	$0	$127	$10,567	2.18%	14.46%

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

Based on the June 30, 2018 Summary of Deposit Market Share Report, MUB ranked 15th out of 35 depository institutions with a 0.59 percent market share in the AA. U.S. Bank, N.A. ranked first with a 21.69 percent market share. In overall HMDA lending, MUB ranked 64th out of 542 lenders with a 0.28 percent market share. Wells Fargo Bank, N.A. ranked first in the market with a 10.67 percent market share, Guild Mortgage Company ranked second with a 5.23 percent market share, and US Bank, N.A. ranked third with a 3.98 percent market share. Although MUB's HMDA market share is lower than its deposit market share, lending competition was significantly stronger than the competition for deposits in the AA. There are 542 HMDA lenders in the AA, many without a depository presence. In contrast, there are 35 depository institutions in the AA. In small loans to businesses, MUB ranked 45th out of 126 lenders with a market share of 0.07 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in the Portland AA.

Home Mortgage Loans

Refer to Table O in the State of Oregon 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. Based on the data in Table O, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is good.

- For both 2015-2016 and 2017-2018 time periods, there was a very small proportion of owner-occupied housing units located in low-income geographies. Additionally, only a small proportion of the population resides in low-income geographies, and the proportion of the population residing in low-income geographies declined slightly from the 2015-2016 time period to the 2017-2018 time period. More emphasis was placed on the 2017-2018 time period, as the majority of home mortgage lending was done during this time period.

- For 2015-2016, the proportion of home mortgage loans in low-income geographies exceeds both the proportion of owner-occupied housing units in low-income geographies and the aggregate distribution of loans in those geographies. The proportion of home mortgage loans in moderate-income geographies is below both the proportion of owner-occupied housing units in moderate-income geographies and the aggregate distribution of loans in those geographies.

- The bank's performance for 2017-2018 is stronger than 2015-2016. This is due to stronger distribution and aggregate lending performance in moderate-income geographies, and this had a positive impact on the combined conclusion.

Small Loans to Businesses

Refer to Table Q in the State of Oregon 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. Based on the data in Table Q, the bank's overall geographic distribution of small loans to businesses for this evaluation is good.

- For both the 2015-2016 time and the 2017-2018 time period, there was a very small proportion of businesses located in low-income geographies.

- For 2015-2016, the proportion of the bank's small loans to businesses in low-income geographies exceeds both the proportion of businesses located in those geographies and the aggregate distribution of loans in those geographies. The proportion of the bank's small loans to businesses in moderate-income geographies is near to the proportion of businesses located in those geographies and exceeds the aggregate distribution of loans in those geographies.

- The bank's performance for 2017-2018 is weaker than the bank's performance for 2015-2016. MUB did not originate loans in low-income geographies, however, there was a very small proportion of businesses located in low-income geographies. Additionally, the distribution and aggregate lending performance in moderate-income geographies was poorer. This had a negative impact on the combined conclusion.

Lending Gap Analysis

The OCC reviewed summary reports to analyze MUB's geographic lending patterns throughout the AA and did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P in the State of Oregon 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 the data in Table P, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is good.

- The housing costs in relation to the median family incomes in the AA, and the affordability challenges for LMI families, discussed under the demographic data, were considered in the evaluation. The OCC placed more emphasis on the bank's performance in comparison to the aggregate percentage of all reporting lenders.

- According to the NAR National Qualifying Income study for Metro areas, with 10 percent down, it would take income of $87,345 to afford a median priced home as of the first quarter of 2018. Based on the 2015 ACS Median Family Income, a low-income family would earn $36,546 or less and a moderate-income family would earn no more than $58,471, making it difficult for LMI families to purchase a home. Given the affordability challenges, the OCC placed more emphasis on aggregate performance than demographic performance.

- For the 2015-2016 time period, the proportion of loans to low-income borrowers exceeded the aggregate distribution of loans to those borrowers and is significantly below the proportion of low-income families. The proportion of loans to moderate-income borrowers is below the proportion of moderate-income families, and near to the aggregate distribution of loans to those borrowers.

- The bank's performance in 2017-2018 is consistent with the bank's performance for 2015-2016.

Small Loans to Businesses

Refer to Table R in the State of Oregon section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses. Based on the data in Table R, the OCC concluded the distribution of the bank's originations and purchases of small loans to businesses by revenue is adequate.

- The OCC placed more emphasis on the bank's performance in comparison to the aggregate percentage of all reporting lenders because the small business percentages include micro-businesses that don't qualify for traditional small business loans. Additionally, the OCC considered the competition from larger financial institutions that offer credit cards. MUB purchased a credit card portfolio in 2016, however, this credit card portfolio is not as significant as some of the larger, more established credit card lenders.

- For the 2015-2016 time period, the bank's distribution of small loans to businesses with revenues of $1 million or less exceeded the aggregate percentage of all reporting lenders, and the distribution of loans is well below the percentage of small businesses located in the AA. While the bank's performance is well below the demographics, the distribution by size of loans shows that 78.62 percent of the loan originations in the 2015-2016 time period are for $100 thousand or less, which is an indicator that MUB is lending to small businesses.

- The bank's performance for 2017-2018 is weaker than the bank's performance for 2015-2016. This is due to poorer distribution and aggregate lending performance, and this had a negative impact on the combined conclusion.

Community Development Lending

The bank is a leader in making CD loans in the Portland AA.

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

The level of CD lending in the Portland AA is excellent. MUB made 20 CD loans in the Portland AA for a total of $20 million which represents 26.89 percent of the allocated Tier 1 Capital. The CD loans were responsive to the identified needs in the AA, including $20.2 million (99.98 percent) for affordable housing, and $4 thousand (0.02 percent) for economic development. CD lending performance had a positive impact on the Lending Test rating.

Examples of CD loans in the AA include:

- MUB provided two lines of credit, one for $1.5 million and one for $500 thousand to the consortium for affordable housing. The consortium provides financial tools for affordable housing, including pre-development loans, long-term financing, access to tax-exempt bond financing and technical assistance. These resources enable organizations to develop affordable housing options in their community.

Product Innovation and Flexibility

The bank makes little use of innovative and/or flexible lending practices in order to serve AA credit needs. MUB's innovative and flexible lending programs had a neutral impact on the Lending Test. During the evaluation period, MUB extended ten EOM loans totaling $2.4 million and 76 HomeReady mortgage totaling $20.5 million. Refer to the comments in the bank Innovative or Flexible Lending Practices section of this public evaluation for additional details regarding these programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Lending Test in the Salem AA is stronger than the bank's overall performance under the Lending Test in the full-scope area. The bank's geographic and borrower distribution is excellent. While the bank has limited presence, deposits, and lending in this AA, the bank's performance in the Salem AA had a positive impact on the overall rating.

Refer to Tables O through V in the State of Oregon section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

MUB's performance under the Investment Test in Oregon is rated High Satisfactory, this is primarily based on the full-scope review of the Portland AA. Refer to The Qualified Investments Table in the State of Oregon section of this report for the facts and data used to evaluate the bank's level of qualified investments. The number of investments in Oregon doubled over the prior period; however, the dollar amount decreased substantially ($7.2 million) from the prior period but did not affect the overall assessment of the state. The increase in the number of investments is primarily due to the increase in the number of donations made in the Portland AA.

Qualified Investments

Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Portland-Vancouver-Hillsboro OR Partial	4	3,189	26	2,274	30	57.69	5,464	86.78	3	473
Salem OR	9	382	13	450	22	42.31	832	13.22	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 bank's financial reporting system.

Portland AA

MUB's performance under the Investment Test in the Portland AA is rated "High Satisfactory" based on a full-scope review of the state and the bank's performance in the Portland AA.

Examples of Community Development Investments include:

- MUB investments during the current period represents over 80% in LIHTC for affordable housing with the remaining investments in community and economic development for this assessment area.
- Affordable housing investments made during the period included a $1.4 million loan to construct a 40-unit affordable housing to a nonprofit organization that supports people in substance abuse recovery in a 5-story mixed use bldg. Six units will be targeted to tenants with incomes less than 30

percent MFI and all other units will be for those with incomes less than 50 percent MFI.

- Donations and BEA grants made during the period for the Portland total $76 thousand nearly equally divided between 2015-2016 and 2017-2018. Organizations benefitting from the bank's donations have missions that provide meals to support senior citizens who are homebound and want to remain independent and living in their own homes, housing for the homeless and transitional housing facilities, social services for at risk youth in low-income areas who have sustained severe mental/behavioral disabilities as victims of trauma (violence, sexual abuse, neglect, foster care, etc.) and higher learning opportunities for low-income youth that want to pursue a higher education, vocational training, or looking to develop leadership skills.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Salem assessment is consistent with the bank's satisfactory performance in the full-scope assessment areas in Oregon.

SERVICE TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Portland AA is adequate considering the good performance in Community Development services. Performance in the limited-scope assessment areas had a neutral influence on the state rating.

Retail Banking Services

Service delivery systems are unreasonably inaccessible to geographies and individuals of different income levels in the bank's AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%) *				% of Population within Each Geography *			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
FS Portland-Vancouver-Hillsboro OR MSA AA	85.36	2	66.67	0.0	0.0	0.0	50**	2.35	25.47	42.80	29.23
LS-Salem OR MSA AA	14.64	1	33.33	0.0	0.0	0.0	100	2.51	24.35	46.51	26.64

* May not add up to 100 percent due to geographies with unknown tract income level and rounding.

Distribution of Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upper	NA
FS Portland-Vancouver-Hillsboro MSA AA	0.0	0.0	0.0	0.0	0.0	0.0	0.0
LS Salem MSA AA	0.0	0.0	0.0	0.0	0.0	0.0	0.0

As of December 31, 2018, MUB operates two branches and one ATM in the Portland AA. Both branches are full-service locations. There is one branch in an upper-income geography and one branch in an unknown income classification geography. The branch distribution in low-income geographies is below the percentage of the population in low-income geographies and the distribution of branches in moderate-income geographies is significantly below the percent of the population in moderate-income geographies in the AA. When considering the two branches that directly border a branch and serves LMI geographies, the bank's distribution improves accessibility.

The bank did not open or close any branches during the evaluation period which had a neutral effect on LMI accessibility.

Examiners also considered the bank's ADS, including ATMs, online, and mobile banking in evaluating accessibility to the bank's products and services. Based on customer usage, ADS had a neutral impact on the accessibility of the bank's retail delivery systems to LMI individuals and geographies. The LMI customer usage did not exceed LMI demographics.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. While there are slight variations in opening or closing times, generally, branches are open Monday through Friday from 9:00 am to 5:00 pm. None of the branches offers Saturday or Sunday hours. All MUB services are available at the full-service branches and all delivery systems discussed bank-wide are available in this AA.

Community Development Services

The bank provides a good level of CD services.

Bank records show that employees provided financial or job-specific expertise and/or technical assistance for 33 CD service activities to five organizations during the evaluation period, logging a total of 122 qualified hours within this AA. A majority (75 percent) of the bank's assistance was to organizations that provide community services to LMI individuals and families. Other activities targeted affordable housing (25 percent). The following example of CD services provided in this AA:

- MUB employees contributed by serving on five boards of directors providing financial education and technical assistance to LMI persons and participating in fundraising events.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the bank's Service Test in the Salem AA is consistent with the bank's overall performance under the Service Test in the full-scope area with respect to branch distribution.

State Rating

State of Texas

CRA rating for the State:	**Satisfactory**
The Lending Test is rated:	**Outstanding**
The Investment Test is rated:	**High Satisfactory**
The Service Test is rated:	**Low Satisfactory**

The major factors that support the Satisfactory rating include:

- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution and borrower distribution of the bank's home mortgage and small business loan originations and purchases is excellent.

- The aggregate statewide investment performance and the limited scope area improved the Investment Test rating by the significant dollar amount of statewide investments relative to the operations in the State of Texas.

- MUB branch distribution in Texas is adequate. The bank's branches in this rating area only receives deposits from commercial customers. The OCC considered the commercial nature of the bank's operations during our analysis.

Description of Institution's Operations in Texas

The OCC delineated two AAs in the State of Texas, Dallas MD which is a subset of the Dallas-Plano-Irving, TX MSA and received a full scope review and the Houston MD which is a subset of the Houston-The Woodland-Sugar Land, MSA which received a limited scope review. The bank originated and purchased approximately $53 million in loans during the evaluation period. MUB has two branch locations in Texas with one located in Dallas and one in Houston with a primary purpose of making commercial loans.

Dallas MD AA

Dallas MD (Dallas AA) consist of the following Counties Collin, Dallas, Denton, Ellis, Hunt, Kaufman and Rockwall which is a subset of the Dallas-Fort Worth-Arlington MSA and received a full scope review. MUB had a 0.03 percent deposit market share in the Dallas AA according to the FDIC 2018 Market Share.

MUB had $1.9 billion of allocated deposits representing 2.2 percent of the bank's adjusted overall deposits for the Dallas AA.

Houston MD AA

Houston MD consist of the following counties Austin, Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery and Waller. According to the 2018 MUB's deposit market share in the Houston MD is 0.04 percent. MUB had $684 million of allocated deposits representing less than one percent of the bank's adjusted overall deposits.

Demographic and Economic Data by Assessment Area

Dallas AA

The Dallas AA table provides a summary of the demographics that includes housing and business information for the Dallas AA. Median housing value is two and a half times median income, but three times moderate-, and five times low-income, indicating a limited proportion of owner-occupied units affordable to LMI individuals. Median rents suggest rental housing is unaffordable for many low-income residents. A significant proportion of families are LMI.

Table A – Demographic Information of the Assessment Area

Assessment Area: Dallas-Plano-Irving

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	897	13.5	26.2	25.5	34.1	0.7
Population by Geography	4,519,004	11.8	26.1	27.4	34.5	0.2
Housing Units by Geography	1,721,065	12.5	24.5	27.8	34.9	0.3
Owner-Occupied Units by Geography	930,164	5.4	20.4	28.9	45.2	0.1
Occupied Rental Units by Geography	661,577	20.8	29.6	26.7	22.4	0.5
Vacant Units by Geography	129,324	21.6	27.8	25.7	24.5	0.4
Businesses by Geography	395,893	7.3	18.8	26.2	46.9	0.8
Farms by Geography	7,356	5.4	17.7	32.2	44.0	0.6
Family Distribution by Income Level	1,098,880	23.7	16.5	17.6	42.2	0.0
Household Distribution by Income Level	1,591,741	24.0	16.5	17.5	42.0	0.0
Median Family Income MSA - 19124 Dallas-Plano-Irving, TX MD		$71,149	Median Housing Value			$186,544
			Median Gross Rent			$994
			Families Below Poverty Level			11.5%

Source: 2010 U.S. Census & 2015 ACS Census and 2018 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.

For the Dallas AA, the OCC used data from the U.S. Economic Development Administration, 2010 U.S. Census, and the BLS data. Dallas is the center of this MSA and the ninth largest city in the country. The Dallas-Fort Worth metroplex is also the fourth largest (by population) in the country at 7.5 million residents as of 2018. The AA's major employers are Wal-Mart Stores Inc., AT&T, Baylor Scott & White

Health, and Bank of America Corp. according to Moody's Analytics. The Dallas AA unemployment rate for December 2018 was at 3.5 percent which is consistently below the national average at 3.9 percent in December 2018. This is due to an influx of larger employers migrating to the area. For example, in July of 2017 Toyota opened a billion-dollar North American headquarters in Plano, Texas providing up to 4,000 new jobs (Source: Planotexas.org).

According to the January 2019 Moody's Analytics report the Dallas AA is advancing at an above-average pace, though some signs of deceleration have emerged. Job growth in every major industry exceeded the national average over the past year but the gains in recent months have been concentrated in just a few industries, notably construction and hospitality. Core professional services have slowed significantly, and commercial real estate development gains reflected a stream of corporate relocations and expansions that generate the need for accounting, legal, financial, IT and architecture services. IT firms account for the largest share of new demand for office space. The Dallas AA has a stable demand for professional services because of many corporate headquarters located in the market.

Residential homebuilding is expected to grow slowly in 2019 but keep pace to support the overall economy. Total new permits are already well above their peak prior to the Great Recession. A weakness in the market is diminished housing affordability as the metro division matures and land values increase. The Dallas-Plano-Irving MSA will grow at an above-average pace in 2019, led by construction and professional services. Longer term, the concentration of corporate headquarters, technology businesses and financial services as well as above-average population growth will contribute to performance well above average.

Community Contacts

Examiners reviewed two existing community contacts from nonprofit organizations made during the exam period. One contact stated that the area has experienced an influx of large companies moving their headquarters within the area and they expect this trend to continue for the next few years. The contact stated that plenty of opportunity exists for financial institutions to be involved with providing affordable housing. However, competition for these opportunities has increased as a number of banks from outside of the city have expressed interest in real estate opportunities in the markets.

Another contact stated that there is a need for financial institutions to build trust with LMI individuals to encourage them to become bankable by offering financial education services. There are needs for micro small business lending along with small business financial training and coaching. Small dollar lending was also mentioned as a need for LMI individuals.

Houston AA

The Houston AA table provides a summary of the demographics that includes housing and business information for the Houston AA.

Table A – Demographic Information of the Assessment Area

Assessment Area: Houston-The Woodlands-Sugar Land

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #

Geographies (Census Tracts)	1,072	14.8	29.0	25.6	29.5	1.1
Population by Geography	6,346,653	11.6	25.9	27.9	34.2	0.4
Housing Units by Geography	2,402,507	12.2	25.3	27.2	35.1	0.3
Owner-Occupied Units by Geography	1,314,631	5.2	21.3	29.4	44.1	0.1
Occupied Rental Units by Geography	854,011	20.9	30.2	24.6	23.7	0.6
Vacant Units by Geography	233,865	19.5	29.6	24.0	26.6	0.3
Businesses by Geography	478,600	9.8	19.1	23.6	47.3	0.2
Farms by Geography	8,021	5.3	17.1	31.6	45.9	0.1
Family Distribution by Income Level	1,530,226	24.4	16.1	17.1	42.4	0.0
Household Distribution by Income Level	2,168,642	24.9	15.9	16.8	42.4	0.0
Median Family Income MSA - 26420 Houston-The Woodlands-Sugar Land, TX MSA		$69,373	Median Housing Value			$172,974
			Families Below Poverty Level			12.8%
			Median Gross Rent			$972

Source: 2010 U.S. Census & 2015 ACS Census and 2018 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.

For the Houston AA the OCC used data from the U.S. Economic Development Administration, 2010 U.S. Census, and the BLS data. The AA's major employers are Memorial Hermann Health System, The University of Texas Health Science Center, Schlumberger ltd., Landry's Inc. according to Moody's Analytics. The Houston AA annual unemployment rate for 2018 was at 3.2 percent according to the January 2019 Moody's Analytics report. The Houston AA advanced steadily over 2018 with job growth at twice the national average. Goods-producing industries led the way contributing to nearly two-fifths of the total job gains, but private services also out performed their national counterparts, especially professional services and distribution.

The Houston AA will grow at an above-average pace in 2019, though not quite as quickly as in 2018. Manufacturing and IT will lead the way. Residential construction will also be a positive factor, elevated by job growth and demographics. New multifamily permits have begun to recover from their downturn in 2015 and 2016 and new permits for single-family units, due to Hurricane Harvey rebuilding have boosted the construction industry. However, the recent decline in oil prices poses downside risks. Longer term, the concentration of upstream and downstream energy industries, above-average population growth and expansion in housing, transportation and distribution industries will help propel above average gains for the metropolitan area.

Community Contacts

Examiners reviewed two existing nonprofit community contacts made during the exam period. One contact stated that since Hurricane Harvey small business clients have been service related, restaurants, day care, small retailers and small manufacturers. General banking and credit needs consist of small business lending. The organization works with banks and connects clients to SBA lenders. There are numerous opportunities for small business loans in the Houston market area. Most of the opportunity occurs with small businesses employing 10 to 20 employees. Another contact stated that small businesses have trouble creating economic activity outside the oil and gas industry as it is difficult to find employees who can be retained at a reasonable cost. For smaller and start-up businesses alternative financing assisted by nonprofits supported by the banks is a primary need that is met by the many competing financial institutions in these markets.

Scope of Evaluation in Texas

The rating for the State of Texas is based on a full-scope evaluation of the bank's performance in the Dallas AA. The OCC performed a limited-scope analysis in the Houston AA. The rating for the State of Texas is based on a full-scope evaluation of the bank's performance in the Dallas AA under the retail test for 2015 and 2016 combined with the Strategic Plan performance for 2017 and 2018. The OCC gave equal weight to the two tests considering the performance context and the bank's business model for these commercial branch states.

The evaluation for 2015 and 2016 focused on HMDA, small business lending, CD loans, qualified investments, and retail and CD services. In 2017 MUB received approval from the OCC to operate part of its AA's under a CRA Strategic Plan. The plan for 2017 and 2018 was focused on community development loans and qualified investments. Loans reported pursuant to the HMDA and CRA data collection requirements for 2015-2016 was included in the review. The review included both loan originations and purchases. All aggregate lending data used in the analysis is from 2015-2016. Information from recently completed community contacts in these AAs along with performance context provided by the bank was also considered.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS

LENDING TEST

The bank's performance under the Lending Test in Texas is rated outstanding.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs when considering the bank's deposits and limited presence in this AA. There are no retail branches in this AA.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Dallas-Plano-Irving AA	100	4	0	1	105	53.85%	54.65%
Houston-The Woodlands-Sugar Land AA	83	7	0	0	90	46.15%	45.35%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only from January 1, 2015 through December 31, 2016. Deposits are as of June 30, 2016.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Dallas-Plano-Irving AA	$36,409	$1,070	0	$2,000	$39,479	74.82%	54.65%
Houston-The Woodlands-Sugar Land AA	$12,633	$656	0	0	$13,289	25.18%	45.35%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only from January 1, 2015 through December 31, 2016. Deposits are as of June 30, 2016.

Based on the June 30, 2018 Summary of Deposit Market Share Report, MUB ranked 90th out of 141 depository institutions with a 0.03 percent market share in the AA. In overall HMDA lending, MUB ranked 389th out of 900 lenders with a 0.01 percent market share. The number and dollar volume of small loans to businesses was too low to register a market share. Due to the low market share, the OCC did not consider market share as a significant measure of performance.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O in the State of Texas 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. Based on the data in Table O, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is excellent.

- For 2015-2016, the proportion of home mortgage loans in low-income geographies exceeds the aggregate distribution of loans in those geographies but is near to the proportion of owner-occupied housing units. The proportion of home mortgage loans in moderate-income geographies exceeds both the proportion of owner-occupied housing units and the aggregate distribution of loans in those geographies.

Lending Gap Analysis

The OCC reviewed summary reports to analyze MUB's geographic lending patterns throughout the AA and did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P in the State of Texas 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 the data in Table P, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is excellent.

- The housing costs in relation to the median family incomes in the AA, and the affordability challenges for low-income families, which was discussed under the demographic data, were considered. The OCC placed more emphasis on the bank's performance in comparison to the aggregate percentage of all reporting lenders.

- For 2015-2016, the proportion of loans to low-income borrowers exceeds the aggregate distribution of loans to those borrowers and is below the proportion of low-income families in the AA. The proportion of loans to moderate-income borrowers exceeds both the proportion of moderate-income families and the aggregate distribution of loans to those borrowers.

Community Development Lending

The bank has made a low level of CD loans in the Dallas AA.

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

The level of CD lending in the Dallas AA is poor, after considering the bank's limited presence and competition in the AA. MUB originated one CD loan in the Dallas AA for a total of $2 million, which represents 0.69 percent of the allocated Tier 1 Capital. CD lending performance had a neutral impact on the Lending Test rating of the State of Texas.

- MUB provided a $2 million commercial real estate loan to refinance a 138-unit multifamily project in North Dallas, Texas that is in a moderate-income census tract.

Product Innovation and Flexibility

The bank makes no use of innovative and/or flexible lending practices in order to serve AA credit needs. No loans were originated under innovative and/or flexible lending programs. This has a neutral impact on the Lending Test rating.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Houston AA is consistent with the bank's overall performance under the Lending Test in the full-scope area. Refer to Tables O through V in the State of Texas section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

MUB's performance under the Investment Test in Texas is rated low satisfactory for the 2015-2016 assessment period. This is primarily attributed to the Dallas AA rating of low satisfactory, which was offset by investments made in the statewide and Houston assessment areas. The statewide investment directly targeted affordable housing for LMI individuals outside the assessment area. Due to the influx of residents, the needs in the Texas assessment area focuses on affordable housing and the need for small business training and coaching for LMI individuals.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Dallas-Plano-Irving	10	900	15	526	25	65.79	1,426	23.06	2	98
Houston-The Woodlands-Sugar Land	3	324	7	567	10	26.32	891	14.41	0	0
TX Statewide Investments	0	0	3	3,867	3	7.89	3,867	62.53	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 bank's financial reporting system.

Dallas AA

MUB's performance under the Investment Test in the Dallas AA is rated low satisfactory for the 2015-2016 assessment period. The investments were not considered innovative with limited responsiveness.

- MUB made only two small investments in 2015-2016 in the Dallas assessment area for $209,000 for community development, to support the creation of 56 jobs. Both investments were exited during the examination period.
- MUB made fourteen donations in 2015-2016 totaling $307 thousand for the Dallas AA. Donations were made to organization that support affordable housing through two CDFIs, community services for children of LMI families, with 50% of the dollar donations going to one organization to support women-owned businesses.
- MUB made one BEA grant in 2015-2016 totaling $10 thousand in the Dallas AA.
- Statewide investments for Texas for 2015 through 2016 totaled $3.9 million for the constructions of ten 2-story garden apartment buildings outside the Dallas MSA. The statewide investments were responsive to the area and near the Dallas AA likely benefiting this AA.

Conclusions for Area Receiving a Limited-Scope Review

The Houston AA performance is stronger than the full scope AA. A LIHTC was used to fund a 210-unit affordable housing unit in Houston that would support LMI families. These investments were responsive to the needs of the community.

SERVICE TEST

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

Conclusions for Area Receiving Full-Scope Review

Based on the full-scope review, the bank’s performance in the Dallas AA is adequate.

Retail Banking Services

Distribution of Branch Delivery System											
	Deposits	Branches						Population			
Assessment Area	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Dallas AA		1	50	0	0	0	1	11.8	26.1	27.4	34.5
Houston AA		1	50	0	0	0	1	11.6	25.9	29.9	35.1

* May not add up to 100% due to geographies with unknown tract income level and rounding.

Distribution of Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upper	NA
Dallas AA	0	0	0	0	0	0	0
Houston AA	0	0	0	0	0	0	0

Dallas AA

MUB operated one branch in an upper-income geography in the Dallas AA. The branch is part of the bank’s strategy to serve commercial customers only for lending and deposits. The branch is not accessible to the public for retail transactions. The hours and services are not considered accessible. The AA does not have any ATMs or alternate delivery service activities to meet the retail needs within the AA. The bank did not open or close any branches in the AA, and this had a neutral impact on the Service Test rating. While the bank did not have a retail branch presence, management took a proactive approach and created a strategic plan to address needs within the community based on their business model.

Community Development Services

Dallas AA

The bank provides a very poor level of CD services.

Bank records show that employees did not provide their financial or job-specific expertise and/or technical assistance in 2015 or 2016 within this AA.

Conclusion for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under Service Test in the Houston AA is stronger than the bank's overall performance under the Service Test in the full-scope area due to higher level of CD services. This stronger performance does not impact the overall rating considering the commercial branch business model in these AAs.

Strategic Plan State Rating

State of Texas

CRA Rating for Texas: Outstanding

The major factors that support this rating include:

- Aggregate CD activities between March 1, 2017 and December 31, 2018, exceeded goals for outstanding performance in Texas.

- Aggregate CD activities exceeded goals for outstanding performance in the Houston AA but did not meet goals for satisfactory performance in the Dallas AA.

- Investment in, and binding commitments for further investment in a BSRA area that includes the bank's AAs helped the bank exceed its aggregate CD lending and investment goals for outstanding performance in Texas.

In consideration of new investment commitments entered into by the bank during the evaluation period and statewide investments that benefit neighboring communities, MUB's actual advances and future commitments towards CD investments exceeded goals for outstanding performance.

- MUB made five investments totaling $5.4 million with commitments to advance an additional $9.3 million in future periods and 49 grants totaling $541 thousand in the Houston AA.

- MUB made three investments and 38 grants totaling $1.7 million in the Dallas AA.

- MUB also made advances of $14.5 million with commitments to advance an additional $10.4 million in future periods in a statewide fund.

- CD lending did not meet goals for satisfactory performance in Texas. MUB granted one loan for $1 million in the Dallas AA and no CD loans in the Houston AA.

The bank exhibits adequate responsiveness to community credit needs via occasional use of innovative or complex qualified investments/CD loans and demonstrated leadership in addressing identified needs.

Conclusions About Performance

Summary

Texas is served by two commercial branches covering two separate metropolitan areas, the Dallas-Plano-Irving MD and the Houston-The Woodlands-Sugar Land MSA. According to the Strategic Plan, the state rating is based on the percent of the reinvestment dollars of the combined AAs to the aggregate goal for the two markets. The bank's state rating will be determined by applying the ranges for specific performance percent of actual aggregate reinvestment dollars to aggregate goals in the Dallas and Houston AAs. In addition to established quantitative goals, the Strategic Plan envisions the application of qualitative factors that could potentially enhance performance.
MUB's CD performance in Texas is rated Outstanding. MUB's aggregate level of CD activities exceeded goals for outstanding performance in the State of Texas during the evaluation period. The bank's investments directly in the AAs exceeded goals for outstanding performance but CD lending was well below its goals. Investment levels were not sufficient to cover the shortfall in CD lending.

Aggregate CD activities exceeded goals for outstanding performance in the Houston AA but did not meet goals for satisfactory performance in the Dallas AA.

- Investment in, and legally binding commitments for further investment in a BSRA that includes the bank's AAs helped the bank exceed its aggregate CD lending and investment goals for outstanding performance in Texas.

In consideration of new investment commitments entered into by the bank during the evaluation period, MUB's actual aggregate advances and future commitments towards CD investments exceeded goals for outstanding performance. MUB exceeded investment goals for outstanding performance in the Houston AA but did not meet investment goals for satisfactory performance in the Dallas AA.

- MUB made five investments totaling $5.4 million with commitments to advance an additional $9.3 million in future periods and 49 grants totaling $541 thousand in the Houston AA.

- MUB made three investments and 38 grants totaling $1.7 million in the Dallas AA.

- MUB also made advances of $14.5 million with commitments to advance an additional $10.4 million in future periods in a statewide fund. This statewide fund benefited both AA in Texas.

MUB's CD lending did not meet goals for satisfactory performance in Texas. MUB granted one loan for $1 million in the Dallas AA and no CD loans in the Houston AA.

The bank exhibits adequate responsiveness to community credit needs via occasional use of innovative or complex qualified investments and CD loans.

Qualified Investments

Commercial Branch Service Markets CRA Strategic Plan Goals ($000's)											
Commercial Branch Market Texas	Exam Period (2017-2018)										
Review Period Total											
		Current Period Advances and Commitments						Current Period + Statewide			
	Goal	Current Actual Advances	Current Unfunded Commitments	Current Advances + Commitments	% of Goal	Actual to Goal Excess/(Gap)	Preliminary Rating Based on Plan Specifications	Statewide Advances *	Current Advances/ Commitments + Statewide *	% of Goal	Based on Plan Specifications
2017-2018 Aggregate CD Totals	**$39,500**	**$8,563**	**$9,269**	**$17,832**	**45%**	**($21,668)**	**Needs to Improve**	**$24,920**	**$42,752**	**108%**	**Outstanding**
~ Loans	*$26,465*	*$1,000*	*na*	*$1,000*	*4%*	*($25,465)*	*Needs to Improve*	*$0*	*$1,000*	*4%*	*Needs to Improve*
~ Investments	*$13,035*	*$7,563*	*$9,269*	*$16,832*	*129%*	*$3,797*	*Outstanding*	*$24,920*	*$41,752*	*320%*	*Outstanding*
2017											
		Current Period Advances and Commitments						Current Period + Statewide			
	Goal	Current Actual Advances	Current Unfunded Commitments	Current Advances + Commitments	% of Goal	Actual to Goal Excess/(Gap)	Preliminary Rating Based on Plan Specifications	Statewide Advances	Current Advances/ Commitments + Statewide	% of Goal	Based on Plan Specifications
2017 CD Totals	**$18,500**	**$3,157**	**$2,454**	**$5,611**	**30%**	**($12,889)**	**Needs to Improve**	**$9,599**	**$15,210**	**82%**	**Low Satisfactory**
~ Loans	*$12,395*	*$0*	*na*	*$0*	*0%*	*($12,395)*	*Needs to Improve*	*$0*	*$0*	*0%*	*Needs to Improve*
~ Investments	*$6,105*	*$3,157*	*$2,454*	*$5,611*	*92%*	*($494)*	*Low Satisfactory*	*$9,599*	*$15,210*	*249%*	*Outstanding*
2018											
		Current Period Advances and Commitments						Current Period + Statewide			
	Goal	Current Actual Advances	Current Unfunded Commitments	Current Advances + Commitments	% of Goal	Actual to Goal Excess/(Gap)	Preliminary Rating Based on Plan Specifications	Statewide Advances	Current Advances/ Commitments + Statewide	% of Goal	Based on Plan Specifications
2018 CD Totals	**$21,000**	**$5,406**	**$6,815**	**$12,220**	**58%**	**($8,780)**	**Needs to Improve**	**$4,884**	**$17,104**	**81%**	**Low Satisfactory**
~ Loans	*$14,070*	*$1,000*	*na*	*$1,000*	*7%*	*($13,070)*	*Needs to Improve*	*$0*	*$1,000*	*7%*	*Needs to Improve*
~ Investments	*$6,930*	*$4,406*	*$6,815*	*$11,220*	*162%*	*$4,290*	*Outstanding*	*$4,884*	*$16,104*	*232%*	*Outstanding*
* Includes $10.437 million in unfunded commitment to a project outside the bank's AAs											

Broader Statewide or Regional/Nationwide

- During the evaluation period, MUB advanced $14.4 million towards a $24.8 million commitment in a fund for affordable housing. The proceeds will be used to construct a 160-unit apartment complex, in which 144 units are designated for LMI households. MUB has binding commitments to advance an additional $10.5 million towards the project.

- MUB advanced $52 thousand towards an SBIC fund with direct benefit in other communities in the State of Texas. This advance is part of a larger investment by the bank in the BSRA that includes the bank's AAs. This investment vehicle provides one direct investment within a community outside of the bank's delineated AA. This fund supports small business development.

Dallas AA

Commercial Branch Service Markets CRA Strategic Plan Goals ($000 s)										
Commercial Branch Market Dallas, Texas	Exam Period (2017-2018)									
Review Period Total										
	Goal	Current Actual Advances	Current Advances as % of Goal	Current + Unfunded Commitments			Current + Unfunded Commitments + Statewide			Prelim Rating
				Unfunded	Adv+Unfund	% of Goal	Statewide Advances	Current+ Unfund+ Statewide	% of Goal	
2017-2018 Aggregate CD Totals	$25,500	$2,652	**10%**	$0	$2,652	**10%**	**$0**	$2,652	10%	**Needs**
~ *Loans*	*$17,085*	*$1,000*	*6%*			*0%*	*$0*	*$1,000*	*6%*	*Needs*
~ *Investments*	*$8,415*	*$1,652*	*20%*	*$0*	*$1,652*	*20%*	*$0*	*$1,652*	*20%*	*Needs*
2017										
	Goal	Current Actual Advances	Current Advances as % of Goal	Actual to Goal Excess/**(Gap)**			Current + Statewide			Prelim Rating
							Statewide Advances	Current + Statewide	% of Goal	
2017 CD Totals	$12,000	**$1,300**	**11%**	**($10,700)**			**$0**	**$1,300**	11%	**Needs**
~ *Loans*	*$8,040*	***$0***	*0%*	*($8,040)*			*$0*	*$0*	*0%*	*Needs*
~ *Investments*	*$3,960*	***$1,300***	*33%*	*($2,660)*			*$0*	*$1,300*	*33%*	*Needs*
2018										
	Goal	Current Actual Advances	Current Advances as % of Goal	Actual to Goal Excess/**(Gap)**			Current + Statewide			Prelim Rating
							Statewide Advances	Current + Statewide	% of Goal	
2018 CD Totals	$13,500	**$1,352**	**10%**	**($12,148)**			**$0**	**$1,352**	10%	**Needs**
~ *Loans*	*$9,045*	***$1,000***	*11%*	*($8,045)*			*$0*	*$1,000*	*11%*	*Needs*
~ *Investments*	*$4,455*	***$352***	*8%*	*($4,103)*			*$0*	*$352*	*8%*	*Needs*

- During the evaluation period, MUB advanced $882 thousand towards a community investment fund with direct benefit in the Dallas AA. These advances are part of a larger investment by the bank in a BSRA investment vehicle with eight direct investments in the AA. The fund supports two multifamily projects providing 412 affordable rental housing units to LMI individuals and seven home mortgage loans to LMI borrowers.

- MUB advanced $117 thousand in a structured equity fund for the support of a small business in the AA. The advance is part of a larger investment by the bank in the BSRA. This investment vehicle provides one direct investment in the AA. The Fund's emphasis is supporting companies located in LMI geographies or companies employing individuals residing in LMI geographies.

- MUB advanced $10 thousand towards an SBIC fund with direct benefit in the Dallas AA. This advance is part of a larger investment by the bank in the BSRA that includes the bank's AAs. This investment vehicle provides one direct investment in a community within the bank's AA. This fund supports small business development.

- MUB made 38 grants totaling $642 thousand in the AA.

Houston AA

Commercial Branch Service Markets CRA Strategic Plan Goals ($000 s)										
Commercial Branch Market Houston, Texas	Exam Period (2017-2018)									
Review Period Total										
				Current + Unfunded Commitments			Current + Unfunded Commitments + Statewide			
	Goal	Current Actual Advances	Current Advances as % of Goal	Unfunded	Adv+Unfund	% of Goal	Statewide Advances	Current+ Unfund+ Statewide	% of Goal	Prelim Rating
2017-2018 Aggregate CD Totals	$14,000	$5,411	**39%**	$9,269	$14,680	**105%**	**$0**	$14,680	105%	**Out**
~ Loans	*$9,380*	*$0*	*0%*			*0%*	*$0*	*$0*	*0%*	*Needs*
~ Investments	*$4,620*	*$5,411*	*117%*	*$9,269*	*$14,680*	*318%*	*$0*	*$14,680*	*318%*	*Out*
2017										
							Current + Statewide			
	Goal	Current Actual Advances	Current Advances as % of Goal	Actual to Goal Excess/**(Gap)**			Statewide Advances	Current + Statewide	% of Goal	Prelim Rating
2017 CD Totals	$6,500	**$1,858**	**29%**	**($4,642)**			**$0**	**$1,858**	29%	**Needs**
~ Loans	*$4,355*	***$0***	*0%*	*($4,355)*			*$0*	*$0*	*0%*	*Needs*
~ Investments	*$2,145*	***$1,858***	*87%*	*($287)*			*$0*	*$1,858*	*87%*	*Low Sat*
2018										
							Current + Statewide			
	Goal	Current Actual Advances	Current Advances as % of Goal	Actual to Goal Excess/**(Gap)**			Statewide Advances	Current + Statewide	% of Goal	Prelim Rating
2018 CD Totals	$7,500	**$3,553**	**47%**	**($3,947)**			**$0**	**$3,553**	47%	**Needs**
~ Loans	*$5,025*	***$0***	*0%*	*($5,025)*			*$0*	*$0*	*0%*	*Needs*
~ Investments	*$2,475*	***$3,553***	*144%*	*$1,078*			*$0*	*$3,553*	*144%*	*Out*

- During the evaluation period, MUB advanced $233 thousand towards a community investment fund with direct benefit in the Houston AA. These advances are part of a larger investment by the bank in a BSRA investment vehicle with one direct investment in Houston. The fund supports one loan for economic development in the AA.

- MUB advanced $1.1 million during the evaluation period towards a LIHTC and has binding commitments to make future advances of $6.8 million. These advances are part of a larger investment by the bank in a BSRA investment vehicle with two direct investments in the AA. The fund will develop 300 units of affordable of rental housing units in two apartment complexes in the AA.

- During the evaluation period, MUB advanced $3.5 million in a real estate tax credit fund with direct benefit in the Houston AA. The bank also has a binding commitment to make future advances of $2.5 million towards the project. These advances are part of a larger investment by the bank in a BSRA investment vehicle with one direct investment in the AA. The fund supports the rehabilitation of one multifamily project and the preservation of 147 affordable rental housing units for LMI individuals and families.

- MUB made 49 grants totaling $541 thousand in the AA.

CD Lending

In July 2018, MUB made an equity equivalent (EQ2) loan to support a CDFI and SBA Micro-lender. This loan serves a BSRA that includes the bank's AAs with $1.0 million targeted directly to small businesses in the Dallas AA. The primary mission of this CDFI is to provide affordable and user-friendly credit to community-based and high-growth minority- or women-owned businesses and local small business and provides financing and technical assistance.

State Rating

State of Washington

CRA rating for the State: **Satisfactory**
The Lending Test is rated: **High Satisfactory**
The Investment Test is rated: **Outstanding**
The Service Test is rated: **High Satisfactory**

The major factors that support this rating include:

- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of the bank's home mortgage and small business loan originations and purchases is good.

- Based on the data in the tables and performance context considerations discussed below, the overall borrower distribution of the bank's home mortgage and small business loan originations and purchases is adequate.

- In the Seattle AA, CD loans were effective in addressing community credit needs. The bank was a leader in originating CD loans, which had a significant positive effect on the Lending Test rating.

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

- MUB's branch distribution in the Seattle AA is excellent but branch distribution is poor in the Bremerton AA. MUB's branch opening, and closings consider LMI population impact and alternative delivery options. Branch closings in the Bremerton AA negatively impacted the overall rating.

Description of Institution's Operations in Washington

MUB delineated two AAs within Washington including the Seattle-Tacoma-Bellevue WA MSA (Seattle AA), and Bremerton-Silverdale WA MSA (Bremerton AA). Both MSAs make up the region known as the Central Puget Sound region. The Seattle AA, and the Bremerton AA received full scope reviews. MUB had $2.3 billion of allocated deposits representing 2.7 percent of adjusted deposits. The bank originated and purchased approximately $3.4 billion total reported loans during the evaluation period. The bank's primary purpose in Washington is commercial banking.

Seattle AA

The Seattle AA consists of King, Snohomish, Pierce counties. Within the Seattle AA, the bank had $2 billion in deposits and ranked 10th amongst 50 financial institutions in the market with 1.8 percent market share. Bank of America, N.A., Wells Fargo Bank, N.A. and JPMorgan Chase Bank, N.A. ranked as the top three banks with a market share of 26.66, 12.98 and 12.86 percent respectively. MUB operated 19 branch offices and 1 ATM in the MSA during the evaluation period.

Bremerton AA

The Bremerton AA consists of Kitsap County. Within the Bremerton AA, the bank had $96 million in deposits and ranked ninth amongst 15 financial institutions in the market with a 2.87 percent market share. Bank of America, N.A, Kitsap Bank, and JPMorgan Chase Bank, N.A. ranked as the top three banks with a market share of 22.25, 20.03, and 13.46 percent respectively. MUB operated 1 branch office and 1 ATMs in the AA during the evaluation period.

Demographic and Economic Data by Assessment Area

Seattle AA

The following table provides a summary of the demographics that includes housing and business information for the Seattle AA.

Table A – Demographic Information of the Assessment Area

Assessment Area: Seattle-Bellevue-Everett

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	549	5.6	22.8	41.5	29.1	0.9
Population by Geography	2,792,409	6.0	22.9	41.3	29.5	0.3
Housing Units by Geography	1,165,983	5.8	22.4	41.2	30.4	0.2
Owner-Occupied Units by Geography	651,888	3.0	18.1	44.8	34.1	0.0
Occupied Rental Units by Geography	442,529	9.7	28.4	36.2	25.3	0.4
Vacant Units by Geography	71,566	6.7	24.7	40.5	27.9	0.2
Businesses by Geography	225,130	6.0	19.2	37.4	36.9	0.5
Farms by Geography	4,606	4.1	17.4	45.6	32.8	0.1
Family Distribution by Income Level	675,378	21.5	17.5	20.6	40.4	0.0
Household Distribution by Income Level	1,094,417	24.1	16.1	17.8	42.0	0.0
Median Family Income MSA - 42644 Seattle-Bellevue-Everett, WA MD		$92,317	Median Housing Value			$380,393
			Families Below Poverty Level			6.9%
			Median Gross Rent			$1,228

Source: 2010 U.S. Census & 2015 ACS Census and 2018 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.

For the Seattle AA the OCC used data from Moody's Analytics, the Puget Sound Regional Council, BLS data, the RWJ Foundation, and US Census. Per BLS, the average annual unemployment rate decreased from 4.6 percent in 2015 to 3.8 percent in 2018. This was less than the state annual averages of 5.6 percent and 4.5 percent, for the same period. The area's average annual unemployment rates were close to the national annual average unemployment rates of 5.3 percent for 2015, and 3.6 percent for 2018.

According to Moody's Analytics the AA's major employers are Boeing, Amazon, Microsoft Corp., University of Washington, and Provident Health & Services. The economy in the region is in the late expansion phase. The economy is considered strong and growing with net job additions, a rapidly diversifying tech sector, and net inflows of new residents. Strengths include a highly trained and well-educated labor force, a large port with connections to emerging Asian markets and relatively high per capita incomes. The impact of the recent grounding of the Boeing 737-Max has put a cloud on aerospace manufacturing in region and will likely herald some changes as the company copes with profit and manufacturing pressures. Additionally, the area is home to several major military installations including Joint Base Lewis-McChord, Camp Murray National Guard, Naval Station Everett, and US Coast Guard Base Seattle which serve as large employment centers for both military and civilians. The MSA is also home to several Native American Tribes including the Muckleshoot, Puyallup, Tulalip, and Snoqualmie. According to the Puget Sound Regional Council the population has grown faster than it has in decades, with over 80,000 new people moving into the area two years in a row in 2016 and 2017. Both King and Snohomish were the fastest growing counties in the region. King County is the regions' most populous county with home to 53 percent of the population. Due to the robust economy of the region, the area is experiencing housing constraints, and affordability is considered poor.

Homeownership in the region is out of reach for many due the rapid increase in the housing prices and a general shortage of affordable units during the last several years. While there is a concerted effort to increase supply, production has not kept up with demand. According to the PSRC's Vision 2050 Housing Background Paper, the Seattle MSA has led the nation in annual housing cost increases over the last 5 years, and while all home prices have increased the price gap is widening amongst the three counties with King County almost double that of Pierce. The median home price in 2017 for King, Snohomish, and Pierce counties were approximately $563,600, $407,900, and $300,200 respectively. The median incomes as of 2017 in King, Snohomish and Pierce Counties were $89,675, $82,595, and $69,278. Using those figures, the current median household income to median house price ratios are approximately 6.2, 4.9, and 4.3. For renters the situation is not better. According to the RWJF County Health Rankings and Roadmaps research, approximately 15 percent of all renters in the MSA are severely cost burdened, which means that households spend 50 percent or more of their household income on housing. Approximately 35 percent of households in the region are rent burdened which means those households spend between 31 percent and 50 percent of their household income on housing.

Community Contacts

Examiners reviewed several nonprofit community contacts conducted during the evaluation period that pertained to the Seattle MSA. The contacts represent interviews with individual organizations and a group listening session. Not surprising, the groups interviewed mentioned the most critical needs for the LMI constituents they serve included housing and housing related programs and funding. These included products for first time homebuyers for moderate- and middle-income buyers, down payment assistance grants and loans, rental housing for LMI families both in terms of development financing and assistance for renters, such as security deposit loans (small dollar loans), and investments and loans for projects designed to stabilize and revitalize neighborhoods while preserving the diverse cultures and avoiding displacement in those communities. Other community development needs that were shared were financing and technical assistance for small businesses especially micro-lending programs, investments in CDFIs that serve LMI communities and families, workforce development programs and partnerships, affordable banking products, and financial education programs for both youth and adults.

Bremerton AA

The Bremerton AA contains 55 CTs, of which 1.8 percent are low- 21.8 percent are moderate-, 56.4 percent are middle-, and 18.2 percent are upper-income. The following table provides a summary of the demographics that includes housing and business information for the Bremerton AA.

Table A – Demographic Information of the Assessment Area

Assessment Area: Bremerton-Silverdale

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	55	1.8	21.8	56.4	18.2	1.8
Population by Geography	255,441	1.0	22.8	57.6	18.6	0.0
Housing Units by Geography	108,689	1.6	22.3	58.3	17.8	0.0
Owner-Occupied Units by Geography	65,671	0.6	14.7	63.5	21.2	0.0
Occupied Rental Units by Geography	32,068	2.9	37.4	48.2	11.5	0.0
Vacant Units by Geography	10,950	3.6	23.7	57.3	15.4	0.0
Businesses by Geography	15,484	2.1	15.5	54.9	27.4	0.0
Farms by Geography	566	0.7	9.0	61.8	28.4	0.0
Family Distribution by Income Level	65,501	19.3	18.7	21.9	40.1	0.0
Household Distribution by Income Level	97,739	22.5	16.4	20.0	41.1	0.0
Median Family Income MSA - 14740 Bremerton-Silverdale, WA MSA		$75,652	Median Housing Value			$265,563
			Median Gross Rent			$1,051
			Families Below Poverty Level			7.0%

Source: 2010 U.S. Census & 2015 ACS Census and 2018 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.

For the Bremerton AA the OCC used data from Moody's Analytics, the Puget Sound Regional Council, BLS data, ACS, and US Census. Per the BLS, the average annual unemployment rate decreased from 5.5 percent in 2015 to 4.9 percent in 2018. This was close to the state annual averages of 5.6 percent and 4.5 percent, for the same period. The area's average annual unemployment rates were close to the national annual average unemployment rates of 5.3 percent for 2015, but more than a full percentage point higher than the 3.6 percent for 2018.

According to Moody's Analytics the AA's major employers are Naval Base Kitsap, Harrison Medical Center, Naval Undersea Warfare Center, Naval Hospital, and Olympic College. The economy in the region is in the mid-expansion phase. The economy is considered strong and growing with net job additions, and payroll employment outpacing the state average. Strengths include above average educational attainment in the labor force, the stable foundation from the Navy presence which will continue to anchor the county. Bremerton MSA also has a large commuter workforce, and due to the influx of transplants flowing into the region from across the Sound, the county is adding workers faster than jobs, which explains the uptick in the unemployment rate. The MSA is also home to two Native American Tribes; the Suquamish and Port Gamble S'Klallam both have reservations here. The Suquamish tribal enterprise, Port Madison Enterprises, is the sixth largest employer in the County. According to the Puget Sound Regional Council the population has grown faster than it has in decades, but Kitsap County has grown at slower pace than the rest of the region at 2.8 percent. This is anticipated to grow as the residents from the more expensive King, and Pierce counties seek more affordable but commutable alternatives. As part of the Central Puget

Sound Region, the Bremerton MSA is also experiencing housing constraints, and affordability is considered poor although better than the other parts of the region. The median home price in 2017 for the AA was approximately $326,200. Using that figure, the current median household income to median house price ratio is 4.3. For renters the situation is somewhat more unaffordable. Approximately 22 percent of all renters in the MSA are severely cost burdened, which means that households spend 50 percent or more of their household income on housing. Approximately 23 percent of households in the region are rent burdened which means those households spend between 31 percent and 50 percent of their household income on housing.

Community Contacts

Examiners reviewed community contacts with nonprofits conducted during the evaluation period that pertained to the Bremerton AA. The contacts represent interviews with an individual organization and a group listening session. The organizations shared that several communities have a higher level of LMI households than others and mentioned both the south county area and the reservation communities. The organization interviewed, stated that housing development and housing related programs were critical needs, particularly support for low income rental, and workforce housing including rental and affordable homeownership. Other community development needs are affordable and flexible banking products to help underbanked individuals enter the banking mainstream, support for financial education and asset building programs such as VITA, and small business financing and technical assistance for startups.

Scope of Evaluation in Washington

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WASHINGTON

LENDING TEST

The bank’s performance under the Lending Test in Washington is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Seattle AA is good and the performance in the Bremerton AA is poor.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Seattle-Tacoma-Bellevue AA	4,735	1,594	10	68	6,407	97.09%	95.54%
Bremerton-Silverdale AA	120	68	3	1	192	2.91%	4.46%

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

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Seattle-Tacoma-Bellevue AA	$3,018,121	$136,763	$84	$165,942	$3,320,910	97.79%	95.54%
Bremerton-Silverdale AA	$69,955	$3,191	$60	$1,750	$74,956	2.21%	4.46%

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

Seattle AA

Lending levels reflect adequate responsiveness to AA credit needs. Based on the June 30, 2018 Summary of Deposit Market Share Report, MUB ranked tenth out of 50 depository institutions with a 1.79 percent market share in the AA. Bank of America, N.A. ranked first with a 26.66 percent market share. In overall HMDA lending, MUB ranked 23rd out of 616 lenders with a 1.06 percent market share. Wells Fargo Bank, N.A. ranked first in the market with an 8.78 percent market share, Caliber Home Loans, Inc. ranked second with a 5.41 percent market share, and HomeStreet Bank ranked third with 4.93 percent market share. Although MUB's HMDA market share is lower than its deposit market share, lending competition was stronger than the competition for deposits in the AA. There are 616 HMDA lenders in the AA, many without a depository presence. In contrast, there are 50 depository institutions in the AA. In small loans to businesses, MUB ranked 27th out of 127 lenders with a market share of 0.30 percent. The top lender was Bank of America, N.A. with a market share of 19.55 percent, American Express, FSB ranked second with a market share of 15.01 percent, and Chase Bank USA, N.A. ranked third with a market share of 11.84 percent.

Bremerton AA

Lending levels reflect adequate responsiveness to AA credit needs. Based on the June 30, 2018 Summary of Deposit Market Share Report, MUB ranked ninth out of 15 depository institutions with a 2.87 percent market share in the AA. Bank of America ranked first with a 22.25 percent market share.

In overall HMDA lending, MUB ranked 54th out of 350 lenders with a 0.35 percent market share. Wells Fargo Bank, N.A. ranked first in the market with a 7.55 percent market share, Evergreen Moneysource Mortgage Company ranked second with a 6.77 percent market share, and Navy Federal Credit Union ranked third with 6.11 percent market share. Although MUB's HMDA market share is lower than its deposit market share, lending competition was stronger than the competition for deposits in the AA. There are 350 HMDA lenders in the AA, many without a depository presence. In contrast, there are 15 depository institutions in the AA.

In small loans to businesses, MUB ranked 21st out of 53 lenders with a market share of 0.23 percent. The top lender was Bank of America, N.A. with a market share of 16.9 percent, Citibank, N.A. ranked second with a market share of 13.01 percent, and American Express, FSB ranked third with a market share of 12.58 percent.

Distribution of Loans by Income Level of the Geography

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

The geographic distribution of home mortgage loans is good in the Seattle AA and is very poor in the Bremerton AA.

The geographic distribution of small loans to businesses is excellent in the Seattle AA and is very poor in the Bremerton AA.

Seattle AA

Home Mortgage Loans

Refer to Table O in the State of Washington 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. Based on the data in Table O, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is good.

- For both the 2015-2016 period and the 2017-2018 period, the small proportion of owner-occupied housing units located in low-income geographies was considered.

- For 2015-2016, the proportion of home mortgage loans in low-income geographies exceeds both the proportion of owner-occupied housing units in low-income geographies and the aggregate distribution of loans in those geographies. The proportion of home mortgage loans in moderate-income geographies is near to the proportion of owner-occupied housing units in moderate-income geographies, and slightly exceeds the aggregate distribution of loans in those geographies.

- The bank’s performance for 2017-2018 is weaker than the bank’s performance for 2015-2016. This is due to poorer distribution and aggregate lending performance in low-income geographies and poorer aggregate lending performance in moderate-income geographies. This had an impact on the combined conclusions.

Small Loans to Businesses

Refer to Table Q in the State of Washington 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. Based on the data in Table Q, the bank’s overall geographic distribution of small loans to businesses for this evaluation is excellent.

- For 2015-2016, the proportion of the bank’s small loans to businesses in both LMI geographies exceeds both the proportion of businesses located in those geographies and the aggregate distribution of loans in those geographies.

- The bank’s performance in 2017-2018 is consistent with the bank’s performance for 2015-2016.

Lending Gap Analysis

The OCC reviewed summary reports to analyze MUB’s geographic lending patterns throughout the AA and did not identify any unexplained conspicuous lending gaps.

Bremerton AA

Home Mortgage Loans

Refer to Table O in the State of Washington 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. Based on the data in Table O, the bank’s overall geographic distribution of home mortgage loan originations and purchases for this evaluation is very poor.

- For the 2015-2016 time period, there were no owner-occupied housing units in low-income geographies and for the 2017-2018 time period, there was only a small proportion of owner-occupied housing units located in low-income geographies. The OCC placed more weight on moderate-income performance.

- For 2015-2016, the proportion of home mortgage loans in moderate-income geographies is significantly below both the proportion of owner-occupied housing units in moderate-income geographies and the aggregate distribution of loans in those geographies.

- The bank's performance for 2017-2018 is consistent with the bank's performance for 2015-2016 and is very poor.

Small Loans to Businesses

Refer to Table Q in the State of Washington 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. Based on the data in Table Q, the bank's overall geographic distribution of small loans to businesses for this evaluation is very poor.

- For 2015-2016, there were no loans originated in moderate-income geographies.

- There were too few loans for 2017-2018 to allow for a meaningful analysis.

Lending Gap Analysis

The OCC reviewed summary reports to analyze MUB's geographic lending patterns throughout the AA and did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

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

The borrower distribution of home mortgage loans is adequate in the Seattle AA and very poor in the Bremerton AA.

The borrower distribution of small loans to businesses is adequate in the Seattle AA and is good in the Bremerton AA.

Seattle AA

Home Mortgage Loans

Refer to Table P in the State of Washington 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 the data in Table P, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is adequate.

- The housing costs in relation to the median family incomes in the AA, and the affordability challenges for LMI families, discussed under the demographic data, were considered in our evaluation. The OCC placed more emphasis on the bank's performance in comparison to the aggregate percentage of all reporting lenders.

- For 2015-2016, the proportion of loans to low-income borrowers exceeds the aggregate distribution of loans to those borrowers and is significantly below the proportion of low-income families. The proportion of loans to moderate-income borrowers is near the aggregate distribution of loans to those borrowers and is below the proportion of moderate-income families.

- The bank's performance for 2017-2018 is weaker than the bank's performance for 2015-2016. This is due to poorer aggregate lending performance to LMI borrowers. This had an impact on the combined conclusion.

Small Loans to Businesses

Refer to Table R in the State of Washington section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses. Based on the data in Table R, the OCC concluded the distribution of the bank's originations and purchases of small loans to businesses by revenue is adequate.

- The OCC placed more emphasis on the bank's performance in comparison to the aggregate percentage of all reporting lenders because the small business percentages include micro-businesses that don't qualify for traditional small business loans. Additionally, the OCC considered the competition from larger financial institutions that offer credit cards.

- For 2015-2016, the bank's distribution of small loans to businesses with revenues of $1 million or less is well below the percentage of small businesses located in the AA but exceeds the aggregate distribution of loans to those businesses.

- While the bank's performance is well below the demographics, most of originated loans were in small dollar amounts, which is an indicator of lending to small businesses. The distribution by size of loans shows that 89.51 percent of the loan originations are for $100 thousand or less.

- The bank's performance for 2017-2018 is weaker than the bank's performance for 2015-2016. This is due to poorer aggregate lending performance. This had an impact on the combined conclusions.

Bremerton AA

Home Mortgage Loans

Refer to Table P in the State of Washington 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 the data in Table P, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is very poor.

- For both the 2015-2016 period and the 2017-2018 period, no loans were originated to low-income borrowers. The proportion of loans to moderate-income borrowers is significantly below both the proportion of moderate-income families and the aggregate distribution of loans to those borrowers.

Small Loans to Businesses

Refer to Table R in the State of Washington section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses. Based on the data in Table R, the OCC concluded the distribution of the bank's originations and purchases of small loans to businesses by revenue is good.

- The OCC placed more emphasis on the bank's performance in comparison to the aggregate percentage of all reporting lenders because the small business percentages include micro-businesses that don't qualify for traditional small business loans. Additionally, the OCC considered the competition from larger financial institutions that offer credit cards.

- For 2015-2016, the bank's distribution of small loans to businesses with revenues of $1 million or less is below the percentage of small businesses located in the AA but exceeds the aggregate distribution of loans to those businesses.

- While the bank's performance is below the demographics, most of originated loans were in small dollar amounts, which is an indicator of lending to small businesses. The distribution by size of loans shows that 98 percent of the loan originations are for $100 thousand or less.

- There were too few loans for 2017-2018 to allow for a meaningful analysis. This had an impact on the combined conclusion.

Community Development Lending

Seattle AA

The bank is a leader in making CD loans in Seattle AA.

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

The level of CD lending in the Seattle AA is excellent. MUB made 68 CD loans in the Seattle AA for a total of $166 million, which represents 46.18 percent of the allocated Tier 1 Capital. The CD loans were responsive to the identified needs in the AA, including $158.5 million (95.50 percent) for affordable housing, $4.6 million (2.76 percent) for community services, and $2.9 million (1.74 percent) for economic development. CD lending performance had a significant positive impact on the Lending Test rating.

Examples of CD loans in the AA include:

- MUB provided a $21.1 million construction loan for a LIHTC project in Federal Way, Washington. The project consists of 189-units for seniors restricted to 50 percent and 60 percent of AMI. The project is located in close proximity to parks, shopping, schools, and hospitals. It is walking distance to The Commons at Federal Way, the second largest shopping center in South King County.

- MUB provided an $800 thousand line of credit to a nonprofit that provides housing and vocational training to primarily LMI individuals with severe disabilities. Services include occupational and speech therapy, support to individuals who have experienced traumatic brain injury, employment, community living, and a dental clinic. The organization also operates a Fabrication Division which provides light machining and manufacturing for the US Government and aerospace industry and employs people with varying ranges of disabilities.

- MUB provided an increase from $250 thousand to $500 thousand to a nonprofit organization. The funds will be used to provide working capital, which will be used to acquire real property on which to construct future affordable housing projects or to fund predevelopment costs.

Bremerton AA

The bank has made an adequate level of CD loans in Bremerton AA.

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

The level of CD lending in the Bremerton AA is adequate, after considering the bank's presence, competition, and the number and responsiveness of community development lending. MUB originated one CD loan in the Bremerton AA for a total of $1.75 million, which represents 10.44 percent of the allocated Tier 1 Capital. CD lending performance had a neutral impact on the Lending Test rating.

- MUB provided a $1.75 million line of credit to a certified nonprofit community development financial institution to be used for community development activities attributed to this AA. The organization offers an array of capital products including business, real estate, community development, consumer, and micro loans combined with technical assistance to entrepreneurs, small businesses, nonprofit organizations, individuals, and other who have been unable or no longer able to access traditional capital.

Product Innovation and Flexibility

The bank makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. Innovative or flexible loan programs were effective in helping the bank address community credit needs. MUB's innovative and flexible lending programs had a neutral impact on the Lending Test. During the evaluation period, MUB extended ten EOM mortgages totaling $2.4 million. An additional 76 HomeReady mortgages were extended totaling $20.5 million in the State of Washington.

Seattle AA

The bank makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. Innovative or flexible loan programs were effective in helping the bank address community credit needs. MUB's innovative and flexible lending programs had a neutral impact on the Lending Test. During the evaluation period, MUB extended ten EOM loans totaling $2.4 million and 74 HomeReady mortgages totaling $19.9 million.

Bremerton AA

The bank makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. Innovative or flexible loan programs were effective in helping the bank address community credit needs. MUB's innovative and flexible lending programs had a neutral impact on the Lending Test. MUB extended two HomeReady mortgages totaling $585 thousand.

INVESTMENT TEST

MUB's performance under the Investment Test in Washington is rated Outstanding, this is primarily based on the full-scope reviews of the Seattle AA while the Bremerton AA is a much weaker assessment area it does not negatively impact the Investment Test rating.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Seattle-Tacoma	15	$16,315	259	$69,729	274	96.82	$86,044	99.97	9	$260
Bremerton-Silverdale	0	$0	9	$24	9	3.18	$24	0.03	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 bank's financial reporting system.

SERVICE TEST

The bank's performance under the Service Test in Washington is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Seattle AA is excellent and Bremerton AA is very poor.

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%) *				% of Population within Each Geography *			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
FS Seattle-Tacoma-Bellevue-Everett MSA AA	95.54	20	95.24	10	20	45	25	5.61	22.74	43.10	28.29

FS Bremerton-Silverdale MSA AA	4.46	1	4.76	0.0	0.0	0.0	100	1.02	22.77	57.59	18.62

* May not add up to 100 percent due to geographies with unknown tract income level and rounding.

Distribution of Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upper	NA
FS Seattle-Tacoma-Bellevue-Everett MSA AA	0.0	14	0.0	-4	-8	-2	0.0
FS Bremerton-Silverdale MSA AA	0.0	3	0.0	-1	-2	0.0	0.0

Seattle AA

As of December 31, 2018, MUB operates 20 branches and 21 ATMs in the Seattle AA. All twenty branches are full-service locations. There are two branches in lower-income geographies, four branches in moderate-income geographies, nine branches in middle-income geographies and five branches in upper-income geographies. The branch distribution in low-income geographies exceeds the percent of the population in low-income geographies and the distribution of branches in moderate-income geographies is near to the percent of the population in moderate-income geographies in the AA. When considering 5 branches that directly border a branch within a 1-mile radius and serves LMI geographies, the bank's distribution improves accessibility.

The bank's branch closing has significantly adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank closed five branches within a moderate-income, seven within a middle-income and two within an upper-income geography since the last evaluation. MUB closed 14 branches that were part of the Pacific Northwest marketplace acquired in the 2010 Frontier Bank acquisition. The consolidation created a more densely concentrated network in the Greater Seattle area. The nearest proximity accessible branches were within 2.6 miles to 17 miles of the closed branches in moderate-income geographies.

Examiners also considered the bank's ADS, including ATMs, online, and mobile banking in evaluating accessibility to the bank's products and services. Based on customer usage, ADS had a positive impact on the accessibility of the bank's retail delivery systems to LMI individuals and geographies. The LMI customer usage exceeded LMI demographics.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. While there are slight variations in opening or closing times, generally, branches are open Monday through Friday from 9:00 am to 5:00 pm. Two branches in moderate-income tracts offer Saturday hours. All MUB services are available at the full-service branches and all delivery systems discussed bank-wide are available in this AA.

Bremerton AA

As of December 31, 2018, MUB operates one branch and one ATM in Bremerton AA. The one branch is a full-service location. The one branch is in an upper-income geography. There are no branches in low-income and moderate-income geographies. The distribution of branches in low-income and moderate-income geographies is significantly below the percent of the population in low-income and moderate-income geographies in the AA. When considering zero branches directly border a branch within a 1-mile radius and serve LMI geographies, the bank's distribution has a neutral impact on accessibility.

The bank's branch closing has adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank closed one branch within a moderate-income and two within a middle-income geography since the last evaluation. MUB closed three branches were part of the Pacific Northwest marketplace acquired in the 2010 Frontier Bank acquisition. The consolidation created a more densely concentrated network in the Greater Seattle area. The nearest proximity accessible branch was within 26 miles of the closed branch in moderate-income geographies.

Examiners also considered the bank's ADS, including ATMs, online, and mobile banking in evaluating accessibility to the bank's products and services. Based on customer usage, ADS had a neutral impact on the accessibility of the bank's retail delivery systems to LMI individuals and geographies. The LMI customer usage did not exceed demographics.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. The one branch is open Monday through Friday from 9:00 am to 5:00 pm and do not offer Saturday hours. All MUB services are available at the full-service branches and all delivery systems discussed bank-wide are available in this AA.

Community Development Services

Seattle AA

The bank provides an adequate level of CD services.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 134 CD service activities to 13 organizations since the last evaluation, logging a total of 331 qualified hours within this AA. A majority (87 percent) of the bank's assistance was to organizations that provide community services to LMI individuals and families. Other activities targeted affordable housing (12 percent) and economic development (1 percent). The following are examples of CD services provided in this AA:

- MUB employees contributed by serving on 10 boards of directors, providing financial education and technical assistance to LMI persons, and participating in fundraising events.

- Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for one CD service activities to one organization since the last evaluation, logging a total of two qualified hours within this AA. An employee served as a Board Member to an organization that provides community services to LMI individuals and families.

Bremerton AA

The bank provides a very poor level of CD services in this AA.

Bank records show that employees did not provide financial or job-specific expertise and/or technical assistance during the evaluation period within this AA.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and 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".

Time Period Reviewed:	(01/01/15 to 12/31/18)	
Bank Products Reviewed:	Home mortgage, small business, small farm loans) Community development loans, qualified investments, community development services	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	**Type of Exam**	**Other Information**
California		
Los Angeles–Long Beach–Anaheim MSA	Full-scope	
Sacramento-Roseville-Arden-Arcade MSA	Full-scope	
San Diego-Carlsbad MSA	Full-scope	
San Francisco-Oakland-Hayward MSA	Full-scope	
Bakersfield MSA	Limited-scope	
El Centro MSA	Limited-scope	
Fresno MSA	Limited-scope	
Hanford-Corcoran MSA	Limited-scope	
Madera MSA	Limited-scope	
Modesto MSA	Limited-scope	
Oxnard-Thousand Oaks-Ventura MSA	Limited-scope	
Redding MSA	Limited-scope	
Riverside-San Bernardino-Ontario MSA	Limited-scope	
Salinas MSA	Limited-scope	
San Jose-Sunnyvale-Santa Clara MSA	Limited-scope	
San Luis Obispo-Paso Robles-Arroyo Grande MSA	Limited-scope	
Santa Cruz-Watsonville MSA	Limited-scope	
Santa Maria-Santa Barbara MSA	Limited-scope	
Santa Rosa MSA	Limited-scope	
Stockton – Lodi MSA	Limited-scope	
Vallejo-Fairfield	Limited-scope	
Visalia-Porterville MSA	Limited-scope	
Yuba City MSA	Limited-scope	
CA Non-MSA	Limited-scope	
Georgia		
Atlanta-Sandy Springs-Roswell	Full-scope	01/01/15-02/28/17
	Strategic Plan	03/01/17-12/31/18

Illinois		
Chicago-Naperville-Arlington Heights	Full-scope	01/01/15-02/28/17
	Strategic Plan	03/01/17-12/31/18
New York		
New York-Jersey City-White Plains	Full-scope	01/01/15-02/28/17
	Strategic Plan	03/01/17-12/31/18
Oregon		
Portland-Vancouver-Hillsboro (Partial)	Full-scope	EXCLUDES the WA portion of the MSA
Salem	Limited-scope	
Texas		
Dallas-Plano-Irving	Full-scope	01/01/15-02/28/17
	Strategic Plan	03/01/17-12/31/18
Houston-The Woodlands-Sugar Land	Limited Scope	01/01/15-02/28/17
	Strategic Plan	03/01/17-12/31/18
Washington		
Seattle-Tacoma-Bellevue	Full-scope	
Bremerton-Silverdale	Full-scope	

Appendix B: Summary of State Ratings

RATINGS MUFG Union Bank N. A.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/ Multistate Rating
MUFG Union Bank	Outstanding	Outstanding	High Satisfactory	Outstanding
States:				
California	Outstanding	Outstanding	High Satisfactory	Outstanding
Georgia	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Illinois	Outstanding	Low Satisfactory	Low Satisfactory	Satisfactory
New York	Outstanding	Outstanding	Low Satisfactory	Satisfactory
Oregon	Outstanding	High Satisfactory	Satisfactory	Satisfactory
Texas	Outstanding	High Satisfactory	Low Satisfactory	Satisfactory
Washington	High Satisfactory	Outstanding	High Satisfactory	Satisfactory

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder' and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

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

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

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

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

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

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

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

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

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

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

Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

Table O. **Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

Table P. **Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.

Table Q. **Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to $1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank's assessment area.

Table R. **Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to $1 million) originated and purchased by the bank to businesses with revenues of $1 million or less to: 1) the percentage distribution of businesses with revenues of greater than $1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table S. **Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to $500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

Table T. **Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to $500 thousand) originated and purchased by the bank to farms with revenues of $1 million or less to: 1) the percentage distribution of farms with revenues of greater than $1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

State of California

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2015-16

Assessment Area:	Total Home Mortgage Loans				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total	Overall Market	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate
Los Angeles	10,478	8,141,133	40.9	418,164	2.4	2.4	2.3	17.4	20.7	16.9	29.9	14.9	29.5	50.2	61.9	51.3	0.0	0.2	0.1
Sacramento	421	193,218	1.6	113,622	3.7	1.7	3.3	18.0	10.7	15.3	41.2	38.0	39.7	37.1	49.6	41.7	0.0	0.0	0.0
San Diego	3,211	2,109,551	12.5	141,802	3.3	3.8	3.2	14.3	15.9	13.2	38.8	24.4	38.1	43.6	55.9	45.5	0.0	0.0	0.0
San Francisco	4,884	3,882,542	19.1	192,850	4.6	4.9	4.8	14.5	16.3	14.2	39.9	27.9	40.4	41.0	50.9	40.6	0.0	0.0	0.0
Bakersfield	197	34,250	0.8	26,180	2.0	1.0	0.7	23.2	29.4	14.6	30.8	28.4	25.6	44.1	41.1	59.1	0.0	0.0	0.0
El Centro	51	7,172	0.2	4,244	0.0	0.0	0.0	22.4	15.7	12.6	51.9	52.9	51.2	25.7	31.4	36.3	0.0	0.0	0.0
Fresno	290	58,448	1.1	26,733	5.0	2.8	2.9	20.8	20.7	14.5	27.8	23.8	25.0	46.5	52.8	57.6	0.0	0.0	0.0
Hanford-Corcoran	38	6,214	0.1	4,202	0.0	0.0	0.0	27.9	13.2	15.2	25.6	34.2	25.8	46.5	52.6	59.0	0.0	0.0	0.0
Madera	48	9,406	0.2	4,430	0.0	0.0	0.0	19.8	27.1	21.5	60.7	50.0	55.6	19.5	22.9	23.0	0.0	0.0	0.0
Modesto	57	14,077	0.2	20,762	1.2	0.0	1.0	14.6	12.3	10.8	44.4	40.4	45.5	39.9	47.4	42.7	0.0	0.0	0.0
Oxnard-Thousand Oaks-Ventura	692	434,636	2.7	36,739	1.9	3.6	2.0	17.1	16.8	15.2	43.2	28.0	44.8	37.8	51.6	38.1	0.0	0.0	0.0
Redding	21	4,228	0.1	7,072	0.0	0.0	0.0	20.8	9.5	20.6	53.8	47.6	52.5	25.4	42.9	26.8	0.0	0.0	0.0
Riverside San Bernardino -Ontario	1,158	575,361	4.5	192,442	2.9	1.9	2.1	21.6	16.1	15.9	36.3	32.1	36.6	39.2	49.8	45.4	0.0	0.0	0.0
Salinas	332	192,455	1.3	11,762	1.8	1.2	1.2	16.1	9.3	14.4	37.7	27.7	41.9	44.4	61.7	42.4	0.0	0.0	0.0
San Jose-Sunnyvale-Santa Clara	2,080	1,658,088	8.1	80,390	4.4	5.8	4.9	18.7	22.4	20.9	39.5	33.0	41.4	37.5	38.8	32.8	0.0	0.0	0.0

San Luis Obispo-Paso Robles-Arroyo Grande	79	49,456	0.3	12,838	0.3	0.0	0.5	5.6	6.3	6.8	66.3	65.8	68.0	27.8	27.8	24.6	0.0	0.0	0.0
Santa Cruz-Watsonville	185	115,136	0.7	10,024	0.5	2.2	0.4	22.3	25.9	20.7	36.6	34.1	37.0	40.6	37.8	41.9	0.0	0.0	0.0
Santa Maria-Santa Barbara	628	464,519	2.5	13,960	2.8	3.8	3.4	15.1	13.7	17.7	34.9	18.2	35.4	47.1	64.3	43.5	0.0	0.0	0.0
Santa Rosa	124	94,563	0.5	20,967	0.1	0.0	0.2	16.6	4.0	18.0	58.5	50.0	59.2	24.8	46.0	22.5	0.0	0.0	0.0
Stockton-Lodi	389	121,491	1.5	29,040	2.2	1.8	1.5	20.8	16.2	13.9	33.0	24.2	30.9	44.0	57.8	53.8	0.0	0.0	0.0
Vallejo Fairfield	68	28,345	0.3	22,460	0.6	0.0	0.5	16.5	14.7	13.1	51.0	35.3	49.6	32.0	50.0	36.8	0.0	0.0	0.0
Visalia Porterville	133	19,704	0.5	12,554	0.7	0.0	0.2	22.5	25.6	12.9	34.6	33.1	27.5	42.2	41.4	59.3	0.0	0.0	0.0
Yuba City	8	1,651	0.0	6,426	1.4	0.0	0.7	19.0	12.5	15.2	36.0	37.5	35.9	43.6	50.0	48.2	0.0	0.0	0.0
California Non-MSA	38	13,525	0.1	1,137	0.0	0.0	0.0	9.1	0.0	3.0	42.9	18.4	20.1	48.0	81.6	76.9	0.0	0.0	0.0
Total	**25,610**	**18,229,169**	**100.0**	**1,410,800**	**2.9**	**3.2**	**2.7**	**17.6**	**18.5**	**15.7**	**36.5**	**23.0**	**36.4**	**43.0**	**55.2**	**45.2**	**0.0**	**0.1**	**0.0**

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-18

Assessment Area:	Total Home Mortgage Loans				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total	Overall Market	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate
Los Angeles	12,930	8,810,530	38.8	309,482	2.7	3.1	3.3	17.6	21.0	19.1	27.5	14.9	27.7	52.2	60.7	49.4	0.1	0.3	0.4
Sacramento	617	244,452	1.9	89,598	4.5	6.2	5.6	18.3	16.0	19.0	34.9	23.5	33.9	42.2	54.3	41.4	0.0	0.0	0.1
San Diego	3,811	2,106,772	11.4	102,685	2.8	3.4	3.5	15.1	15.5	16.4	35.5	24.6	35.7	46.6	56.5	44.3	0.0	0.0	0.0
San Francisco	7,091	5,023,408	21.3	132,374	4.6	4.5	6.0	16.9	18.1	18.9	34.5	26.3	35.1	43.9	50.8	39.7	0.1	0.3	0.3
Bakersfield	199	28,941	0.6	23,898	5.6	7.0	3.7	15.8	12.1	10.7	32.3	38.7	30.6	46.2	42.2	54.7	0.1	0.0	0.3
El Centro	58	6,701	0.2	3,678	0.0	0.0	0.0	33.5	37.9	23.3	25.5	27.6	22.2	40.8	34.5	54.5	0.1	0.0	0.0
Fresno	384	65,190	1.2	25,105	3.2	7.6	2.4	23.2	37.0	19.2	22.4	19.8	20.3	51.1	35.7	58.1	0.0	0.0	0.0
Hanford-Corcoran	40	5,755	0.1	3,651	1.3	0.0	1.1	22.9	7.5	14.0	25.8	20.0	27.7	50.0	72.5	57.2	0.0	0.0	0.0
Madera	43	8,880	0.1	4,001	0.0	0.0	0.0	19.1	37.2	22.1	30.4	46.5	28.5	50.5	16.3	49.4	0.0	0.0	0.0
Modesto	91	20,851	0.3	18,186	1.8	1.1	1.8	18.0	17.6	18.2	38.9	31.9	41.4	41.3	49.5	38.6	0.0	0.0	0.0
Oxnard-Thousand Oaks-Ventura	912	504,865	2.7	24,784	1.4	1.5	1.2	19.2	18.6	21.2	40.6	26.9	41.1	38.7	52.7	36.4	0.1	0.2	0.2
Redding	25	4,027	0.1	6,101	0.0	0.0	0.0	14.3	20.0	14.7	57.3	36.0	55.3	28.4	44.0	30.1	0.0	0.0	0.0
Riverside San Bernardino -Ontario	1,602	551,028	4.8	165,025	2.6	1.9	2.0	21.0	18.8	19.0	37.2	32.6	38.3	39.1	46.6	40.6	0.1	0.1	0.1
Salinas	358	194,948	1.1	9,453	0.6	0.3	1.0	15.3	9.8	15.5	33.9	21.8	37.4	50.2	68.2	46.2	0.0	0.0	0.0

San Jose-Sunnyvale-Santa Clara	3,072	2,277,878	9.2	49,418	4.5	5.2	5.8	16.5	18.3	20.4	36.8	36.9	38.8	42.2	39.6	35.0	0.0	0.0	0.0
San Luis Obispo-Paso Robles-Arroyo Grande	109	50,657	0.3	9,089	0.0	0.0	0.0	9.3	11.9	11.4	71.7	64.2	72.6	18.5	22.9	15.8	0.5	0.9	0.2
Santa Cruz-Watsonville	217	131,295	0.7	7,046	2.6	1.8	3.2	17.2	13.4	16.7	41.1	42.4	42.1	39.1	42.4	38.0	0.0	0.0	0.0
Santa Maria-Santa Barbara	789	486,254	2.4	10,314	3.1	2.7	4.5	15.6	15.2	19.6	34.1	18.5	37.4	47.2	63.6	38.6	0.0	0.0	0.0
Santa Rosa	181	114,374	0.5	15,016	0.0	0.0	0.0	18.6	16.6	21.8	55.1	48.6	54.2	26.3	34.8	24.0	0.0	0.0	0.0
Stockton-Lodi	451	169,590	1.4	24,801	3.8	2.2	3.2	16.6	8.0	15.1	36.3	18.4	34.4	43.3	71.4	47.3	0.0	0.0	0.0
Vallejo Fairfield	90	36,013	0.3	17,800	2.9	1.1	3.0	19.5	10.0	20.6	40.2	17.8	40.8	37.4	71.1	35.5	0.0	0.0	0.0
Visalia Porterville	183	22,712	0.5	11,244	1.3	3.3	0.6	23.6	25.7	16.5	31.8	35.0	29.7	43.3	36.1	53.3	0.0	0.0	0.0
Yuba City	27	4,773	0.1	5,538	2.3	7.4	2.4	13.6	11.1	13.7	35.0	37.0	33.1	49.1	44.4	50.8	0.0	0.0	0.0
California Non-MSA	37	12,714	0.1	1,058	0.0	0.0	0.0	10.0	0.0	3.5	31.3	5.4	15.1	58.7	94.6	81.4	0.0	0.0	0.0
Total	**33,317**	**20,882,606**	**100.0**	**1,069,345**	**3.1**	**3.5**	**3.5**	**17.8**	**18.8**	**18.5**	**33.6**	**23.0**	**34.1**	**45.4**	**54.4**	**43.8**	**0.1**	**0.2**	**0.2**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2015-16

Assessment Area:	Total Home Mortgage Loans				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total	Overall Market	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate
Los Angeles	10,478	8,141,133	40.9	418,164	23.6	1.5	1.7	16.6	7.7	6.0	18.1	9.9	15.2	41.7	76.5	62.6	0.0	4.4	14.7
Sacramento	421	193,218	1.6	113,622	22.0	5.0	2.5	17.0	10.0	11.0	20.0	8.8	20.2	41.0	72.2	49.6	0.0	4.0	16.8
San Diego	3,211	2,109,551	12.5	141,802	22.4	3.0	1.5	17.6	10.8	6.3	18.7	13.3	17.5	41.3	67.5	55.9	0.0	5.4	18.8
San Francisco	4,884	3,882,542	19.1	192,850	23.4	1.6	2.6	16.4	7.3	9.7	18.9	10.6	18.6	41.4	77.6	57.5	0.0	3.0	11.7
Bakersfield	197	34,250	0.8	26,180	23.0	8.1	2.6	17.2	22.3	9.5	18.0	22.8	17.3	41.8	43.1	45.8	0.0	3.6	24.9
El Centro	51	7,172	0.2	4,244	24.4	5.9	1.8	17.0	27.5	8.0	16.4	23.5	17.8	42.1	43.1	47.1	0.0	0.0	25.2
Fresno	290	58,448	1.1	26,733	24.7	5.5	1.7	16.0	16.9	7.4	17.1	23.1	16.6	42.1	51.4	51.3	0.0	3.1	22.9
Hanford-Corcoran	38	6,214	0.1	4,202	22.4	10.5	1.2	18.5	15.8	5.8	18.9	13.2	14.9	40.2	60.5	46.7	0.0	0.0	31.4
Madera	48	9,406	0.3	4,430	20.5	12.5	1.5	18.9	14.6	8.1	20.7	18.8	17.7	40.0	45.8	49.2	0.0	8.3	23.5
Modesto	57	14,077	0.2	20,762	22.6	5.3	2.3	16.7	10.5	11.3	19.6	17.5	23.3	41.1	63.2	45.2	0.0	3.5	17.9
Oxnard-Thousand Oaks-Ventura	692	434,636	2.7	36,739	21.4	4.2	2.8	17.4	14.3	10.7	20.5	16.3	22.9	40.7	61.4	48.7	0.0	3.8	14.9
Redding	21	4,228	0.2	7,072	22.7	9.5	2.1	18.0	19.0	8.9	19.1	23.8	19.0	40.2	47.6	47.0	0.0	0.0	23.0
Riverside San Bernardino -Ontario	1,158	575,361	4.5	192,442	21.8	3.9	2.2	17.5	13.5	9.5	19.8	16.8	18.7	40.8	63.0	47.5	0.0	2.9	22.1
Salinas	332	192,455	1.3	11,762	21.8	1.8	1.3	16.7	8.1	5.8	19.5	14.8	16.8	42.0	72.0	60.9	0.0	3.3	15.1
San Jose-Sunnyvale-Santa Clara	2,080	1,658,088	8.1	80,390	23.7	1.8	2.2	16.3	7.4	8.6	19.5	13.9	19.1	40.5	75.7	60.7	0.0	1.1	9.3
San Luis Obispo-Paso Robles-Arroyo Grande	79	49,456	0.8	12,838	19.8	1.3	2.4	18.2	5.1	8.2	21.6	12.7	20.8	40.4	77.2	55.5	0.0	3.8	13.1

Santa Cruz-Watsonville	185	115,136	1.2	10,024	23.9	1.1	2.2	16.9	8.6	8.5	18.3	13.5	18.2	40.9	72.4	60.4	0.0	4.3	10.6
Santa Maria-Santa Barbara	628	464,519	2.5	13,960	21.7	2.2	2.8	17.8	9.2	10.6	18.6	12.3	19.2	41.9	73.7	51.6	0.0	2.5	15.8
Santa Rosa	124	94,563	0.8	20,967	20.1	0.8	2.0	18.5	1.6	8.8	20.8	2.4	20.8	40.6	90.3	56.8	0.0	4.8	11.7
Stockton-Lodi	389	121,491	1.5	29,040	22.0	4.4	1.8	17.7	11.3	8.0	19.1	18.3	19.4	41.1	66.1	53.0	0.0	0.0	17.6
Vallejo Fairfield	68	28,345	0.7	22,460	19.9	1.5	2.7	17.7	14.7	12.5	22.6	22.1	23.4	39.8	60.3	40.3	0.0	1.5	21.1
Visalia Porterville	133	19,704	0.5	12,554	22.8	3.0	1.1	17.6	12.0	6.1	17.8	27.1	14.1	41.8	56.4	51.2	0.0	1.5	27.5
Yuba City	8	1,651	0.1	6,426	21.4	0.0	2.1	17.3	12.5	10.6	20.3	12.5	22.1	41.0	62.5	42.2	0.0	12.5	23.1
California Non-MSA	38	13,525	0.4	1,137	15.4	2.6	1.1	16.5	5.3	5.5	18.0	13.2	12.5	50.1	76.3	70.2	0.0	2.6	10.7
Total	**25,610**	**18,229,169**	**100.0**	**1,410,800**	**22.9**	**2.2**	**2.0**	**16.9**	**8.9**	**8.2**	**18.9**	**12.0**	**17.9**	**41.3**	**73.3**	**55.6**	**0.0**	**3.7**	**16.3**

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017-18

	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
Los Angeles	12,930	8,810,530	38.8	309,482	24.4	2.2	2.2	16.3	9.5	6.7	17.0	10.0	15.7	42.3	75.8	61.0	0.0	2.6	14.5
Sacramento	617	244,452	1.9	89,598	23.6	6.6	3.4	16.3	16.4	14.1	18.3	11.0	22.6	41.8	63.9	47.1	0.0	2.1	12.8
San Diego	3,811	2,106,772	11.4	102,685	23.6	4.1	2.4	16.9	12.0	8.6	17.8	12.9	20.3	41.7	67.4	55.2	0.0	3.5	13.5
San Francisco	7,091	5,023,408	21.3	132,374	24.4	2.2	3.4	16.0	9.7	10.4	18.1	10.4	18.6	41.5	76.4	56.1	0.0	1.4	11.4
Bakersfield	199	28,941	0.6	23,898	24.8	9.0	2.6	16.4	25.6	10.0	16.1	21.1	19.4	42.7	42.7	47.3	0.0	1.5	20.6
El Centro	58	6,701	0.2	3,678	24.1	6.9	1.2	17.0	22.4	8.9	15.7	25.9	17.9	43.2	44.8	50.6	0.0	0.0	21.5
Fresno	384	65,190	1.2	25,105	25.3	10.2	1.7	15.9	33.6	7.4	16.3	16.7	17.9	42.5	38.0	54.5	0.0	1.6	18.5
Hanford-Corcoran	40	5,755	0.2	3,651	23.3	5.0	1.6	17.0	20.0	7.2	17.8	25.0	16.1	41.9	50.0	47.6	0.0	0.0	27.4
Madera	43	8,880	0.1	4,001	22.6	11.6	2.6	17.2	16.3	9.0	19.4	23.3	19.1	40.8	48.8	51.1	0.0	0.0	18.2
Modesto	91	20,851	0.5	18,186	22.7	5.5	2.3	17.2	9.9	10.2	18.7	19.8	23.9	41.4	62.6	49.1	0.0	2.2	14.5

Oxnard-Thousand Oaks-Ventura	912	504,865	2.7	24,784	22.2	4.1	2.9	17.1	14.4	10.1	19.9	13.7	22.3	40.8	65.2	52.5	0.0	2.6	12.2
Redding	25	4,027	0.2	6,101	21.2	8.0	4.7	18.0	12.0	13.6	19.8	32.0	22.7	41.0	48.0	39.0	0.0	0.0	20.0
Riverside San Bernardino -Ontario	1,602	551,028	4.8	165,025	23.0	5.3	2.7	16.8	14.7	10.1	18.9	15.7	20.6	41.3	61.5	49.7	0.0	2.7	17.0
Salinas	358	194,948	1.1	9,453	21.6	1.7	1.3	17.9	5.9	4.8	18.7	12.0	15.2	41.9	79.3	65.4	0.0	1.1	13.3
San Jose-Sunnyvale-Santa Clara	3,072	2,277,878	9.2	49,418	24.1	2.1	3.1	15.7	8.1	9.3	18.6	11.9	19.5	41.6	77.2	59.2	0.0	0.6	9.0
San Luis Obispo-Paso Robles-Arroyo Grande	109	50,657	0.6	9,089	21.0	0.9	3.2	18.2	8.3	11.1	20.2	13.8	22.2	40.6	74.3	52.9	0.0	2.8	10.6
Santa Cruz-Watsonville	217	131,295	0.7	7,046	23.1	2.3	2.7	17.0	7.8	7.9	18.0	8.3	16.6	41.9	81.6	62.6	0.0	0.0	10.1
Santa Maria-Santa Barbara	789	486,254	2.4	10,314	23.4	3.8	2.5	16.8	8.2	9.6	18.2	11.7	19.5	41.6	74.4	55.2	0.0	1.9	13.2
Santa Rosa	181	114,374	1.1	15,016	21.3	0.0	3.0	18.0	1.1	10.7	19.5	8.3	21.4	41.2	84.0	55.1	0.0	6.6	9.8
Stockton-Lodi	451	169,590	2.7	24,801	23.5	2.0	2.2	16.4	6.7	9.1	18.6	14.6	21.4	41.6	76.3	53.3	0.0	0.4	14.0
Vallejo Fairfield	90	36,013	0.5	17,800	22.4	1.1	3.2	17.1	12.2	13.5	19.5	13.3	26.1	40.9	73.3	42.7	0.0	0.0	14.5
Visalia Porterville	183	22,712	0.5	11,244	23.3	10.4	1.6	17.6	19.7	8.3	16.8	23.0	17.0	42.3	44.8	49.1	0.0	2.2	24.0
Yuba City	27	4,773	0.1	5,538	22.8	11.1	2.0	16.4	14.8	10.3	19.6	44.4	22.4	41.2	29.6	49.8	0.0	0.0	15.5

California Non-MSA	37	12,714	0.2	1,058	15.8	5.4	2.1	15.8	8.1	4.7	17.7	5.4	11.5	50.8	78.4	72.2	0.0	2.7	9.5
Total	**33,317**	**20,882,606**	**100.0**	**1,069,345**	**23.8**	**2.9**	**2.6**	**16.5**	**10.5**	**9.2**	**17.8**	**11.5**	**19.0**	**41.8**	**72.9**	**54.9**	**0.0**	**2.1**	**14.2**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
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 2015-16

	Total Loans to Small Businesses				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	#	$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Los Angeles	13,404	1,036,307	42.8	523,168	6.0	5.8	5.1	20.1	19.7	18.7	27.3	26.3	27.0	45.4	46.4	48.3	1.2	1.8	0.9
Sacramento	800	51,303	2.6	68,359	7.0	7.4	5.8	21.0	21.0	17.1	38.7	41.3	37.8	33.3	30.4	39.3	0.0	0.0	0.0
San Diego	6,403	372,589	20.5	123,509	5.8	5.3	4.4	15.5	15.4	14.1	35.2	37.4	34.4	43.3	41.9	47.1	0.1	0.1	0.1
San Francisco	2,486	211,563	7.9	193,503	13.0	14.4	9.7	14.7	15.2	14.6	33.8	32.1	35.8	38.5	38.3	39.9	0.1	0.0	0.0
Bakersfield	478	25,709	1.5	18,274	3.8	4.6	2.7	20.6	22.0	16.6	29.9	21.5	25.2	45.7	51.9	55.5	0.0	0.0	0.0
El Centro	120	10,653	0.4	2,660	0.0	0.0	0.0	31.7	33.3	26.9	45.4	48.3	48.6	22.9	18.3	24.5	0.0	0.0	0.0
Fresno	995	48,087	3.2	22,850	9.6	7.6	6.3	23.6	23.7	19.4	26.1	25.1	24.8	40.6	43.5	49.5	0.2	0.0	0.0
Hanford-Corcoran	140	5,070	0.4	2,010	0.0	0.0	0.0	39.6	33.6	30.0	20.4	30.0	26.6	39.8	36.4	43.3	0.2	0.0	0.1
Madera	88	3,167	0.3	3,301	0.0	0.0	0.0	25.7	33.0	20.8	59.6	50.0	58.9	14.8	17.0	20.4	0.0	0.0	0.0
Modesto	132	8,800	0.4	12,465	2.4	3.0	2.1	19.1	22.0	16.4	44.4	47.7	42.6	34.1	27.3	38.9	0.0	0.0	0.0
Oxnard-Thousand Oaks-Ventura	873	47,759	2.8	32,805	3.5	2.4	2.9	18.7	17.5	16.0	44.5	46.6	41.8	33.3	33.4	39.4	0.0	0.0	0.0

Redding	86	3,454	0.3	5,845	0.0	0.0	0.0	34.4	43.0	26.3	47.7	40.7	50.3	17.9	16.3	23.4	0.0	0.0	0.0
Riverside San Bernardino -Ontario	2,093	139,544	6.7	111,947	4.5	5.1	3.0	24.1	27.6	20.7	34.1	37.7	32.8	37.3	29.6	43.4	0.1	0.0	0.0
Salinas	413	31,047	1.3	9,770	1.4	0.0	1.3	18.9	11.9	16.9	38.9	42.4	39.9	40.2	44.8	41.5	0.6	1.0	0.4
San Jose-Sunnyvale-Santa Clara	1,114	74,720	3.6	73,140	5.9	4.7	5.4	21.9	30.3	22.3	34.7	35.9	36.8	37.3	29.1	35.5	0.1	0.0	0.0
San Luis Obispo-Paso Robles-Arroyo Grande	177	12,708	0.6	12,602	2.0	0.6	1.3	10.5	9.6	8.6	60.5	59.9	59.0	27.0	29.9	31.1	0.1	0.0	0.0
Santa Cruz-Watsonville	174	7,606	0.6	10,597	2.0	0.6	1.0	21.2	30.5	19.6	43.6	39.1	41.7	33.1	29.9	37.6	0.0	0.0	0.0
Santa Maria-Santa Barbara	587	40,736	1.9	13,631	13.2	9.5	9.5	21.7	21.0	19.8	26.5	25.2	27.9	38.1	43.1	42.2	0.5	1.2	0.6
Santa Rosa	74	6,304	0.2	19,124	3.6	0.0	2.1	20.0	9.5	17.3	53.2	39.2	53.8	23.2	51.4	26.8	0.0	0.0	0.0
Stockton-Lodi	159	9,246	0.5	16,044	8.1	13.8	5.3	22.2	23.3	17.3	30.9	27.7	30.0	38.8	35.2	47.3	0.0	0.0	0.0
Vallejo Fairfield	54	2,447	0.2	9,738	2.1	1.9	1.4	24.3	25.9	18.5	47.0	38.9	45.6	26.4	33.3	34.5	0.2	0.0	0.0
Visalia Porterville	289	12,263	0.9	9,378	1.3	1.7	1.2	27.4	31.8	22.3	28.5	26.3	30.2	42.9	40.1	46.3	0.0	0.0	0.0
Yuba City	45	1,491	0.1	3,417	0.6	0.0	0.8	33.0	35.6	22.5	31.1	31.1	33.6	35.3	33.3	43.1	0.0	0.0	0.0
California Non-MSA	125	3,863	0.4	889	0.0	0.0	0.0	7.1	0.0	6.2	48.0	40.8	41.2	44.8	59.2	52.6	0.0	0.0	0.0

Total	**31,309**	**2,166,436**	**100.0**	**1,299,026**	**6.6**	**6.1**	**5.3**	**19.6**	**19.7**	**17.8**	**32.8**	**31.8**	**32.5**	**40.5**	**41.6**	**44.1**	**0.5**	**0.8**	**0.4**

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
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 2017-18

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
Los Angeles	7,711	779,136	45.1	424,096	5.0	5.7	4.7	19.4	16.5	19.4	25.3	28.2	25.6	48.4	47.5	48.8	1.9	2.1	1.5
Sacramento	402	43,581	2.4	49,606	9.2	5.5	8.4	20.8	15.7	19.7	31.3	38.6	29.7	36.8	37.8	41.2	1.9	2.5	1.1
San Diego	3,457	286,099	20.2	90,218	5.5	4.2	4.7	15.1	14.3	14.4	35.1	38.8	34.9	44.1	42.6	45.9	0.2	0.1	0.1
San Francisco	1,305	158,883	7.6	139,338	11.4	13.9	10.3	17.1	17.5	17.6	29.4	25.7	30.4	41.4	42.8	41.1	0.8	0.0	0.6
Bakersfield	189	14,117	1.1	13,138	6.0	6.9	4.4	20.7	15.3	17.9	28.1	31.2	25.6	44.4	46.6	51.1	0.8	0.0	1.0
El Centro	49	7,688	0.3	2,117	0.0	0.0	0.0	42.9	49.0	36.4	26.9	22.4	30.8	29.8	28.6	32.6	0.3	0.0	0.1
Fresno	510	38,130	3.0	15,652	6.6	5.7	5.2	28.0	32.5	23.9	21.6	19.0	23.4	42.4	40.8	46.4	1.3	2.0	1.2
Hanford-Corcoran	48	2,578	0.3	1,500	1.7	0.0	1.7	37.2	39.6	32.9	19.7	16.7	22.3	41.1	43.8	43.1	0.2	0.0	0.0
Madera	47	4,327	0.3	2,085	0.0	0.0	0.0	24.7	31.9	23.7	29.8	23.4	28.2	45.4	44.7	48.0	0.0	0.0	0.0
Modesto	52	7,623	0.3	8,745	1.9	0.0	2.1	25.9	40.4	23.9	35.9	50.0	36.4	36.3	9.6	37.6	0.0	0.0	0.0
Oxnard-Thousand Oaks-Ventura	492	32,958	2.9	22,773	5.4	3.9	5.4	19.7	22.4	18.7	39.8	39.6	39.6	34.5	34.1	35.7	0.5	0.0	0.5
Redding	42	3,146	0.2	3,158	0.0	0.0	0.0	20.6	23.8	18.5	58.8	59.5	61.6	20.6	16.7	19.9	0.0	0.0	0.0
Riverside San Bernardino -Ontario	1,011	94,880	5.9	88,385	4.6	7.3	3.5	25.9	27.2	24.3	34.8	34.9	34.8	34.5	30.4	37.4	0.1	0.2	0.1
Salinas	245	19,656	2.9	7,056	3.9	2.9	3.4	13.3	5.3	12.1	31.2	29.0	31.7	51.0	62.4	52.4	0.6	0.4	0.3

San Jose-Sunnyvale-Santa Clara	619	52,631	3.6	52,664	5.7	3.9	5.8	19.1	27.6	19.5	35.7	39.7	37.4	39.4	28.8	37.2	0.1	0.0	0.0
San Luis Obispo-Paso Robles-Arroyo Grande	87	5,662	0.5	8,115	0.0	0.0	0.0	20.9	21.8	18.2	58.6	55.2	61.0	19.7	23.0	20.4	0.8	0.0	0.4
Santa Cruz-Watsonville	110	5,752	0.6	6,072	4.2	5.5	3.7	15.3	20.0	16.8	47.7	45.5	47.1	32.7	29.1	32.4	0.0	0.0	0.0
Santa Maria-Santa Barbara	382	33,897	2.2	9,984	5.5	2.6	4.4	29.4	31.2	29.8	25.7	19.4	25.9	39.0	45.8	39.4	0.5	1.0	0.5
Santa Rosa	52	3,772	0.3	11,909	0.0	0.0	0.0	28.3	7.7	25.9	46.9	30.8	47.5	24.8	61.5	26.6	0.0	0.0	0.0
Stockton-Lodi	53	8,081	0.3	11,903	9.0	17.0	6.9	18.9	17.0	16.3	34.7	28.3	34.1	37.4	37.7	42.6	0.0	0.0	0.0
Vallejo Fairfield	23	3,364	0.1	6,066	10.3	17.4	7.8	22.5	30.4	21.0	33.4	26.1	33.2	33.6	26.1	38.0	0.2	0.0	0.0
Visalia Porterville	139	10,015	1.6	5,818	1.1	0.7	1.1	29.8	32.4	30.4	28.9	32.4	28.0	40.1	34.5	40.5	0.0	0.0	0.0
Yuba City	26	2,139	0.2	2,968	4.7	7.7	2.8	30.4	26.9	23.5	28.2	46.2	31.0	36.7	19.2	42.7	0.0	0.0	0.0
California Non-MSA	55	3,403	0.3	601	0.0	0.0	0.0	6.8	0.0	6.8	41.9	30.9	33.1	51.3	69.1	60.1	0.0	0.0	0.0
Total	**17,106**	**1,621,518**	**100.0**	**983,967**	**6.1**	**5.7**	**5.5**	**19.9**	**18.4**	**19.4**	**30.4**	**31.5**	**30.2**	**42.5**	**43.2**	**44.0**	**1.1**	**1.1**	**0.8**

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2015-16

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
Los Angeles	13,404	1,036,307	42.8	523,168	86.8	56.8	44.3	6.2	30.8	7.1	12.3
Sacramento	800	51,303	2.6	68,359	85.6	56.5	40.8	4.8	31.5	9.6	12.0
San Diego	6,403	372,589	20.5	123,509	87.6	60.6	42.1	5.1	26.6	7.2	12.9
San Francisco	2,486	211,563	7.9	193,503	85.7	52.7	38.8	6.1	34.6	8.2	12.8
Bakersfield	478	25,709	1.5	18,274	84.3	63.0	39.5	5.0	24.7	10.6	12.3
El Centro	120	10,653	0.4	2,660	76.5	55.8	44.1	6.1	30.0	17.4	14.2
Fresno	995	48,087	3.2	22,850	83.8	63.9	38.2	5.6	23.1	10.6	13.0
Hanford-Corcoran	140	5,070	0.4	2,010	80.7	70.7	42.8	4.7	21.4	14.6	7.9
Madera	88	3,167	0.3	3,301	85.3	60.2	43.7	4.6	23.9	10.2	15.9
Modesto	132	8,800	0.4	12,465	84.2	63.6	42.4	5.4	22.0	10.5	14.4
Oxnard-Thousand Oaks-Ventura	873	47,759	2.8	32,805	86.4	64.3	40.9	5.4	26.8	8.2	8.9
Redding	86	3,454	0.3	5,845	85.2	53.5	36.5	5.0	32.6	9.8	14.0
Riverside San Bernardino -Ontario	2,093	139,544	6.7	111,947	85.9	57.6	44.2	5.0	30.3	9.1	12.1
Salinas	413	31,047	1.3	9,770	85.1	63.2	44.2	4.9	28.6	10.0	8.2
San Jose-Sunnyvale-Santa Clara	1,114	74,720	3.6	73,140	86.3	58.3	39.6	6.3	29.6	7.5	12.1
San Luis Obispo-Paso Robles-Arroyo Grande	177	12,708	0.6	12,602	87.4	63.3	38.1	4.6	26.6	8.0	10.2
Santa Cruz-Watsonville	174	7,606	0.6	10,597	88.4	71.8	39.1	4.6	18.4	7.0	9.8
Santa Maria-Santa Barbara	587	40,736	1.9	13,631	84.7	61.8	40.1	5.8	26.7	9.5	11.4

Santa Rosa	74	6,304	0.2	19,124	87.4	74.3	40.3	5.3	20.3	7.3	5.4
Stockton-Lodi	159	9,246	0.5	16,044	83.2	54.1	44.1	5.3	31.4	11.5	14.5
Vallejo Fairfield	54	2,447	0.2	9,738	85.6	75.9	38.9	4.1	20.4	10.3	3.7
Visalia Porterville	289	12,263	0.9	9,378	82.2	73.7	39.1	5.6	18.0	12.2	8.3
Yuba City	45	1,491	0.1	3,417	84.4	57.8	40.1	4.3	17.8	11.3	24.4
California Non-MSA	125	3,863	0.4	889	79.1	64.0	46.9	5.1	19.2	15.8	16.8
Total	**31,309**	**2,166,436**	**100.0**	**1,299,026**	**86.2**	**58.5**	**42.2**	**5.7**	**29.2**	**8.0**	**12.3**

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017-18

	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
Assessment Area:	**#**	**$**	**% of Total**	**Overall Market**	**% Businesses**	**% Bank Loans**	**Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
Los Angeles	7,711	779,136	45.1	424,096	86.8	41.5	53.0	6.0	27.8	7.1	30.7
Sacramento	402	43,581	2.4	49,606	85.4	34.3	50.9	4.8	28.9	9.8	36.8
San Diego	3,457	286,099	20.2	90,218	87.4	43.4	51.3	5.2	25.6	7.4	31.0
San Francisco	1,305	158,883	7.6	139,338	85.6	36.5	53.3	6.1	31.1	8.3	32.4
Bakersfield	189	14,117	1.1	13,138	84.4	35.5	45.3	4.9	21.7	10.7	42.9
El Centro	49	7,688	0.3	2,117	75.4	34.7	48.0	6.5	34.7	18.1	30.6
Fresno	510	38,130	3.0	15,652	83.9	44.5	44.5	5.5	20.8	10.6	34.7
Hanford-Corcoran	48	2,578	0.3	1,500	80.9	52.1	48.0	4.7	20.8	14.4	27.1
Madera	47	4,327	0.3	2,085	85.0	40.4	48.1	4.7	31.9	10.3	27.7
Modesto	52	7,623	0.3	8,745	84.0	34.6	49.2	5.5	30.8	10.6	34.6
Oxnard-Thousand Oaks-Ventura	492	32,958	2.9	22,773	86.2	48.8	49.3	5.4	27.4	8.4	23.8
Redding	42	3,146	0.2	3,158	84.6	38.1	50.8	5.1	11.9	10.2	50.0
Riverside San Bernardino -Ontario	1,011	94,880	5.9	88,385	85.8	36.1	51.5	5.0	32.4	9.2	31.5
Salinas	245	19,656	1.4	7,056	85.3	50.6	49.4	5.1	34.7	9.6	14.7
San Jose-Sunnyvale-Santa Clara	619	52,631	3.6	52,664	85.6	43.1	53.9	6.1	31.3	8.2	25.5
San Luis Obispo-Paso Robles-Arroyo Grande	87	5,662	0.5	8,115	87.4	48.3	45.9	4.5	24.1	8.1	27.6
Santa Cruz-Watsonville	110	5,752	0.6	6,072	87.9	60.9	54.6	4.9	16.4	7.2	22.7
Santa Maria-Santa Barbara	382	33,897	2.2	9,984	84.9	54.2	47.4	5.8	36.6	9.3	9.2

Santa Rosa	52	3,772	0.4	11,909	86.7	63.5	49.9	5.6	17.3	7.7	19.2
Stockton-Lodi	53	8,081	0.3	11,903	83.6	26.4	50.3	5.0	28.3	11.4	45.3
Vallejo Fairfield	23	3,364	0.1	6,066	86.3	30.4	49.8	3.9	50.0	9.8	43.5
Visalia Porterville	139	10,015	0.8	5,818	81.5	51.1	45.5	5.8	22.3	12.7	26.6
Yuba City	26	2,139	0.2	2,968	84.0	42.3	45.4	4.7	42.3	11.4	15.4
California Non-MSA	55	3,403	0.3	601	77.7	52.7	44.8	6.8	16.4	15.5	30.9
Total	**17,106**	**1,621,518**	**100.0**	**983,967**	**86.2**	**42.0**	**52.0**	**5.7**	**27.8**	**8.2**	**30.2**

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

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2015-16

	Total Loans to Farms				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	#	$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Los Angeles	35	1,160	6.0	458	3.7	2.9	3.5	19.4	11.4	17.7	28.9	37.1	29.5	47.3	48.6	48.5	0.6	0.0	0.9
Sacramento	31	2,445	5.4	438	3.7	3.2	1.4	16.2	16.1	10.0	46.7	64.5	50.0	33.4	16.1	38.6	0.0	0.0	0.0
San Diego	49	1,735	8.5	282	3.8	0.0	0.7	16.1	16.3	12.1	38.9	26.5	36.2	41.2	57.1	50.7	0.0	0.0	0.4
San Francisco	8	128	1.4	260	6.6	12.5	4.2	15.6	12.5	8.5	38.4	37.5	36.5	39.3	37.5	50.8	0.0	0.0	0.0
Bakersfield	29	1,167	5.0	253	1.2	0.0	0.4	28.4	27.6	34.4	29.5	44.8	28.5	40.8	27.6	36.8	0.0	0.0	0.0
El Centro	15	706	2.6	115	0.0	0.0	0.0	19.5	20.0	15.7	40.6	13.3	40.0	40.0	66.7	44.3	0.0	0.0	0.0
Fresno	59	2,332	10.2	545	5.1	3.4	4.4	29.5	28.8	30.5	34.0	37.3	37.6	31.4	30.5	27.5	0.0	0.0	0.0
Hanford-Corcoran	35	1,245	6.0	139	0.0	0.0	0.0	20.0	17.1	11.5	42.1	42.9	38.8	37.8	40.0	49.6	0.1	0.0	0.0
Madera	29	2,500	5.0	180	0.0	0.0	0.0	16.3	6.9	14.4	69.8	48.3	67.8	13.8	44.8	17.8	0.0	0.0	0.0
Modesto	44	7,665	7.6	470	0.8	0.0	0.6	8.4	0.0	5.5	51.2	77.3	56.2	39.7	22.7	37.7	0.0	0.0	0.0
Oxnard-Thousand Oaks-Ventura	25	1,398	4.3	206	5.9	12.0	9.7	24.7	8.0	23.3	44.7	68.0	45.6	24.7	12.0	21.4	0.0	0.0	0.0
Redding	1	22	0.2	51	0.0	0.0	0.0	23.7	0.0	41.2	52.3	100.0	41.2	24.0	100.0	17.6	0.0	0.0	0.0
Riverside San Bernardino -Ontario	20	942	3.5	298	4.0	5.0	5.4	22.9	40.0	20.5	35.5	40.0	28.5	37.6	15.0	45.6	0.0	0.0	0.0

Salinas	14	231	2.4	169	0.6	0.0	1.2	15.3	14.3	20.1	42.8	64.3	45.6	40.8	21.4	32.5	0.4	0.0	0.6
San Jose-Sunnyvale-Santa Clara	16	391	2.8	152	6.5	0.0	2.0	25.4	50.0	30.9	36.3	43.8	34.2	31.7	6.3	32.9	0.1	0.0	0.0
San Luis Obispo-Paso Robles-Arroyo Grande	11	513	1.9	230	0.4	0.0	0.9	5.7	0.0	3.9	64.8	54.5	64.3	29.2	45.5	30.9	0.0	0.0	0.0
Santa Cruz-Watsonville	9	1,570	1.6	93	1.4	0.0	1.1	27.8	66.7	49.5	38.6	33.3	32.3	32.1	0.0	17.2	0.0	0.0	0.0
Santa Maria-Santa Barbara	22	799	3.8	164	6.3	4.5	8.5	16.5	9.1	17.1	24.3	13.6	38.4	52.7	72.7	36.0	0.2	0.0	0.0
Santa Rosa	4	91	0.7	213	0.9	0.0	0.5	12.4	0.0	8.5	56.2	75.0	58.2	30.6	25.0	32.9	0.0	0.0	0.0
Stockton-Lodi	34	7,335	5.9	524	4.6	11.8	5.5	12.1	0.0	7.4	31.5	29.4	30.5	51.9	58.8	56.5	0.0	0.0	0.0
Vallejo Fairfield	3	337	0.5	53	0.6	0.0	0.0	11.3	0.0	1.9	56.4	100.0	67.9	31.8	0.0	30.2	0.0	0.0	0.0
Visalia Porterville	64	4,275	11.1	435	2.5	20.3	3.4	25.1	23.4	27.4	42.0	29.7	42.3	30.4	26.6	26.9	0.0	0.0	0.0
Yuba City	22	4,699	3.8	204	0.1	0.0	0.0	7.1	4.5	3.4	37.7	18.2	36.8	55.2	77.3	59.8	0.0	0.0	0.0
California Non-MSA	0	0	0.0	3	0.0	0.0	0.0	2.4	0.0	0.0	40.1	0.0	66.7	57.5	0.0	33.3	0.0	0.0	0.0
Total	**580**	**43,690**	**100.0**	**5,935**	**3.6**	**4.7**	**2.8**	**18.8**	**16.9**	**16.8**	**38.7**	**41.7**	**41.5**	**38.8**	**36.7**	**38.8**	**0.1**	**0.0**	**0.1**

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017-18

	Total Loans to Farms				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	#	$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Los Angeles	9	666	3.5	476	3.5	0.0	5.5	18.6	0.0	14.7	28.1	77.8	25.8	49.0	22.2	52.3	0.8	0.0	1.7
Sacramento	15	1,340	5.8	433	5.0	0.0	2.5	17.7	13.3	10.6	35.2	46.7	37.4	41.6	40.0	49.0	0.5	0.0	0.5
San Diego	18	993	6.9	288	3.6	0.0	2.4	17.6	5.6	16.3	38.6	11.1	39.6	40.2	83.3	41.3	0.0	0.0	0.3
San Francisco	2	360	0.8	315	7.0	0.0	6.0	18.1	0.0	14.9	33.6	0.0	30.2	41.2	100.0	48.9	0.1	0.0	0.0
Bakersfield	10	705	3.8	222	4.4	0.0	5.0	20.9	30.0	19.4	33.5	50.0	38.3	39.4	20.0	36.5	1.9	0.0	0.9
El Centro	7	622	2.7	112	0.0	0.0	0.0	24.1	0.0	18.8	26.3	14.3	25.0	48.6	85.7	56.3	1.0	0.0	0.0
Fresno	25	996	9.6	534	4.1	0.0	3.2	28.7	40.0	27.9	31.5	32.0	35.8	35.5	28.0	33.1	0.1	0.0	0.0
Hanford-Corcoran	10	365	3.8	122	2.3	0.0	0.0	17.4	0.0	5.7	25.4	20.0	26.2	54.7	80.0	68.0	0.2	0.0	0.0
Madera	17	2,945	6.5	179	0.0	0.0	0.0	5.1	0.0	8.4	43.2	70.6	47.5	51.7	29.4	44.1	0.0	0.0	0.0
Modesto	47	11,638	18.1	531	0.6	0.0	0.6	16.9	6.4	12.8	35.1	40.4	41.2	47.3	53.2	45.4	0.0	0.0	0.0
Oxnard-Thousand Oaks-Ventura	17	1,000	6.5	189	4.9	0.0	11.6	23.6	11.8	22.8	43.5	70.6	43.9	27.7	17.6	21.7	0.4	0.0	0.0
Redding	0	0	0.0	46	0.0	0.0	0.0	16.9	0.0	19.6	62.5	0.0	63.0	20.6	0.0	17.4	0.0	0.0	0.0
Riverside San Bernardino -Ontario	8	608	3.1	304	3.8	37.5	3.9	23.8	25.0	20.7	38.3	37.5	31.6	34.0	0.0	43.8	0.1	0.0	0.0

Salinas	1	15	0.4	153	1.1	0.0	0.7	15.9	0.0	19.0	41.7	100.0	50.3	40.8	0.0	29.4	0.5	0.0	0.7
San Jose-Sunnyvale-Santa Clara	8	573	3.1	168	6.4	0.0	3.6	25.7	50.0	25.6	37.6	25.0	39.9	30.2	25.0	31.0	0.1	0.0	0.0
San Luis Obispo-Paso Robles-Arroyo Grande	3	185	1.2	229	0.0	0.0	0.0	10.0	0.0	8.3	71.6	66.7	69.9	16.9	33.3	21.4	1.5	0.0	0.4
Santa Cruz-Watsonville	2	500	.08	90	2.1	0.0	3.3	20.0	50.0	33.3	48.8	50.0	44.4	29.1	50.0	18.9	0.0	0.0	0.0
Santa Maria-Santa Barbara	8	328	3.1	175	4.4	0.0	6.3	17.7	12.5	18.9	24.2	0.0	35.4	53.5	87.5	38.9	0.3	0.0	0.6
Santa Rosa	1	25	0.4	219	0.0	0.0	0.0	15.7	0.0	11.9	59.9	100.0	61.6	24.3	0.0	26.5	0.0	0.0	0.0
Stockton-Lodi	19	6,126	7.3	565	2.4	0.0	0.2	7.5	0.0	5.0	38.7	26.3	36.3	51.4	73.7	58.6	0.0	0.0	0.0
Vallejo Fairfield	0	0	0.0	60	2.4	0.0	0.0	16.1	0.0	3.3	42.9	0.0	61.7	38.6	0.0	35.0	0.0	0.0	0.0
Visalia Porterville	22	2,528	8.5	459	0.8	0.0	1.1	37.3	54.5	44.4	27.1	22.7	24.0	34.9	22.7	30.5	0.0	0.0	0.0
Yuba City	11	3,141	4.2	174	0.7	0.0	1.1	6.9	0.0	5.7	41.2	36.4	31.6	51.2	63.6	61.5	0.0	0.0	0.0
California Non-MSA	0	0	0.0	3	0.0	0.0	0.0	3.1	0.0	0.0	33.8	0.0	33.3	63.1	0.0	66.7	0.0	0.0	0.0
Total	**261**	**35,919**	**100.0**	**6,046**	**3.6**	**1.1**	**2.6**	**19.4**	**15.7**	**17.4**	**36.3**	**37.9**	**37.9**	**40.4**	**45.2**	**41.8**	**0.4**	**0.0**	**0.3**

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2015-16

	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
Assessment Area:	**#**	**$**	**% of Total**	**Overall Market**	**% Farms**	**% Bank Loans**	**Aggregate**	**% Farms**	**% Bank Loans**	**% Farms**	**% Bank Loans**
Los Angeles	35	1,160	6.0	458	93.1	60.0	40.2	4.3	31.4	2.6	8.6
Sacramento	31	2,445	5.4	438	94.5	61.3	59.4	3.3	19.4	2.2	19.4
San Diego	49	1,735	8.5	282	94.2	63.3	56.7	3.9	24.5	1.8	12.2
San Francisco	8	128	1.4	260	94.1	75.0	48.1	4.0	12.5	1.9	12.5
Bakersfield	29	1,167	5.0	253	87.3	31.0	39.5	9.7	55.2	3.0	13.8
El Centro	15	706	2.6	115	76.5	75.0	42.6	20.2	33.3	3.2	33.3
Fresno	59	2,332	10.2	545	90.3	66.1	49.7	7.7	20.3	2.1	13.6
Hanford-Corcoran	35	1,245	6.0	139	88.6	57.1	42.4	9.5	37.1	1.9	6.9
Madera	29	2,500	5.0	180	90.6	62.1	48.3	8.0	24.1	1.3	13.8
Modesto	44	7,665	7.6	470	91.0	50.0	51.9	6.8	50.0	2.3	0.0
Oxnard-Thousand Oaks-Ventura	25	1,398	4.3	206	90.5	56.0	41.7	6.3	32.0	3.2	15.8
Redding	2	26	0.2	51	95.2	100.0	47.1	1.9	0.0	2.9	0.0
Riverside San Bernardino -Ontario	20	942	3.5	298	93.3	65.0	50.0	4.4	20.0	2.3	15.0
Salinas	14	231	2.4	169	82.1	84.6	44.4	14.0	7.7	3.9	14.3
San Jose-Sunnyvale-Santa Clara	16	391	2.8	152	93.2	81.3	54.6	4.7	14.3	2.1	50.0
San Luis Obispo-Paso Robles-Arroyo Grande	11	513	1.9	230	94.7	72.7	50.4	3.8	27.3	1.5	0.0
Santa Cruz-Watsonville	9	1,570	1.6	93	91.9	55.6	44.1	6.3	44.4	1.8	0.0
Santa Maria-Santa Barbara	22	799	3.8	164	88.9	77.3	50.0	8.3	9.1	2.8	13.6
Santa Rosa	4	91	0.7	213	93.8	50.0	49.8	4.0	50.0	2.3	0.0
Stockton-Lodi	34	7,335	5.9	524	91.2	50.0	45.8	7.3	50.0	1.6	0.0

Vallejo Fairfield	3	337	0.5	53	94.7	50.0	54.7	3.9	66.7	1.3	0.0
Visalia Porterville	64	4,275	11.1	435	87.2	60.9	47.8	10.6	32.8	2.1	6.3
Yuba City	22	4,699	3.8	204	92.5	81.8	60.3	6.0	13.6	1.5	16.7
California Non-MSA	0	0	0.0	3	92.8	0.0	66.7	2.4	0.0	4.8	0.0
Total	**580**	**43,690**	**100.0**	**5,935**	**92.2**	**61.0**	**48.9**	**5.6**	**30.0**	**2.3**	**9.0**

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2017-18

	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
Assessment Area:	**#**	**$**	**% of Total**	**Overall Market**	**% Farms**	**% Bank Loans**	**Aggregate**	**% Farms**	**% Bank Loans**	**% Farms**	**% Bank Loans**
Los Angeles	9	666	3.5	476	93.4	33.3	53.4	3.8	25.0	2.7	55.6
Sacramento	15	1,340	5.8	433	94.1	40.0	61.7	3.6	25.0	2.4	46.7
San Diego	18	993	6.9	288	94.3	11.1	54.9	3.7	22.2	2.0	66.7
San Francisco	2	360	0.8	315	94.1	100.0	51.4	3.8	0.0	2.1	0.0
Bakersfield	10	705	3.8	222	87.2	20.0	42.8	9.5	50.0	3.3	30.0
El Centro	7	622	2.7	112	76.4	28.6	33.9	20.3	28.6	3.4	42.9
Fresno	25	996	9.6	534	89.4	44.0	51.3	8.2	12.0	2.5	44.0
Hanford-Corcoran	10	365	3.8	122	87.4	50.0	50.8	10.2	20.0	2.4	30.0
Madera	17	2,945	6.5	179	89.2	23.5	41.9	9.3	52.9	1.5	23.5
Modesto	47	11,638	18.1	531	89.5	61.7	52.9	7.8	38.3	2.7	0.0
Oxnard-Thousand Oaks-Ventura	17	1,000	6.5	189	90.3	64.7	46.6	6.8	23.5	2.9	11.8
Redding	0	0	0.0	46	94.8	0.0	67.4	2.0	0.0	3.2	0.0
Riverside San Bernardino -Ontario	8	608	3.1	304	93.1	16.7	53.9	4.3	16.7	2.6	75.0
Salinas	1	15	0.4	153	82.3	100.0	44.4	13.5	0.0	4.1	0.0
San Jose-Sunnyvale-Santa Clara	8	573	3.1	168	93.2	60.0	50.6	4.1	37.5	2.6	25.0
San Luis Obispo-Paso Robles-Arroyo Grande	3	185	1.2	229	94.3	66.7	55.0	4.0	50.0	1.7	0.0
Santa Cruz-Watsonville	3	760	.08	90	91.1	50.0	53.3	6.6	66.7	2.3	0.0
Santa Maria-Santa Barbara	8	328	3.1	175	89.9	62.5	42.3	7.2	20.0	2.9	25.0
Santa Rosa	1	25	0.4	219	92.8	100.0	54.3	4.5	0.0	2.7	0.0
Stockton-Lodi	19	6,126	7.3	565	90.2	36.8	45.1	7.9	52.6	1.9	40.0

Vallejo Fairfield	0	0	0.0	60	95.4	0.0	56.7	3.4	0.0	1.2	0.0
Visalia Porterville	22	2,528	8.5	459	85.7	50.0	43.1	11.9	27.3	2.4	22.7
Yuba City	11	3,141	4.2	174	91.5	45.5	59.2	6.6	36.4	1.9	18.2
California Non-MSA	0	0	0.0	3	93.4	0.0	100.0	2.6	0.0	3.9	0.0
Total	**261**	**35,919**	**100.0**	**6,046**	**92.0**	**43.7**	**50.6**	**5.5**	**29.9**	**2.5**	**26.4**

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

State of Georgia

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2015-16

Assessment Area:	Total Home Mortgage Loans				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total	Overall Market	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate
Atlanta	94	16,358	100.0	141,328	3.9	6.4	2.6	19.0	41.5	14.5	33.7	21.3	33.1	43.4	30.9	49.8	0.0	0.0	0.0
Total	**94**	**16,358**	**100.0**	**141,328**	**3.9**	**6.4**	**2.6**	**19.0**	**41.5**	**14.5**	**33.7**	**21.3**	**33.1**	**43.4**	**30.9**	**49.8**	**0.0**	**0.0**	**0.0**

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-18

Assessment Area:	Total Home Mortgage Loans				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total	Overall Market	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate
Atlanta	15	1,991	100.0	130,540	4.7	6.7	4.5	20.5	20.0	20.1	29.6	46.7	29.8	45.3	26.7	45.5	0.0	0.0	0.1
Total	**15**	**1,991**	**100.0**	**130,540**	**4.7**	**6.7**	**4.5**	**20.5**	**20.0**	**20.1**	**29.6**	**46.7**	**29.8**	**45.3**	**26.7**	**45.5**	**0.0**	**0.0**	**0.1**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2015-16

	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**
Atlanta	94	16,358	100.0	141,328	22.5	9.6	5.0	16.6	43.6	13.5	18.2	21.3	17.4	42.7	25.5	44.4	0.0	0.0	19.7
Total	**94**	**16,358**	**100.0**	**141,328**	**22.5**	**9.6**	**5.0**	**16.6**	**43.6**	**13.5**	**18.2**	**21.3**	**17.4**	**42.7**	**25.5**	**44.4**	**0.0**	**0.0**	**19.7**

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017-18

	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**
Atlanta	15	1,991	100.0	130,540	23.9	20.0	7.2	16.3	46.7	16.2	17.1	6.7	19.3	42.6	26.7	40.6	0.0	0.0	16.8
Total	**15**	**1,991**	**100.0**	**130,540**	**23.9**	**20.0**	**7.2**	**16.3**	**46.7**	**16.2**	**17.1**	**6.7**	**19.3**	**42.6**	**26.7**	**40.6**	**0.0**	**0.0**	**16.8**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
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 2015-16

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
Atlanta	3	39	100.0	109,626	6.0	33.3	5.2	21.3	66.7	18.5	29.9	0.0	27.3	42.7	0.0	49.0	0.1	0.0	0.0
Total	**3**	**39**	**100.0**	**109,626**	**6.0**	**33.3**	**5.2**	**21.3**	**66.7**	**18.5**	**29.9**	**0.0**	**27.3**	**42.7**	**0.0**	**49.0**	**0.1**	**0.0**	**0.0**

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
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 2017-18

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
Atlanta	2	853	100.0	105,153	7.2	0.0	6.0	21.7	50.0	20.2	26.0	50.0	24.1	44.3	0.0	49.3	0.8	0.0	0.5
Total	**2**	**853**	**100.0**	**105,153**	**7.2**	**0.0**	**6.0**	**21.7**	**50.0**	**20.2**	**26.0**	**50.0**	**24.1**	**44.3**	**0.0**	**49.3**	**0.8**	**0.0**	**0.5**

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2015-16

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
Atlanta	3	39	100.0	109,626	86.9	33.3	50.1	5.0	66.7	8.1	0.0
Total	**3**	**39**	**100.0**	**109,626**	**86.9**	**33.3**	**50.1**	**5.0**	**66.7**	**8.1**	**0.0**

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017-18

	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
Assessment Area:	#	$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Atlanta	2	867	100.0	105,153	87.2	0.0	53.0	4.8	100.0	8.0	0.0
Total	**2**	**867**	**100.0**	**105,153**	**87.2**	**0.0**	**53.0**	**4.8**	**100.0**	**8.0**	**0.0**

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

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2015-16

	Total Loans to Farms				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	#	$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Atlanta	0	0	0.0	119	4.5	0.0	2.5	18.6	0.0	14.3	34.5	0.0	28.6	42.2	0.0	54.6	0.1	0.0	0.0
Total	**0**	**0**	**0.0**	**119**	**4.5**	**0.0**	**2.5**	**18.6**	**0.0**	**14.3**	**34.5**	**0.0**	**28.6**	**42.2**	**0.0**	**54.6**	**0.1**	**0.0**	**0.0**

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017-18

	Total Loans to Farms				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	#	$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Atlanta	0	0	0.0	136	5.6	0.0	1.5	20.8	0.0	16.9	30.9	0.0	22.1	42.5	0.0	59.6	0.2	0.0	0.0
Total	**0**	**0**	**0.0**	**136**	**5.6**	**0.0**	**1.5**	**20.8**	**0.0**	**16.9**	**30.9**	**0.0**	**22.1**	**42.5**	**0.0**	**59.6**	**0.2**	**0.0**	**0.0**

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2015-16

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Atlanta	0	0	0.0	119	94.4	0.0	48.7	3.3	0.0	2.2	0.0
Total	**0**	**0**	**0.0**	**119**	**94.4**	**0.0**	**48.7**	**3.3**	**0.0**	**2.2**	**0.0**

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2017-18

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Atlanta	0	0	0.0	136	94.7	0.0	59.6	3.0	0.0	2.3	0.0
Total	**0**	**0**	**0.0**	**136**	**94.7**	**0.0**	**59.6**	**3.0**	**0.0**	**2.3**	**0.0**

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

State of Illinois

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2015-16

Assessment Area:	Total Home Mortgage Loans				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total	Overall Market	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate
Chicago	101	96,406	100.0	249,501	4.2	6.9	2.8	16.8	31.7	12.1	38.1	31.7	35.2	40.9	29.7	50.0	0.0	0.0	0.0
Total	**101**	**96,406**	**100.0**	**249,501**	**4.2**	**6.9**	**2.8**	**16.8**	**31.7**	**12.1**	**38.1**	**31.7**	**35.2**	**40.9**	**29.7**	**50.0**	**0.0**	**0.0**	**0.0**

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-18

Assessment Area:	Total Home Mortgage Loans				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total	Overall Market	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate
Chicago	178	259,584	100.0	195,095	4.9	0.6	4.0	17.5	8.4	14.9	34.8	8.4	33.9	42.7	82.0	47.1	0.2	0.6	0.2
Total	**178**	**259,584**	**100.0**	**195,095**	**4.9**	**0.6**	**4.0**	**17.5**	**8.4**	**14.9**	**34.8**	**8.4**	**33.9**	**42.7**	**82.0**	**47.1**	**0.2**	**0.6**	**0.2**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2015-16

	Total Home Mortgage Loans				Low Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Chicago	101	96,406	100.0	249,501	22.7	12.9	4.7	16.7	47.5	13.2	19.3	23.8	19.8	41.3	13.9	47.2	0.0	2.0	15.1
Total	**101**	**96,406**	**100.0**	**249,501**	**22.7**	**12.9**	**4.7**	**16.7**	**47.5**	**13.2**	**19.3**	**23.8**	**19.8**	**41.3**	**13.9**	**47.2**	**0.0**	**2.0**	**15.1**

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017-18

	Total Home Mortgage Loans				Low Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	**#**	**$**	**% of Total**	**Overall Market**	**% Families**	**% Bank Loans**	**Aggregate**	**% Families**	**% Bank Loans**	**Aggregate**	**% Families**	**% Bank Loans**	**Aggregate**	**% Families**	**% Bank Loans**	**Aggregate**	**% Families**	**% Bank Loans**	**Aggregate**
Chicago	178	259,584	100.0	195,095	23.8	0.6	7.1	16.2	6.7	17.4	18.4	2.8	21.3	41.5	88.8	39.1	0.0	1.1	15.1
Total	**178**	**259,584**	**100.0**	**195,095**	**23.8**	**0.6**	**7.1**	**16.2**	**6.7**	**17.4**	**18.4**	**2.8**	**21.3**	**41.5**	**88.8**	**39.1**	**0.0**	**1.1**	**15.1**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
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 2015-16

	Total Loans to Small Businesses				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	**#**	**$**	**% of Total**	**Overall Market**	**% Businesses**	**% Bank Loans**	**Aggregate**	**% Businesses**	**% Bank Loans**	**Aggregate**	**% Businesses**	**% Bank Loans**	**Aggregate**	**% Businesses**	**% Bank Loans**	**Aggregate**	**% Businesses**	**% Bank Loans**	**Aggregate**
Chicago	8	86	100.0	184,134	4.7	12.5	3.6	15.0	25.0	14.8	32.3	25.0	33.3	47.8	37.5	48.3	0.1	0.0	0.1
Total	**8**	**86**	**100.0**	**184,134**	**4.7**	**12.5**	**3.6**	**15.0**	**25.0**	**14.8**	**32.3**	**25.0**	**33.3**	**47.8**	**37.5**	**48.3**	**0.1**	**0.0**	**0.1**

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
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 2017-18

	Total Loans to Small Businesses				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	**#**	**$**	**% of Total**	**Overall Market**	**% Businesses**	**% Bank Loans**	**Aggregate**	**% Businesses**	**% Bank Loans**	**Aggregate**	**% Businesses**	**% Bank Loans**	**Aggregate**	**% Businesses**	**% Bank Loans**	**Aggregate**	**% Businesses**	**% Bank Loans**	**Aggregate**
Chicago	2	750	100.0	163,566	5.2	50.0	4.2	15.4	0.0	16.5	29.6	50.0	31.5	49.1	0.0	47.4	0.6	0.0	0.3
Total	**2**	**750**	**100.0**	**163,566**	**5.2**	**50.0**	**4.2**	**15.4**	**0.0**	**16.5**	**29.6**	**50.0**	**31.5**	**49.1**	**0.0**	**47.4**	**0.6**	**0.0**	**0.3**

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2015-16

	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
Assessment Area:	**#**	**$**	**% of Total**	**Overall Market**	**% Businesses**	**% Bank Loans**	**Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
Chicago	8	86	100.0	184,134	80.6	37.5	39.4	8.3	12.5	11.0	50.0
Total	**8**	**86**	**100.0**	**184,134**	**80.6**	**37.5**	**39.4**	**8.3**	**12.5**	**11.0**	**50.0**

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017-18

	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
Assessment Area:	**#**	**$**	**% of Total**	**Overall Market**	**% Businesses**	**% Bank Loans**	**Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
Chicago	1	750	100.0	163,566	80.8	100.0	48.3	8.1	0.0	11.1	100.0
Total	**1**	**750**	**100.0**	**163,566**	**80.8**	**100.0**	**48.3**	**8.1**	**0.0**	**11.1**	**100.0**

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

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2015-16

	Total Loans to Farms				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	**#**	**$**	**% of Total**	**Overall Market**	**% Farms**	**% Bank Loans**	**Aggregate**	**% Farms**	**% Bank Loans**	**Aggregate**	**% Farms**	**% Bank Loans**	**Aggregate**	**% Farms**	**% Bank Loans**	**Aggregate**	**% Farms**	**% Bank Loans**	**Aggregate**
Chicago	0	0	0.0	511	2.7	0.0	1.0	11.5	0.0	5.5	41.1	0.0	60.5	44.6	0.0	33.1	0.0	0.0	0.0
Total	**0**	**0**	**0.0**	**511**	**2.7**	**0.0**	**1.0**	**11.5**	**0.0**	**5.5**	**41.1**	**0.0**	**60.5**	**44.6**	**0.0**	**33.1**	**0.0**	**0.0**	**0.0**

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017-18

Assessment Area:	Total Loans to Farms				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Chicago	0	0	0.0	610	3.2	0.0	0.8	13.4	0.0	4.4	40.0	0.0	55.4	43.4	0.0	39.3	0.1	0.0	0.0
Total	**0**	**0**	**0.0**	**610**	**3.2**	**0.0**	**0.8**	**13.4**	**0.0**	**4.4**	**40.0**	**0.0**	**55.4**	**43.4**	**0.0**	**39.3**	**0.1**	**0.0**	**0.0**

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2015-16

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Chicago	0	0	0.0	511	93.5	0.0	54.2	3.8	0.0	2.7	0.0
Total	**0**	**0**	**0.0**	**511**	**93.5**	**0.0**	**54.2**	**3.8**	**0.0**	**2.7**	**0.0**

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2017-18

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Chicago	0	0	0.0	610	93.3	0.0	50.5	3.9	0.0	2.9	0.0
Total	**0**	**0**	**0.0**	**610**	**93.3**	**0.0**	**50.5**	**3.9**	**0.0**	**2.9**	**0.0**

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

State of New York

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2015-16

	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
New York	95	106,145	100.0	105,422	3.3	14.7	4.6	16.0	58.9	15.9	30.6	16.8	28.2	50.1	9.5	51.3	0.0	0.0	0.0
Total	**95**	**106,145**	**100.0**	**105,422**	**3.3**	**14.7**	**4.6**	**16.0**	**58.9**	**15.9**	**30.6**	**16.8**	**28.2**	**50.1**	**9.5**	**51.3**	**0.0**	**0.0**	**0.0**

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-18

	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
New York	15	115,916	100.0	114,555	3.7	20.0	5.6	16.0	40.0	16.9	29.4	20.0	26.8	50.8	20.0	50.6	0.1	0.0	0.1
Total	**15**	**115,916**	**100.0**	**114,555**	**3.7**	**20.0**	**5.6**	**16.0**	**40.0**	**16.9**	**29.4**	**20.0**	**26.8**	**50.8**	**20.0**	**50.6**	**0.1**	**0.0**	**0.1**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2015-16

	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**
New York	95	106,145	100.0	105,422	28.8	7.4	1.7	16.3	26.3	6.9	16.4	20.0	17.3	38.5	44.2	59.2	0.0	2.1	14.9
Total	**95**	**106,145**	**100.0**	**105,422**	**28.8**	**7.4**	**1.7**	**16.3**	**26.3**	**6.9**	**16.4**	**20.0**	**17.3**	**38.5**	**44.2**	**59.2**	**0.0**	**2.1**	**14.9**

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017-18

	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**
New York	15	115,916	100.0	114,555	29.8	0.0	3.2	15.5	26.7	6.7	15.5	6.7	15.8	39.3	40.0	56.7	0.0	26.7	17.6
Total	**15**	**115,916**	**100.0**	**114,555**	**29.8**	**0.0**	**3.2**	**15.5**	**26.7**	**6.7**	**15.5**	**6.7**	**15.8**	**39.3**	**40.0**	**56.7**	**0.0**	**26.7**	**17.6**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
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 2015-16

	Total Loans to Small Businesses				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	**#**	**$**	**% of Total**	**Overall Market**	**% Businesses**	**% Bank Loans**	**Aggregate**	**% Businesses**	**% Bank Loans**	**Aggregate**	**% Businesses**	**% Bank Loans**	**Aggregate**	**% Businesses**	**% Bank Loans**	**Aggregate**	**% Businesses**	**% Bank Loans**	**Aggregate**
New York	10	821	100.0	290,899	9.3	0.0	10.2	20.1	10.0	19.9	21.6	0.0	22.5	46.5	80.0	44.9	2.6	10.0	2.4
Total	**10**	**821**	**100.0**	**290,899**	**9.3**	**0.0**	**10.2**	**20.1**	**10.0**	**19.9**	**21.6**	**0.0**	**22.5**	**46.5**	**80.0**	**44.9**	**2.6**	**10.0**	**2.4**

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
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 2017-18

	Total Loans to Small Businesses				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	**#**	**$**	**% of Total**	**Overall Market**	**% Businesses**	**% Bank Loans**	**Aggregate**	**% Businesses**	**% Bank Loans**	**Aggregate**	**% Businesses**	**% Bank Loans**	**Aggregate**	**% Businesses**	**% Bank Loans**	**Aggregate**	**% Businesses**	**% Bank Loans**	**Aggregate**
New York	2	155	100.0	289,692	9.7	0.0	11.4	18.7	0.0	19.1	19.8	0.0	19.4	49.4	100.0	48.2	2.4	0.0	1.9
Total	**2**	**155**	**100.0**	**289,692**	**9.7**	**0.0**	**11.4**	**18.7**	**0.0**	**19.1**	**19.8**	**0.0**	**19.4**	**49.4**	**100.0**	**48.2**	**2.4**	**0.0**	**1.9**

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2015-16

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
New York	10	821	100.0	290,899	85.7	30.0	42.9	7.1	40.0	7.1	30.0
Total	**10**	**821**	**100.0**	**290,899**	**85.7**	**30.0**	**42.9**	**7.1**	**40.0**	**7.1**	**30.0**

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017-18

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
New York	2	155	100.0	289,692	86.2	50.0	49.9	6.8	0.0	7.0	50.0
Total	**2**	**155**	**100.0**	**289,692**	**86.2**	**50.0**	**49.9**	**6.8**	**0.0**	**7.0**	**50.0**

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

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2015-16

Assessment Area:	Total Loans to Farms				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
New York	0	0	0.0	192	3.2	0.0	5.7	12.3	0.0	15.1	21.2	0.0	17.7	62.6	0.0	59.9	0.6	0.0	1.6
Total	**0**	**0**	**0.0**	**192**	**3.2**	**0.0**	**5.7**	**12.3**	**0.0**	**15.1**	**21.2**	**0.0**	**17.7**	**62.6**	**0.0**	**59.9**	**0.6**	**0.0**	**1.6**

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017-18

Assessment Area:	Total Loans to Farms				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
New York	0	0	0.0	211	4.0	0.0	6.6	13.6	0.0	7.1	19.6	0.0	13.3	62.2	0.0	73.0	0.7	0.0	0.0
Total	**0**	**0**	**0.0**	**211**	**4.0**	**0.0**	**6.6**	**13.6**	**0.0**	**7.1**	**19.6**	**0.0**	**13.3**	**62.2**	**0.0**	**73.0**	**0.7**	**0.0**	**0.0**

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2015-16

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
New York	0	0	0.0	192	95.3	0.0	21.4	2.9	0.0	1.8	0.0
Total	**0**	**0**	**0.0**	**192**	**95.3**	**0.0**	**21.4**	**2.9**	**0.0**	**1.8**	**0.0**

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2017-18

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
New York	0	0	0.0	211	95.2	0.0	49.3	2.9	0.0	1.9	0.0
Total	**0**	**0**	**0.0**	**211**	**95.2**	**0.0**	**49.3**	**2.9**	**0.0**	**1.9**	**0.0**

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

State of Oregon

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2015-16

Assessment Area:	Total Home Mortgage Loans				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total	Overall Market	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate
Portland	285	136,463	94.4	89,257	1.2	2.5	1.4	19.0	14.4	19.2	47.5	35.1	47.8	32.3	48.1	31.6	0.0	0.0	0.0
Salem	17	2,999	5.6	15,048	0.0	0.0	0.0	11.9	11.8	11.4	60.2	58.8	59.1	28.0	29.4	29.5	0.0	0.0	0.0
Total	**302**	**139,462**	**100.0**	**104,305**	**1.0**	**2.3**	**1.2**	**17.8**	**14.2**	**18.1**	**49.7**	**36.4**	**49.4**	**31.5**	**47.0**	**31.3**	**0.0**	**0.0**	**0.0**

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-18

Assessment Area:	Total Home Mortgage Loans				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total	Overall Market	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate
Portland	529	285,237	96.2	72,246	1.0	1.1	1.1	19.6	23.6	21.9	44.8	29.5	45.3	34.6	45.7	31.7	0.0	0.0	0.0
Salem	21	3,882	3.8	14,482	1.0	4.8	1.3	15.3	19.0	16.7	51.4	33.3	49.4	32.3	42.9	32.6	0.0	0.0	0.0
Total	**550**	**289,119**	**100.0**	**86,728**	**1.0**	**1.3**	**1.1**	**18.9**	**23.5**	**21.0**	**45.9**	**29.6**	**46.0**	**34.2**	**45.6**	**31.8**	**0.0**	**0.0**	**0.0**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2015-16

	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**
Portland	285	136,463	94.4	89,257	20.7	3.2	2.7	17.5	11.6	13.2	21.0	13.7	23.0	40.8	66.3	46.2	0.0	5.3	14.9
Salem	17	2,999	5.6	15,048	19.9	11.8	2.2	18.8	17.6	12.4	21.1	23.5	22.3	40.2	35.3	43.1	0.0	11.8	20.0
Total	**302**	**139,462**	**100.0**	**104,305**	**20.6**	**3.6**	**2.7**	**17.7**	**11.9**	**13.1**	**21.1**	**14.2**	**22.9**	**40.7**	**64.6**	**45.7**	**0.0**	**5.6**	**15.6**

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017-18

	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**
Portland	529	285,237	96.2	72,246	21.6	2.5	3.2	17.0	15.9	13.7	20.0	14.6	24.4	41.3	64.7	47.3	0.0	2.5	11.3
Salem	21	3,882	3.8	14,482	21.5	4.8	2.4	17.2	19.0	12.7	20.5	28.6	25.2	40.7	42.9	44.7	0.0	4.8	14.9
Total	**550**	**289,119**	**100.0**	**86,728**	**21.6**	**2.5**	**3.1**	**17.1**	**16.0**	**13.6**	**20.1**	**15.1**	**24.5**	**41.2**	**63.8**	**46.9**	**0.0**	**2.5**	**11.9**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
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 2015-16

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
Portland	145	18,672	83.8	61,185	4.7	19.3	3.3	22.3	20.0	20.0	42.0	33.8	41.9	30.9	26.9	34.7	0.2	0.0	0.1
Salem	28	2,779	16.2	9,787	0.0	0.0	0.0	21.0	42.9	16.8	57.0	28.6	55.9	22.1	28.6	27.2	0.0	0.0	0.0
Total	**173**	**21,451**	**100.0**	**70,972**	**4.0**	**16.2**	**2.9**	**22.1**	**23.7**	**19.6**	**44.0**	**32.9**	**43.8**	**29.7**	**27.2**	**33.7**	**0.1**	**0.0**	**0.1**

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
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 2017-18

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
Portland	69	13,584	76.7	44,171	2.9	0.0	2.7	20.8	13.0	20.6	38.2	21.7	38.3	35.2	44.9	36.1	2.9	20.3	2.2
Salem	21	780	23.3	6,154	2.6	0.0	3.1	22.4	33.3	20.5	42.2	23.8	41.5	32.9	42.9	35.0	0.0	0.0	0.0
Total	**90**	**14,364**	**100.0**	**50,325**	**2.8**	**0.0**	**2.8**	**21.0**	**17.8**	**20.6**	**38.7**	**22.2**	**38.7**	**34.9**	**44.4**	**36.0**	**2.5**	**15.6**	**1.9**

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2015-16

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
Portland	145	18,672	83.8	61,185	87.5	42.8	41.1	4.8	47.6	7.7	9.7
Salem	28	2,779	22.7	9,787	85.8	67.9	38.2	4.3	32.1	9.9	0.0
Total	**173**	**21,451**	**100.0**	**70,972**	**87.3**	**46.8**	**40.7**	**4.7**	**45.1**	**8.0**	**8.1**

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017-18

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
Portland	69	13,584	76.7	44,171	87.5	26.1	53.4	4.6	44.9	7.8	29.0
Salem	21	780	23.3	6,154	85.7	81.0	52.3	4.2	12.5	10.1	14.3
Total	**90**	**14,364**	**100.0**	**50,325**	**87.3**	**38.9**	**53.3**	**4.6**	**35.6**	**8.1**	**25.6**

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

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2015-16

Assessment Area:	Total Loans to Farms				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Portland	3	83	100.0	576	1.8	0.0	1.2	14.8	0.0	9.7	53.1	33.3	60.2	30.1	66.7	28.8	0.1	0.0	0.0
Salem	0	0	0.0	398	0.0	0.0	0.0	8.1	0.0	3.8	72.2	0.0	81.9	19.8	0.0	14.3	0.0	0.0	0.0
Total	**3**	**83**	**100.0**	**974**	**1.3**	**0.0**	**0.7**	**13.1**	**0.0**	**7.3**	**58.2**	**33.3**	**69.1**	**27.4**	**66.7**	**22.9**	**0.1**	**0.0**	**0.0**

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017-18

Assessment Area:	Total Loans to Farms				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Portland	0	0	0.0	621	1.5	0.0	0.6	15.6	0.0	9.7	53.1	0.0	62.5	29.0	0.0	26.4	0.7	0.0	0.8
Salem	0	0	0.0	400	1.1	0.0	1.0	10.4	0.0	4.3	50.6	0.0	53.3	37.9	0.0	41.5	0.0	0.0	0.0
Total	**0**	**0**	**0.0**	**1,021**	**1.4**	**0.0**	**0.8**	**14.2**	**0.0**	**7.5**	**52.5**	**0.0**	**58.9**	**31.4**	**0.0**	**32.3**	**0.5**	**0.0**	**0.5**

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2015-16

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Portland	3	83	100.0	576	95.0	66.7	52.1	3.3	33.3	1.6	0.0
Salem	0	0	0.0	398	92.2	0.0	45.2	6.3	0.0	1.6	0.0
Total	**3**	**83**	**100.0**	**974**	**94.3**	**66.7**	**49.3**	**4.1**	**33.3**	**1.6**	**0.0**

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2017-18

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Portland	0	0	0.0	621	95.0	0.0	59.9	3.4	0.0	1.6	0.0
Salem	0	0	0.0	400	92.2	0.0	45.8	5.9	0.0	1.9	0.0
Total	**0**	**0**	**0.0**	**1,021**	**94.3**	**0.0**	**54.4**	**4.1**	**0.0**	**1.6**	**0.0**

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

State of Texas

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2015-16

Assessment Area:	Total Home Mortgage Loans				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total	Overall Market	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate
Dallas	100	36,409	54.6	176,529	5.3	5.0	2.4	19.3	41.0	9.7	29.8	21.0	29.3	45.6	33.0	58.6	0.0	0.0	0.0
Houston	83	12,633	45.9	191,261	4.0	3.6	1.6	21.2	27.7	10.9	30.4	37.3	29.4	44.4	31.3	58.1	0.0	0.0	0.0
Total	**183**	**49,042**	**100.0**	**367,790**	**4.6**	**4.4**	**2.0**	**20.4**	**35.0**	**10.4**	**30.1**	**28.4**	**29.3**	**44.9**	**32.2**	**58.3**	**0.0**	**0.0**	**0.0**

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-18

Assessment Area:	Total Home Mortgage Loans				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total	Overall Market	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate
Dallas	19	2,849	39.6	155,657	5.4	0.0	3.3	20.4	31.6	13.4	28.9	47.4	30.6	45.2	21.1	52.5	0.1	0.0	0.1
Houston	29	4,196	60.4	175,062	5.2	17.2	2.8	21.3	27.6	14.2	29.4	24.1	28.6	44.1	31.0	54.4	0.1	0.0	0.0
Total	**48**	**7,045**	**100.0**	**330,719**	**5.3**	**10.4**	**3.0**	**20.9**	**29.2**	**13.8**	**29.2**	**33.3**	**29.6**	**44.5**	**27.1**	**53.5**	**0.1**	**0.0**	**0.1**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2015-16

	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
Dallas	100	21,875	54.6	176,529	23.1	12.0	3.0	16.6	51.0	10.5	18.3	11.0	17.0	42.1	24.0	51.8	0.0	2.0	17.7
Houston	83	12,633	45.4	191,261	23.7	12.0	2.4	16.5	60.2	10.6	17.6	4.8	17.5	42.2	22.9	50.8	0.0	0.0	18.7
Total	**183**	**27,167**	**100.0**	**367,790**	**23.4**	**12.0**	**2.7**	**16.6**	**55.2**	**10.6**	**17.9**	**8.2**	**17.2**	**42.1**	**23.5**	**51.3**	**0.0**	**1.1**	**18.2**

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017-18

	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
Dallas	19	2,849	39.6	155,657	23.7	5.3	4.2	16.5	73.7	12.7	17.6	0.0	19.4	42.2	21.1	47.1	0.0	0.0	16.6
Houston	29	4,196	60.4	175,062	24.4	10.3	4.6	16.1	51.7	14.2	17.1	10.3	19.4	42.4	27.6	43.2	0.0	0.0	18.5
Total	**48**	**7,045**	**100.0**	**330,719**	**24.1**	**8.3**	**4.4**	**16.3**	**60.4**	**13.5**	**17.3**	**6.3**	**19.4**	**42.3**	**25.0**	**45.0**	**0.0**	**0.0**	**17.6**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
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 2015-16

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
Dallas	4	1,070	36.4	118,002	8.1	0.0	7.9	17.4	25.0	16.6	25.9	50.0	24.1	48.3	25.0	51.3	0.2	0.0	0.2
Houston	7	656	63.6	154,577	8.0	14.3	7.5	19.3	0.0	18.2	25.3	14.3	25.0	47.4	71.4	49.3	0.1	0.0	0.0
Total	**11**	**1,726**	**100.0**	**272,579**	**8.0**	**9.1**	**7.7**	**18.5**	**9.1**	**17.5**	**25.5**	**27.3**	**24.6**	**47.8**	**54.5**	**50.2**	**0.1**	**0.0**	**0.1**

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
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 2017-18

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
Dallas	6	1,591	75.0	110,897	7.3	0.0	7.6	18.8	50.0	19.1	26.2	50.0	25.4	46.9	0.0	47.0	0.8	0.0	0.9
Houston	7	1,899	140.0	148,304	9.8	0.0	10.0	19.1	0.0	19.0	23.6	14.3	23.7	47.3	85.7	47.2	0.2	0.0	0.2
Total	**13**	**3,490**	**100.0**	**259,201**	**8.7**	**0.0**	**8.9**	**18.9**	**23.1**	**19.0**	**24.8**	**30.8**	**24.4**	**47.1**	**46.2**	**47.1**	**0.5**	**0.0**	**0.5**

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2015-16

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
Dallas	4	1,070	36.4	118,002	85.4	75.0	42.5	5.5	25.0	9.1	0.0
Houston	7	656	63.6	154,577	85.3	42.9	40.7	5.8	42.9	8.9	14.3
Total	**11**	**1,726**	**100.0**	**272,579**	**85.3**	**54.5**	**41.5**	**5.6**	**36.4**	**9.0**	**9.1**

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017-18

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
Dallas	6	1,591	62.5	110,897	85.9	0.0	47.1	5.2	60.0	9.0	50.0
Houston	7	1,899	53.8	148,304	85.4	0.0	45.6	5.8	57.1	8.8	42.9
Total	**13**	**3,490**	**100.0**	**259,201**	**85.6**	**0.0**	**46.3**	**5.5**	**53.8**	**8.9**	**46.2**

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

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2015-16

Assessment Area:	Total Loans to Farms				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Dallas	0	0	0.0	587	5.6	0.0	4.9	16.7	0.0	15.2	32.7	0.0	45.7	44.9	0.0	34.2	0.1	0.0	0.0
Houston	0	0	0.0	740	4.3	0.0	1.6	17.8	0.0	16.6	33.6	0.0	49.1	44.2	0.0	32.7	0.0	0.0	0.0
Total	**0**	**0**	**0.0**	**1,327**	**4.9**	**0.0**	**3.1**	**17.3**	**0.0**	**16.0**	**33.2**	**0.0**	**47.6**	**44.5**	**0.0**	**33.4**	**0.0**	**0.0**	**0.0**

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017-18

Assessment Area:	Total Loans to Farms				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Dallas	0	0	0.0	690	5.4	0.0	1.7	17.7	0.0	16.4	32.2	0.0	48.3	44.0	0.0	33.5	0.6	0.0	0.1
Houston	0	0	0.0	834	5.3	0.0	2.8	17.1	0.0	17.3	31.6	0.0	41.2	45.9	0.0	38.6	0.1	0.0	0.1
Total	**0**	**0**	**0.0**	**1,524**	**5.4**	**0.0**	**2.3**	**17.4**	**0.0**	**16.9**	**31.9**	**0.0**	**44.4**	**45.0**	**0.0**	**36.3**	**0.3**	**0.0**	**0.1**

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2015-16

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Dallas	0	0	0.0	587	94.9	0.0	51.4	2.8	0.0	2.3	0.0
Houston	0	0	0.0	740	95.2	0.0	54.2	2.7	0.0	2.1	0.0
Total	**0**	**0**	**0.0**	**1,327**	**95.1**	**0.0**	**53.0**	**2.7**	**0.0**	**2.2**	**0.0**

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2017-18

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Dallas	0	0	0.0	690	94.9	0.0	59.6	2.6	0.0	2.5	0.0
Houston	0	0	0.0	834	95.0	0.0	57.9	2.7	0.0	2.4	0.0
Total	**0**	**0**	**0.0**	**1,524**	**94.9**	**0.0**	**58.7**	**2.6**	**0.0**	**2.4**	**0.0**

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

State of Washington

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2015-16

Assessment Area:	Total Home Mortgage Loans				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total	Overall Market	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate
Seattle	1,706	1,135,301	97.6	175,475	1.6	1.8	1.7	15.6	14.7	14.6	50.3	34.9	51.0	32.5	48.6	32.7	0.0	0.0	0.0
Bremerton	42	24,609	2.4	11,828	0.0	0.0	0.0	13.2	2.4	14.0	61.7	19.0	61.7	25.1	78.6	24.2	0.0	0.0	0.0
Total	**1,748**	**1,159,910**	**100.0**	**187,303**	**1.5**	**1.7**	**1.5**	**15.4**	**14.4**	**14.6**	**51.1**	**34.6**	**51.6**	**32.0**	**49.3**	**32.2**	**0.0**	**0.0**	**0.0**

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-18

Assessment Area:	Total Home Mortgage Loans				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total	Overall Market	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate
Seattle	3,029	1,882,820	97.5	149,311	2.6	1.8	2.7	17.8	16.9	19.3	46.2	33.5	47.5	33.4	47.7	30.5	0.0	0.0	0.0
Bremerton	78	45,346	2.5	11,576	0.6	0.0	0.7	14.7	2.6	17.8	63.5	15.4	62.8	21.2	82.1	18.6	0.0	0.0	0.0
Total	**3,107**	**1,928,167**	**100.0**	**160,887**	**2.5**	**1.8**	**2.5**	**17.6**	**16.6**	**19.2**	**47.5**	**33.1**	**48.6**	**32.5**	**48.5**	**29.6**	**0.0**	**0.0**	**0.0**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

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

2015-16

	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**
Seattle	1,706	1,135,301	97.6	175,475	20.2	4.2	3.7	17.9	14.2	14.4	22.2	9.9	22.9	39.7	67.6	45.2	0.0	4.0	13.7
Bremerton	42	24,609	6.0	11,828	17.9	0.0	4.2	19.0	4.8	17.1	22.9	2.4	23.9	40.2	88.1	35.6	0.0	4.8	19.2
Total	**1,748**	**1,159,910**	**100.0**	**187,303**	**20.1**	**4.1**	**3.8**	**18.0**	**14.0**	**14.6**	**22.2**	**9.7**	**23.0**	**39.7**	**68.1**	**44.6**	**0.0**	**4.1**	**14.1**

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

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

2017-18

	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**
Seattle	3,029	1,882,820	97.5	149,311	21.2	3.0	4.1	17.6	11.4	16.3	20.8	15.7	24.9	40.4	67.5	44.3	0.0	2.3	10.4
Bremerton	78	45,346	5.3	11,576	19.3	0.0	3.5	18.7	7.7	16.7	21.9	7.7	27.3	40.1	83.3	40.2	0.0	1.3	12.3
Total	**3,107**	**1,928,167**	**100.0**	**160,887**	**21.1**	**3.0**	**4.1**	**17.7**	**11.3**	**16.3**	**20.9**	**15.5**	**25.1**	**40.3**	**67.9**	**44.0**	**0.0**	**2.3**	**10.5**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
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 2015-16

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
Seattle	1,115	78,156	95.7	114,813	4.8	5.5	4.0	17.7	24.0	15.8	44.9	43.5	45.8	32.5	27.0	34.3	0.1	0.0	0.0
Bremerton	50	2,300	4.3	6,598	0.0	0.0	0.0	14.7	0.0	11.7	54.1	64.0	56.8	31.1	36.0	31.5	0.0	0.0	0.0
Total	**1,165**	**80,456**	**100.0**	**121,411**	**4.5**	**5.2**	**3.8**	**17.5**	**23.0**	**15.6**	**45.5**	**44.4**	**46.4**	**32.4**	**27.4**	**34.1**	**0.1**	**0.0**	**0.0**

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
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 2017-18

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
Seattle	479	58,607	96.4	79,299	5.9	7.3	5.7	19.4	18.0	18.4	39.2	40.1	40.0	35.1	34.7	35.5	0.4	0.0	0.4
Bremerton	18	891	3.6	3,812	2.1	0.0	2.0	15.4	0.0	13.5	54.9	61.1	55.9	27.7	38.9	28.7	0.0	0.0	0.0
Total	**497**	**59,498**	**100.0**	**83,111**	**5.7**	**7.0**	**5.6**	**19.2**	**17.3**	**18.2**	**40.0**	**40.8**	**40.7**	**34.7**	**34.8**	**35.2**	**0.4**	**0.0**	**0.4**

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2015-16

	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
Assessment Area:	**#**	**$**	**% of Total**	**Overall Market**	**% Businesses**	**% Bank Loans**	**Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
Seattle	1,115	78,156	95.7	114,813	86.3	57.8	38.9	5.2	33.5	8.5	8.8
Bremerton	50	2,300	4.3	6,598	87.9	74.0	39.0	3.5	16.0	8.6	10.0
Total	**1,165**	**80,456**	**100.0**	**121,411**	**86.3**	**58.5**	**39.0**	**5.1**	**32.7**	**8.5**	**8.8**

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017-18

	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
Assessment Area:	**#**	**$**	**% of Total**	**Overall Market**	**% Businesses**	**% Bank Loans**	**Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
Seattle	479	58,607	96.4	79,299	86.0	41.3	50.3	5.1	37.8	8.9	20.9
Bremerton	18	891	3.6	3,812	87.5	33.3	50.2	3.6	38.9	8.9	27.8
Total	**497**	**59,498**	**100.0**	**83,111**	**86.1**	**41.0**	**50.3**	**5.0**	**37.8**	**8.9**	**21.1**

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

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2015-16

	Total Loans to Farms				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	**#**	**$**	**% of Total**	**Overall Market**	**% Farms**	**% Bank Loans**	**Aggregate**	**% Farms**	**% Bank Loans**	**Aggregate**	**% Farms**	**% Bank Loans**	**Aggregate**	**% Farms**	**% Bank Loans**	**Aggregate**	**% Farms**	**% Bank Loans**	**Aggregate**
Seattle	9	80	81.8	296	2.2	0.0	0.3	15.3	22.2	10.1	52.1	44.4	55.4	30.5	33.3	34.1	0.0	0.0	0.0
Bremerton	2	35	18.2	30	0.0	0.0	0.0	7.2	0.0	6.7	59.5	50.0	40.0	33.3	50.0	53.3	0.0	0.0	0.0
Total	**11**	**115**	**100.0**	**326**	**2.0**	**0.0**	**0.3**	**14.6**	**18.2**	**9.8**	**52.7**	**45.5**	**54.0**	**30.7**	**36.4**	**35.9**	**0.0**	**0.0**	**0.0**

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017-18

Assessment Area:	Total Loans to Farms				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Seattle	1	4	100.0	327	3.7	0.0	0.9	17.4	0.0	9.5	46.8	100.0	55.7	32.1	0.0	33.6	0.1	0.0	0.3
Bremerton	1	25	100.0	27	0.9	0.0	0.0	9.2	0.0	14.8	60.7	0.0	33.3	29.2	100.0	51.9	0.0	0.0	0.0
Total	**1**	**25**	**100.0**	**354**	**3.4**	**0.0**	**0.8**	**16.7**	**0.0**	**9.9**	**48.0**	**100.0**	**54.0**	**31.8**	**100.0**	**35.0**	**0.1**	**0.0**	**0.3**

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2015-16

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Seattle	9	80	81.8	296	95.0	77.8	54.1	3.1	11.1	1.8	11.1
Bremerton	2	35	18.2	30	97.4	50.0	40.0	2.0	0.0	0.6	50.0
Total	**11**	**115**	**100.0**	**326**	**95.2**	**72.7**	**52.8**	**3.0**	**9.1**	**1.7**	**18.2**

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2017-18

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Seattle	1	4	100.0	327	95.0	0.0	54.1	3.0	0.0	2.0	100.0
Bremerton	1	25	100.0	27	97.9	100.0	55.6	1.6	0.0	0.5	0.0

Total	**2**	**29**	**100.0**	**354**	**95.3**	**100.0**	**54.2**	**2.9**	**0.0**	**1.9**	**100.0**

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