



**WHOLESALE BANK**

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## **PUBLIC DISCLOSURE**

April 20, 2009

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

Sterling National Bank  
Charter Number: 13295

650 Fifth Avenue  
New York, N.Y. 10019-6108

Office of the Comptroller of the Currency

New York Metro Field Office  
340 Madison Avenue, 4<sup>th</sup> Floor  
New York, N.Y. 10173-0002

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

## **INSTITUTION'S CRA RATING:**

**This institution is rated “Outstanding”.**

Principal conclusions are:

- Sterling National Bank (“SNB”) has a high level of community development loans and community development services. The bank also has an adequate level of qualified investment activity. Bank officers and other bank employees have provided services that were responsive to identified community needs;
- The bank does not use innovative or complex qualified investments, community development loans, or community development services. The bank makes general type of qualified investments that are customarily provided by private investors; and
- The bank exhibits excellent responsiveness to credit and community economic development needs in its assessment area.

## Scope of the Examination

In evaluating the bank's performance under the CRA, we reviewed community development activities from July 1, 2005 through December 31, 2008. We reviewed the level and nature of qualified investments, community development lending, and community development services submitted for consideration. At the prior examination dated September 7, 2005, we rated the bank "Outstanding".

SNB presented for consideration loans, services and investments that have community development as their primary purpose during this evaluation period. One hundred percent of the bank's activities were within or directly benefited the delineated assessment area. The bank has adequately addressed its assessment area needs, and therefore, qualified investments made outside of its assessment area, and/or community development loans and services would be considered in evaluating its performance. Activities considered in this evaluation were conducted directly by SNB.

## Description of Institution

SNB was organized in 1929 under the National Bank Act and commenced operations in New York City. The bank maintains twelve offices in New York: nine offices in New York City (four branches and an International Banking Facility in Manhattan, and four branches in Queens); two branches in Nassau County (one in Great Neck and the other in Woodbury, New York); and one branch in Yonkers. The main office is located at 650 Fifth Avenue, New York, NY. There were no branch closings during the evaluation period. SNB is the principal banking subsidiary of Sterling Bancorp, a NY-based banking and financial services company with assets of \$2.2 billion.

The bank is renowned for its focus on business customers, and having an extensive and diverse product portfolio. The bank offers working capital lines, asset-based financing, factoring, accounts receivable financing and management, payroll funding and processing, equipment leasing and financing, commercial mortgages, import trade financing, a wide array of depository products and cash management services, trust and estate administration and custodial account services. There are no industry concentrations in the commercial and industrial loan portfolio that exceed 10% of gross loans. Approximately 75% of the bank's loans are to borrowers located in the New York metropolitan area. The bank has no foreign loans.

SNB was designated a wholesale institution by the Office of the Comptroller of the Currency (OCC) on February 22, 2001 for evaluation under the Community Reinvestment Act (CRA). An institution so designated is evaluated pursuant to the community development test, which assesses a bank's record of meeting assessment area credit needs through community development lending, qualified investments or community development services, as applicable.

As of December 31, 2008, SNB reported average assets of \$2.1 billion compared to \$1.8 billion as of December 31, 2005. Assets are centered in loans (\$1.2 billion or 59%) and investment securities (\$807 million or 39%). Commercial loans totaling \$683 million account

for 52% of average loans and leases; real estate loans, mainly composed of commercial real estate and 1-4 family residential, and lease financing represent 24% (\$288 million) and 21% (\$256 million) respectively. The investment portfolio consists primarily of \$756 million of U.S. Treasury and Agency securities (94%), followed by municipal securities of \$23 million (3%), and all other securities totaling \$13 million (2%). Total deposits are approximately \$1.5 billion and comprised of \$150 million in demand deposits (10%), NOW accounts of \$32 million (2%), money market deposits of \$333 million (23%), other savings deposits of \$610 million (42%), time deposits under \$100 thousand of \$117 million (8%), and time deposits of \$100 thousand or more of \$211 million (15%). Tier 1 Capital is \$138 million.

SNB is not subject to any financial, legal, or regulatory restrictions that could obstruct its ability to help meet the credit needs of its assessment area.

**Table 1: Financial Information (000s)**

	Year-end 2005	Year-end 2006	Year-end 2007	Year-end 2008	Average for Evaluation Period
<b>Tier 1 Capital</b>	119,910	122,819	132,213	138,453	128,349
<b>Total Income</b>	142,168	151,050	156,640	152,782	150,660
<b>Net Operating Income</b>	27,235	25,523	19,598	19,514	22,968
<b>Total Assets</b>	1,963,135	1,851,415	1,987,908	2,196,255	1,999,678

Source: Consolidated Report of Condition and Income and bank reported data.

## Description of Assessment Area – New York

SNB is an intrastate community bank, operates in a large urban area, and has identified the entire New York-Wayne-White Plains NY-NJ Metropolitan Statistical Area (#35644) as its Assessment Area (AA). The bank's AA consists of the five counties of New York City (Bronx, Kings, New York, Richmond and Queens) with a total population of 10.266 million according to the 2000 U.S. Census Report. Census and HUD estimated MSA median family income for 2009 were \$49,461 & \$64,800 respectively. The AA does not arbitrarily exclude low- and moderate-income ("LMI") geographies.

The New York-White Plains-Wayne, NY-NJ Metropolitan Division includes eleven counties in New York and the State of New Jersey. The counties in New York City comprise of Kings (Brooklyn), Queens, New York (Manhattan), Bronx, and Richmond (Staten Island). It also includes the Counties of Westchester, Rockland and Putnam in New York State. In New Jersey, it includes the Counties of Bergen, Hudson and Passaic. The five counties in New York City are also called boroughs and if the boroughs were each independent cities, four of the boroughs (Brooklyn, Queens, Manhattan, and the Bronx) would be among the ten most populous cities in the United States. Manhattan is the most densely populated borough and is the financial center of the city.

The states of New York & New Jersey are both ranked among the top 10 fastest growing immigration states in America. As of 2006, New York was the third largest state in population,

after California & Texas with an estimated population of 19,490,297 as of July 1, 2008. This represents an increase of 513,481 or 2.7% since the last census in 2000.

New York City is a global hub of international business and commerce and is one of three “command centers” for the world economy (along with London & Tokyo). The city is a major center for finance, insurance, real estate, media and the arts in the United States. The New York metropolitan area had an estimated gross metropolitan product of \$1.13 trillion in 2005, the largest regional economy in the United States and second largest city economy in the world. Many major corporations are headquartered in New York City, including 43 Fortune 500 companies. New York is also unique among American cities for its large number of foreign corporations. One of ten private sector jobs in the city is with a foreign company.

New York City is the most populous city in the United States with an estimated population of 8.3 million in 2007, up from 7.3 million in 1990. This amounts to about 40% of New York State’s population and a similar percentage of the metropolitan regional population. New York’s two key demographic features are its population density and cultural diversity. New York City is exceptionally diverse. Throughout its history, the city has been a major point of entry for immigrants.

New York City has a high degree of income disparity. In 2005, the median household income in the wealthiest census tract was \$188,697, while in the poorest it was \$9,320. The disparity is driven by wage growth in high-income brackets, while wages have been stationary for middle- and lower-income brackets. Home ownership in New York City is approximately 33%, which is much lower than the national average of 69%. Rental vacancy is between 3% and 4.5%, well below the 5% threshold defined to be a housing emergency and used to justify the continuation of rent control and rent stabilization. About 33% of rental units are rent-stabilized. Finding housing, particularly affordable housing, in New York City can be challenging.

**Table 2: Assessment Area Description**

	Number	Low	Moderate	Middle	Upper
<b>Tracts</b>	2,715	12%	24%	32%	29%
<b>Families</b>	2,456,513	13%*	26%*	32%*	29%*
<b>Businesses</b>	881,800	7%**	18%**	29%**	46%**

Source: Demographic Data – 2000 U.S. Census. \*Represents families by income level. \*\*Represents businesses by income level of census tract.

We contacted two not-for-profit community based organizations; Ohel Children’s Home and Family Services, and South Bronx Overall Economic Development Corp. (SoBRO), during this evaluation period.

Ohel Children’s Home and Family Services was established in 1969 to provide homes and families for abandoned, neglected, abused, and disabled Jewish children. Today, the organization extends its services to LMI communities in the five boroughs of New York City, Long Island, and Rockland County, regardless of their religious background. Its seven core services, which encompass 26 programs, are housing, foster care, outpatient counseling, at-home services, school-based programs, camps, and sexual abuse services. Ohel’s staff consists of over one thousand full and part-time professionals, including psychiatrists, psychologists, certified social workers, nurses, and counselors. They also have a volunteer

base of more than 800 teen-age, adult and senior volunteers who serve the community as tutors, respite workers, escorts, vocational trainers, mentors, and more. The organization serves an average of 350 people on a monthly basis.

Approximately 86% of Ohel's financing is derived from federal, state, and local government support through Medicaid, the NYS Office of Mental Retardation and Developmental Disabilities (OMRDD), and the NYC Department of Health & Mental Hygiene. The remaining 14% is obtained from the private sector through grants, donations, and special events. About 61% of the organization's \$49 million budget is devoted to housing services, 10% to outpatient counseling services, 7% to at-home services, and the remaining 22% is distributed amongst its other services and any other programs that may be deficit.

Our contact at Ohel, reported that SNB has been the organizations primary banking partner for approximately nine years. SNB has made available various banking products, such as deposit accounts and a lending relationship totaling \$8 million, as well as a \$1,800 grant to the organization in 2008. The contact reported that the organization is involved with various local and large banks, but that SNB has been particularly effective in meeting its credit needs as it has extended funds whenever Ohel was in need and provided adequate credit terms. SNB's continuous lending support has enabled the organization to provide health related services even when Medicaid delays payments, and to acquire and renovate homes to be converted to group homes for mentally impaired individuals under the Prior Property Approval Program managed by the Office of OMRDD.

SoBRO was established in 1972 to reverse the flight of businesses from the South Bronx. The organization's early focus was on commercial revitalization and industrial development. Later, the organization became involved in the development and maintenance of residential housing. Today, the organization has taken on the four essentials of economic development – community and economic renewal, housing and real estate development, adult education and career development, and youth education. Approximately 250 people come into the organization's representative offices each day for assistance and/or to bring issues to the organization's attention. Over 3,000 adults and children are involved in training programs, and there are over 1,000 adults and teens involved in the Summer Youth Program. In addition, the organization manages 500 residential units, all of which are occupied. The organization has helped thousands of other individuals obtain permanent housing via rental subsidies, and it has assisted hundreds of small business owners obtain financing via the Community Development Financial Institution (CDFI).

About two-thirds of the organization's financing is derived from federal, state, city, and local governments. The remaining portion is obtained from private support, commercial rent, management and development fees, and special events. About 75 percent of the organization's \$12 million annual budget is devoted to direct program services.

The contact at SoBRO, reported that SNB has provided financial support to the organization since 2005, with contributions totaling \$4,500. The contact added that financial institutions in general, have been quite instrumental in helping the organization achieve its goals in the past by financing numerous commercial real estate (CRE) projects, which included the construction and rehabilitation of commercial, industrial and residential spaces. Given the recent deterioration in the CRE market, the organization has found it difficult to obtain financing at a reasonable cost to support the 1,200 unit development project that is underway, especially

since these projects present additional risks as the sites contain environmental contamination and must be rezoned from commercial/industrial to residential.

### Description of Assessment Area – Nassau & Suffolk

Nassau-Suffolk, is part of the New York MSA under the NY Metropolitan Division #35004. Nassau County is a suburban county in the New York Metropolitan Area east of New York City. As of the 2000 Census, the population was 1,334,544. Nassau and Suffolk counties together are generally referred to as “Long Island” by area residents – as distinct from the New York City boroughs of Queens and Brooklyn, which physically make up the island’s westernmost end.

**Table 3: Assessment Area Description**

	Number	Low	Moderate	Middle	Upper
<b>Tracts</b>	597	0.67%	14%	63%	20%
<b>Families</b>	712,551	0.60%	14%	65%	20%
<b>Businesses</b>	291,803	0.80%	13%	63%	23%

Source: Demographic Data – 2000 U.S. Census. \*Represents families by income level. \*\*Represents businesses by income level of census tract.

There are four low-income and eighty-four moderate-income tracts in the AA. The number of low-income tracts increased from two in 2004, while the number of moderate-income tracts increased from twenty. Only 0.22% of owner-occupied units were located in low-income tracts and 12% were in moderate-income tracts. As of 2008, Nassau County is the second wealthiest county per capita in the State of New York and the tenth wealthiest in the nation, with a median household income of \$85,994. Therefore, this explains the low percentages in the low- to moderate-income area.

## Conclusions about Performance

### Summary

SNB's performance for the evaluation period is "Outstanding." The level of community development activities is high and exceeds the level of such activities during the prior assessment period. All of the bank's community development activities directly benefit the AA. The majority of community development loans (94%) were granted to organizations that provide various types of community services to individuals and families. All qualifying investments assist in providing affordable mortgage LMI individuals (i.e., mortgage-backed securities). SNB, through its officers and other personnel, have provided an adequate level of community development services during the evaluation period.

SNB has demonstrated excellent responsiveness to the needs of its AA through a high level of loans to organizations that provide vital community services and develop affordable housing for LMI individuals and families. SNB has responded to the need for affordable mortgage loans for LMI individuals by purchasing a high level of mortgage-backed securities (MBS) comprised of mortgage loans to LMI individuals within the bank's AA. Further, SNB has responded to the need for economic development by sponsoring numerous seminars for small business owners.

The bank does not utilize innovative or complex qualified investments, loans, or services. Qualified investments made by SNB are generally of the type routinely provided by private investors.

### Qualified Investments

As noted in Table 4, qualified investments totaled nearly \$21 million compared to \$19 million during the prior evaluation period. All of SNB's investments directly benefited the bank's AA. The bank did not sell any investments, and approximately \$8 million of the qualified investments were purchased during this evaluation period. None of the investments were considered innovative or complex. Below are some examples of the bank's qualified investments:

- SNB purchased nearly \$8.4 million in MBS that are supported by mortgages to LMI individuals and families within the AA.
- Over \$12 million of qualified MBS purchased during prior periods remain outstanding.
- SNB maintains two \$100 thousand certificates of deposit from a community development financial institution (CDFI). The CDFI uses the funds to make community development loans within the bank's AA.

Other investments consist of qualifying contributions and donations to organizations engaged in affordable housing, economic development, or those serving LMI housing or other



community development directed to LMI individuals. Most notably, the bank contributed over \$130 thousand during the assessment period to the Federal Home Loan Bank's Affordable Housing Program, which funds numerous affordable housing initiatives in the New York area.

**Table 4: Qualified Investment Activity (\$000s)**

	Benefits AA	Outside AA	Totals
<b>Originated Investments</b>	\$8,347	0	\$8,347
<b>Originated Grants</b>	\$188	0	\$188
<b>Prior-Period Investments that Remain Outstanding</b>	\$12,323	0	\$12,323
<b>Total Qualified Investments</b>	\$20,858	0	\$20,858

As depicted in Table 5 below, total qualified investments to average Tier 1 capital declined since the last evaluation period from 17.5% to 16.3% despite the fact that the level of qualified investments increased. In addition, total qualified investments to average total income declined from 15.3% during the last evaluation period to 13.8%. These declines can be attributed to increases of approximately \$19 million in average Tier 1 capital and \$26 million in average total income since the prior evaluation period.

**Table 5: Qualified Investment Percentages**

	Benefits AA (%)	Outside AA (%)	Total (%)
<b>Total Investments/Average Tier 1 Capital</b>	16.3%	0%	16.3%
<b>Total Investments/Average Total Income</b>	13.8%	0%	13.8%

## Community Development Lending

The bank originated a high level of community development loans during the evaluation period. The bank originated twenty loans totaling \$33.7 million that qualified under the community development definition in the CRA regulation (12 CFR 25) compared to \$26.2 million during the prior evaluation period. None of the loans originated during this evaluation period were outside of the bank's AA. Approximately 94% of community development loans, representing nearly \$32 million, provide community services to LMI individuals and families within the bank's AA. The remaining loans support the development of affordable housing and economic development by financing small businesses that are creating or retaining jobs for LMI people or jobs that are located in LMI areas. None of the loans were considered innovative or complex in nature. Examples of the community development loans originated during the evaluation period include:

- \$6 million line of credit to a not-for-profit charitable membership association that manages and supports seven hospitals and nursing facilities within the bank's AA. In addition, SNB originated loans totaling more than \$4 million to some members of the charitable association.

- \$8 million line of credit to a not-for-profit organization that provides homes and families for abandoned, neglected, abused, and disabled children within the bank’s AA.

Participation of \$1.7 million in syndicated revolving line of credit and secured collateral trust note to a private, non-profit institution that specializes in financing affordable housing for LMI individuals.

**Table 6: Community Development Lending Percentages**

	<b>Benefits AA (%)</b>	<b>Outside AA (%)</b>	<b>Total (%)</b>
<b>Total CD Lending/Average Tier 1 Capital</b>	26.2%	0%	26.2%
<b>Total CD Lending/Average Total Income</b>	22.4%	0%	22.4%

As depicted in Table 6 above, total community development lending to average Tier 1 capital has increased from 24% during the prior evaluation period to 26.2%. In addition, total community development lending to average total income has increased from 21% during the prior evaluation period to 22.4%. These increases represent the growth in community development lending outpacing the growth of average Tier 1 capital and average total income.

## Community Development Services

SNB, through its officers and other bank employees, have provided an adequate level of community development services during the evaluation period. The bank hosted and participated in various seminars to small business owners in LMI geographies regarding financing opportunities and surviving despite the recent deterioration in market conditions. The bank also hosted a mortgage seminar for residents of the LMI neighborhood of Jamaica, Queens. In addition, the bank held two fundraisers during the assessment period to raise funds for adults and children at risk of hunger and domestic violence.

Management involvement in community development services during the evaluation period included the following:

- Assisting in providing economic development opportunities and enhancing the quality of life for local residents in the Jamaica section of Queens in conjunction with the Sutphin Boulevard Business Improvement District.
- Assisting in fund raising activities in conjunction with the Queens Boulevard Kiwanis Club to provide neighborhood children the opportunity to attend day camp during the summer season.
- Serving on a panel with the Nassau County Office of Minority Affairs for financing minority and women-owned businesses.
- Providing technical and financial counsel to the New York Business Development Corporation to assist partner banks in making loans to minority and women-owned businesses.
- Counseling the CUNY Graduate Center regarding homeownership education opportunities for LMI individuals and families.

## **Fair Lending or Other Illegal Credit Practices Review**

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation. 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 both companies are directly or indirectly controlled by the same company. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Assessment Area (AA):** A geographic area that consists generally of one or more MSAs (using the MSA boundaries that were in effect as of January 1 of the calendar year in which the delineation is made) or one or more contiguous political subdivisions, such as counties, cities, or towns, in which the bank has its main office, branches, and deposit-taking ATMs.

**Benefit to Assessment Area:** A qualified Community Development activity benefits the assessment area if (i) the activity benefits areas within the assessment area, or (ii) the activity has the potential to benefit the assessment area and is located in the broader statewide or regional area that includes the bank's assessment area. If a bank has adequately addressed the needs of its assessment area, then the OCC also considers activities submitted by the bank that benefit areas outside of its assessment area.

**CEBA:** Competitive Equality Banking Act of 1987, which permitted corporations to form limited-purpose credit card banks, whose operations are restricted to credit card activities, without the corporation becoming subject to the limitations of a "bank holding company" under the Bank Holding Company Act. A CEBA credit card bank engages only in credit card operations, does not accept demand deposits or savings or time deposits of less than \$100,000 (other than to secure extensions of credit), maintains only one office and does not engage in the business of making commercial loans. [*This definition is not needed for non-CEBA Limited Purchase or Wholesale Institutions.*]

**Census Tract (CT):** Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the United States Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per 10-year census and an average population of 4,000.

**Community Development (CD):** Affordable 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low-or moderate-income geographies;

- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
  - a. Rates of poverty, unemployment, and population loss; or
  - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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.

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

**Limited Purpose Institution:** An institution that offers only a narrow product line (such as credit cards or automobile loans) to a regional or broader market and for which a designation as limited purpose bank is in effect. [*This definition is not needed if bank is designated a wholesale institution.*]

**Median Family Income (MFI):** The median income determined by the United States Census Bureau every 10 years and used to determine the income level category of geographies. Also, it is the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of families. For any given geography, the median is the point at which half of the families have income above it and half below it. (See the four categories of median income below.)

- **Low-Income** – An income level that is less than 50% of the MFI.
- **Moderate-Income** – An income level that is at least 50% and less than 80% of the MFI.
- **Middle-Income** – An income level that is at least 80% and less than 120% of the MFI.
- **Upper-Income** – An income level that is 120% or more of the MFI.

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

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

**Net Operating Income:** As listed in the Consolidated Report of Condition and Income: Income before income taxes and extraordinary items and other adjustments. [*Schedule RI - Income Statement, line 8 or UBPR, page 2, "PreTax Operating Income (TE)"*]

**Pass-Through Receivables:** Outstanding receivables tied to all accounts issued or owned by the bank. Pass-through receivables include receivables attributable and receivables retained on balance sheet as those terms are used in 12 CFR 8. [*If not already reported to the OCC, the bank provides this information. If not applicable to institution being examined, definition is not required.*]

**Tier 1 Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with noncumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries. [*Schedule RC-R - Regulatory Capital, line 3a(1) or UBPR, page 11A, "Net Tier One"*]

**Total Assets:** Total bank assets as listed in the Consolidated Report of Condition and Income. [*Schedule RC - Balance Sheet, line 12 or UBPR, page 4, "Total Assets"*]

**Total Income:** From the Consolidated Report of Condition and Income – Total Interest income plus Total Noninterest income. [*Schedule RI - Income Statement, Total Interest Income, line 1g and Total Noninterest Income, line 5g, except for banks with domestic offices only and total assets less than \$100 million, line 5c or UBPR, page 2, "Total Interest Income" and "Noninterest Income"*]

**Wholesale Institution:** An institution that is not in the business of extending home mortgage, small business, small farm, or consumer loans to retail customers and for which a designation as a wholesale bank is in effect.