PUBLIC DISCLOSURE

May 6, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Citibank, N.A.
Charter Number: 1461

5800 South Corporate Place
Sioux Falls, SD 57108

Office of the Comptroller of the Currency

Large Bank Supervision
Constitution Center
400 7th Street, S.W.
Washington, DC 20219

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

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

The following table indicates the performance level of Citibank, N.A. (CBNA or bank) with respect to the Lending, Investment, and Service Tests:

	Citibank, 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:

- The Lending Test rating is based on an Outstanding rating in all the bank's rating areas.
- The Investment Test rating is based on an Outstanding rating in all the bank's rating areas.
- The bank's High Satisfactory Service Test performance was driven by an Outstanding rating in the New York-Newark, NY-NJ-CT-PA Combined Statistical Area (New York CSA), and High Satisfactory ratings in four rating areas, the District of Columbia, California, Florida, and South Dakota. Cumulatively, these five rating areas made up 88.7 percent by deposit volume.

Lending in Assessment Area

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

The bank originated and purchased 39.5 percent of its total loans by number and 71.3 percent by dollar amount inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA level. The percentages do not include extensions of credit by affiliates that may be considered under the other performance criteria. The percentages reflect a significant volume of small business credit card loans that were originated through retail partnerships located outside of the bank's AAs, which had the effect of lowering the percentages of small business lending inside the bank's AAs. This was considered as performance context.

Lending Inside and Outside of the Assessment Area										
	Number of Loans				Total	Dollar Amount of Loans				Total
Loan Category	Inside		Outside			Inside		Outside		
	#	%	#	%	#	$	%	$	%	$
Home Mortgage	97,238	69.7	42,349	30.3	139,587	77,305,533,426	73.0	28,592,374,161	27.0	105,897,907,587
Small Business	454,756	36.2	802,523	63.8	1,257,279	5,584,461,000	54.1	4,731,876,000	45.9	10,316,337,000
Total	**551,994**	**39.5**	**844,872**	**60.5**	**1,396,866**	**82,889,994,426**	**71.3**	**33,324,250,161**	**28.7**	**116,214,244,587**
Source: Bank Data *Due to rounding, totals may not equal 100.0%*										

Description of Institution

CBNA's main office is in Sioux Falls, S.D., but is headquartered in New York City, N.Y. CBNA is a full-service interstate bank that is a subsidiary of Citigroup, LLC, which is a direct subsidiary of Citigroup, Inc. (Citi). Citi is a global financial services company that does business in nearly 160 countries and employs approximately 230,000 employees worldwide. During the review period, on July 1, 2022, Department Stores National Bank, which was a subsidiary of CBNA, was merged into the bank. The merger did not affect the scope of the bank's operations during the evaluation period.

CBNA had total assets of almost $1.8 trillion as of December 31, 2022. This included total loans and leases of $641.5 billion that consisted of $153.9 billion (24 percent) of loans and leases in commercial loans, $151.6 billion (23.6 percent) in other loans, $167.6 billion (26.1 percent) in real-estate related loans, $ 167.9 billion (26.2 percent) in individual loans, and $306 million (less than 0.1 percent) in agricultural loans. Total tier 1 capital as of December 31, 2022, was $151.7 billion.

As of December 31, 2022, CBNA had a network of 657 branch office locations and 2,127 deposit-taking automated teller machines (ATMs), in 10 states including California, Connecticut, Florida, Illinois, Maryland, New Jersey, Nevada, New York, South Dakota, and Virginia. CBNA also has branches and ATMs in the District of Columbia (Washington DC) and Commonwealth of Puerto Rico. This Performance Evaluation (PE) contains the evaluation of CBNA's performance within 14 AAs in five states, one multistate CSA and one MMSA rating area, and the Commonwealth of Puerto Rico.

CBNA provides consumers, corporations, governments, and institutions with a broad range of financial products and services, including consumer banking and credit, corporate and investment banking, securities brokerage, transaction services, and wealth management.

In early 2020, the coronavirus (COVID-19) pandemic led to a public health emergency that severely impacted the national economy. COVID-19 spread worldwide and caused deteriorating economic conditions resulting from mandated stay-at-home orders and business shutdowns to slow the spread of the virus. CBNA adapted to changing needs and priorities, providing essential banking products and services to customers during the pandemic. CBNA participated in the Small Business Administration's (SBA) Paycheck Protection Program (PPP), which provided small businesses impacted by the pandemic with funds to cover payroll costs or other expenses. CBNA committed to donating net profits from its PPP lending to the Citi Foundation, which were used to fund an array of initiatives designed to bring economic relief to low- and moderate-income individuals and communities and small business owners

most adversely impacted by the effects of the pandemic. CBNA's response to needs related to the COVID-19 pandemic included, among other efforts, grants for: Immediate COVID-19 Relief, a Small Business Relief Program and NY Loan Fund, and a Community Development Financial Institution (CDFI) Scale Up Fund.

The pandemic impacted access to CBNA retail banking offices from 2020 into 2021 with office closures due to social distancing mandates limiting in-person transactions. Despite the impact, CBNA reported more than half of its retail branches were open and operating throughout the pandemic with a large network of deposit-taking ATMs to facilitate routine deposit account transactions without in-person contact. Additionally, CBNA data usage reports indicated increased adoption of most alternative delivery systems (ADS) since the prior evaluation. The pandemic also impacted community development (CD) service activities reflecting cancellation of in-person events by CBNA and community service organizations in 2020 and the shift to virtual CD activities.

Currently, there are no financial impediments to CBNA's ability to help meet the credit needs within its communities.

The OCC assigned CBNA an overall Outstanding rating for its last CRA evaluation dated February 8, 2021.

Scope of the Evaluation

Evaluation Period/Products Evaluated

Examiners evaluated home mortgage loans, small loans to businesses, CD loans, qualified investments, and CD and retail services from January 1, 2020, through December 31, 2022 (the evaluation period). Examiners did not consider consumer loans in this evaluation, as consumer lending was not a substantial majority of CBNA's business and management did not request consideration. Examiners considered qualifying activities performed in response to the significant impact of the COVID-19 pandemic across the United States that occurred during the evaluation period. This included consideration of loans made under the SBA's PPP as either small loans to businesses or farms under the borrower and geographic distribution of lending analysis, or as CD loans, depending on their size.

Due to updated 2020 Census data, census tract income level designation changes became effective on January 1, 2022. Examiners must analyze loan data against the applicable demographic data for each period, resulting in multiple analyses and presentation of data. Examiners analyzed home mortgage loans and small loans to businesses data from January 1, 2020, through December 31, 2021 (2020-2021 analysis period), using 2015 American Community Survey (ACS) demographic information. Examiners analyzed home mortgage loans and small loans to businesses data from January 1, 2022, through December 31, 2022 (2022 analysis period), using 2020 Census demographic information. Unless otherwise noted in a specific rating area, examiners placed more weight on the 2020-2021 analysis period as it covered more of the overall evaluation period. Examiners included narrative discussions and data in the tables in Appendix D for both analysis periods.

On June 5, 2020, the OCC published a modernized CRA Rule. The Rule was in effect from October 1, 2020, but subsequently rescinded on December 14, 2021. The Rule was in effect from October 1, 2020, until December 31, 2021. While in force, the rule expanded bank lending, investment, and services activities that qualified for positive CRA consideration. This included other activities that met the credit

needs of economically disadvantaged individuals and entities, low- and moderate-income geographies, and other identified areas of need in each bank's communities. The Rule also expanded the circumstances in which banks received pro-rata consideration for qualifying activities beyond those activities that received consideration under the current framework. Certain CD activities that provided some benefit to, but did not primarily benefit specified populations, entities, or areas, would receive pro-rata credit equal to the partial benefit provided. Finally, the Rule allowed for allocation of an activity across the bank's AAs and other MSAs or non-MSAs served by the activity according to the share of the bank's deposits in those areas, to the extent the bank cannot document that the services or funding it provided was allocated to a particular project. CBNA's activity that met qualifying criteria under the Rule and conducted during the effective period, remained a qualifying activity even after the Rule's rescission and were included in this evaluation. Examiners listed CD services considered under the expanded Rule that did not fall into a current CD service criteria as "general qualified volunteer activities."

Changes to MSA boundaries by the Office of Management and Budget did not impact CBNA's AAs.

Lending Test

Examiners did not perform statistical analysis or draw conclusions for a loan product if there were fewer than 20 loans originated or purchased in an AA. CBNA did not originate or purchase any small loans to farms during the evaluation period. Farm lending was not a primary product for the bank.

Examiners determined lending activity responsiveness in each AA by comparing the bank's market rank percentage for deposits to each lending product's market rank percentage. Examiners divided the bank's market rank by the total number of depository institutions or lenders, respectively. This approach takes into consideration the differences between the number of insured depository institutions and number of home mortgage and small business lenders within the AA.

For lending performance, the loan distribution analyses compared originated and purchased home mortgage loans and small loans to businesses to demographic and aggregate data under the applicable Lending Test components. Aggregate data illustrates how the bank is performing compared to other lenders in the AA and provides context on the reasonableness of the bank's performance. For both home mortgage loans and small loans to businesses, examiners placed more emphasis on borrower and geographic demographic distributions than on aggregate performance. If 2022 performance was stronger or weaker than the 2020-2021 performance, only those factors that impacted the conclusion were listed. All other comparator performances were consistent.

Examiners generally gave equal weighting to geographic and borrower distribution components of the Lending Test unless performance context factors indicated examiners consider one component more than the other. When there were differences in performance between loan products in a specific AA, examiners determined the overall conclusion by weighting the products based on the loan mix by number of loans over the evaluation period. Weighting by number of loans gives consideration for each lending decision regardless of the loan's dollar amount. When there were performance differences between low- and moderate-income geographies, examiners placed more emphasis on the geographic category with more lending opportunities (e.g., higher percentage of businesses or owner-occupied housing units). Examiners described any variations within the narrative comments of each rating area.

For the home mortgage borrower distribution analysis, examiners considered the impact that income, poverty levels, and housing costs have on limiting homeownership opportunities of low- and moderate-

income individuals and families. Additionally, examiners considered the impact of home affordability for low- and moderate-income borrowers in higher cost areas when comparing the distribution of home mortgage loans to the demographics. CBNA's AAs contain mostly high-cost housing markets where many low- and moderate-income households would be challenged to afford a median priced home.

CBNA originated a substantial volume of PPP loans during the evaluation period. Between 2020 and 2021, the bank originated and purchased 55,810 PPP loans totaling $3.2 billion within the bank's AAs. Examiners considered those loans that met the Call Report definition of a small loan to businesses in the geographic and borrower distribution of small business lending. In addition to the 55,810 PPP loans, 521 PPP loans, totaling $1.1 billion, received consideration as CD Lending within the bank's AAs.

The lending analysis also considered the number and dollar volume of CD loans, with emphasis placed on loans that were particularly complex or responsive to AA needs. CD lending could have a positive, neutral, or negative impact on the performance rating, which examiners described within the narrative comments. To provide perspective, examiners compared the dollar amount of CD loans to the bank's tier 1 capital allocated to the AAs.

Examiners also considered CD lending by the bank in its broader statewide or regional area (BSRA). This consisted of lending in the BSRA that included the AA, where the entity or activity had a purpose, mandate, or function that included serving the AA. Examiners considered BSRA activities that did not serve an AA only if the bank had reasonably served the needs of its AAs.

Tier 1 capital was allocated to the rating areas and AAs based on the pro rata share of bank deposits to that area, which included non-retail, non-consumer deposits, online and mobile deposits, international deposits, and business entities. CBNA tracks the geographic distribution of internet deposits based on the depositor's address. The internet deposits located within the bank's footprint were allocated to specific AAs. Our analysis reflects the dispersion of the internet accounts, and allocated tier 1 capital was adjusted accordingly.

Other Loan Data

Examiners also considered, at the bank's request, commercial leases and letters of credit with a CD purpose.

Investment Test

The analysis of qualified investments included the investment portfolio, donations, and grants made during the evaluation period that had CD as their primary purpose. Qualified investments included those that met the definition of CD that CBNA made in the current evaluation period and prior to the current evaluation period that were still outstanding. Examiners considered prior-period investments at their book value at the end of the current evaluation period and current-period investments at their original investment amount.

CBNA received consideration for any qualified investment activity that benefited a specific AA in the applicable state or multistate rating area. This included investments in the BSRA that included the AA, where the entity or activity had a purpose, mandate, or function that included serving the AA. Examiners considered broader statewide or regional activities that did not serve an AA only if the bank had reasonably served the needs of its AAs.

To provide perspective regarding the relative level of qualified investments, examiners compared the dollar amount of current and prior period investments to the bank's tier 1 capital allocated to the AAs. Tier 1 capital was allocated to the rating areas and AAs based on the pro rata share of bank deposits to that area.

CBNA focused on targeted affordable housing private equity investments and bond purchases. In 2021, CBNA established its Affordable Housing Preservation Program with Emerging Managers. Under this program, CBNA committed to deploy funds to affordable and workforce housing projects with Black investment managers to help close the racial wealth gap and increase economic mobility in the United States. CBNA and the advisory council selected five Black-led manager projects; each received an allocation to invest in and manage workforce and affordable housing in partnership with industry participants.

Service Test

The review of services during the evaluation period included analyzing CBNA's network of branches and deposit-taking ATMs for the availability and effectiveness of delivering retail banking services. Examiners gave the most weight to the geographic distribution of bank branches and changes in branch locations. The analysis of the distribution of the bank's retail branches was based on branch and ATM locations as of December 31, 2022. Geography income category classifications were based on the 2020 Census. When applicable, examiners considered changes to the branch distribution in an AA that resulted solely from a geography's income classification changing from the 2015 ACS Update to the 2010 U.S. Census.

In full-scope AAs, examiners reviewed branch locations in middle- and upper-income geographies that served and improved access for low- and moderate-income customers or customers in low- and moderate-income geographies in one of two ways. Examiners gave positive consideration when a middle- or upper-income branch was "across the street" (less than 1,000 feet) from a low- or moderate-income geography. Examiners also considered branches in middle- and upper-income geographies and geographies without an income designation adjacent to low- and moderate-income geographies that demonstrated, based on bank prepared data, that the branch served customers from low- and moderate-income geographies with performance at least equal to or exceeding the population and household distribution within each AA. Examiners considered each middle- and upper-income branch only once in this analysis.

CBNA offered ADS including telephone and online banking, electronic bill pay, mobile banking, and CBNA owned, deposit-taking ATMs that increased accessibility for both retail and business customers. Examiners positively considered ADS usage where 2022 bank data demonstrated that systems usage by customers from low- and moderate-income geographies was high (over 50 percent) compared to the total number of customers from those geographies or at least comparable to (90 percent or more) usage rates by customers in middle- and upper-income geographies to the total number of customers from those geographies. Surcharge-free cash dispensing third party ATMs were available at specific retailers under the CBNA brand. CBNA customers also had access to surcharge-free cash dispensing ATMs through the Allpoint and MoneyPass networks. CBNA also offered surcharge-free cash withdrawals and account inquiries at its branch ATMs to clients of 31 participating community development credit unions, community banks, and minority-owned banks through its Citi ATM Community Network.

Where the bank opened or closed branches within an AA, the overall impact of the changes was evaluated. If no branches were opened or closed in an AA, examiners did not include that performance element in the analysis.

Examiners specifically focused on differences in branch hours and services in low- and moderate-income geographies compared to those in middle- and upper-income geographies. Examiners evaluated the range of services and products offered by all the bank's branches. Services and products offered at branches were consistent throughout the branch network and included Access Checking which was certified as meeting Bank On National Account Standards for low-cost accounts.

The bank's record of providing CD services was evaluated in AAs that received full-scope reviews. The primary consideration was the extent and responsiveness of CBNA's CD services in meeting community needs within its AAs. In 2020 and 2021, CBNA focused on two criteria to determine CD service performance – hours of service per employee participating to conduct a CD service and the number of low- or moderate-income beneficiaries of the individual CD service. For 2022, CBNA used three criteria to make this determination, the number of: low- or moderate-income beneficiaries of the individual service; events organized by CBNA; and bank employees engaged in conducting events. Examiners weighted 2022 CD service activities higher than 2020 and 2021 activities due to social distancing requirements in the bank's AA during that time resulting from the pandemic which compromised the bank's ability to provide CD services.

Selection of Areas for Full-Scope Review

In each state where the bank has a branch office, one or more AAs within that state were selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA, MMSA, or 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. When determining areas for full-scope reviews, examiners considered factors such as CBNA's percentage of deposits within the rating area, business strategy within a particular MMSA or state, number of branches, volume of reportable loans originated and purchased in each state or MMSA, significance of the bank to the AA based on its deposit market share and rank, comments received from the public, and conclusions from prior CRA evaluations. Where necessary, examiners selected multiple AAs to complete sufficient full-scope analyses to support the conclusions and ratings. Refer to the "Scope" section under each State Rating section for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings. The New York CSA carried the greatest weight in the overall conclusions. This AA represented 46.6 percent of CBNA's deposits.

Examiners based the MMSA and state ratings on performance in all the bank's AAs and were not based solely on the performance in the full-scope AAs to the exclusion of performance in the limited-scope AAs. Refer to the "Scope" section under each state and MMSA rating section for details regarding how examiners weighted the areas in arriving at the respective ratings.

Flexible and Innovative Lending Products

CBNA used innovative or flexible lending products to serve AA credit needs during the evaluation period. CBNA also participated in several programs offered by local governments, non-profit organizations, and affordable housing agencies throughout its AAs. Some of the more significant products and programs include:

Deed Restriction – This mortgage program is for properties with deed restrictions, including those that survive foreclosure. Deed restricted properties are a key feature to preserve affordability in many communities. Deed restrictions can be based on age, resale price, first-time homebuyer status, employment, or occupancy. Deed restrictions are placed on the property that limit the terms of future sales to maintain affordability for subsequent buyers.

Employer Assisted Housing Programs – An Employer-Assisted Housing Program is used to assist borrowers with the purchase of a primary residence. Funds can be used for paying part of the closing costs, supplementing financial reserves, and supplementing the borrower's down payment. Borrowers, however, must use their own funds to meet the minimum down payment or borrower contribution requirements. Several types of assistance are available in the form of grants, repayable second mortgages, or deferred payment mortgages.

Federal Housing Administration (FHA) and Veterans Affairs (VA) Programs – FHA and VA insured loans had more flexible lending criteria than conventional mortgage loans. The U.S. Department of Housing and Urban Development (HUD) provided mortgage insurance for FHA loans, enabling the Bank to offer additional loan options to borrowers that may not have qualified for a conventional mortgage. The U.S. Department of Veterans Affairs guaranteed the VA loans, which provided protection against losses arising from a borrower default.

Home Run – This proprietary, held-in-portfolio mortgage program, provides greater flexibility by offering lower down payment requirement options, eliminating mortgage insurance, and providing underwriting flexibility including the use of nontraditional credit, all of which address major barriers to homeownership. The key differentiator of this program is that mortgage insurance is not required, which lowers the cost of the monthly mortgage payment to the consumer. As part of the program requirements for borrowers to be well prepared and understand the mortgage process, CBNA mandates borrowers complete homebuyer and landlord education through HUD approved providers or providers aligned with NIS (National Industry Standard).

Lender Paid Assistance Program (LPA) – For many borrowers closing costs can be a major barrier to buying a home. The Citibank LPA Program provides financial assistance for eligible borrowers in the form of a non-repayable credit that is to be applied toward the borrower’s eligible closing costs, including discount points to buy down the rate.

SBA – These small business loans provide easier qualification, longer terms, and lower down payments. A significant portion of SBA loans during the evaluation period were made under the PPP. More than 99 percent of these loans were for companies with fewer than 100 employees. For small businesses, the Bank offered loans guaranteed by the SBA, including SBA 504, SBA 7a, and SBA Express loans and lines of credit. SBA loans offer more flexible terms than conventional loans.

State and Locally Sponsored Bond Programs – Citibank participates in State of New York Mortgage Agency (SONYMA), a New York mortgage revenue bond program. This program is

offered by NY state, to first time homebuyers, or customers buying in a target area. The program offers low-interest mortgage loans, low down payment requirements, and forgivable loans to assist with down payments.

The bank offered various affordable home mortgage products, restricted to 1-4 family properties, with reduced down payment requirements, and lower credit score requirements. The bank offered additional flexible conventional products, such as Fannie Mae Home Ready and Freddie Mac Home Possible mortgages across its AAs. CBNA participates in different state and locally sponsored down payment closing cost assistance programs to help bridge the affordability gap for potential homebuyers through Community Assistance Programs.

Other Information

Deposit Market Share – The OCC used summary deposit data reported to the FDIC as of June 30, 2022. This was the most recent public data available during the evaluation period.

Lending Market/Peer Data – The OCC used 2021 and 2022 peer mortgage data and 2021 and 2022 peer small loans to businesses data reported to the Federal Financial Institutions Examination Council (FFIEC).

Lending Gap Analysis – Summary reports and maps were reviewed, and lending activity of home mortgage loans and small loans to business were analyzed over the evaluation period to identify any unexplained and conspicuous gaps in the geographic distribution of loans in each full-scope AA. The presence of conspicuous and unexplained gaps in an AA is factored into the conclusions regarding the geographic distribution of lending by income level of geography and can result in a more adverse assessment of the geographic distribution. Similarly, the absence of lending gaps does not necessarily indicate an adequate or better assessment of the geographic distribution of loans.

Unemployment rate – In most cases, unemployment rates referenced are the MSA non-seasonally adjusted rate as published monthly by the U.S. Bureau of Labor Statistics (BLS). Nationally, the unemployment rate in December 2022 was 3.5 percent. Pandemic-related unemployment peaked at 14.7 percent in April 2020.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. § 25 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 (CFPB), as applicable.

The OCC identified the following public information regarding non-compliance with the statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to this institution:

The CFPB found that the bank violated the Equal Credit Opportunity Act 15 USC § 1691(a) and Regulation B, 12 CFR § 1002.4(a), 1002.6(b)(1), 1002.6(b)(9) by engaging in a pattern or practice of discrimination against certain credit card applicants based on Armenian national origin during the period from 2015-2021. The CFPB also found that the bank violated 15 USC § 1691(d) and 12 CFR § 1002.9(a)-(b) by failing to provide applicants with an accurate and adequate statement of the specific reasons for adverse action when the applicant was denied based on Armenian national origin. Specifically, employees took action that negatively affected applicants with last names ending in -ian or -yan, especially if the applicant's address was in or around Glendale, California, including applying additional scrutiny to the application. This affected credit card applicants who were subject to manual underwriting by the bank's Retail Services unit. The CFPB required $1.4MM in remediation. A Consent Order was executed November 8, 2023. The bank generally did not admit nor deny the CFPB's findings of fact or conclusions of law.

The OCC found evidence of violations of the Servicemembers Civil Relief Act (SCRA) and Military Lending Act (MLA). The violations of SCRA involved the bank's failure to provide full interest rate or payment reductions on a small number of loans held by eligible servicemembers and limited instances of improper foreclosure processes. The violations of MLA involved the bank's failure to provide full annual percentage rate reductions and mandatory loan disclosures, on a small number of loans held by eligible covered borrowers. The bank made full restitution to affected servicemembers and covered borrowers, and enhanced procedures and controls to ensure future compliance.

The OCC does not have additional public information regarding non-compliance with statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to this institution. In determining this institution's overall CRA rating, the OCC has considered information that was made available to the OCC on a confidential basis during its consultations.

The CRA performance rating was not lowered as a result of these findings. We considered the nature, extent, and strength of the evidence of the practices; extent to which the institution had policies and procedures in place to prevent the practices; extent to which the institution has taken or has committed to take corrective action, including voluntary corrective action resulting from self-assessment; and other relevant information.

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

Multistate Metropolitan Statistical Area Ratings

New York-Newark, NY-NJ-CT-PA Combined Statistical Area (New York CSA)

CRA rating for the New York CSA: Outstanding

The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The overall geographic distribution of lending was good and borrower distribution of lending was excellent.
- CBNA was a leader in making CD loans, which further supported the bank's Outstanding performance under the Lending Test.
- CBNA had an excellent level of qualified CD investment and grants which were responsive in addressing community needs.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA. CBNA provided an adequate level of CD services responsive to identified community needs.

Description of Institution's Operations in the New York CSA

The bank delineated four AAs within the New York CSA. CBNA delineated the majority of New York-Jersey City-White Plains, NY-NJ, entire Nassau County-Suffolk County, NY MD, entire Bridgeport-Stamford-Norwalk, CT MSA, and a portion of the Newark, NJ MD. The AAs were combined, analyzed, and presented as one AA for purposes of this evaluation and in evaluating performance under each test. The New York CSA represents the largest retail market for the bank in terms of deposits and branches. Refer to the table in appendix A for a list of counties reviewed.

CBNA operated 235 branches within this CSA, representing 35.8 percent of total branches, and 1,122 deposit-taking ATMs within this CSA, representing 52.8 percent of total deposit-taking ATMs. CBNA had $142.5 billion in adjusted deposits, which represented 46.6 percent of the bank's total adjusted deposits. During the evaluation period, CBNA originated or purchased 36.5 percent of its total dollar volume of home mortgage loans and small loans to businesses in this AA.

Based on the June 30, 2022, FDIC Summary of Deposit Market Share Report, CBNA had $143.7 billion in deposits and ranked sixth out of 147 FDIC-insured depository institutions with a 5.4 percent deposit market share. The top three banks by deposit market share are JPMorgan Chase Bank with 625 branches and 32.5 percent, Goldman Sachs Bank with two branches and 9.8 percent, and Morgan Stanley Private Bank with one branch and 6.9 percent.

The following tables provide a summary of the demographics, including housing and business information, for the New York CSA.

Table A – Demographic Information of the Assessment Area Assessment Area: New York CSA 2020-2021						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	3,928	11.9	22.1	31.4	32.3	2.3
Population by Geography	16,398,846	12.7	23.6	30.3	33.1	0.3
Housing Units by Geography	6,416,363	11.9	22.3	29.6	35.9	0.2
Owner-Occupied Units by Geography	2,750,328	3.0	13.5	35.9	47.5	0.1
Occupied Rental Units by Geography	3,097,225	19.7	30.0	24.4	25.6	0.2
Vacant Units by Geography	568,810	12.3	23.3	27.8	36.2	0.3
Businesses by Geography	2,184,129	8.0	17.9	28.1	44.7	1.3
Farms by Geography	23,558	5.5	17.5	32.9	43.6	0.4
Family Distribution by Income Level	3,811,244	27.3	15.8	16.9	40.1	0.0
Household Distribution by Income Level	5,847,553	28.8	14.5	15.7	41.0	0.0
Median Family Income MSA - 14860 Bridgeport-Stamford-Norwalk, CT MSA		$105,628	Median Housing Value			$489,218
Median Family Income MD - 35004 Nassau County-Suffolk County, NY		$108,193	Median Gross Rent			$1,344
Median Family Income MD - 35084 Newark, NJ-PA		$90,570	Families Below Poverty Level			12.5%
Median Family Income MD - 35614 New York-Jersey City-White Plains, NY-NJ		$67,560				

Source: 2015 ACS and 2021 D&B Data
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification.

Table A – Demographic Information of the Assessment Area Assessment Area: New York CSA 2022						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	4,263	11.0	22.0	31.7	30.9	4.4
Population by Geography	17,094,521	12.1	23.0	31.4	32.4	1.1
Housing Units by Geography	6,566,161	11.6	21.7	30.7	35.0	1.0
Owner-Occupied Units by Geography	2,856,245	3.1	14.5	36.9	44.9	0.5
Occupied Rental Units by Geography	3,143,511	19.7	28.4	25.5	25.1	1.4
Vacant Units by Geography	566,405	9.4	21.4	28.5	39.4	1.3
Businesses by Geography	2,340,324	8.3	17.8	28.7	42.5	2.6
Farms by Geography	24,794	6.1	17.4	33.5	41.9	1.0

Family Distribution by Income Level	3,886,249	25.6	15.6	17.2	41.6	0.0
Household Distribution by Income Level	5,999,756	28.1	14.2	15.3	42.4	0.0

Median Family Income MSA - 14860 Bridgeport-Stamford-Norwalk, CT MSA	$120,156	Median Housing Value	$587,466
Median Family Income MD - 35004 Nassau County-Suffolk County, NY	$130,301	Median Gross Rent	$1,580
Median Family Income MD - 35084 Newark, NJ-PA	$107,333	Families Below Poverty Level	10.2%
Median Family Income MD - 35614 New York-Jersey City-White Plains, NY-NJ	$85,483		

Source: 2020 U.S. Census and 2022 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.

To assess the affordability of housing, examiners compared an estimated mortgage payment for a median home to the expected incomes for low- and moderate-income households within each component MSA or MD of the New York CSA and for both analysis periods.

Based on the information in the 2020-2021 table above, the median housing value for the New York CSA AA was $489,218. In the lowest median income MD (New York-Jersey City-White Plains, NY-NJ), low-income families earned less than $33,780 and moderate-income families earned less than $54,048. In the highest median income MD (Nassau County-Suffolk County, NY), low-income families earned less than $54,097 and moderate-income families earned less than $86,554. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of $845 to $1,352 for low-income borrowers and $1,351 to $2,164 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would have been $2,626. Based on these calculations, low- and moderate-income borrowers would be challenged to qualify for and afford home mortgage financing in any of the MSAs during 2020-2021.

Based on the information in the 2022 table above, the median housing value for the New York CSA AA was $587,466. In the lowest median income MD (New York-Jersey City-White Plains, NY-NJ), low-income families earned less than $42,742 and moderate-income families earned less than $68,386. In the highest median income MD (Nassau County-Suffolk County, NY), low-income families earned less than $65,151 and moderate-income families earned less than $104,241. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of $1,069 to $1,629 for low-income borrowers and $1,710 to $2,606 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would have been $3,154. Based on these calculations, low- and moderate-income borrowers would be challenged to qualify for and afford home mortgage financing in any of the MSAs during 2022.

Affordable housing for low- and moderate-income families is a significant need. This AA is considered a high-cost housing market, limiting access to affordable home ownership among low- and moderate-income borrowers. In evaluating the New York CSA AA, examiners considered the significant home ownership affordability barriers that exist and evaluated the disparity between the median family income within the AA and the cost of housing, and the impact this has on home ownership.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 12.5 percent of families were living below the poverty level in 2020-2021 and 10.2 percent of families were living below the poverty level in 2022.

Economic Data

New York-Newark-Jersey City, NY-NJ-PA MSA

Information from the November 2022 Moody's Analytics report indicated recent performance in the New York metro area faced a swift decline in the once-strong economic momentum. Despite the slowdown, gains are widespread, particularly in consumer industries and construction. The growth in consumer industries is largely attributed to tourists and weekend visitors. Although the housing market has slowed, heavy reliance on condos has mitigated the impact of broader price corrections in single-family homes. However, apartment rent growth has significantly decreased, especially in the ultra-luxury market.

Major employment industries include education and health services, professional and business services, government, and manufacturing. Major employers in the area include Montefiore Health System, Mount Sinai Health System, JPMorgan & Chase Co., Bank of America, and New York-Presbyterian Healthcare System.

According to the BLS, the unemployment rate for the New York-Newark-Jersey City, NY-NJ-PA MSA was 4 percent as of January 2020. Unemployment levels significantly increased to 17.3 percent in May 2020 due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined to 3.7 percent as of December 2022. The national unemployment rate was 3.5 percent as of December 2022.

Bridgeport-Stamford-Norwalk, CT MSA

Information from the September 2022 Moody's Analytics report indicated the economy of the Bridgeport-Stamford-Norwalk metro area is facing challenges in maintaining growth. It has lagged both the national and regional averages this year. The main industries driving the economy are struggling to provide significant support. Employment is crucial the financial services industry remains stagnant due to uncertainties impacting growth prospects. However, there is some positive news as job gains in the leisure/hospitality sector have contributed to payroll growth, albeit typically offering lower wages. Despite a steady increase in the labor force participation rate, the unemployment rate remains consistent with that of the state. After initially outpacing average growth, house prices are now declining, aligning more closely with national trends.

Major employment industries include manufacturing, education and health services, retail trade and professional and business services. Major employers in the area include Sikorsky Aircraft Corp., Boehringer Ingelheim Corp., ASML US Inc., Cecl Brothers, Inc., and Deloitte.

According to the BLS, the unemployment rate for the Bridgeport-Stamford-Norwalk, CT Metropolitan area was 4.3 percent as of January 2020. Unemployment levels increased significantly to 12.1 percent in May 2020 due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined to 3.3 percent as of December 2022. The national unemployment rate was 3.5 percent as of December 2022.

Community Contacts

Examiners reviewed and considered six community contact interviews that were conducted during the evaluation period. Interviews were conducted with representatives from two economic development corporations, a social services organization, and three affordable housing agencies located throughout the AA. There is a significant need for affordable housing programs, including homeownership and rental housing, and shelter solutions for the homeless. This is particularly necessary in high-cost metropolitan areas such as New York City. One contact noted during the COVID-19 crisis, the focus was on how to create more affordable housing while being more efficient in the construction and renovations of properties. For homeowners across the MSA, affordable mortgages with down payment assistance and home improvement loans are needed for low- and moderate-income families to purchase and renovate homes. One contact indicated it was difficult to find for sale housing that can be affordable without subsidies in the New York City area. Other needs throughout the AA include small business lending and micro-loans to small businesses. There is a pressing need for job training as experienced workers retire, leaving gaps in the workforce that are not adequately filled.

The community contacts suggested several opportunities for financial institutions, including financing affordable housing and smaller multifamily housing loans, expanding credit access for small businesses, providing financial literacy education, establishing branches in underserved communities, and fostering relationships with small businesses.

The contacts identified the following needs within the community:

- Affordable senior housing
- Smaller commercial loans to smaller businesses
- Additional branch services and additional access to ATMs
- Access to credit repair programs
- Homeownership and wealth creation
- Sponsorship and hosting financial and credit counseling workshops
- Job training and resources

Scope of Evaluation in the New York CSA

Examiners conducted a full-scope review of the New York CSA AA. Examiners placed more emphasis on small loans to businesses versus home mortgage loans in arriving at the overall conclusion.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NEW YORK CSA

LENDING TEST

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

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

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
New York CSA	37,840	94,609	0	406	132,855
Total	**37,840**	**94,609**	**0**	**406**	**132,855**

Dollar Volume of Loans ($000s)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
New York CSA	28,100,533	2,167,115	0	2,582,982	32,850,630
Total	**28,100,533**	**2,167,115**	**0**	**2,582,982**	**32,850,630**

Based on the June 30, 2022, FDIC Summary of Deposit Market Share Report, CBNA ranked sixth out of 147 FDIC-insured depository institutions (top 5 percent) with a 5.4 percent deposit market share.

For home mortgage loans, CBNA's market share of 3.6 percent ranked fifth out of 833 lenders (top 1 percent). The top three lenders were JPMorgan Chase Bank with 7 percent market share, Wells Fargo Bank with 5.9 percent, and Citizens Bank with 4.4 percent. The bank's lending performance, relative to the number of lenders in this AA, was stronger than the bank's deposit base.

For small loans to businesses, CBNA's market share of 4.8 percent ranked fifth out of 344 lenders (top 2 percent). The top three lenders were American Express with 33.6 percent market share, JPMorgan Chase Bank with 24.6 percent, and Bank of America with 6.8 percent. The bank's lending performance, relative to the number of lenders in this AA, was stronger than the bank's deposit base.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the New York CSA 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 the tables, the overall geographic distribution of home mortgage loans was good.

For 2020 through 2021, the percentage of home mortgage loans in low-income geographies was below the percentage of owner-occupied housing units located in those geographies and was well below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans in moderate-income geographies was near to both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

The bank's lending performance in the 2022 period was stronger than the 2020 through 2021 period. The percentage of home mortgage loans in low-income geographies exceeded the percentage of owner-occupied housing units located in those geographies but was below the aggregate percentage. The percentage of home mortgage loans in moderate-income geographies exceeded the percentage of owner-occupied housing units located in those geographies and approximated the aggregate percentage.

Small Loans to Businesses

Refer to Table Q in the New York CSA 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 the tables, the overall geographic distribution of small loans to businesses was good. For 2020-2021, only 8 percent of businesses was located in low-income geographies while 17.9 percent of businesses was located in moderate-income geographies. In 2022 only 8.3 percent of businesses was located in low-income geographies while 17.8 percent was located in moderate-income geographies. As a result, more weight was given to performance in moderate-income geographies.

This analysis included 4,065 PPP loans totaling $272.6 million to small businesses located in low- and moderate-income geographies that provided support during the COVID-19 pandemic.

For 2020 through 2021, the percentage of small loans to businesses in low-income geographies was below the percentage of businesses located in those geographies and was near to the aggregate percentage of all reporting lenders. The percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

The bank's lending performance in the 2022 period was stronger than the 2020 through 2021 period. The percentage of small loans to businesses in low-income geographies was near to the percentage of businesses located in those geographies and approximated the aggregate percentage of all reporting lenders. The percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AA. Examiners did not identify any unexplained conspicuous gaps in the full-scope area reviewed.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P in the New York CSA 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 the tables and considering performance context factors, the overall borrower distribution of home mortgage loans was good when considering the barriers to housing affordability within the AA.

For 2020 through 2021, the percentage of home mortgage loans to low-income borrowers was significantly below the percentage of those families and was near to the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers was below the percentage of those families and exceeded the aggregate percentage of all reporting lenders.

The bank's lending performance in the 2022 period was stronger than the 2020 through 2021 period. The percentage of home mortgage loans to low-income borrowers exceeded the aggregate percentage, and the percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of those families.

Small Loans to Businesses

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

Based on the data in the tables and considering performance context factors, the overall borrower distribution of small loans to businesses was excellent. Examiners placed more weight on the comparison to the aggregate percentage of all reporting lenders due to the level of PPP lending and constraints posed by the COVID-19 pandemic.

The bank's total included 16,097 PPP loans totaling $542.5 million that supported small businesses during the COVID-19 pandemic. The bank did not collect or consider gross annual revenues in the underwriting of 10 percent of its small loans to businesses, including PPP loans.

For 2020 through 2021, the percentage of small loans to businesses with revenues of $1 million or less was below the percentage of businesses with revenues of $1 million or less but exceeded the aggregate percentage of all reporting lenders. The percentage of small loans to businesses was more than double the aggregate percentage of all reporting lenders.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Community Development Lending

The bank was a leader in making CD loans. CD lending further supported the bank's Outstanding performance under the Lending Test.

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 was excellent. The bank made 406 CD loans totaling $2.6 billion, which represented 17.6 percent of the bank's allocated tier 1 capital. By dollar volume, 62.2 percent of the loans supported affordable housing, 21.4 percent funded economic development activities, 11.9 percent funded revitalization and stabilization efforts, and 4.5 percent funded community services. These loans were responsive to identified community credit needs.

The following are examples of the bank's CD loans that illustrate the complexity, leadership, or responsiveness of the bank's CD lending:

- The bank originated a $19.1 million loan that financed the acquisition and rehabilitation of a 107-unit multifamily, Low-Income Housing Tax Credit (LIHTC) project located in Westchester County, New York. Of the 107 units, 56 units were income restricted to households with income levels less than 60 percent of the area median income. The project was supported by a Section 8 Housing Assistance Payments (HAP) contract that will run for 20 years, which covered 86 units.

- The bank originated a $106.3 million construction to permanent loan to a CDFI that supported two multifamily affordable housing projects. The CDFI is focused on the preservation and development of affordable housing in New York's low- and moderate-income neighborhoods. The CDFI worked closely with the local housing preservation and development agencies.

- The bank originated a $20 million line of credit to a nonprofit human services organization that provides comprehensive services to individuals in New York City and upstate New York. The services included mental health and primary health care, vocational and employment services, shelter and transitional housing, programs for veterans and services for seniors. This line of credit was responsive to the identified community needs for supportive services given the increased risk to this population of individuals.

- The bank originated a $85.3 million bridge loan and a $65 million construction letter of credit to finance a thirteen-story mixed-use development in Brooklyn. The development will contain 173 affordable housing units and a transitional housing shelter containing 169 shelter units. Of the 173 affordable units, 105 will be designated as supportive housing for formerly homeless families with special needs and will receive rental subsidy vouchers through New York City's 15/15 Supportive Housing Initiative. The loan was responsive to identified community needs for affordable housing and community services.

Letters of Credit

Additionally, the bank originated 27 letters of credit totaling $1.2 billion that have a qualified CD purpose and benefited the New York CSA. These letters of credit supported the development and preservation of affording housing and were given positive consideration.

Broader Statewide or Regional area

In addition, CBNA made 41 CD loans totaling $649.9 million and three letters of credit totaling $80.3 million in the broader statewide and regional area whose purpose, mandate, or function included serving

CBNA's AA. The broader statewide and regional area lending further supported the overall Outstanding Lending Test rating for the New York CSA.

Product Innovation and Flexibility

The bank made limited use of innovative or flexible lending practices in order to serve AA credit needs. As shown in the table below, the bank originated or purchased 2,140 loans under its flexible lending programs totaling $585.2 million. Refer to the Flexible and Innovative Lending Products section for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount ($000s)
Community Assistance	95	21,805
Deed Restriction	87	21,200
Employer Paid Assistance	0	0
Federal Housing Authority (FHA)	13	5,211
Home Possible	139	38,929
Home Ready	233	68,916
Home Run	318	92,335
Lender Paid Assistance (LPA) Program	1,156	320,411
Local Bond Programs	74	14,924
MILA Co-Op	23	625
Veteran Affairs, Department of (VA)	2	848
Total	**2,140**	**585,205**

INVESTMENT TEST

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

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

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 CSA	226	2,005,886	201	856,911	427	100.0	2,862,797	100.0	0.0	0.0
Total	**226**	**2,005,886**	**201**	**856,911**	**427**	**100.0**	**2,862,797**	**100.0**	**0.0**	**0.0**

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.
** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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

The combined prior and current period dollar volume represented 19.5 percent of allocated tier 1 capital.

The bank exhibited excellent responsiveness to credit and community development needs. A substantial majority of the dollar volume of the bank's current and prior period investment transactions supported affordable housing, a primary need in the AA. A majority of the grants supported organizations that provided needed community services to primarily low- and moderate-income individuals and funded revitalization and stabilization efforts. By dollar volume, 80.8 percent of total investments and grants supported affordable housing, 16.9 percent supported community services to low- and moderate-income

individuals, economic development and approximately 2.5 percent supported economic development and revitalization and stabilization efforts. The bank occasionally used innovative or complex investments to support CD initiatives.

The following examples demonstrate the bank's responsiveness to community needs:

- The bank purchased a series of bonds, totaling $85.3 million, issued by the New York State Housing Finance Agency (NYS HFA) to provide the permanent financing of a 1,395-unit multifamily apartment building in Queens. The subject is a LIHTC qualified property and is also under a Section 8 HAP contract with HUD providing a total of 1,393 affordable housing units to low- and moderate-income individuals and families who earn less than 80 percent of the area median income.

- The bank made a $5.3 million equity investment for a 709-unit multifamily LIHTC project in Manhattan, New York. The subject property provides a total of 213 affordable housing units to low- and moderate-income individuals and families who earn less than 80 percent of the area median income.

- The bank provided a $524,000 grant to a nonprofit CDFI that supports community development initiatives. The grant supported the CDFI's career opportunities initiatives that assist unemployed and underemployed individuals with technical trainings and post-placement coaching support.

Broader Statewide or Regional Area

In addition, CBNA made 107 investments totaling $467.6 million in projects or organizations in the broader statewide and regional area whose purpose, mandate, or function included serving CBNA's AA. The broader statewide and regional area investments further supported the overall Outstanding Investment Test conclusion.

SERVICE TEST

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

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

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated area Deposits in AA	# of BANK Branches	% of Rated area Branches in AA	Location of Branches by Income of Geographies (%)*				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
New York CSA	100.0	235	100.0	8.9	14.9	26.8	47.2	12.1	23.0	31.4	32.4

*CBNA operates 5 branches in census tracts without an income designation.

Distribution of Branch Openings/Closings						
	Branch Openings/Closings					
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
New York CSA	2	14	0	0	-5	-5

Two branches were closed in geographies with an income level that was classified as non-designated.

CBNA's distribution of branches in low-income geographies was near to, and in moderate-income geographies was below, the percentage of the population living within those geographies. Access to delivery systems was positively impacted by the accessibility of 35 branches located in middle- or upper-income geographies (or geographies without an income designation). These branches served customers from seven adjacent low-income geographies and 28 adjacent moderate-income geographies based on customer usage data provided by CBNA during the evaluation.

ADS positively impacted the accessibility of service delivery systems. CBNA offered several ADS including telephone banking, online banking, mobile banking, bill pay, and ATMs, which provided additional delivery availability and access to banking services to both retail and business customers. Bank data indicated a majority of households in low- or moderate-income geographies used online banking, mobile banking, and ATM services during 2022 with usage rates by households in low- and moderate-income geographies increasing compared to 2019 for bill pay, online banking, mobile banking. Additionally in 2022, ADS usage by households in low- and moderate-income census tracts was comparable to or higher than usage by households in middle- and upper-income census tracts. CBNA operated 1,122 deposit-taking ATMs in the AA with 9.1 percent in low-income geographies and 15.3 percent in moderate-income geographies.

To the extent changes have been made, the bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank closed 14 branches, none of which were in low- or moderate-income geographies. CBNA also opened two branches during the evaluation period, neither of which were located in low- or moderate-income geographies.

Services, including where appropriate, business hours, did not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies or individuals. Branches were generally open from 9:00 a.m. to 5:00 p.m. on Monday and Friday, 9:00 a.m. to 4:00 p.m. on Tuesday through Thursday, and 10:00 a.m. to 2:00 p.m. on Saturday. Additionally, two branches in low-income geographies were open on Sunday from 10:00 a.m. to 2:00 p.m. with these two branches being the only two branches enterprise-wide offering Sunday hours. More branches (85.7 percent) in low- and moderate-income geographies operated on weekends compared to branches in middle- or upper-income geographies (74.1 percent).

Community Development Services

The bank provided an adequate level of CD services.

Bank employees provided 203 qualified CD service activities to 46 organizations with 2,455 qualified hours within this AA during the evaluation period. Additionally, 47 employees served 49 community

development organizations in various capacities including through leadership roles as board members or committee representatives. CD services were responsive to identified needs in the AA, particularly with financial literacy education, homebuyer education, and community services for low- and moderate-income people and small businesses.

Service activity examples during the evaluation period include:

- An employee served on the board of a local community college foundation for the duration of the evaluation period and led the effort for CBNA to provide student internships particularly to low- and moderate-income students. A second employee served on the board of a community service organization for the duration of the evaluation period and was instrumental in helping the organization transition to delivery of services virtually due to the COVID-19 pandemic. The transition to online services enabled the organization to continue to provide vital education, wellness, and community-building programs and services for the under-served and vulnerable residents of East Harlem.

- CBNA employees participated in the Teach Children to Save Campaign. In total, 239 employees contributed 158 hours of financial education benefiting 5,956 students from low- and moderate-income families while an additional 57 employees provided 1,267 hours of financial literacy education through one-on-one mentoring relationships with students from low-income communities in New York City.

- CBNA employees supported the Volunteer Income Tax Assistance (VITA) program, with 17 employees preparing free tax returns for 514 low- or moderate-income households through New York and Connecticut.

Washington-Arlington-Alexandria, DC-VA-MD-WV Multistate Metropolitan Statistical Area (DC MMSA)

CRA rating for the DC MMSA: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The overall geographic distribution of lending was excellent and borrower distribution of lending was excellent.
- CBNA was a leader in making CD loans, which further supported the bank's Outstanding performance under the Lending Test.
- CBNA had an excellent level of qualified CD investment and grants which were responsive in addressing community needs.
- Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AA. CBNA provided an adequate level of CD services.

Description of Institution's Operations in the DC MMSA

The bank delineated two AAs within the DC MMSA. CBNA delineated the District of Columbia (DC), Prince George's County in Maryland (MD), Arlington and Fairfax counties Virginia (VA), the independent cities Alexandria City, Fairfax City, and Falls Church City (VA) within the Washington-Arlington-Alexandria, DC-VA-MD-WV MD; and Montgomery County (MD) within the Frederick-Gaithersburg-Rockville, MD. The AAs were combined, analyzed, and presented as one AA, the DC MMSA, for purposes of this evaluation and in evaluating performance under each test. Refer to the table in appendix A for a list of counties reviewed.

CBNA operated 30 branches within this AA, representing 4.6 percent of total branches, and 76 deposit-taking ATMs with this AA, representing 3.6 percent of total deposit-taking ATMs. CBNA had $14.2 billion in adjusted deposits within the DC MMSA, which represented 4.7 percent of the bank's total adjusted deposits. During the evaluation period, CBNA originated or purchased 4.2 percent of its total dollar volume of home mortgage loans and small loans to businesses within the DC MMSA.

Based on the June 30, 2022, FDIC Summary of Deposit Market Share Report, CBNA had $13.7 billion in deposits and ranked sixth out of 55 FDIC-insured depository institutions with a 5.4 percent deposit market share. The top three banks by deposit market share are Capital One with 57 branches and an 18 percent, Bank of America with 104 branches and a 16.9 percent, and Truist Bank with 137 branches and a 13.3 percent.

The following tables provide a summary of the demographics, including housing and business information, for the DC MMSA AA.

Table A – Demographic Information of the Assessment Area Assessment Area: DC MMSA 2020-2021						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	975	11.9	20.5	30.9	35.4	1.3
Population by Geography	4,096,851	11.3	19.8	32.5	35.7	0.7
Housing Units by Geography	1,624,226	11.4	19.7	32.3	36.0	0.6
Owner-Occupied Units by Geography	890,622	4.7	15.8	34.7	44.7	0.2
Occupied Rental Units by Geography	624,921	19.9	24.8	29.6	24.7	1.1
Vacant Units by Geography	108,683	17.7	22.3	28.8	30.6	0.6
Businesses by Geography	538,910	5.5	17.7	34.3	42.0	0.6
Farms by Geography	6,290	5.0	17.1	36.7	41.0	0.2
Family Distribution by Income Level	941,445	22.9	16.1	19.2	41.9	0.0
Household Distribution by Income Level	1,515,543	23.9	16.4	18.3	41.4	0.0
Median Family Income MD - 23224 Frederick-Gaithersburg-Rockville, MD		$112,655	Median Housing Value			$443,810
Median Family Income MD - 47894 Washington-Arlington-Alexandria, DC-VA-MD-WV		$106,105	Median Gross Rent			$1,567
			Families Below Poverty Level			6.2%

Source: 2015 ACS and 2021 D&B Data
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification.

Table A – Demographic Information of the Assessment Area Assessment Area: DC MMSA 2022						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	1,053	10.2	21.5	29.9	36.8	1.7
Population by Geography	4,306,030	9.9	22.5	31.4	35.5	0.7
Housing Units by Geography	1,666,931	10.2	21.6	31.7	36.0	0.6
Owner-Occupied Units by Geography	923,365	4.7	17.3	33.8	43.9	0.2
Occupied Rental Units by Geography	646,329	17.7	27.2	29.1	25.0	1.0
Vacant Units by Geography	97,237	13.2	24.1	28.0	33.4	1.3
Businesses by Geography	621,415	5.5	19.3	33.8	40.6	0.7
Farms by Geography	6,994	4.9	19.8	34.9	40.2	0.2
Family Distribution by Income Level	962,669	22.3	16.2	19.3	42.2	0.0
Household Distribution by Income Level	1,569,694	23.8	16.1	18.8	41.2	0.0
Median Family Income MD - 23224 Frederick-Gaithersburg-Rockville, MD		$129,092	Median Housing Value			$511,366

Median Family Income MD - 47894 Washington-Arlington-Alexandria, DC-VA-MD-WV	$126,224	Median Gross Rent	$1,767
		Families Below Poverty Level	5.5%

Source: 2020 U.S. Census and 2022 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.

To assess the affordability of housing, examiners compared an estimated mortgage payment for a median home to the expected incomes for low- and moderate-income households within each component MD of the DC MMSA and for both analysis periods.

Based on the information in the 2020-2021 table above, the median housing value for the DC MMSA AA was $443,810. In the lowest median income MD (Washington-Arlington-Alexandria, DC-VA-MD-WV), low-income families earned less than $53,053 and moderate-income families earned less than $84,884. In the highest median income MD (Frederick-Gaithersburg-Rockville), low-income families earned less than $56,328 and moderate-income families earned less than $90,124. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of $1,326 to $1,408 for low-income borrowers and $2,122 to $2,253 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would have been $2,382. Based on these calculations, low- and moderate-income borrowers would be challenged to qualify for and afford home mortgage financing in any of the MDs during 2020-2021.

Based on the information in the 2022 table above, the median housing value for the DC MMSA AA was $511,366. In the lowest median income MD (Washington-Arlington-Alexandria, DC-VA-MD-WV), low-income families earned less than $63,112 and moderate-income families earned less than $100,979. In the highest median income MD (Frederick-Gaithersburg-Rockville), low-income families earned less than $64,546 and moderate-income families earned less than $103,274. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of $1,578 to $1,614 for low-income borrowers and $2,524 to $2,582 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would have been $2,745 on these calculations, low- and moderate-income borrowers would be challenged to qualify for and afford home mortgage financing in any of the MDs during 2022.

Affordable housing for low- and moderate-income families is a significant need. This AA is considered a high-cost housing market, limiting access to affordable home ownership among low- and moderate-income borrowers. In evaluating the DC MMSA AA, examiners considered the significant home ownership affordability barriers that exist and evaluated the disparity between the median family income within the AA and the cost of housing, and the impact this has on home ownership.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income

above the poverty level. For this AA, 6.2 percent of families was living below the poverty level in 2020-2021 and 5.5 percent was living below the poverty level in 2022.

Economic Data

Washington DC is a popular tourist area, has an educated workforce, a high per capita income, and is a major center for information technology. Information from the November 2022 Moody's Analytics report indicated the Washington-Arlington-Alexandria DC-VA-MD-WV area's economy has stagnated, however. The area's economic performance is heavily reliant on the public sector, as public sector jobs account for more than one fifth of all jobs in the metro division. A key strain on the economy has been an inconsistent recovery in the pivotal public sector. The government's commitment to expanding its high-tech workforce has paid off and additional funding was provided to local universities to produce more degrees in computer science and related fields. Major employment industries include professional and business services, government, and education and health services. Major employers in the area include Naval Support Activity Washington, Joint Base Andrews-Naval Air Facility, MedStar Health, Marriott International Inc., and Inova Health System. With the recent moves by Boeing and Raytheon, the area is now home to four of the top five U.S. aerospace and defense companies.

According to the BLS, the unemployment rate for the Washington-Arlington-Alexandria, DC-VA-MD-WV MSA was 3.1 percent as of January 2020. Unemployment levels significantly increased to 9.4 percent in April 2020 due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined to 2.5 percent as of December 2022. The national unemployment rate was 3.5 percent as of December 2022.

Community Contacts

Examiners reviewed and considered one community needs assessment meeting conducted with representatives of multiple nonprofit and community-based organizations, and three community contact interviews that were conducted by the FDIC and OCC during the evaluation period. All organizations were located within the rating area. Two contacts were with organizations that focused on affordable housing, one that focused on human and social services, education, and one that focused on affordable housing and small business development. Contacts noted the COVID-19 pandemic exacerbated already existing needs such as affordable housing, support for small businesses, access to childcare, economic inequality, and behavioral health issues. Housing affordability is a significant concern throughout the area. The housing squeeze is felt by low-, moderate-, and middle-income individuals and families. Availability of local affordable housing stock has significantly declined given the exponential increase in housing prices in the overall market. Because Washington DC is a high-cost area, many low-income residents receive government housing assistance. One contact stated Washington DC has largely become a mix of extremely poor and extremely rich.

The contacts identified the following needs within the community:

- Affordable housing (both rental and owner-occupied)
- Financing to support rehabilitation of older homes
- First-time homebuyer downpayment grants
- Flexible first-time homebuyer loan products
- First-time homebuyer counseling and workshops

- Funding to increase access to technology for low- and moderate-income individuals, especially students
- Access to and funding for affordable childcare and behavioral health services
- Financial literacy training targeted to learning about credit, building credit, budgeting during a crisis, paying down debt, opening bank accounts, how to access credit, how to achieve financial stability
- Support for Volunteer Income Tax Assistance programs
- Services and education to help people become/remain self-sufficient
- Small business planning assistance that focuses on starting a business
- Access to capital and technical assistance for small businesses
- Workforce development funding to increase access to living-wage jobs
- Grants for small businesses
- Technical assistance for small businesses and micro-entrepreneurs

The area is served by numerous nonprofit organizations, community-based organizations, CDFIs, loans funds, economic development organizations, and community development organizations that provide opportunities to help meet community needs.

Scope of Evaluation in the DC MMSA

Examiners conducted a full-scope review of DC MMSA AA. Examiners placed more emphasis on small loans to businesses versus home mortgage loans in arriving at the overall conclusion.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE DC MMSA

LENDING TEST

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

Based on a full-scope review, the bank's performance in the DC MMSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
DC MMSA	4,571	18,031	0	35	22,637
Total	**4,571**	**18,031**	**0**	**35**	**22,637**

Dollar Volume of Loans ($000s)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
DC MMSA	3,290,011	198,742	0	511,047	3,999,800
Total	**3,290,011**	**198,742**	**0**	**511,047**	**3.999,800**

Based on the June 30, 2022, FDIC Summary of Deposit Market Share Report, CBNA ranked sixth out of 55 FDIC-insured depository institutions (top 11 percent) with a 5.4 percent deposit market share.

For home mortgage loans, CBNA's market share of 1 percent ranked 30th out of 775 lenders (top 4 percent). The top three lenders were Truist Bank with 6 percent market share, Rocket Mortgage with 4.3 percent market share, and Wells Fargo Bank with 3.9 percent market share. The bank's lending performance, relative to the number of lenders in this AA, was stronger than the bank's deposit base.

For small loans to businesses, CBNA's market share of 5.5 percent ranked fifth out of 209 lenders (top 3 percent). The top three lenders were American Express with 30.4 percent market share, JPMorgan Chase Bank with 15.7 percent market share, and Bank of America with 12.8 percent market share. The bank's lending performance, relative to the number of lenders in this AA, was stronger than the bank's deposit base, which further supported the overall excellent responsiveness for Lending Activity.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

Based on the data in the tables, the overall geographic distribution of home mortgage loans was excellent.

For 2020 through 2021, the percentage of home mortgage loans in low-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans in moderate-income geographies was near to the percentage of owner-occupied housing units located in those geographies and approximated the aggregate percentage of all reporting lenders.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Businesses

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

Based on the data in the tables, the overall geographic distribution of small loans to businesses was excellent.

For 2020 through 2021, the percentage of small loans to businesses in low-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. This analysis included 535 PPP loans totaling $26.9 million to businesses located in low- and moderate-income geographies that provided support during the COVID-19 pandemic.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AA. Examiners did not identify any unexplained conspicuous gaps in the full-scope area reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

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

Based on the data in the tables and considering performance context factors, the overall borrower distribution of home mortgage loans was excellent when considering the barriers to housing affordability with the AA.

For 2020 through 2021, the percentage of home mortgage loans to low-income borrowers was well below the percentage of those families but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of those families and the aggregate percentage of all reporting lenders.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Businesses

Refer to Table R in the DC MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables, the overall borrower distribution of small loans to businesses was excellent. Examiners placed more weight on the comparison to the aggregate percentage of all reporting lenders due to the level of PPP lending and constraints posed by the COVID-19 pandemic.

The bank's totals included 980 PPP loans totaling $33.9 million that supported small businesses during the COVID-19 pandemic. The bank did not collect or consider gross annual revenues in the underwriting of 34.8 percent of its small loans to businesses, including PPP loans.

For 2020 through 2021, the percentage of small loans to businesses with revenues of $1 million or less was near to the percentage of businesses with revenues of $1 million or less and exceeded the aggregate percentage of all reporting lenders. The percentage of small loans to businesses was almost double the aggregate percentage of all reporting lenders.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Community Development Lending

The bank was a leader in making CD loans. CD further supported the bank's Outstanding performance under the Lending Test.

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 was excellent. The bank made 35 CD loans totaling $511 million, which represented 34.7 percent of allocated tier 1 capital. By dollar volume, 94.1 percent of the loans supported affordable housing, 4.6 percent funded economic development activities, less than 1 percent funded community services, and 1.1 percent funded revitalization and stabilization efforts. These loans were responsive to identified community credit needs.

The following are examples of the bank's CD loans that illustrate the complexity, leadership, or responsiveness of the bank's CD lending:

- The bank made a $116.8 million complex construction loan for the acquisition and rehabilitation of a 398-unit affordable housing project located east of the Anacostia River, of which a portion of the interest was tax-exempt. CBNA also provided $90 million in permanent financing and invested in the related LIHTC project. The loan was responsive to community needs for affordable housing, as all 398 units are reserved for residents earning less than 60 percent of the area median income and are supported by a long-term HUD HAP contract.

- The bank provided $10.3 million to finance the new construction of a 41-unit LIHTC project in Washington, DC. Of the 41 units, nine are restricted to households earning less than 30 percent of the area median income, and 32 units are restricted to households earning less than 50 percent of the area median income. Nine of the units will be set aside as Permanent Supportive Housing and subsidized by the District of Columbia Housing Authority's Local Rent Supplementation Program. This complex transaction required coordination of both public and private organizations to provide financing.

- The bank originated a $33 million construction loan for the development of a 163-unit multifamily LIHTC project in Oxon Hill, Maryland. Of the 163 units, 18 units are restricted to households earning less than 50 percent of the area median income and 129 units are restricted to households earning less than 60 percent of the area median income with the remaining 16 units offered at market rate. This complex and responsive project will include on-site resident services along with connections to services and activities available in the broader community.

Broader Statewide or Regional Area

In addition, CBNA made 18 CD loans totaling $199.9 million in the broader statewide and regional area whose purpose, mandate, or function included serving CBNA's AA. The broader statewide and regional area lending further supported the overall Outstanding Lending Test rating for the DC MMSA.

Product Innovation and Flexibility

The bank made extensive use of innovative or flexible lending practices in order to serve AA credit needs. As shown in the table below, the bank originated or purchased 625 loans under its flexible lending programs totaling $179.3 million. Refer to the Flexible and Innovative Lending Products section for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount ($000s)
Community Assistance	23	6,652
Deed Restriction	7	1,243
Employer Paid Assistance	2	955
Federal Housing Administration (FHA)	2	508
Home Possible	117	35,339
Home Ready	206	57,243
Home Run	117	34,739
Lender Paid Assistance (LPA) Program	149	41,912
Veterans Affairs, Department of (VA)	2	664
Total	**625**	**179,254**

INVESTMENT TEST

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

Based on a full-scope review, the bank's performance in the DC MMSA AA was excellent.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
DC MMSA	19	129,214	86	130,248	105	100.0	259,462	100.0	0.0	0.0
Total	**19**	**129,214**	**86**	**130,248**	**105**	**100.0**	**259,462**	**100.0**	**0.0**	**0.0**

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.
** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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

The combined prior and current period dollar volume represented 17.6 percent of allocated tier 1 capital.

The bank exhibited excellent responsiveness to credit and community development needs. A majority of the dollar volume of the bank's current and prior period investment transactions supported affordable housing, a primary need in the AA. Most of the grants supported organizations that provided needed community services or affordable housing to primarily low- and moderate-income individuals. By dollar volume, 53.3 percent of total investments and grants supported affordable housing, 31.6 percent funded community services to low- and moderate-income individuals 11.2 percent supported revitalization and stabilization efforts, and 3.9 percent supported economic development. The bank occasionally used innovative or complex investments to support CD initiatives.

The following examples demonstrate the bank's responsiveness to community needs:

- The bank made a $23.3 million LIHTC investment in Washington DC. The investment supported the acquisition and rehabilitation of a multifamily property which created 398 units of affordable housing for low- and moderate-income individuals who earn 60 percent or less of the area median income. The property is also supported by a long-term HAP contract with HUD.

- The bank provided a $5 million grant to a nonprofit organization headquartered in Washington DC that provides supportive services to low- and moderate-income children and families to fight hunger and poverty. The funding provided emergency grants to food banks, schools, and community groups to help underserved communities during COVID-19 pandemic.

- The bank provided a $500,000 grant to a nonprofit CDFI with a mission to help alleviate poverty in the greater Washington, DC metro area by providing affordable financial products, services, and education. The bank offers microloans, training, and support for low-income entrepreneurs who are overlooked by traditional lenders.

Broader Statewide or Regional Area

In addition, CBNA made 34 investments totaling $92.9 million to organizations in the broader statewide and regional area whose purpose, mandate, or function included serving the DC MMSA. The broader statewide and regional area investments further supported the overall Outstanding Investment Test rating for the DC MMSA.

SERVICE TEST

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

Based on a full-scope review, the bank's performance in the DC MMSA AA was good.

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated area Deposits in AA	# of BANK Branches	% of Rated area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
DC MMSA	100.0	30	100.0	6.7	30.0	23.3	40.0	9.9	22.5	31.4	35.5

Distribution of Branch Openings/Closings						
	Branch Openings/Closings					
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches* (+ or -)			

			Low	Mod	Mid	Upp
DC MMSA	0	2	0	0	0	-1

*One closing occurred in a geography without an income designation.

CBNA's distribution of branches in low-income geographies was below, and in moderate-income geographies exceeded, the percentage of the population living within those geographies. Access to delivery systems was positively impacted by the accessibility of five branches located in middle- or upper-income geographies (or geographies without an income designation). These branches served customers from one adjacent low-income geography and four adjacent moderate-income geographies based on customer usage data provided by CBNA during the evaluation.

ADS positively impacted service delivery systems. CBNA offered several ADS including telephone banking, online banking, mobile banking, bill pay, and ATMs which provided additional delivery availability and access to banking services to both retail and business customers. Bank data indicated a majority of households in low- or moderate-income geographies used online banking, mobile banking, and ATM services during 2022 with usage rates by households in low- and moderate-income geographies increasing compared to 2019 usage rates for bill pay, online banking, mobile banking. Additionally in 2022, ADS usage by households in low- and moderate-income census tracts were comparable to or higher than usage rates by households in middle- and upper-income census tracts. CBNA operated 76 deposit-taking ATMs in the AA with 7.9 percent in low-income geographies and 29 percent in moderate-income geographies.

To the extent changes have been made, the bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation, CBNA closed two branches, none of which were located in low- and moderate-income geographies. CBNA did not open any branches during the evaluation period in the DC MMSA.

Services, including where appropriate, business hours, vary in a way that inconveniences its AA, particularly low- and moderate-income geographies or individuals. Branches were generally open from 10:00 a.m. to 6:00 p.m. on Monday and Friday and from 10:00 a.m. to 5:00 p.m. Tuesday through Thursday while several others operated from 9:00 a.m. to 5:00 p.m. on Monday and Friday and from 9:00 a.m. to 4:00 p.m. on Tuesday through Thursday. Most branches did not offer Saturday hours while those that did were open from 10:00 a.m. to 2:00 p.m. Fewer branches (27.3 percent) in low- and moderate-income geographies, operated on Saturdays when compared to branches in middle- and upper-income geographies (57.9 percent).

Community Development Services

The bank provided an adequate level of CD services.

Bank employees provided 73 qualified CD service activities to 16 organizations with 238 qualified hours within this AA during the evaluation period benefiting 2,318 low- and moderate-income individuals and families. Additionally, six employees served ten community development organizations in various capacities, including through leadership roles as board members or committee representatives. CD Services were responsive to identified needs in the DC MMSA and supported homebuyer education, career development, technical assistance to small businesses and community organizations.

Service activity examples during the evaluation period include:

- One senior level employee served as chairman of the board for a community organization that fosters affordable housing opportunities within Washington DC.

- CBNA employees provided 93 hours of training as part of a program which helped prepare 767 low- and moderate-income students with on-the-job skills training and career preparation following graduation.

- CBNA employees dedicated 64 hours to homebuyer and homeownership education for 924 low- and moderate-income individuals and families.

State Ratings

State of California

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

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The overall geographic distribution and borrower distribution of lending was excellent.
- CBNA was a leader in making CD loans, which further supported the bank's Outstanding performance under the Lending Test.
- CBNA had an excellent level of qualified CD investments and grants which were responsive in addressing community needs.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA. CBNA provided a low level of CD services responsive to identified community needs.

Description of Institution's Operations in the State of California

The bank delineated 19 AAs within the state of California. The OCC combined the MSAs and MDs that comprise the Los Angeles CSA (LA CSA), San Jose-San Francisco CSA (San Jose CSA) and Fresno-Madera-Hanford CA CSA for analysis and presentation purposes, reducing the number of AAs within California to six. These include the LA CSA, San Jose CSA, Fresno CSA, Bakersfield CA MSA, Sacramento-Roseville-Folsom, CA MSA, and San Diego-Chula Vista-Carlsbad, CA MSA. Refer to the table in appendix A for a list of all counties of each CSA reviewed.

CBNA operated 274 branches within these AAs, representing 41.7 percent of total branches, and 541 deposit-taking ATMs within these AAs, representing 25.4 percent of total deposit-taking ATMs. CBNA had $80.1 billion in adjusted deposits in California, which represented 27.5 percent of the bank's total adjusted deposits. During the evaluation period, CBNA originated or purchased 48.3 percent of its total dollar volume of home mortgage loans and small loans to businesses in California.

Based on the June 30, 2022 FDIC Summary of Deposit Market Share Report, CBNA had $77 billion in deposits and ranked seventh out of 169 FDIC-insured depository institutions with a 3.8 percent deposit market share. The top three banks by deposit market share were Bank of America with 723 branches and a 21 percent deposit market share, Wells Fargo Bank with 780 branches and a 14.8 percent, and JPMorgan Chase Bank with 817 branches and a 13 percent.

Los Angeles CSA AA

CBNA operated 149 branches and 294 deposit-taking ATMs in the Los Angeles CSA and had $42.4 billion in adjusted deposits. During the evaluation period, CBNA originated or purchased 24.7 percent of its total dollar volume of home mortgage loans and small loans to businesses in this AA. Based on the June 30, 2022 FDIC Summary of Deposit Market Share Report, CBNA had $40.7 billion in deposits and ranked sixth out of 121 FDIC-insured depository institutions with a 4.5 percent deposit market share. The top three banks by deposit market share are Bank of America with 401 branches and an 18 percent deposit market share, JPMorgan Chase Bank with 463 branches and a 17.2 percent, and Wells Fargo Bank with 403 branches and a 14.5 percent.

The following tables provide a summary of the demographics, including housing and business information, for the Los Angeles CSA AA.

Table A – Demographic Information of the Assessment Area

Assessment Area: Los Angeles CSA 2020-2021

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	3,925	8.1	28.5	28.6	33.2	1.6
Population by Geography	18,388,091	7.6	28.6	29.4	33.8	0.5
Housing Units by Geography	6,346,543	6.7	26.2	29.2	37.5	0.4
Owner-Occupied Units by Geography	3,074,292	2.6	18.6	30.8	47.9	0.1
Occupied Rental Units by Geography	2,780,656	11.3	34.6	27.1	26.4	0.6
Vacant Units by Geography	491,595	6.4	26.1	31.5	35.3	0.7
Businesses by Geography	1,937,113	4.8	20.2	26.9	46.6	1.5
Farms by Geography	23,826	3.8	20.4	31.1	44.0	0.6
Family Distribution by Income Level	4,090,774	23.9	16.5	17.6	42.0	0.0
Household Distribution by Income Level	5,854,948	25.3	15.6	16.5	42.6	0.0
Median Family Income MD - 11244 Anaheim-Santa Ana-Irvine, CA		$86,003	Median Housing Value			$449,452
Median Family Income MD - 31084 Los Angeles-Long Beach-Glendale, CA		$62,703	Median Gross Rent			$1,330
Median Family Income MSA - 37100 Oxnard-Thousand Oaks-Ventura, CA MSA		$86,766	Families Below Poverty Level			13.1%
Median Family Income MSA - 40140 Riverside-San Bernardino-Ontario, CA MSA		$61,507				

Source: 2015 ACS and 2021 D&B Data
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification.

Table A – Demographic Information of the Assessment Area

Assessment Area: Los Angeles CSA 2022

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

Geographies (Census Tracts)	4,286	5.5	27.6	31.8	32.8	2.3
Population by Geography	18,644,680	4.9	27.8	33.1	33.2	1.0
Housing Units by Geography	6,516,901	4.6	25.7	32.4	36.2	1.1
Owner-Occupied Units by Geography	3,183,770	1.6	18.3	34.1	45.6	0.4
Occupied Rental Units by Geography	2,836,877	8.0	34.2	30.8	25.3	1.7
Vacant Units by Geography	496,254	4.5	24.6	30.4	38.3	2.1
Businesses by Geography	2,251,275	3.3	19.3	29.5	45.7	2.2
Farms by Geography	26,710	2.8	19.1	33.0	44.0	1.1
Family Distribution by Income Level	4,179,103	23.1	16.7	18.4	41.7	0.0
Household Distribution by Income Level	6,020,647	25.2	15.4	17.1	42.3	0.0
Median Family Income MD - 11244 Anaheim-Santa Ana-Irvine, CA		$106,451	Median Housing Value			$610,825
Median Family Income MD - 31084 Los Angeles-Long Beach-Glendale, CA		$80,317	Median Gross Rent			$1,640
Median Family Income MSA - 37100 Oxnard-Thousand Oaks-Ventura, CA MSA		$101,160	Families Below Poverty Level			9.7%
Median Family Income MSA - 40140 Riverside-San Bernardino-Ontario, CA MSA		$76,686				

Source: 2020 U.S. Census and 2022 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.

To assess the affordability of housing, examiners compared an estimated mortgage payment for the median home to the expected incomes for low- and moderate-income households within each component MSA or MD of the Los Angeles CSA and for both analysis periods.

Based on the information in the 2020-2021 table above, the median housing value for the Los Angeles CSA AA was $449,452. In the lowest median income MSA (Riverside-San Bernardino-Ontario, CA), low-income families earned less than $30,754 and moderate-income families earned less than $49,206. In the highest median income MSA (Oxnard-Thousand Oaks-Ventura, CA), low-income families earned less than $43,383 and moderate-income families earned less than $69,413. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of $769 to $1,085 for low-income borrowers and $1,230 to $1,735 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would have been $2,413. Based on these calculations, low- and moderate-income borrowers would be challenged to qualify for and afford home mortgage financing in any of the MSAs during 2020-2021.

Based on the information in the 2022 table above, the median housing value for the Los Angeles CSA AA was $610,825. In the lowest median income MSA (Riverside-San Bernardino-Ontario, CA), low-income families earned less than $38,343 and moderate-income families earned less than $61,349. In the highest median income MSA (Anaheim-Santa Ana-Irvine, CA), low-income families earned less than

$53,226 and moderate-income families earned less than $85,161. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of $959 to $1,331 for low-income borrowers and $1,533 to $2,129 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would have been $3,279. Based on these calculations, low- and moderate-income borrowers would be challenged to qualify for and afford home mortgage financing in any of the MSAs during 2022.

Affordable housing for low- and moderate-income families is a significant need. This AA is considered a high-cost housing market, limiting access to affordable home ownership among low- and moderate-income borrowers. In evaluating the Los Angeles CSA AA, examiners considered the significant home ownership affordability barriers that exist and evaluated the disparity between the median family income within the AA and the cost of housing, and the impact this has on home ownership.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 13.1 percent of families were living below the poverty level in 2020-2021 and 9.7 percent of families were living below the poverty level in 2022.

Economic Data

Los Angeles-Long Beach-Anaheim, CA MSA

Information from the November 2022 Moody's Analytics report indicated that the Los Angeles-Long Beach-Glendale economy cooled but remained on track for a full employment recovery. Arrivals to Los Angeles International Airport and hotel occupancy have increased as the pandemic faded. However, several tech firms announced layoffs in 2022, which exacerbated the outflow of residents from the MSA. Investor funding decreased due to economic uncertainty and concerns of a recession. The elevated interest rate environment made it difficult for businesses to raise capital. Housing sales fell significantly, which resulted in inventory returning to pre-pandemic levels; however, housing prices remained elevated. The area's strengths included a strong healthcare base, a growing tech presence, international tourism and business, and a seaport that could handle megaships that other ports cannot. Weaknesses included high costs and natural disasters. Major employment industries included education and health services, professional and business services, government, and leisure and hospitality services. Major employers in the area included Cedars-Sinai Medical Center, Los Angeles International Airport, University of California Los Angeles, and VXI Global Solutions.

According to the BLS, the unemployment rate for the Los Angeles-Long Beach-Anaheim CA MSA was 4.5 percent as of January 2020. Unemployment levels significantly increased to 18 percent in May 2020 due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined to 4 percent as of December 2022. The national unemployment rate was 3.5 percent as of December 2022.

Oxnard-Thousand Oaks-Ventura, CA MSA

Information from the July 2022 Moody's Analytics report indicated that the Oxnard-Thousand Oaks-Ventura's economy was in recovery; however, the economy was lagging behind its peers. Employment was further below pre-pandemic levels than the state average, despite job growth that had been on par with the state average. Weaknesses in financial services and other industries offset the strengths in the healthcare and leisure/hospitality industries. Many emerging tech hubs throughout California were luring tech firms away from the area by offering even lower living and business costs. This positioned the MSA unfavorably between the established tech hubs in California and the lower-cost emerging tech hubs. Defense remained a cornerstone of the local economy due to the Naval Base Ventura County, which had become a center for unmanned vehicle testing and development. Labor costs increased for farms due to declines in worker supply. Additionally, farms were negatively impacted by extreme drought and elevated input costs. Rental rates remained elevated. The MSA's average monthly rent was among the five highest of all metro areas in the United States. The area's strengths included a large military presence, lower business costs, and above-average educational attainment. Weaknesses included a high cost of living, weak migration trends, population loss, and a threat to the farming sector from declining immigration and weaker overseas demand. Major employment industries included education and health services, professional and business services, government, and retail trade. Major employers in the area included Naval Base Ventura County, Amgen Inc., Bank of America, WellPoint Health Networks Inc., and Community Memorial Hospital of San Buenaventura.

According to the BLS, the unemployment rate for the Oxnard-Thousand Oaks-Ventura, CA MSA was 4 percent as of January 2020. Unemployment levels significantly increased to 14.8 percent in April 2020 due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined to 3.5 percent as of December 2022. The national unemployment rate was 3.5 percent as of December 2022.

Riverside-San Bernardino-Ontario, CA MSA

Information from the August 2022 Moody's Analytics report indicated that Riverside-San Bernardino-Ontario's economy was at risk. The MSA's unemployment rate dipped to a historic low; however, nearly two-thirds of private industries added jobs. The area was an ideal logistics hub due to competitive business costs and proximity to major highways, large population centers, and the port of San Pedro. The area had comparatively lower costs and was the least congested large metro area in California, which was a significant factor behind the area's population growth. The MSA lagged most of California and the United States in high-wage jobs. The military was a leading source of jobs in the area, which insulated the local economy from regional downturns. The area's strengths included lower business and housing costs than in nearby areas, a young population, positive net migration, and a comparative advantage in transportation, distribution, and warehousing. Weaknesses included a lack of a vibrant central downtown, scarcity of high-wage industries, and a low educational attainment. Major employment industries included professional and business services, government, transportation/utilities, and retail trade. Major employers in the area included Stater Brothers Market, Arrowhead Regional Medical Center, U.S. Marine Corps. Air Ground Combat Center, Fort Irwin, and Walmart Inc.

According to the BLS, the unemployment rate for the Riverside-San Bernardino-Ontario, CA MSA was 4.1 percent as of January 2020. Unemployment levels significantly increased to 15.4 percent in April 2020 due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined to 3.7 percent as of December 2022. The national unemployment rate was 3.5 percent as of December 2022.

Community Contacts

Examiners reviewed seven community contacts conducted during the evaluation period with organizations located throughout the Los Angeles CSA. Interviews were conducted with representatives from two affordable housing organization, one human and social services organization and four organizations focused on small business development. One contact indicated an increase in the unemployment stemming from COVID-19 pandemic, primarily centered in the tourism sector. Multiple contacts noted a lack of affordable housing as a significant issue, which was exacerbated by the population density and a limited housing supply. Due to the intense economy, construction and land costs have increased, which have increased homelessness in the area as well as making affordable housing developments more expensive to build. In addition, increased income inequality has negatively impacted affordable housing. Another contact from a housing agency indicated there is a need for rental assistance and home renovation loans for low- and moderate-income individuals with disabilities.

Multiple contacts noted a need for small business loans, specifically loans for micro businesses and start-ups. Small businesses faced challenges in qualifying for traditional financing and access to credit. There was also an identified need for financial literacy and education in low-income communities, such as assistance with resume writing, applications, and interview skills. One contact noted a lack of access to high quality childcare. One contact indicated that there was a large, underbanked population in the area, as language barriers made it difficult for many to open accounts and identify banking opportunities.

The contacts identified the following needs within the community:

- Affordable housing loans
- Small consumer loans
- Small business loans
- Financial literacy outreach
- Credit counseling
- Credit-building loans
- Small business start-up loans
- New housing to address housing shortage
- Capital investments
- Downpayment assistance
- First-time homebuyer programs

<u>San Jose CSA AA</u>

CBNA operated 93 branches and 189 deposit-taking ATMs in this AA. CBNA had $31.8 billion in adjusted deposits within this AA. During the evaluation period, CBNA originated or purchased 20 percent of its total dollar volume of home mortgage loans and small loans to businesses in this AA. Based on the June 30, 2022, FDIC Summary of Deposit Market Share Report, CBNA had $30.9 billion in deposits and ranked seventh out of 80 FDIC-insured depository institutions with a 3.4 percent deposit market share. The top three banks by deposit market share were Bank of America with 202 branches and a 25.7 percent deposit market share, Silicon Valley Bank with eight branches and an 18.5 percent deposit market share, and Wells Fargo Bank with 233 branches and a 13.9 percent deposit market share.

The following tables provide a summary of the demographics, including housing and business information, for the San Jose CSA AA.

Table A – Demographic Information of the Assessment Area

Assessment Area: San Jose CSA 2020-2021

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,827	9.5	22.5	34.7	32.2	1.1
Population by Geography	8,801,500	8.9	22.5	36.2	32.2	0.3
Housing Units by Geography	3,276,960	8.6	21.3	36.2	33.6	0.3
Owner-Occupied Units by Geography	1,699,058	3.8	16.9	37.4	41.8	0.1
Occupied Rental Units by Geography	1,380,665	14.1	26.6	34.7	24.0	0.6
Vacant Units by Geography	197,237	11.3	22.4	36.1	29.6	0.6
Businesses by Geography	861,043	8.4	18.8	32.9	39.4	0.5
Farms by Geography	19,348	4.5	17.0	39.9	38.6	0.1
Family Distribution by Income Level	2,054,078	23.8	16.2	18.3	41.7	0.0
Household Distribution by Income Level	3,079,723	25.6	15.1	16.7	42.6	0.0
Median Family Income MSA - 32900 Merced, CA MSA		$46,793	Median Housing Value			$582,938
Median Family Income MSA - 33700 Modesto, CA MSA		$55,611	Median Gross Rent			$1,476
Median Family Income MSA - 34900 Napa, CA MSA		$80,921	Families Below Poverty Level			8.8%
Median Family Income MD - 36084 Oakland-Berkeley-Livermore, CA		$93,822				
Median Family Income MD - 41884 San Francisco-San Mateo-Redwood City, CA		$103,742				
Median Family Income MSA - 41940 San Jose-Sunnyvale-Santa Clara, CA MSA		$107,126				
Median Family Income MD - 42034 San Rafael, CA		$121,130				
Median Family Income MSA - 42100 Santa Cruz-Watsonville, CA MSA		$81,912				
Median Family Income MSA - 42220 Santa Rosa-Petaluma, CA MSA		$77,587				
Median Family Income MSA - 44700 Stockton, CA MSA		$59,946				

Source: 2015 ACS and 2021 D&B Data
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification.

Table A – Demographic Information of the Assessment Area Assessment Area: San Jose CSA 2022						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	1,969	7.7	22.2	36.7	30.9	2.5
Population by Geography	8,707,460	7.1	22.3	37.5	31.8	1.3
Housing Units by Geography	3,154,698	6.6	20.9	37.9	33.2	1.4
Owner-Occupied Units by Geography	1,661,902	3.0	17.3	39.0	40.0	0.6
Occupied Rental Units by Geography	1,307,260	10.9	25.6	36.7	24.4	2.4
Vacant Units by Geography	185,536	7.6	19.3	36.5	34.2	2.4
Businesses by Geography	917,849	5.7	17.9	34.5	38.6	3.3
Farms by Geography	18,771	3.9	17.2	39.8	37.4	1.6
Family Distribution by Income Level	2,001,178	23.0	16.5	18.8	41.6	0.0
Household Distribution by Income Level	2,969,162	25.4	15.1	17.4	42.2	0.0
Median Family Income MSA - 32900 Merced, CA MSA		$61,162	Median Housing Value			$878,258
Median Family Income MSA - 33700 Modesto, CA MSA		$69,654	Median Gross Rent			$1,988
Median Family Income MSA - 34900 Napa, CA MSA		$107,995	Families Below Poverty Level			6.2%
Median Family Income MD - 36084 Oakland-Berkeley-Livermore, CA		$123,312				
Median Family Income MD - 41884 San Francisco-San Mateo-Redwood City, CA		$143,526				
Median Family Income MSA - 41940 San Jose-Sunnyvale-Santa Clara, CA MSA		$145,548				
Median Family Income MD - 42034 San Rafael, CA		$159,898				
Median Family Income MSA - 42100 Santa Cruz-Watsonville, CA MSA		$109,931				
Median Family Income MSA - 44700 Stockton, CA MSA		$76,536				

Source: 2020 U.S. Census and 2022 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.

To assess the affordability of housing, examiners compared an estimated mortgage payment for the median home to the expected incomes for low- and moderate-income households within each component MSA or MD of the San Jose CSA and for both analysis periods.

Based on the information in the 2020-2021 table above, the median housing value for the San Jose CSA AA was $582,938. In the lowest median income MSA (Merced, CA), low-income families earned less than $23,397 and moderate-income families earned less than $37,434. In the highest median income MSA (San Rafael, CA), low-income families earned less than $60,565 and moderate-income families earned less than $96,904. One method used to determine housing affordability assumed a maximum

monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of $585 to $1,514 for low-income borrowers and $936 to $2,423 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would have been $3,129. Based on these calculations, low- and moderate-income borrowers would be challenged to qualify for and afford home mortgage financing in any of the MSAs during 2020-2021.

Based on the information in the 2022 table above, the median housing value for the San Jose CSA AA was $878,258. In the lowest median income MSA (Merced, CA), low-income families earned less than $30,581 and moderate-income families earned less than $48,930. In the highest median income MSA (San Rafael, CA), low-income families earned less than $79,949 and moderate-income families earned less than $127,918. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of $765 to $1,999 for low-income borrowers and $1,223 to $3,198 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would have been $4,715. Based on these calculations, low- and moderate-income borrowers would be challenged to qualify for and afford home mortgage financing in any of the MSAs during 2022.

Affordable housing for low- and moderate-income families is a significant need. This AA is considered a high-cost housing market, limiting access to affordable home ownership among low- and moderate-income borrowers. In evaluating the San Jose CSA AA, examiners considered the significant home ownership affordability barriers that exist and evaluated the disparity between the median family income within the AA and the cost of housing, and the impact this has on home ownership.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 8.8 percent of families were living below the poverty level in 2020-2021 and 6.2 percent of families were living below the poverty level in 2022.

Economic Data

San Jose-Sunnyvale-Santa Clara, CA MSA

Information from the July 2022 Moody's Analytics report indicated that San Jose-Sunnyvale-Santa Clara's economy was in recovery. Nearly three-quarters of private sectors added jobs, which pushed unemployment below the pre-recession rate, despite upward pressure from an increased labor force. Tech payrolls surpassed the pre-pandemic peak, despite slower tech employment growth. The tech firms in the area benefitted from a highly skilled workforce, an entrepreneurial culture, and the presence of several significant tech firms. The MSA experienced a shrinking population base. Several employers allowed flexible and remote work during the COVID-19 pandemic, which drove employees into lower-cost areas. Both in- and out-migration increased since the start of pandemic; however, net losses continued. The area's strengths included highly skilled workers, a legacy of successful entrepreneurship that allowed access to substantial venture capital, and a high-value-added manufacturing base that supported wage growth. Weaknesses included high business and living costs, and tech industries with above-average volatility of sustained success as an ongoing enterprise with the speed of innovation.

Major employment industries included professional and business services, education and health services, manufacturing, and information. Major employers in the area included Cisco Systems Inc., Alphabet Inc., eBay Inc., Lockheed Martin Corp., and Intel Corp.

According to the BLS, the unemployment rate for the San Jose-Sunnyvale-Santa Clara, CA MSA was 2.8 percent as of January 2020. Unemployment levels significantly increased to 12.6 percent in April 2020 due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined to 2.4 percent as of December 2022. The national unemployment rate was 3.5 percent as of December 2022.

San Francisco-Oakland-Berkeley, CA MSA

Information from the November 2022 Moody's Analytics report indicated San Francisco-Redwood City-South San Francisco's economy was in recovery. The area's employment remained further below its pre-pandemic peak than all other large California economies, despite nearly two-thirds of private industries adding jobs. Net out-migration moderated; however, the area lost more residents than before the pandemic. Several high-profile tech corporations and smaller tech firms reported layoffs. The elevated interest rate environment made it difficult for these tech firms to raise capital and investor funding. Many tech employees moved out of the area given the ease of working remotely. The area faced one of the sharpest price corrections in the nation. Home sales plummeted to near-historic lows and inventories started to increase. Housing affordability remained an issue despite contracted prices. The area's strengths included a highly educated and skilled workforce, very high incomes, and a cluster of internet and other tech-service companies. Weaknesses included land constraints and regulations that limit construction. Additionally, the area was impacted by high costs, including housing, office rents and energy. Major employment industries included professional and business services, education and health services, government, and information. Major employers in the area included the University of California, San Francisco, Salesforce.com Inc., Wells Fargo, Kaiser Permanente, and United Airlines.

According to the BLS, the unemployment rate for the San Francisco-Oakland-Hayward, CA MSA was 2.8 percent as of January 2020. Unemployment levels significantly increased to 13.9 percent in April 2020 due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined to 2.6 percent as of December 2022. The national unemployment rate was 3.5 percent as of December 2022.

Merced, CA MSA

Information from the July 2022 Moody's Analytics report indicated that Merced's economy stalled after recovering to pre-crisis levels in early 2022. The area's unemployment rate remained below its pre-pandemic level, despite a rebound in the labor force. Crop production, animal production, and agricultural support services comprised more than 20 percent of the area's employment, which was significantly above the national average of one percent. Farming profit margins were compressed due to elevated input costs. Additionally, drought conditions and water shortages impacted farm yields. The percentage of workers employed in food manufacturing in the MSA was approximately seven times the U.S. average. Food manufacturing was negatively impacted by rising input costs stemming from higher commodity prices. Approximately one-third of the non-farm workforce was employed by the government. Housing prices started to come down in the MSA, despite home prices continuing to rise across the state and the U.S. The area's strengths included the presence of UC Merced, strong population trends, and a favorable age structure. Weaknesses included many jobs in low-skilled and low-paying agriculture and food manufacturing, low per capita income, high poverty rate, very few high-tech jobs, and exposure to volatile commodity prices. Major employment industries included

government, education and health services, manufacturing, and retail trade. Major employers in the area included Mercy Medical Center Merced, Foster Farms AG Inc., University of California, Merced, Quad Graphics Merced, and Hilmar Cheese Co.

According to the BLS, the unemployment rate for the Merced, CA MSA was 9.9 percent as of January 2020. Unemployment levels significantly increased to 18.6 percent in April 2020 due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined to 7.9 percent as of December 2022. The national unemployment rate was 3.5 percent as of December 2022.

Modesto, CA MSA

Information from the July 2022 Moody's Analytics report indicated that Modesto's economy was expanding. Professional and business services sector growth outpaced the state and national average. The MSA's unemployment rate declined below its pre-recession level; however, payroll growth slowed and trailed regional and national averages. The MSA's economy was dependent on food producers. The MSA's farms experienced profit compression due to high input costs and low yields. Healthcare jobs accounted for more than one in five private sector jobs in the MSA, which was the area's primary source of higher-wage jobs. There were limited high-paying jobs outside of the manufacturing and healthcare sectors. A limited supply of houses increased prices in the area; however, home price appreciation lagged the national average. The area's strengths included comparatively lower living and business costs, an established manufacturing infrastructure, and a high quality of life. Weaknesses included below-average per capita income, low educational attainment of workforce, weak migration trends, and investments skewed towards low-value-added activities. Major employment industries included educational and health services, government, retail trade, and manufacturing. Major employers in the area included E. and J. Gallo Winery, Doctors Medical Center, Memorial Medical Center, Foster Farms, Del Monte Foods Inc.

According to the BLS, the unemployment rate for the Modesto, CA MSA was 6.8 percent as of January 2020. Unemployment levels significantly increased to 17.5 percent in April 2020 due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined to 5.3 percent as of December 2022. The national unemployment rate was 3.5 percent as of December 2022.

Napa, CA MSA

Information from the July 2022 Moody's Analytics report indicated that Napa's economy was in recovery after growing slowly in early 2022. The MSA's unemployment rate fell below its pre-pandemic level, primarily driven by strong employment growth in the healthcare sector. While the leisure/hospitality sectors also experienced job growth, the manufacturing sector hindered the MSA's overall job growth. Approximately one in six workers in the MSA were employed in food and beverage processing. Despite lower yields of wine, the regional and national demand for wine remained strong as restaurants and bars returned to their pre-pandemic level of traffic. The MSA's population declined for the past four years primarily due to high living costs and limited employment opportunities. The MSA was subject to high employment volatility and was in the bottom ten U.S. metro areas in industrial diversity. Home prices continued to increase; however, the MSA's house price appreciation still lagged the regional and national averages. The area's strengths included very high per capita income, and a prestigious wine and tourism industry that was the backbone of the economy. Weaknesses included high employment volatility, very high cost of living, below-average concentration of prime-age adults, and population loss. Major employment industries included manufacturing, leisure and hospitality services,

education and health services, and government. Major employers in the area included Napa State Hospital, Veteran's Home, St. Helena Hospital, Napa Valley College, and Silverado Resort and Spa.

According to the BLS, the unemployment rate for the Napa, CA MSA was 3.6 percent as of January 2020. Unemployment levels significantly increased to 18.1 percent in April 2020 due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined to 3.1 percent as of December 2022. The national unemployment rate was 3.5 percent as of December 2022.

Santa Cruz-Watsonville, CA MSA

Information from the July 2022 Moody's Analytics report indicated that Santa Cruz-Watsonville's economy was in recovery. The MSA's job growth lagged the national average, and the employment rate remained below the pre-pandemic level. The public sector experienced modest job growth, with the University of California, Santa Cruz increasing hiring as pandemic-related concerns faded. The public sector was key for the MSA, accounting for approximately one quarter of local employment. The farming sector was another key sector for the MSA. Farms benefitted from higher commodity prices, which was partially offset by elevated input costs and the threat of drought. Home price appreciation was above the national average; however, new permits for single-family homes increased during the evaluation period. The area's strengths included comparatively lower housing costs, higher than average per capita income, competitive business costs, and a high quality of life. Weaknesses included above average employment volatility and an uneven distribution of wealth and income. Major employment industries included government, education and health services, leisure and hospitality services, and retail trade. Major employers in the area included Dominican Hospital, University of California, Santa Cruz, Source Naturals, Sesnon House, and Monterey Mushroom Inc.

According to the BLS, the unemployment rate for the Santa Cruz-Watsonville, CA MSA was 6.3 percent as of January 2020. Unemployment levels significantly increased to 17.9 percent in April 2020 due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined to 5 percent as of December 2022. The national unemployment rate was 3.5 percent as of December 2022.

Stockton, CA MSA

Information from the July 2022 Moody's Analytics report indicated Stockton's economy was continuing to expand. The MSA's non-farm payrolls were above pre-pandemic levels and were rising more quickly than the regional and national averages, primarily driven by gains in both private and public sectors. The MSA's unemployment rate was below the pre-recession level, despite an increase in the labor force. Logistics was a key sector for the MSA, as the metro area was located on an inland port with readily accessible highways that fed into heavily populated areas. The MSA was a strategic location for shipping-related activity, with major firms selecting the MSA as a regional fulfillment hub. Logistics was a comparatively low-wage industry, which limited the downstream benefits to consumer industries and the housing market. Farming was another key sector for the MSA. Farming was negatively impacted by supply-chain stress and agricultural prices. Home prices continued to rise rapidly; however, appreciation stalled and was below the state and national rates. The area's strengths included a comparative advantage in logistics, and a large and growing commuter workforce. Weaknesses included low income and low-skilled workforce, exposure to swings in the agriculture sector, scarcity of knowledge-based industries, and high employment volatility. Major employment industries included government, transportation/utilities, education and health services, and retail trade. Major employers in

the area included St. Joseph Medical Center, Amazon, Safeway Inc., Dameron Hospital, and Pacific Gas and Electric.

According to the BLS, the unemployment rate for the Stockton-Lodi, CA MSA was 6.7 percent as of January 2020. Unemployment levels significantly increased to 18.2 percent in April 2020 due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined to 5.2 percent as of December 2022. The national unemployment rate was 3.5 percent as of December 2022.

Community Contacts

Examiners reviewed eight community contacts conducted during the evaluation period with organizations located throughout the San Jose CSA. Interviews were conducted with representatives from six affordable housing organizations, one social service organization, and one government agency that worked with lenders who offered various loans to small businesses. The primary credit need within the area is affordable housing. The San Jose MSA is located within one of the most expensive regions in the country. During the evaluation period, construction costs skyrocketed due to lumber prices and labor shortages. One contact indicated that the main credit needs were more tax-exempt bonds for affordable housing organizations to develop new properties. Many developers had to fund the acquisition or predevelopment of these projects before they could get access to construction funding. Additionally, contacts noted that many tenants were unable to pay rent due to the impact of the COVID-19 pandemic. There is a large population that could not afford rent and asked for rental assistance; however, there was a lack of affordable housing supply.

One contact identified small consumer loans as a community need. For consumers seeking small dollar loans, they often had to turn to Fintechs, since they did not qualify with a bank or had an inherent distrust in banking institutions as a whole.

One contact noted that small businesses were hesitant to take on additional debt during the COVID-19 pandemic, as many were already struggling to make rent and utility payments. One contact indicated that many financial institutions were hesitant to provide small business loans in amounts less than $250,000. Additionally, the contact indicated that many lenders required businesses to have been in business for a minimum amount of time in order to qualify for a loan, which made it more difficult for many start-ups to qualify for small business loans. One contact noted that the cost of living is an issue, which made it harder for businesses to attract and retain minimum wage workers.

The contacts identified the following needs within the community:

- Pre-development funding for affordable housing construction projects
- Donations to affordable housing organizations
- Tax-exempt bonds for the development of new affordable housing projects
- Low-interest rate, long-term loans
- Credit guarantees for construction projects
- Small consumer loans
- Banking services provided in multiple languages
- Financial literacy

Scope of Evaluation in the State of California

Examiners conducted a full-scope review of the Los Angeles CSA AA and the San Jose CSA AA. The Los Angeles CSA AA was the largest AA in the state with 53 percent of deposits and 61.9 percent of the lending activity and received the most weight when determining conclusions. The San Jose CSA AA was the second largest AA in the state with 39.7 percent of deposits and 22.1 percent of the lending activity and received the second most weight when determining conclusions. Examiners analyzed the Bakersfield MSA AA, Fresno CSA AA, Sacramento MSA AA, and San Diego MSA AA using limited-scope procedures.

For all AAs, examiners placed more emphasis on small loans to businesses versus home mortgage loans in arriving at the overall conclusion.

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 CSA AA and San Jose CSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**	**%State Loans**	**%State Deposits****
Full-Scope:							
Los Angeles CSA	21,262	148,531	0	161	169,954	61.9	53.0
San Jose CSA	16,581	43,858	0	96	60,533	22.1	39.7
Limited-Scope:							
Bakersfield MSA	160	4,413	0	3	4,576	1.7	0.3
Fresno CSA	347	5,260	0	5	5,612	2.0	1.6
Sacramento MSA	808	7,615	0	14	8,437	3.1	1.5
San Diego MSA	2,492	22,813	0	55	25,360	9.2	3.9
Total	**41,650**	**232,490**	**0**	**332**	**274,472**	**100.0**	**100.0**

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.
** Percentages are based on adjusted deposit calculations.

Dollar Volume of Loans* (000s)							
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**	**%State Loans**	**%State Deposits ****
Full-Scope:							

Los Angeles CSA	19,115,469	1,375,804	0	1,977,892	22,469,165	49.6	53.0
San Jose CSA	16,089,779	524,193	0	2,096,754	18,710,726	41.2	39.7
Limited-Scope:							
Bakersfield MSA	48,670	27,678	0	22,046	98,394	0.2	0.3
Fresno CSA	81,499	55,906	0	51,257	188,662	0.4	1.6
Sacramento MSA	339,181	54,752	0	297,004	690,937	1.5	1.5
San Diego MSA	2,150,016	191,654	0	868,544	3,210,214	7.1	3.9
Total	**37,824,614**	**2,229,987**	**0**	**5,313,497**	**45,368,098**	**100.0**	**100.0**

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.
** Percentages are based on adjusted deposit calculations.

Los Angeles CSA AA

Lending levels reflected excellent responsiveness to AA credit needs.

Based on the June 30, 2022 FDIC Summary of Deposit Market Share Report, CBNA ranked sixth out of 121 FDIC-insured depository institutions (top 5 percent) with a 4.5 percent deposit market share.

For home mortgage loans, CBNA's market share of 1 percent ranked 21st out of 960 lenders (top 2 percent). The top three lenders were United Wholesale Mortgage with 8 percent market share, Rocket Mortgage with 5.7 percent, and Wells Fargo Bank with 2.9 percent. The bank's lending performance, relative to the number of lenders in this AA, was stronger than the bank's deposit base.

For small loans to businesses, CBNA's market share of 7.5 percent ranked fourth out of 306 lenders (top 1 percent). The top three lenders were American Express with 26.8 percent market share, JPMorgan Chase Bank with 19.8 percent, and Bank of America with 12.5 percent. The bank's lending performance, relative to the number of lenders in this AA, was stronger than the bank's deposit base. The bank's lending performance, relative to the number of lenders in this AA, was stronger than the bank's deposit base, which further supported the overall excellent responsiveness for Lending Activity.

San Jose CSA AA

Lending levels reflected excellent responsiveness to AA credit needs.

Based on the June 30, 2022 FDIC Summary of Deposit Market Share Report, CBNA ranked seventh out of 80 FDIC-insured depository institutions (top 9 percent) with a 3.4 percent deposit market share.

For home mortgage loans, CBNA's market share of 1.3 percent ranked 16th out of 785 lenders (top 2 percent). The top three lenders were Wells Fargo Bank with 6.5 percent market share, First Republic Bank with 5.4 percent, and Rocket Mortgage with 5.3 percent. The bank's lending performance, relative to the number of lenders in this AA, was stronger than the bank's deposit base, which further supported the overall excellent responsiveness for Lending Activity.

For small loans to businesses, CBNA's market share of 5.5 percent ranked fifth out of 248 lenders (top 2 percent). The top three lenders were JPMorgan Chase Bank with 24.7 percent market share, American Express with 21.3 percent, and Bank of America with 12 percent. The bank's lending performance, relative to the number of lenders in this AA, was stronger than the bank's deposit base, which further supported the overall excellent responsiveness for Lending Activity.

Distribution of Loans by Income Level of the Geography

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

Los Angeles CSA 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 the tables, the overall geographic distribution of home mortgage loans was excellent.

For 2020 through 2021, the percentage of home mortgage loans in low-income geographies approximated the percentage of owner-occupied housing units located in those geographies and exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans in moderate-income geographies was near to the percentage of owner-occupied housing units located in those geographies and exceeded the aggregate percentage of all reporting lenders.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

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 the tables, the overall geographic distribution of small loans to businesses was excellent.

For 2020 through 2021, the percentage of small loans to businesses in low-income geographies equaled the percentage of businesses located in those geographies and exceeded the aggregate percentage of all reporting lenders. The percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. This analysis included 2,574 PPP loans totaling $156.9 million to businesses located in low- and moderate-income geographies that provided support during the COVID-19 pandemic.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

San Jose CSA 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 the tables, the overall geographic distribution of home mortgage loans was excellent.

For 2020 through 2021, the percentage of home mortgage loans in low-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans in moderate-income was near to the percentage of owner-occupied housing units located in those geographies and equaled the aggregate percentage of all reporting lenders.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

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 the tables, the overall geographic distribution of small loans to businesses was excellent.

For 2020 through 2021, the percentage of small loans to businesses in low-income was near to the percentage of businesses located in those geographies and equaled the aggregate percentage of all reporting lenders. The percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. This analysis included 1,500 PPP loans totaling $84.5 million to businesses located in low- and moderate-income geographies that provided support during the COVID-19 pandemic.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage, and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AAs. Examiners did not identify any unexplained conspicuous gaps in the full-scope areas reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.

Los Angeles CSA 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 the tables, the overall borrower distribution of home mortgage loans was good when considering the barriers to housing affordability within the AA.

For 2020 through 2021, the percentage of home mortgage loans to low-income borrowers was significantly below the percentage of those families but exceeded the aggregate percentage of all

reporting lenders. The percentage of home mortgage loans to moderate-income borrowers was near to the percentage of those families but exceeded the aggregate percentage of all reporting lenders.

The bank's lending performance in the 2022 period was weaker than the 2020 through 2021 period primarily due to weaker performance against all reporting lenders to low-income borrowers and weaker performance in lending to moderate-income borrowers.

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 the tables, the overall borrower distribution of small loans to businesses was excellent. Examiners placed more weight on the comparison to the aggregate percentage of all reporting lenders due to the level of PPP lending and constraints posed by the COVID-19 pandemic.

The bank's totals included 6,277 PPP loans totaling $217.3 million that supported small businesses during the COVID-19 pandemic. The bank did not collect or consider gross annual revenues in the underwriting of 26.4 percent of its small loans to businesses, including PPP loans.

For 2020 through 2021, the percentage of small loans to businesses with revenues of $1 million or less was near to the percentage of businesses with revenues of $1 million or less but exceeded the aggregate percentage of all reporting lenders. The percentage of small loans to businesses was nearly double the aggregate percentage of all reporting lenders.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

<u>San Jose CSA AA</u>

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 the tables, the overall borrower distribution of home mortgage loans was excellent when considering the barriers to housing affordability with the AA.

For 2020 through 2021, the percentage of home mortgage loans to low-income borrowers was significantly below the percentage of those families but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of those families and the aggregate percentage of all reporting lenders.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

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 the tables, the overall borrower distribution of small loans to businesses was excellent. Examiners placed more weight on the comparison to the aggregate percentage of all reporting lenders due to the level of PPP lending and constraints posed by the COVID-19 pandemic.

The bank's totals included 2,681 PPP loans totaling $103.5 million that supported small businesses during the COVID-19 pandemic. The bank did not collect or consider gross annual revenues in the underwriting of 34.1 percent of its small loans to businesses, including PPP loans.

For 2020 through 2021, the percentage of small loans to businesses with revenues of $1 million or less was near to the percentage of businesses with revenues of $1 million or less but exceeded the aggregate percentage of all reporting lenders. The percentage of small loans to businesses was nearly double the aggregate percentage of all reporting lenders.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Community Development Lending

The bank was a leader in making CD loans. CD lending further supported the bank's Outstanding performance under the Lending Test.

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.

Los Angeles CSA AA

The level of CD lending was excellent. The bank made 161 CD loans totaling $2 billion, which represented 45.1 percent of allocated tier 1 capital. By dollar volume, 93.9 percent of the loans supported affordable housing, 5 percent funded economic development activities, less than 1 percent funded community services, and less than 1 percent funded revitalization and stabilization efforts. These loans were responsive to identified community credit needs.

The following are examples of the bank's CD loans that illustrate the complexity, leadership, or responsiveness of the bank's CD lending:

- The bank provided a $17.7 million construction to permanent loan to finance a 57-unit affordable housing project in Los Angeles focused on special needs, homeless, or chronically homeless persons or families. This project was responsive to community needs for affordable housing providing 56 units income restricted to tenants earning less than 50 percent of the area median income. Additionally, 42 of the 57 units were reserved for homeless veterans. Comprehensive supportive services were also provided through a local non-profit organization.

- The bank financed a $12.8 million construction to permanent loan for the new construction of a 46-unit affordable housing project in Los Angeles. This project was a modular build with units constructed offsite and then shipped and assembled onsite. This project was responsive to the need for affordable housing with 45 units designated as permanent supportive housing for homeless women earning less than 50 percent of the area median income. The project provided supportive services to the tenants and promote long-term housing stability.

- The bank originated a $15.7 million construction to permanent loan for the development of a complex 42-unit LIHTC affordable housing project in Los Angeles. The project was responsive to the identified community need for affordable housing with 41 units income restricted to households earning less than 50 percent of the area median income. Of those 41 units, 21 were reserved as permanently supportive housing for formerly homeless individuals or families. Onsite supportive services were provided at no cost in coordination with local public and private organizations.

San Jose CSA AA

The level of CD lending was excellent. The bank made 96 CD loans totaling $2.1 billion, which represented 63.9 percent of allocated tier 1 capital. By dollar volume, 97.2 percent of the loans supported affordable housing, 2.1 percent funded economic development activities, less than 1 percent funded community services, and less than 1 percent funded revitalization and stabilization efforts. These loans were responsive to identified community credit needs.

The following are examples of the bank's CD loans that illustrate the complexity, leadership, or responsiveness of the bank's CD lending:

- The bank provided an $83.5 million construction to permanent loan for the development of a 138-unit multifamily project in San Francisco. This complex project required multiple layers of funding and included capital from the City and County of San Francisco. The project consisted of 114 affordable housing units, 23 market rate units, and one manager's unit. This project was responsive to area needs for affordable housing.

- The bank provided a $56.9 million construction to permanent loan to finance the new construction of an 84-unit multifamily, LIHTC project located in a low-income census tract in San Francisco. The project comprised 82 affordable units and two manager units. Thirteen of the units were designated for disabled or homeless veterans under the Veterans Administration Supportive Housing Program. Fifty-five units were covered by a Section 8 Project-Based Voucher Program Agreement. This project was responsive to area needs for affordable housing.

- The bank provided a $35 million construction to permanent loan to finance an 80-unit multifamily LIHTC project targeting veterans in San Mateo County. The project included 79 units that were income restricted to tenants earning less than 60 percent of the area median income and one manager's unit that was not income restricted. Supportive services were provided by local non-profit and governmental organizations. This project was responsive to area needs for affordable housing.

Broader Statewide or Regional Area

In addition, CBNA made 38 CD loans totaling $516.4 million in the broader statewide and regional area whose purpose, mandate, or function included serving CBNA's AAs. The broader statewide and regional CD loans further supported the overall Outstanding Lending Test rating for the state of California.

Product Innovation and Flexibility

The bank made little use of innovative or flexible lending practices in order to serve AA credit needs. Refer to the Flexible and Innovative Lending Products section for additional details regarding the programs.

Los Angeles CSA AA

As shown in the table below, the bank originated or purchased 262 loans under its flexible lending programs totaling $110.9 million.

Flexible Loan Program	Number of Loans	Dollar Amount ($000s)
Community Assistance	6	1,611
Deed Restriction	4	925
Federal Housing Authority	4	1,052
Home Possible	9	2,829
Home Ready	44	11,944
Home Run	82	40,133
Lender Paid Assistance Program	110	51,817
Mortgage Credit Certificates (MCCs) and Re-Issued MCCs	1	175
Veteran Affairs, Department of	2	397
Total	**262**	**110,884**

San Jose CSA AA

As shown in the table below, the bank originated or purchased 244 loans under its flexible lending programs totaling $112.7 million.

Flexible Loan Program	Number of Loans	Dollar Amount ($000s)
Community Assistance	4	1,297
Deed Restriction	3	1,168
Home Possible	14	4,614
Home Ready	90	30,966
Home Run	53	28,587
Lender Paid Assistance Program	79	45,618
Veteran Affairs, Department of	1	459
Total	**244**	**112,710**

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Bakersfield MSA AA, Fresno CSA AA, Sacramento MSA AA, and San Diego MSA AA was consistent with the bank's overall performance under the Lending Test in the full-scope areas. Performance in the limited-scope AAs did not alter the overall Lending Test conclusion for the state of California.

Refer to Tables O through R 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 CSA AA and San Jose CSA AA was excellent.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Full-Scope:										
Los Angeles CSA	108	711,520	99	162,025	207	41.9	873,545	44.5	0	0
San Jose CSA	91	443,059	88	293,632	179	36.2	736,691	37.6	0	0
Limited-Scope:										
Bakersfield MSA	6	9,815	2	248	8	1.6	10,063	0.5	0	0
Fresno CSA	10	42,454	9	2,751	19	3.8	45,205	2.3	0	0
Sacramento MSA	11	65,874	16	15,553	27	5.5	81,427	4.2	0	0
San Diego MSA	35	193,574	19	20,756	54	10.9	214,330	10.9	0	0
Total	**261**	**1,466,296**	**233**	**494,965**	**494**	**100.0**	**1,961,261**	**100.0**	**0**	**0**

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.
** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Los Angeles CSA AA

The bank had 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 combined prior and current period dollar volume represented 19.9 percent of the bank's allocated tier 1 capital.

The bank exhibited excellent responsiveness to credit and community development needs. A substantial majority of the dollar volume of the bank's current and prior period investment transactions supported affordable housing, a primary need in the AA. A substantial majority of the grants supported organizations that provided needed community services to primarily low- and moderate-income individuals. By dollar volume, 58.1 percent of total investments and grants supported affordable housing, 40.3 percent funded community services to low- and moderate-income individuals, and approximately 1.6 percent supported economic development and revitalization and stabilization efforts. The bank made significant use of complex investments to support CD initiatives, all of which were investments in LIHTC projects.

The following examples demonstrate the bank's use of complex investments or responsiveness to community needs:

- The bank made a $15 million equity investment in a 180-unit multifamily LIHTC and Section 8 project, located in Torrance in Los Angeles County. The project required a complex financing structure. The bank funded 49 percent of the LIHTC equity and served as the lender for the tax-exempt loan of $71 million. The project included 178 affordable housing units restricted to low- and

moderate-income individuals and families who earn less than 50 percent of the area median income, and two manager's units.

- The bank made a $12.3 million equity investment in a 210-unit multifamily LIHTC and Section 8 project, located in Lancaster in Los Angeles County. The project required a complex financing structure. The bank funded 49 percent of the LIHTC equity and served as the lender for the tax-exempt loan of $59.2 million. The project included 208 affordable housing units restricted to low- and moderate-income individuals and families, and two manager's units. The 208 affordable housing units were income restricted to households earning less than 50 percent of the area median income.

- The bank made a $31.9 million investment in bonds issued by a school district that primarily serves low- and moderate-income students and families. The funds were used to update aging classrooms, upgrade security systems, improve computer technology, and reduce overcrowding by building neighborhood schools and early education centers. This investment helped to support community services by making improvements to a school district where 79.2 percent of students are eligible for the National School Lunch Program.

San Jose CSA AA

The bank had 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 combined prior and current period dollar volume represented 22.4 percent of allocated tier 1 capital.

The bank exhibited excellent responsiveness to credit and community development needs. A substantial majority of the dollar volume of the bank's current and prior period investment transactions supported affordable housing, a primary need in the AA. A substantial majority of the grants supported organizations that provided needed community services to primarily low- and moderate-income individuals. By dollar volume, 68.6 percent of total investments and grants supported affordable housing, 28.4 percent funded community services to low- and moderate-income individuals, and approximately 3 percent supported economic development and revitalization and stabilization efforts. The bank made significant use of complex investments to support CD initiatives, all of which were investments in LIHTC projects.

The following examples demonstrate the bank's use of complex investments or responsiveness to community needs:

- The bank made a $21.9 million equity investment in a 146-unit multifamily LIHTC project located in San Francisco. The project required a complex financing structure, including tax-exempt private activity bonds and a letter of credit which the bank provided to fund a portion of the construction loan. The project included a total of 145 affordable housing units restricted to low- and moderate-income individuals and families, and one manager's unit. All units were income restricted to persons earning 60 percent or less of the area median income.

- The bank made a $17.1 million equity investment in a 132-unit multifamily LIHTC project, located in Burlingame, California. The project used a complex financing structure, which included the bank providing 49 percent of the LIHTC equity and a $72 million construction to permanent loan to finance the project. The property consisted of a total of 131 affordable housing units restricted to low- and moderate-income individuals and families, and one manager's unit.

- The bank made a $700,000 grant to an organization which provides guidance on filing taxes to low- and moderate-income individuals and families. The organization provides needed community services by participating in the Volunteer Income Tax Assistance (VITA) program, which focuses on providing financial education and assistance with filing taxes to individuals who earn less than $64,000 annually.

Broader Statewide or Regional Area

In addition, CBNA made 45 investments totaling $120.9 million to organizations in the broader statewide and regional area whose purpose, mandate, or function included serving CBNA's AA. The broader statewide and regional area investments further supported the overall Outstanding Investment Test rating for the state of California.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Bakersfield MSA AA, Fresno CSA AA, Sacramento MSA AA, and San Diego MSA AA was consistent with the bank's overall performance under the Investment Test in the full-scope areas.

SERVICE TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Los Angeles CSA and San Jose CSA was good.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated area Deposits in AA	# of BANK Branches	% of Rated area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Los Angeles CSA	53.0	149	54.4	2.0	25.5	30.2	38.9	4.9	27.8	33.1	33.2
San Jose CSA	39.7	93	33.9	4.3	19.4	35.5	35.5	7.1	22.3	37.5	31.8
Bakersfield MSA	0.3	2	0.7	0.0	50.0	0.0	50.0	8.0	28.0	29.8	31.4
Fresno CSA	1.6	9	3.3	0.0	44.4	11.1	33.3	10.0	28.1	27.1	33.5

Sacramento MSA	1.5	5	1.8	20.0	20.0	20.0	40.0	10.8	29.4	35.1	23.9
San Diego MSA	3.9	16	5.8	6.3	12.5	37.5	43.8	6.5	24.5	34.6	33.4

Distribution of Branch Openings/Closings						
	Branch Openings/Closings					
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)*			
			Low	Mod	Mid	Upp
Los Angeles CSA	0	3	0	-1	0	-1
San Jose CSA	0	7	-1	-1	-2	-2
Bakersfield MSA	0	0	0	0	0	0
Fresno CSA	0	0	0	0	0	0
Sacramento MSA	0	4	0	-2	-2	0
San Diego MSA	0	2	0	0	-1	-1

*CBNA closed one branch in the Los Angeles CSA AA and one branch in the San Jose CSA AA both of which were located in census tracts without an income designation

Los Angeles CSA AA

CBNA's distribution of branches in low-income geographies was well below, and in moderate-income geographies approximated, the percentage of the population living within those geographies. Access to delivery systems was positively impacted by the accessibility of 27 branches located in middle- or upper-income geographies (or geographies without an income designation). These branches served customers in three adjacent low-income geographies and 24 adjacent moderate-income geographies based on customer usage data provided by CBNA during the evaluation.

ADS positively impacted service delivery systems. CBNA offered several ADS including telephone banking, online banking, mobile banking, bill pay, and ATMs which provided additional delivery availability and access to banking services to both retail and business customers. Bank data indicated a majority of households in low- or moderate-income geographies used online banking, mobile banking, and ATM services during 2022 with usage rates by households in low- and moderate-income geographies increasing compared to 2019 for bill pay, online banking, mobile banking. Additionally in 2022, ADS usage by households in low- and moderate-income census tracts was comparable to or higher than usage rates by households in middle- and upper-income census tracts. CBNA operated 294 deposit-taking ATMs in the AA with 2.4 percent in low-income geographies and 27.2 percent in moderate-income geographies.

To the extent changes have been made, the bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank closed three branches, none of which were in low-income geographies and one of which was in a moderate-income geography. The branch closure was due to lower than market average deposit levels and lower than market average monthly transaction volume. The 2020 Census did not impact the branch's census tract income designation. The bank did not open any branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies or individuals. Branches were generally open from 10:00 a.m. to 5:00 p.m. on Monday through Friday and from 10:00 a.m. to 2:00 p.m. on Saturday. More branches (70.7 percent) in low- and moderate-income geographies, operated on Saturdays when compared to branches in middle- and upper-income geographies (68 percent).

San Jose CSA AA

CBNA's distribution of branches in low-income geographies was below, and in moderate-income geographies was near to, the percentage of the population living within those geographies. Access to delivery systems was positively impacted by the accessibility of 27 branches located in middle- or upper-income geographies (or geographies without an income designation). These branches served customers in seven adjacent low-income geographies and 20 adjacent moderate-income geographies based on customer usage data provided by CBNA during the evaluation.

ADS positively impacted service delivery systems. CBNA offered several ADS including telephone banking, online banking, mobile banking, bill pay, and ATMs which provided additional delivery availability and access to banking services to both retail and business customers. Bank data indicated a majority of households in low- or moderate-income geographies used online banking, mobile banking, during 2022 with usage rates by households in low- and moderate-income geographies increasing compared to 2019 for bill pay, online banking, mobile banking. Additionally in 2022, ADS usage by households in low- and moderate-income census tracts was comparable to or higher than usage rates by households in middle- and upper-income census tracts. CBNA operated 189 deposit-taking ATMs in the AA with 4.2 percent in low-income geographies and 18 percent in moderate-income geographies.

To the extent changes have been made, the bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank closed seven branches, including one in a low-income geography and one in a moderate-income geography. The branch closed in the low-income geography was to be consolidated and relocated. The branch closed in the moderate-income geography resulted from a strategy to reduce the bank's presence in non-core market areas. The 2020 Census did not impact the branch's census tract income designations. The bank did not open any branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies or individuals. Branches were generally open from 10:00 a.m. to 5:00 p.m. on Monday through Friday and from 10:00 a.m. to 2:00 p.m. on Saturday. Most branches (77.3 percent) in low- and moderate-income geographies, operated on Saturdays when compared to branches in middle- and upper-income geographies (63.6 percent).

Community Development Services

Los Angeles CSA AA

The bank provided a low level of CD services.

Bank employees provided 133 qualified CD service activities to 26 organizations with 260 qualified hours within this AA during the evaluation period. Additionally, 11 employees served 13 community development organizations in various capacities including through leadership roles as a board member

or committee representative. The bank's assistance was responsive to identified needs in the AA, particularly with affordable housing, homebuyer education and financial literacy education.

Service activity examples during the evaluation period include:

- An employee served on the board, throughout the evaluation period, including as board chair in 2022, for an affordable housing CDFI which provided down payment assistance for first-time, low-income homebuyers.

- CBNA employees conducted homebuyer education activities to low- or moderate-income individuals and families. In total, 93 employees conducted 83 homebuyer education activities benefiting 2,143 low- or moderate-income individuals and families.

- CBNA employees conducted financial literacy activities for students and families. In total, 98 employees conducted 43 financial literacy education activities benefiting 3,087 low- or moderate-income students and families.

San Jose CSA AA

The bank provided a low level of CD services.

Bank employees provided 78 qualified CD service activities to 20 organizations with 274 qualified hours within this AA during the evaluation period. Additionally, eight employees served 10 community development organizations in various capacities including through leadership roles as a board member or committee representative. The bank's assistance was responsive to identified needs in the AA, particularly with economic development and financial literacy education.

Service activity examples during the evaluation period include:

- An employee served on the board, for the entire evaluation period, of a community development organization that provided community services primarily to low- and moderate-income persons and families in San Francisco's Mission District.

- CBNA employees provided financial education and career counseling to low- and moderate-income students and families. In total, 122 employees conducted 41 financial literacy activities benefiting 2,180 students or families while 59 employees provided career counseling to 279 students or families.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Bakersfield MSA AA, Fresno CSA AA, Sacramento MSA AA, and San Diego MSA AA was weaker than the bank's overall performance under the Service Test in the full-scope areas due to less accessible service delivery systems. Performance in the limited-scope AAs did not alter the overall Service Test conclusion for the state of California.

State of Florida

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

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The overall geographic distribution of lending was excellent, and the borrower distribution of lending was excellent.
- CBNA was a leader in making CD loans, which further supported the bank's Outstanding performance under the Lending Test.
- CBNA had an excellent level of qualified CD investments and grants which were responsive in addressing community needs.
- Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AA. CBNA provided a relatively high level of CD services responsive to identified community needs.

Description of Institution's Operations in the State of Florida

The bank delineated four AAs in the state of Florida. These include the three MDs that make up the Miami-Fort Lauderdale-Pompano Beach, FL MSA, which were combined, analyzed, and presented as one AA, the Miami MSA, for purposes of this evaluation and in evaluating performance under each test. CBNA also delineated Duval County within the Jacksonville, FL MSA (Jacksonville MSA). Refer to the table in appendix A for a list of counties reviewed.

CBNA operated 52 branches within these AAs, representing 7.9 percent of total branches, and 145 deposit-taking ATMs within these AAs, representing 6.8 percent of total deposit-taking ATMs. CBNA had $26.3 billion in adjusted deposits within the Florida AAs, which represented 9.1 percent of the bank's total adjusted deposits. During the evaluation period, CBNA originated or purchased 6.2 percent of its total dollar volume of home mortgage loans and small loans to businesses in Florida.

Based on the June 30, 2022, FDIC Summary of Deposit Market Share Report, CBNA had $27.5 billion in deposits and ranked fourth out of 90 FDIC-insured depository institutions with a 6.2 percent deposit market share. The top three banks by deposit market share are Bank of America with 189 branches and a 26.1 percent deposit market share, Wells Fargo Bank with 210 branches and 11.8 percent, and JPMorgan Chase Bank with 189 branches and 9.8 percent.

The following tables provide a summary of the demographics, including housing and business information, for the Miami MSA AA.

Miami MSA AA

CBNA operated 51 branches and 143 deposit-taking ATMs in this AA. CBNA had $26.3 billion in adjusted deposits within this AA. During the evaluation period, CBNA originated or purchased 6.1 percent of its total dollar volume of home mortgage loans and small loans to businesses in this AA. Based on the June 30, 2022, FDIC Summary of Deposit Market Share Report, CBNA had $27.5 billion in deposits and ranked fourth out of 83 FDIC-insured depository institutions with a 7.8 percent deposit market share. The top three banks by deposit market share are Bank of America with 171 branches and an 18 percent, Wells Fargo Bank with 185 branches and 13.3 percent, and JPMorgan Chase Bank with 177 branches and 12.1 percent deposit.

Table A – Demographic Information of the Assessment Area

Assessment Area: Miami MSA 2020-2021

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,219	6.2	28.2	29.5	33.6	2.5
Population by Geography	5,861,000	5.8	28.9	31.5	33.4	0.4
Housing Units by Geography	2,484,604	5.5	27.9	30.9	35.3	0.3
Owner-Occupied Units by Geography	1,248,038	2.6	23.2	32.9	41.2	0.2
Occupied Rental Units by Geography	799,004	10.1	36.4	30.1	22.9	0.5
Vacant Units by Geography	437,562	5.6	25.9	26.7	41.2	0.6
Businesses by Geography	1,666,020	4.1	22.2	28.3	44.1	1.2
Farms by Geography	21,208	5.1	25.2	29.6	39.7	0.4
Family Distribution by Income Level	1,330,793	23.1	17.0	17.7	42.2	0.0
Household Distribution by Income Level	2,047,042	25.1	15.7	16.6	42.6	0.0
Median Family Income MD - 22744 Fort Lauderdale-Pompano Beach-Sunrise, FL		$61,809	Median Housing Value			$227,861
Median Family Income MD - 33124 Miami-Miami Beach-Kendall, FL		$49,264	Median Gross Rent			$1,194
Median Family Income MD - 48424 West Palm Beach-Boca Raton-Boynton Beach, FL		$65,914	Families Below Poverty Level			13.5%

Source: 2015 ACS and 2021 D&B Data
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification.

Table A – Demographic Information of the Assessment Area

Assessment Area: Miami MSA 2022

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,497	5.3	26.3	30.5	34.2	3.7
Population by Geography	6,138,333	4.7	28.0	31.4	34.4	1.5
Housing Units by Geography	2,548,767	4.8	27.4	30.9	35.5	1.5
Owner-Occupied Units by Geography	1,299,739	2.9	21.8	32.1	42.2	1.0

Occupied Rental Units by Geography	873,001	7.8	37.4	31.0	22.0	1.8
Vacant Units by Geography	376,027	4.5	23.5	26.3	43.6	2.2
Businesses by Geography	1,969,338	2.9	22.1	29.2	43.1	2.7
Farms by Geography	23,703	3.8	24.7	30.2	40.0	1.3
Family Distribution by Income Level	1,418,815	22.5	17.6	18.0	41.9	0.0
Household Distribution by Income Level	2,172,740	24.7	16.0	16.8	42.5	0.0
Median Family Income MD - 22744 Fort Lauderdale-Pompano Beach-Sunrise, FL		$73,430	Median Housing Value			$321,948
Median Family Income MD - 33124 Miami-Miami Beach-Kendall, FL		$60,666	Median Gross Rent			$1,449
Median Family Income MD - 48424 West Palm Beach-Boca Raton-Boynton Beach, FL		$79,785	Families Below Poverty Level			10.6%

Source: 2020 U.S. Census and 2022 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.

To assess the affordability of housing, examiners compared an estimated mortgage payment for the median home to the expected incomes for low- and moderate-income households within each component MDs of the Miami MSA and for both analysis periods.

Based on the information in the 2020-2021 table above, the median housing value for the Miami MSA AA was $227,861. In the lowest median income MD (Miami-Miami Beach-Kendall, FL), low-income families earned less than $24,632 and moderate-income families earned less than $39,411. In the highest median income MD (West Palm Beach-Boca Raton-Boynton Beach, FL), low-income families earned less than $32,957 and moderate-income families earned less than $52,731. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of $616 to $824 for low-income borrowers and $985 to $1,318 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would have been $1,223. Based on these calculations, low-income and some moderate-income borrowers would be challenged to qualify for and afford home mortgage financing in any of the MDs during 2020-2021.

Based on the information in the 2022 table above, the median housing value for the Miami MSA AA was $321,948. In the lowest median income MD (Miami-Miami Beach-Kendall, FL), low-income families earned less than $30,333 and moderate-income families earned less than $48,533. In the highest median income MD (West Palm Beach-Boca Raton-Boynton Beach, FL), low-income families earned less than $39,893 and moderate-income families earned less than $63,828. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of $758 to $997 for low-income borrowers and $1,213 to $1,596 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would have been $1,728. Based on these calculations, low- and moderate-income borrowers would be challenged to qualify for and afford home mortgage financing in any of the MDs during 2022.

Affordable housing for low- and moderate-income families is a significant need. This AA is considered a high-cost housing market, limiting access to affordable home ownership among low- and moderate-income borrowers. In evaluating the Miami MSA AA, examiners considered the significant home ownership affordability barriers that exist and evaluated the disparity between the median family income within the AA and the cost of housing, and the impact this has on home ownership.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 13.5 percent of families were living below the poverty level in 2020-2021 and 10.6 percent of families were living below the poverty level in 2022.

Economic Data

Information from the November 2022 Moody's Analytics report indicated the Miami-Miami Beach-Kendall's economy is currently at risk. Even though job growth has slowed, it still ranks within the top half of large metro divisions. The area's strengths include strong ties to Latin America, a well-developed shipping and distribution infrastructure, a luxury status that attracts international capital, and the world's second-busiest cruise port. Tourism is a key economic driver for the area. Weaknesses include high household debt burden, congested roads and airport, and an industrial structure that leaves the economy susceptible to business cycle downturns. Major employment industries include education and health services, professional and business services, government, and retail trade. Miami's major employers are Publix Super Markets, Baptist Health South Florida, American Airlines, Jackson Health System, and Florida International University.

According to the BLS, the unemployment rate for the Miami-Fort Lauderdale-West Palm Beach, FL MSA was 2.7 percent as of January 2020. Unemployment levels significantly increased to 14.2 percent in May 2020 due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined to 2.1 percent as of December 2022. The national unemployment rate was 3.5 percent as of December 2022.

Community Contacts

Examiners reviewed and considered six community contact interviews that were conducted during the evaluation period. The organizations contacted focus on affordable housing, community services, and revitalization in the Miami MSA AA. Contacts indicated the housing market and economy are very strong. People are relocating to Broward County, resulting in significant demand for housing combined with a lack of supply. Rent prices and home prices are near all-time highs, and housing is unaffordable for low- and moderate-income individuals. One contact stated Palm Beach County is Florida's wealthiest county and the foreclosure rate was noted to be high within the low- and moderate-income communities in Palm Beach County. Many homeowners have been forced into the rental market, which has resulted in a booming rental market. Contacts noted there is a need for access to capital, especially for small businesses, and affordable rental housing for low- and moderate-income individuals.

The contacts identified the following needs within the community:

- Affordable housing, both single and multifamily housing developments

- Financial literacy education and counseling
- Post home purchase counseling and support
- Flexible small business loans, specifically for minority owned businesses
- Small business lending
- Redevelopment in distressed areas including commercial corridors
- Revitalization of low-income neighborhoods
- Support for economic development in low- and moderate-income areas

Opportunities for participation by financial institutions include access to credit for both consumers and small businesses, funding for the development of affordable multifamily housing, and financial education.

Scope of Evaluation in the State of Florida

Examiners conducted a full-scope review of the Miami MSA AA. The Miami MSA AA was the largest AA in the state with 99.8 percent of deposits and 93.1 percent of lending activity and received the most weight when determining conclusions. Examiners analyzed the Jacksonville MSA AA using limited-scope procedures.

For both AAs, examiners placed more emphasis on small loans to businesses versus home mortgage loans in arriving at the overall conclusion.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Miami MSA AA was excellent

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**	**%State Loans**	**%State Deposits****
Full-Scope:							
Miami MSA	4,718	51,377	0	62	56,157	93.1	99.8
Limited-Scope:							
Jacksonville MSA	184	3,967	0	4	4,155	6.9	0.2
Total	**4,902**	**55,344**	**0**	**66**	**60,312**	**100.0**	**100.0**

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.
** Percentages are based on adjusted deposit calculations.

Dollar Volume of Loans* ($000s)

Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits**
Full-scope:							
Miami MSA	4,628,581	457,563	0	686,969	5,773,113	98.0	99.8
Limited-Scope:							
Jacksonville MSA	52,471	22,086	0	42,050	116,607	2.0	0.2
Total	**4,681,052**	**479,649**	**0**	**729,019**	**5,889,720**	**100.0**	**100.0**

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Due to rounding, totals may not equal 100.0%. ** Percentages are based on adjusted deposit calculations.

Based on the June 30, 2022, FDIC Summary of Deposit Market Share Report, CBNA ranked fourth out of 83 FDIC-insured depository institutions (top 5 percent) with a 7.8 percent deposit market share.

For home mortgage loans, CBNA's market share of 0.9 percent ranked 28th out of 1,112 lenders (top 3 percent). The top three lenders were United Wholesale Mortgage with 8.1 percent market share, Rocket Mortgage with 5 percent, and Wells Fargo Bank with 3.1 percent. The bank's lending performance, relative to the number of lenders in this AA, was stronger than the bank's deposit base.

For small loans to businesses, CBNA's market share of 5.7 percent ranked fourth out of 280 lenders (top 1 percent). The top three lenders were American Express with 30.3 percent market share, JPMorgan Chase Bank with 15.7 percent, and Bank of America with 15.4 percent. The bank's lending performance, relative to the number of lenders in this AA, was stronger than the bank's deposit base.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O in the state of Florida 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 the tables, the overall geographic distribution of home mortgage loans was good.

For 2020 through 2021, the percentage of home mortgage loans in low-income geographies was below the percentage of owner-occupied housing units located in those geographies and equaled the aggregate percentage of all reporting lenders. The percentage of home mortgage loans in moderate-income geographies was near to the percentage of owner-occupied housing units located in those geographies and exceeded the aggregate percentage of all reporting lenders.

The bank's lending performance in the 2022 period was stronger than the 2020 through 2021 period. The percentage of home mortgage loans in moderate-income geographies exceeded the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table Q in the state of Florida 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 the tables, the overall geographic distribution of small loans to businesses was excellent.

For 2020 through 2021, the percentage of small loans to businesses in low-income geographies was near to the percentage of businesses located in those geographies and was below the aggregate percentage of all reporting lenders. The percentage of small loans to businesses in moderate-income exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. This analysis included 946 PPP loans totaling $50.3 million to businesses located in low- and moderate-income geographies that provided support during the COVID-19 pandemic.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AA. Examiners did not identify any unexplained conspicuous gaps in the full-scope area reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited excellent distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

Refer to Table P in the state of Florida 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 the tables, the overall borrower distribution of home mortgage loans was good when considering the barriers to housing affordability within the AA.

For 2020 through 2021, the percentage of home mortgage loans to low-income borrowers was significantly below the percentage of those families but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers was below the percentage of those families but exceeded the aggregate percentage of all reporting lenders.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Businesses

Refer to Table R in the state of Florida 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 the tables, the overall borrower distribution of small loans to businesses was excellent. Examiners placed more weight on the comparison to the aggregate percentage of all reporting lenders due to the level of PPP lending and constraints posed by the COVID-19 pandemic.

The bank's totals included 2,525 PPP loans totaling $69.6 million that supported small businesses with revenues of $1 million or less during the COVID-19 pandemic. The bank did not collect or consider

gross annual revenues in the underwriting of 25.8 percent of its small loans to businesses, all of which were PPP loans.

For 2020 through 2021, the percentage of small loans to businesses with revenues of $1 million or less was below the percentage of businesses with revenues of $1 million or less but exceeded the aggregate percentage of all reporting lenders. The percentage of small loans to businesses was nearly double the aggregate percentage of all reporting lenders.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Community Development Lending

The bank was a leader in making CD loans. CD lending further supported the bank's Outstanding performance under the Lending Test.

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 was excellent. The bank made 62 CD loans totaling $687 million, which represented 25.3 percent of the bank's allocated tier 1 capital. By dollar volume, 94 percent of the loans supported affordable housing, 5.2 percent funded economic development activities, and less than 1 percent funded revitalization and stabilization efforts. These loans were responsive to identified community credit needs.

The following are examples of the bank's CD loans made in the AA that illustrate the responsiveness to area credit needs:

- The bank provided a $17.4 million construction to permanent loan to finance a complex LIHTC loan in Miami. The funding supported the development of a 100-unit multifamily apartment building reserved for seniors aged 62 and older. Of the 100 units, 99 units were income restricted to households earning less than 60 percent of the area median income, and one unit was reserved as a manager's unit. The project also provided support services for residents and is responsive to the area community need for affordable housing.

- The bank financed a $36 million complex LIHTC project for the acquisition and renovation of a 263-unit affordable housing project targeting the elderly and mobility impaired in Miami-Dade County. All units were income restricted to tenants earning less than 80 percent of the area median income. This project was responsive to an identified community need for affordable housing.

- The bank provided a $1.8 million loan for the permanent financing of a 123-unit LIHTC project in Miami, Florida. The housing complex was age restricted to residents aged 55 and older, earning less than 60 percent of the area median income. This loan was part of a complex financing structure that also included a construction loan and LIHTC equity investment from the prior evaluation period. This project was responsive to the identified community need for affordable housing.

Broader Statewide or Regional Area

In addition, CBNA made 31 CD loans totaling $433.2 million and one letter of credit totaling $11 million in the broader statewide and regional area whose purpose, mandate, or function included serving CBNA's AA. The broader statewide and regional area lending further supported the overall Outstanding Lending Test rating for the state of Florida.

Product Innovation and Flexibility

The bank made limited use of innovative or flexible lending practices in order to serve AA credit needs. As shown in the table below, the bank originated or purchased 186 loans under its flexible lending programs totaling $37.3 million. Refer to the Flexible and Innovative Lending Products section for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount ($000s)
Community Assistance	11	1,303
Deed Restriction	21	3,190
Federal Housing Authority	8	1,829
Home Possible	9	1,812
Home Ready	39	6,407
Home Run	29	7,338
Lender Paid Assistance Program	69	15,390
Total	**186**	**37,269**

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Jacksonville MSA AA was consistent with the bank's overall performance under the Lending Test in the full-scope area.

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

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Miami MSA AA was excellent.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Full-Scope:										
Miami MSA	35	371,107	54	188,386	89	80.9	559,493	98.3	0	0

Limited-Scope:										
Jacksonville MSA	5	8,352	16	1,122	21	19.1	9,474	1.7	0	0
Total	**40**	**379,459**	**70**	**189,508**	**110**	**100.0**	**568,967**	**100.0**	**0**	**0**

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.
** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank had an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. The combined prior and current period dollar volume represented 20.6 percent of allocated tier 1 capital.

The bank exhibited excellent responsiveness to credit and community development needs. A substantial majority of the dollar volume of the bank's current and prior period investment transactions supported affordable housing, a primary need in the AA. A substantial majority of the grants supported organizations that provided needed community services to primarily low- and moderate-income individuals. By dollar volume, 50.7 percent of total investments and grants supported affordable housing, 48.6 percent funded community services to low- and moderate-income individuals, and less than 0.8 percent supported economic development and revitalization and stabilization efforts.

The bank occasionally used innovative or complex investments to support CD initiatives, all of which were investments in LIHTC projects.

The following examples demonstrate the bank's use of complex investments or responsiveness to community needs:

- The bank made a $22.1 million equity investment in a 112-unit senior citizen LIHTC project in Homestead, Florida. The project required a complex financing structure and CBNA was in a leadership position. CBNA provided the LIHTC equity investment in addition to providing a $22.5 million construction loan and acting as the initial lender on the $3.9 million Freddie Mac permanent loan. All 112 units were restricted to households and families earning 60 percent or less of the area median income.

- The bank made a $67.4 million investment in bonds issued by a school district that primarily serves low- and moderate-income students and families. The funds were used for enlarging, updating, and furnishing school buildings and grounds within the district. In this school district, 73.1 percent of students are eligible for the National School Lunch Program.

- The bank made a $500,000 grant to an organization supporting small businesses in the Miami area. The organization provides technical assistance and direct loan funding to small businesses, particularly minority and women-owned enterprises in South Florida.

Broader Statewide or Regional Area

In addition, CBNA made 43 investments totaling $125 million to organizations in the broader statewide and regional area whose purpose, mandate, or function included serving CBNA's AA. The broader statewide and regional area investments further supported the overall Outstanding Investment Test rating for the state of Florida.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Jacksonville MSA AA was consistent with the bank's overall performance under the Investment Test in the full-scope area.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Miami MSA AA was good.

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated area Deposits in AA	# of BANK Branches	% of Rated area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Miami MSA	99.9	51	98.2	2.0	17.6	23.5	56.9	4.7	28.0	31.4	34.4
Jacksonville MSA	0.1	1	1.8	0.0	0.0	0.0	100.0	7.9	31.6	35.9	23.7

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

CBNA's distribution of branches in low-income geographies was well below, and in moderate-income geographies was below, the percentage of the population living within those geographies. Access to delivery systems was positively impacted by the accessibility of 11 branches located in middle- or upper-income geographies (or geographies without an income designation). These branches served customers in the adjacent moderate-income areas based on customer usage data provided by CBNA during the evaluation. CBNA operated one branch in a low-income geography with no adjacent branches serving low-income geographies.

ADS positively impacted service delivery systems. CBNA offered several ADS including telephone banking, online banking, mobile banking, bill pay, and ATMs, which provided additional delivery availability and access to banking services to both retail and business customers. Bank data indicated a majority of households in low- or moderate-income geographies used online banking, mobile banking, and ATM services during 2022 with usage rates by households in low- and moderate-income geographies increasing compared to 2019 for bill pay, online banking, and mobile banking. Additionally in 2022, ADS usage by households in low- and moderate-income census tracts was comparable to or higher than usage rates by households in middle- and upper-income census tracts. CBNA operated 143 deposit-taking ATMs in the AA with 2.1 percent in low-income geographies and 17.5 percent in moderate-income geographies.

To the extent changes have been made, the bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. CBNA closed one branch in an upper-income geography and did not open any branches within the AA during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies or individuals. Branches were generally open from 9:00 a.m. to 5:00 p.m. on Monday and Friday, 9:00 a.m. to 4:00 p.m. on Tuesday through Thursday, and 10:00 a.m. to 2:00 p.m. on Saturday. More branches in low- and moderate-income geographies (60 percent), operated on Saturdays when compared to branches in middle- and upper-income geographies (46.3 percent).

Community Development Services

The bank provided a relatively high level of CD services.

Bank employees provided 88 qualified CD service activities to 16 organizations with 758 qualified hours within the AA during the evaluation period. Additionally, seven employees served CD organizations in various capacities including through leadership roles as a board member or committee representative. The bank's assistance was responsive to identified needs in the AA, particularly with community services related to financial education and counseling, homebuyer education, and affordable housing.

Service activity examples during the evaluation period include:

- An employee served as a board member throughout the evaluation period for a community service organization focus on advancing community and economic development for low-income people and geographies in the AA. A second employee served for a portion of the evaluation period as a board member for a community service organization focused on the improving the health of South Florida communities with a focus on low- to moderate-income populations.

- CBNA employees provided homebuyer and homeownership workshops. In total, 61 bank employees provided 41 homebuyer and homeownership workshops totaling 49 hours to 1,332 low- and moderate-income individuals or families.

- CBNA employees provided financial education to elementary students. In total, 71 bank employees provided approximately 279 hours of financial education to 1,284 elementary students from low- and moderate-income families through the Teach Children to Save Campaign.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Jacksonville MSA AA was weaker than the bank's overall performance under the Service Test in the full-scope area due to the less accessible service delivery systems. Performance in the limited-scope AA did not affect the state of Florida's Service Test rating.

State of Illinois

CRA rating for the State of Illinois: Outstanding
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:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The overall geographic distribution and borrower distribution of lending was excellent.
- CBNA was a leader in making CD loans, which further supported the bank's Outstanding performance under the Lending Test.
- CBNA had an excellent level of qualified CD investment and grants which were responsive in addressing community needs.
- Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AA. CBNA provided a low level of CD services.

Description of Institution's Operations in the State of Illinois

The bank delineated three AAs in the state of Illinois. CBNA delineated a majority of the Chicago-Naperville-Evanston, IL MD, a portion of the Elgin, IL MD, and a portion of the Lake County-Kenosha County, IL MD. These AAs were combined, analyzed, and presented as one AA, the Chicago MSA, for purposes of this evaluation and in evaluating performance under each test. Refer to the table in appendix A for a list of counties reviewed.

CBNA operated 56 branches within this AA, representing 8.5 percent of total branches, and 221 deposit-taking ATMs within this AA, representing 10.4 percent of total deposit-taking ATMs. CBNA had $22.3 billion in adjusted deposits within the AA, which represented 7.7 percent of the bank's total adjusted deposits. During the evaluation period, CBNA originated or purchased 4 percent of its total dollar volume of home mortgage loans and small loans to businesses in this AA.

Based on the June 30, 2022, FDIC Summary of Deposit Market Share Report, CBNA had $21.5 billion in deposits and ranked seventh out of 141 FDIC-insured depository institutions with a 3.8 percent deposit market share. The top three banks by deposit market share are JPMorgan Chase Bank with 275 branches and a 23.6 percent deposit market share, BMO Harris Bank with 169 branches and a 14.8 percent deposit, and Bank of America with 127 branches and a 10.6 percent.

The following tables provide a summary of the demographics, including housing and business information, for the Chicago MSA AA.

Table A – Demographic Information of the Assessment Area Assessment Area: Chicago MSA 2020-2021						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	1,975	14.1	24.0	28.3	32.8	0.9
Population by Geography	8,385,941	10.1	24.0	30.8	34.9	0.2
Housing Units by Geography	3,334,182	10.4	22.8	30.8	35.7	0.3
Owner-Occupied Units by Geography	1,933,214	4.5	18.0	34.4	43.0	0.1
Occupied Rental Units by Geography	1,095,864	17.5	29.8	26.1	25.9	0.7
Vacant Units by Geography	305,104	22.4	28.0	24.7	24.5	0.5
Businesses by Geography	743,287	6.2	16.8	28.1	48.4	0.5
Farms by Geography	10,820	4.0	16.5	36.6	42.8	0.1
Family Distribution by Income Level	1,985,710	23.5	16.3	18.5	41.7	0.0
Household Distribution by Income Level	3,029,078	25.4	15.2	17.0	42.4	0.0
Median Family Income MD - 16984 Chicago-Naperville-Evanston, IL		$75,024	Median Housing Value			$248,020
Median Family Income MD - 20994 Elgin, IL		$80,899	Median Gross Rent			$1,055
Median Family Income MD - 29404 Lake County-Kenosha County, IL-WI		$87,137	Families Below Poverty Level			10.5%

Source: 2015 ACS and 2021 D&B Data
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification.

Table A – Demographic Information of the Assessment Area Assessment Area: Chicago MSA 2022						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	2,051	11.8	23.2	30.9	32.9	1.2
Population by Geography	8,445,866	9.0	23.0	32.9	34.5	0.5
Housing Units by Geography	3,377,838	9.3	22.4	32.8	34.9	0.5
Owner-Occupied Units by Geography	1,989,655	4.5	18.6	35.9	40.7	0.2
Occupied Rental Units by Geography	1,122,326	15.4	28.5	28.9	26.4	0.8
Vacant Units by Geography	265,857	19.5	25.5	26.3	28.0	0.7
Businesses by Geography	957,563	5.9	17.1	30.8	45.6	0.5
Farms by Geography	12,787	4.4	19.2	36.0	40.0	0.3
Family Distribution by Income Level	1,996,449	23.0	16.5	19.1	41.3	0.0
Household Distribution by Income Level	3,111,981	25.3	15.2	16.8	42.6	0.0
Median Family Income MD- 16984 Chicago-Naperville-Evanston, IL		$92,622	Median Housing Value			$285,804
Median Family Income MD - 20994 Elgin, IL		$97,326	Median Gross Rent			$1,243

Median Family Income MD - 29404 Lake County-Kenosha County, IL-WI	$105,876	Families Below Poverty Level	8.0%

Source: 2020 U.S. Census and 2022 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.

To assess the affordability of housing, examiners compared an estimated mortgage payment for the median home to the expected incomes for low- and moderate-income households within each component MDs of the Chicago MSA and for both analysis periods.

Based on the information in the 2020-2021 table above, the median housing value for the Chicago MSA AA was $248,020. In the lowest median income MD (Chicago-Naperville-Evanston, IL), low-income families earned less than $37,512 and moderate-income families earned less than $60,019. In the highest median income MD (Lake County-Kenosha County, IL-WI), low-income families earned less than $43,569 and moderate-income families earned less than $69,710. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of $938 to $1,089 for low-income borrowers and $1,500 to $1,743 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would have been $1,331. Based on these calculations, low-income borrowers would be challenged to qualify for and afford home mortgage financing in any of the MDs during 2020-2021.

Based on the information in the 2022 table above, the median housing value for the Chicago MSA AA was $285,804. In the lowest median income MD (Chicago-Naperville-Evanston, IL), low-income families earned less than $46,311 and moderate-income families earned less than $74,098. In the highest median income MD (Lake County-Kenosha County, IL-WI), low-income families earned less than $52,938 and moderate-income families earned less than $84,701. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of $1,158 to $1,323 for low-income borrowers and $1,852 to $2,118 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would have been $1,534. Based on these calculations, low-income borrowers would be challenged to qualify for and afford home mortgage financing in any of the MDs during 2022.

Affordable housing for low- and moderate-income families is a significant need. This AA is considered a high-cost housing market, limiting access to affordable home ownership among low- and moderate-income borrowers. In evaluating the Chicago MSA AA, examiners considered the significant home ownership affordability barriers that exist and evaluated the disparity between the median family income within the AA and the cost of housing, and the impact this has on home ownership.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 10.5 percent of families were living below the poverty level in 2020-2021 and 8 percent of families were living below the poverty level in 2022.

Economic Data

Chicago is the county seat, and a transportation hub with Chicago O'Hare airport being one of the busiest airports in the United States. The City of Chicago is home to the Chicago Mercantile Exchange, the world's largest futures exchange. Information from the November 2022 Moody's Analytics report indicated the Chicago-Naperville-Arlington Height's economy is in recovery and was performing well. Chicago is a major center for business, distribution, transportation, and finance, and has well-regarded educational institutions. The area's weaknesses are the state and local budget pressures, weak population trends, and high crime rates. In the City of Chicago, budgetary shortfalls and strained finances that existed prior to the pandemic continued to impact the amount of spending available for government services and infrastructure. Housing prices have increased over the last few years, but not to the extent as they have nationally. Single and multifamily housing construction has slowed. The major economic drivers are professional and business services, education and health services, government, and leisure and hospitality services. The top employers are Advocate Health Care System, Northwestern Memorial Healthcare, Amita Health, University of Chicago, JPMorgan Chase & Co., and Amazon.

According to the BLS, the unemployment rate for the Chicago-Naperville-Elgin, IL-IN-WI MSA was 4 percent as of January 2020. Unemployment levels significantly increased to 18.4 percent in April 2020 due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined to 4.1 percent as of December 2022. The national unemployment rate was 3.5 percent as of December 2022.

Community Contacts

Examiners reviewed and considered seven community contact interviews that were conducted during the evaluation period. The organizations contacted focus on affordable housing, small business and economic development, financial literacy, and community revitalization and stabilization within the Chicago MSA AA. Contacts noted that poverty has been increasing in the suburban areas around Chicago and the population is declining. COVID-19 also had a significant impact on small local businesses, and many of the businesses were unprepared to obtain financing due to inadequate financials, lack of financial expertise and knowledge, and a lack of a relationship with a bank outside of maintaining an account. Further, many of these businesses were unprepared to shift to an online sales format., Many low-wage households still faced challenges accessing affordable housing. This was particularly prevalent during the pandemic.

The contacts identified the following needs within the community:

- Small business micro loans
- Affordable housing creation (single family and multifamily units)
- Financial education programs that assist consumers with building and maintaining savings, student loan counseling, debt management counseling, and second chance checking accounts
- Flexible deposit products, with no fees and minimal balance requirements, targeted for youth in low- and moderate-income neighborhoods
- First-time homebuyer workshops
- Small business planning assistance

The Chicago MSA AA offered abundant opportunities to meet the identified needs. There were numerous CD and social services organizations in the AA. Opportunities for participation by financial institutions include lending and investment in economic development and workforce development, financial literacy, and various state and local government partnership opportunities.

Scope of Evaluation in the State of Illinois

Examiners conducted a full-scope review of the Chicago MSA AA, which is the only AA in the state of Illinois. Examiners placed more emphasis on small loans to businesses versus home mortgage loans in arriving at the overall conclusion.

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 MSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Chicago MSA	7,358	41,986	0	79	49,423	100.0	100.0
Total	**7,358**	**41,986**	**0**	**79**	**49,423**	**100.0**	**100.0**

Dollar Volume of Loans* (000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Chicago MSA	2,906,213	429,379	0	513,705	3,849,297	100.0	100.0
Total	**2,906,213**	**429,379**	**0**	**513,705**	**3,849,297**	**100.0**	**100.0**

Based on the June 30, 2022, FDIC Summary of Deposit Market Share Report, CBNA ranked seventh out of 141 FDIC-insured depository institutions (top 5 percent) with a 3.8 percent deposit market share.

For home mortgage loans, CBNA's market share of 0.8 percent ranked 32nd out of 892 lenders (top 4 percent). The top three lenders were Guaranteed Rate, Inc. with 7.4 percent market share, JPMorgan Chase Bank with 5.8 percent, and U.S. Bank with a 3.9 percent. The bank's lending performance, relative to the number of lenders in this AA, was stronger than the bank's deposit base.

For small loans to businesses, CBNA's market share of 6.4 percent ranked fourth out of 263 lenders (top 2 percent). The top three lenders were JPMorgan Chase Bank with 27.5 percent market share, American Express with 20.8 percent, and Bank of America with 7 percent. The bank's lending performance,

relative to the number of lenders in this AA, was stronger than the bank's deposit base, which further supported the overall excellent responsiveness for Lending Activity.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its 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 the tables, the overall geographic distribution of home mortgage loans was excellent.

For 2020 through 2021, the percentage of home mortgage loans in low-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans in moderate-income equaled the percentage of owner-occupied housing units located in those geographies and exceeded the aggregate percentage of all reporting lenders.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Businesses

Refer to Table Q in the state of Illinois 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 the tables, the overall geographic distribution of small loans to businesses was excellent. For 2020-2021, only 6.2 percent of businesses was located in low-income geographies while 16.8 percent of businesses was located in moderate-income geographies. In 2022 only 6 percent of businesses was located in low-income geographies while 17.2 percent was located in moderate-income geographies. As a result, more weight was given to performance in moderate-income geographies.

For 2020 through 2021, the percentage of small loans to businesses in low-income geographies was near to the percentage of businesses located in those geographies and was below the aggregate percentage of all reporting lenders. The percentage of small loans to businesses in moderate-income geographies exceeded the percentage of businesses located in those geographies and approximated the aggregate percentage of all reporting lenders. This analysis included 715 PPP loans totaling $26.8 million to businesses located in low- and moderate-income geographies that provided support during the COVID-19 pandemic.

The bank's lending performance in the 2022 period was stronger than the 2020 through 2021 period. The percentage of small loans to businesses in low-income approximated the percentage of businesses located in those geographies and exceeded the aggregate percentage of all reporting lenders. The percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AA. Examiners did not identify any unexplained conspicuous gaps in the full-scope area reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.

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 the tables, the overall borrower distribution of home mortgage loans was excellent when considering the barriers to housing affordability with the AA. Examiners placed more weight on the bank's lending to moderate-income borrowers.

For 2020 through 2021, the percentage of home mortgage loans to low-income borrowers was significantly below the percentage of those families but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of those families and the aggregate percentage of all reporting lenders.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Businesses

Refer to Table R in the state of Illinois 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 the tables, the overall borrower distribution of small loans to businesses was excellent. The examiner placed more weight on the bank's lending performance relative to aggregate lending performance due to the level of PPP lending and constraints posed by the COVID-19 pandemic.

The bank's totals included 2,067 PPP loans totaling $64.6 million that supported small businesses during the COVID-19 pandemic. The bank did not collect or consider gross annual revenues in the underwriting of 28.7 percent of its small loans to businesses, all of which were PPP loans.

For 2020 through 2021, the percentage of small loans to businesses with revenues of $1 million or less was near to the percentage of businesses with revenues of $1 million or less but exceeded the aggregate percentage of all reporting lenders. The percentage of small loans to businesses was nearly double the aggregate percentage of all reporting lenders.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Community Development Lending

The bank was a leader in making CD loans. CD lending further supported the bank's Outstanding performance under the Lending Test.

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 was excellent. The bank made 79 CD loans totaling $513.7 million, which represented 22.3 percent of allocated tier 1 capital. By dollar volume, 83.4 percent of the loans supported affordable housing, 13.7 percent funded economic development activities, and 2.9 percent funded revitalization and stabilization efforts. These loans were responsive to identified community credit needs. The bank made extensive use of complex CD loans, and often acted in a leadership position.

The following are examples of the bank's CD loans that illustrate the complexity, leadership, or responsiveness of the bank's CD lending:

- The bank made a $22 million loan for the construction and permanent financing of a new multifamily LIHTC housing complex. The project consisted of 100 affordable housing units. All units were income restricted to households earning 60 percent or less of the area median income. This development involved a complex, multiple-source financing structure, which included participation from state and local housing authorities. The bank demonstrated its leadership by working closely with the developer of the project to structure the multiple-source financing structure. This complex CD loan was responsive to the identified community need of affordable housing.

- The bank made a $21.8 million loan to finance the construction of a new multifamily LIHTC housing complex. The project consisted of 80 housing units, with 68 units income restricted to persons earning 60 percent or less of the area median income. This loan was responsive to identified needs for affordable housing.

- The bank made a $15 million loan to finance the acquisition and renovation of a multifamily housing complex. The project consisted of 156 affordable housing units and qualified for LIHTCs. All units were income restricted to households at 60 percent of area median income or below. This loan was responsive to identified needs for affordable housing. CBNA provided the loan and also made a forward commitment to purchase the permanent period bonds from the local housing authority.

- The bank made a $15 million loan to finance the acquisition and renovation of a multifamily housing complex. The housing complex consisted of 155 affordable housing units, and all units were income restricted to persons earning 60 percent or less of the area median income. The housing complex qualified for and was awarded LIHTC. This complex CD loan demonstrated responsiveness by addressing the identified affordable housing needs. The bank demonstrated its leadership through a complex financing structure, which included the organization of multiple sources of capital funding from state and local housing authorities.

Broader Statewide or Regional Area

In addition, CBNA made 14 CD loans totaling $86.4 million in the broader statewide and regional area whose purpose, mandate, or function included serving CBNA's AA. The broader statewide and regional area lending further supported the overall Outstanding Lending Test rating for the state of Illinois.

Product Innovation and Flexibility

The bank made extensive use of innovative or flexible lending practices in order to serve AA credit needs. As shown in the table below, the bank originated or purchased 978 loans under its flexible lending programs totaling $203.5 million. Refer to the Flexible and Innovative Lending Products section for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (000s)
Community Assistance	7	$1,251
Deed Restriction	3	$497
Employer Paid Assistance	1	$575
Federal Housing Authority (FHA)	25	$5,318
Home Possible	57	$10,377
Home Ready	114	$20,731
Home Run	229	$49,408
Lender Paid Assistance (LPA) Program	538	$114,504
Veteran Affairs, Department of (VA)	4	$837
Total	**978**	**$203,498**

INVESTMENT TEST

The bank's performance under the Investment 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 MSA AA was excellent.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Chicago MSA	35	153,260	65	207,527	100	100.0	360,787	100.0	0	0
Total	**35**	**153,260**	**65**	**239,527**	**100**	**100.0**	**360,787**	**100.0**	**0**	**0**

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.
** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank had an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. The combined prior and current period dollar volume represented 15.7 percent of allocated tier 1 capital.

The bank exhibited excellent responsiveness to credit and community development needs. A substantial majority of the dollar volume of the bank's current and prior period investment transactions supported affordable housing, a primary need in the AA. A substantial majority of the grants supported community

services to primarily low- and moderate-income individuals. By dollar volume, 88.5 percent of total investments and grants supported affordable housing, 9.5 percent funded community services to low- and moderate-income individuals, and 2 percent supported economic development and revitalization and stabilization efforts. The bank occasionally used innovative or complex investments to support CD initiatives.

The following examples demonstrate the bank's use of complex investments or responsiveness to community needs:

- The bank made a $14 million investment in an impact fund focused on affordable housing and community services. The funds were part of a larger overall investment used to acquire and rehabilitate a 576-unit multifamily housing project to provide affordable housing to low- and moderate-income individuals and families.

- The bank invested in a $5.8 million bond through a housing authority focused on financing, creating, and preserving affordable housing. The investment in the bond was used to fund the permanent financing of a 111-unit multifamily rental housing development, with a majority the units were rent restricted.

- The bank provided a $500,000 grant to a CDFI providing community service support such as loans, consulting, and development guidance to nonprofits that provide services to low- and moderate-income individuals, families, or areas.

Broader Statewide or Regional Area

In addition, CBNA made nine investments totaling $41.3 million to organizations in the broader statewide and regional area whose purpose, mandate, or function included serving CBNA's AA. The broader statewide and regional area investments further supported the overall Outstanding Investment Test rating for the state of Illinois.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Chicago MSA AA was adequate.

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated area Deposits in AA	# of BANK Branches	% of Rated area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Chicago MSA	100.0	56	100.0	5.4	12.5	25.0	57.1	9.0	23.0	32.9	34.5

Distribution of Branch Openings/Closings						
	Branch Openings/Closings					
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Chicago MSA	0	5	0	-1	-1	-3

CBNA's distribution of branches in both low- and moderate-income geographies was below the percentage of the population living within those geographies. Access to delivery systems was positively impacted by five branches located in middle- or upper-income geographies (or geographies without an income designation). These branches served customers in the five adjacent moderate-income areas based on customer usage data provided by CBNA during the evaluation.

ADS positively impacted service delivery systems. CBNA offered several ADS including telephone banking, online banking, mobile banking, and ATMs which provided additional delivery availability and access to banking services to both retail and business customers. Bank data indicated a majority of households in low- or moderate-income geographies used online banking, mobile banking, and ATM services during 2022 with usage rates by households in low- or moderate-income geographies increasing compared to 2019 for bill pay, online banking, mobile banking. Additionally in 2022, ADS usage by households in low- and moderate-income census tracts was comparable to or higher than usage rates by households in middle- and upper-income census tracts. CBNA operated 221 deposit-taking ATMs in the AA with 4.5 percent in low-income geographies and 14.5 percent in moderate-income geographies.

To the extent changes have been made, the bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation, CBNA closed five branches, one of which was in a moderate-income geography. The moderate-income branch closure was due to fire, smoke, and water damage caused during civil unrest which occurred on May 31, 2020. CBNA relocated branch customers to another branch 2.6 miles away. The bank did not open any branches during the evaluation period.

Services, including where appropriate, business hours, are tailored to the convenience and needs of its AA, particularly low- and moderate-income geographies or individuals. Branches were generally open from 10:00 a.m. to 5:00 p.m. Monday through Friday and from 10:00 a.m. to 1:00 p.m. on Saturday. All branches in low- and moderate-income geographies offered Saturday hours compared to 67.4 percent of branches in middle- and upper-income geographies.

Community Development Services

The bank provided a low level of CD services.

Bank employees provided 65 qualified CD service activities to 17 organizations with 167 qualified hours within this AA during the evaluation period benefiting 3,506 low- and moderate-income individuals and families. Additionally, six employees served 11 community development organizations in various capacities including through leadership roles as a board member or committee representatives. The bank's assistance was responsive to identified needs in the AA, particularly with community services related to homebuyer education, career planning and affordable housing.

Service activity examples during the evaluation period include:

- One employee served on the board of four different organizations including as board chair/organization president for three of the organizations. The organizations focused on assisting small businesses through capital solutions, improving workforce development for low- and moderate-individuals, and financial literacy for low- and moderate individuals.

- CBNA employees conducted homebuyer education activities. In total, 58 employees provided 59 hours of homebuyer education for 1,441 low- or moderate-income individuals and families and twenty-three employees provided 30 hours of career planning and job skills training for 1,067 low- or moderate-income individuals.

State of Nevada

CRA rating for the State of Nevada: Outstanding
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:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The overall geographic distribution and the borrower distribution of lending was excellent.
- CBNA was a leader in making CD loans, which further supported the bank's Outstanding performance under the Lending Test.
- CBNA had an excellent level of qualified CD investment and grants which were responsive in addressing community needs.
- Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AA. CBNA provided few if any CD Services.

Description of Institution's Operations in the State of Nevada

The bank delineated one AA within the state of Nevada consisting of the Las Vegas-Henderson-Paradise, NV MSA (Las Vegas MSA) in its entirety. Refer to the table in appendix A for a list of counties reviewed.

CBNA operated eight branches within this AA, representing 1.2 percent of total branches, and 21 deposit-taking ATMs within this AA, representing 1 percent of total deposit-taking ATMs. CBNA had $1.9 billion in adjusted deposits within this AA, which represented 0.7 percent of the bank's total adjusted deposits. During the evaluation period, CBNA originated or purchased 0.7 percent of its total dollar volume of home mortgage loans and small loans to businesses in this AA.

Based on the June 30, 2022, FDIC Summary of Deposit Market Share Report, CBNA had $1.8 billion in deposits and ranked 12th out of 42 FDIC-insured depository institutions with a 1.5 percent deposit market share. The top three banks by deposit market share are Bank of America with 43 branches and a 16.7 percent deposit market share, Wells Fargo Bank with 67 branches and 16.1 percent, and Wells Fargo National Bank West with one branch and a 13.3 percent.

The following tables provide a summary of the demographics, including housing and business information, for the Las Vegas MSA AA.

Table A – Demographic Information of the Assessment Area Assessment Area: Las Vegas MSA 2020-2021						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	487	5.7	26.3	37.2	30.6	0.2
Population by Geography	2,035,572	5.0	25.3	39.2	30.3	0.2
Housing Units by Geography	857,131	5.6	24.9	38.7	30.6	0.2
Owner-Occupied Units by Geography	380,425	1.9	16.9	41.7	39.5	0.0
Occupied Rental Units by Geography	344,021	8.7	33.0	36.9	21.1	0.2
Vacant Units by Geography	132,685	8.1	27.0	34.8	29.5	0.6
Businesses by Geography	137,264	3.8	20.8	38.7	36.1	0.6
Farms by Geography	1,912	2.1	19.7	39.9	38.2	0.2
Family Distribution by Income Level	465,442	20.7	18.4	20.5	40.5	0.0
Household Distribution by Income Level	724,446	22.6	17.0	18.8	41.6	0.0
Median Family Income MSA - 29820 Las Vegas-Henderson-Paradise, NV MSA		$59,993	Median Housing Value			$169,213
			Median Gross Rent			$1,032
			Families Below Poverty Level			11.9%

Source: 2015 ACS and 2021 D&B Data
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification.

Table A – Demographic Information of the Assessment Area Assessment Area: Las Vegas MSA 2022						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	535	6.9	23.9	39.1	29.5	0.6
Population by Geography	2,265,461	6.8	23.8	39.7	29.5	0.2
Housing Units by Geography	912,465	6.9	24.4	39.1	29.4	0.2
Owner-Occupied Units by Geography	443,247	2.4	15.7	42.7	39.0	0.2
Occupied Rental Units by Geography	365,779	11.7	33.7	36.8	17.6	0.2
Vacant Units by Geography	103,439	8.7	29.1	31.8	29.9	0.4
Businesses by Geography	226,379	3.5	25.1	34.1	37.0	0.3
Farms by Geography	2,529	3.4	23.4	35.5	37.6	0.1
Family Distribution by Income Level	516,891	20.9	18.0	20.2	40.9	0.0
Household Distribution by Income Level	809,026	23.1	17.1	18.2	41.6	0.0
Median Family Income MSA - 29820 Las Vegas-Henderson-Paradise, NV MSA		$71,896	Median Housing Value			$282,327
			Median Gross Rent			$1,203
			Families Below Poverty Level			9.8%

Source: 2020 U.S. Census and 2022 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.

To assess the affordability of housing, examiners compared an estimated mortgage payment for the median home to the expected incomes for low- and moderate-income households within the Las Vegas MSA and for both analysis periods.

Based on the information in the 2020-2021 table above, the median housing value for the Las Vegas MSA AA was $169,213. Low-income families earned less than $29,997 and moderate-income families earned less than $47,994. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of $750 for low-income borrowers and $1,200 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would have been $908. Based on these calculations, low-income borrowers would be challenged to qualify for and afford home mortgage financing in this MSA during 2020-2021.

Based on the information in the 2022 table above, the median housing value for the Las Vegas MSA AA was $282,327. Low-income families earned less than $35,948 and moderate-income families earned less than $57,517. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of $899 for low-income borrowers and $1,438 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would have been $1,516. Based on these calculations, low- and moderate-income borrowers would be challenged to qualify for and afford home mortgage financing in this MSA during 2022.

In evaluating the Las Vegas MSA AA, examiners considered the significant home ownership affordability barriers that exist and evaluated the disparity between the median family income within the AA and the cost of housing, and the impact this has on home ownership.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 11.9 percent of families were living below the poverty level in 2020-2021 and 9.8 percent of families were living below the poverty level in 2022.

Economic Data

Information from the July 2022 Moody's Analytics report indicated the Las Vegas MSA economy was in a recovery, payrolls have nearly returned to pre-pandemic levels, and the unemployment rate is within 1 percentage point of its pre-pandemic rate. Healthcare is one of the best-performing industries and employment in hospitals and healthcare has been on the rise. Tourism, a major economic driver, was hit hard by the pandemic but has rebounded. The area strengths include the gaming and entertainment infrastructure, strong migration trends and a high concentration of prime-age workers. Conversely, the

area has an overreliance on consumer spending, high employment volatility, relatively low educational attainment, and single-family housing is overvalued. The housing market is one of the most overvalued housing markets in the country. The major employment industries are leisure and hospitality services, professional and business services, education and health services, and government. The major employers in the Las Vegas MSA are mostly gaming related and include Mandalay Bay Resort & Casino, Las Vegas Sands Corp., MGM Resorts International, Caesars Entertainment Corp., Flamingo Las Vegas Hotel & Casino, and Nellis Air Force Base.

According to the BLS, the unemployment rate for the Las Vegas-Henderson-Paradise, NV MSA was 4.6 percent as of January 2020. Unemployment levels significantly increased to 34 percent in April 2020 due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined to 5.6 percent as of December 2022. The national unemployment rate was 3.5 percent as of December 2022.

Community Contacts

Examiners reviewed and considered three community contact interviews that were conducted during the evaluation period. Interviews were conducted with representatives from an economic development entity and two affordable housing organizations operating within the Las Vegas MSA AA. Contacts noted that the COVID-19 pandemic had a devastating effect on the local economy as the main economic driver in the area is travel and tourism; including leisure, hospitality; and business conventions. These industries included many low-wage service employees who were already struggling prior to the pandemic. Since the pandemic, the economy has been recovering, unemployment has gone down, and there is an increase in businesses wanting to move to the area due to the low property taxes. One contact indicated the biggest challenges facing existing small businesses are continued high inflation and developing plans to grow their businesses, given the growth of the Clark County area. One representative indicated many of the workers in the service sector earn a low-wage and struggle with housing affordability. Many are paying more than 50 percent of their income on rent. Additionally, examiners reviewed the 2020-2024 HUD Consolidated Plan and 2020 Action Plan for Clark County, North Las Vegas, Boulder City, Mesquite.

The contacts and HUD Consolidated plan identified the following needs within the community:

- Low-cost debt and equity financing for housing and other community development related projects
- Flexible loan products for low- and moderate-income homebuyers
- Innovative and creative affordable housing financing options and down payment assistance
- Startup business financing
- Assistance with developing marketing strategies for small and startup businesses
- Credit with lower rates and forgiveness for poor credit history caused by the pandemic
- Affordable rental housing developments
- Debt and equity financing for LIHTC projects
- Preservation of affordable housing
- Funding through donations and grants to local nonprofit organizations
- Rental forbearance
- Affordable housing for rent and purchase, especially for extremely low-income households
- Supportive housing for special needs residents
- Homelessness prevention programs and housing
- Services to help people become/remain self-sufficient

- Nonprofit organization capital improvements and infrastructure development
- Serve as a member of the board and provide education materials, financial advice, and other guidance on the different programs available to help incoming/interested businesses to the Las Vegas area

The area is served by several nonprofit organizations, community-based organizations, economic development organizations, and community development organizations that provide opportunities to help meet community needs. Opportunities for support include unrestricted funding for nonprofits to support capacity building and human capital needed to address increasing demand for services, and volunteer and technical assistance support, such as Board service.

Scope of Evaluation in the State of Nevada

Examiners conducted a full-scope review of the Las Vegas MSA AA, which is the only AA in the state of Nevada. Examiners placed more emphasis on small loans to businesses versus home mortgage loans in arriving at the overall conclusion.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEVADA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Las Vegas MSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Las Vegas MSA	844	7,541	0	26	8,411	100.0	100.0
Total	**844**	**7,541**	**0**	**26**	**8,411**	**100.0**	**100.0**

Dollar Volume of Loans* ($000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Las Vegas MSA	489,610	59,079	0	332,054	880,743	100.0	100.0
Total	**489,610**	**59,079**	**0**	**332,054**	**880,743**	**100.0**	**100.0**

Based on the June 30, 2022, FDIC Summary of Deposit Market Share Report, CBNA ranked 12th out of 42 FDIC-insured depository institutions (top 29 percent) with a 1.5 percent deposit market share.

For home mortgage loans, CBNA's market share of 0.3 percent ranked 64th out of 578 lenders (top 11 percent). The top three lenders were Rocket Mortgage with 5.4 percent market share, United Wholesale

Mortgage with 4.4 percent, and Pennymac Loan Services LLC with 3.9 percent. The bank's lending performance, relative to the number of lenders in this AA, was stronger than the bank's deposit base.

For small loans to businesses, CBNA's market share of 4.1 percent ranked seventh out of 193 lenders (top 4 percent). The top three lenders were American Express with 27.1 percent market share, JPMorgan Chase Bank with 17.4 percent, and Bank of America with 13.1 percent. The bank's lending performance, relative to the number of lenders in this AA, was stronger than the bank's deposit base, which further supported the overall excellent responsiveness for Lending Activity.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O in the state of Nevada 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 the tables, the overall geographic distribution of home mortgage loans was excellent.

For 2020 through 2021, the percentage of home mortgage loans in low-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans in moderate-income geographies was near to the percentage of owner-occupied housing units located in those geographies but exceeded the aggregate percentage of all reporting lenders.

The bank's lending performance in the 2022 period was consistent than the 2020 through 2021 period.

Small Loans to Businesses

Refer to Table Q in the state of Nevada 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 the tables, the overall geographic distribution of small loans to businesses was excellent. For 2020-2021, only 3.8 percent of businesses was located in low-income geographies while 20.8 percent of businesses was located in moderate-income geographies. In 2022 only 3.5 percent of businesses was located in low-income geographies while 25.1 percent was located in moderate-income geographies. As a result, more weight was given to performance in moderate-income geographies.

For 2020 through 2021, the percentage of small loans to businesses in low-income was near to the percentage of businesses located in those geographies and exceeded the aggregate percentage of all reporting lenders. The percentage of small loans to businesses in moderate-income geographies approximated the percentage of businesses located in those geographies and exceeded the aggregate percentage of all reporting lenders. This analysis included 170 PPP loans totaling $ 6.2 million to businesses located in low- and moderate-income geographies that provided support during the COVID-19 pandemic.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AA. Examiners did not identify any unexplained conspicuous gaps in the full-scope area reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

Refer to Table P in the state of Nevada 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 the tables, the overall borrower distribution of home mortgage loans was excellent when considering the barriers to housing affordability with the AA.

For 2020 through 2021, the percentage of home mortgage loans to low-income borrowers was significantly below the percentage of those families but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income exceeded both the percentage of those families and the aggregate percentage of all reporting lenders.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Businesses

Refer to Table R in the state of Nevada 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 the tables, the overall borrower distribution of small loans to businesses was excellent. Examiners placed more weight on the bank's lending performance relative to aggregate lending performance due to the level of PPP lending and constraints posed by the COVID-19 pandemic.

The bank's totals included 260 PPP loans totaling $8.5 million that supported small businesses during the COVID-19 pandemic. The bank did not collect or consider gross annual revenues in the underwriting of 50.1 percent of its small loans to businesses, all of which were PPP loans.

For 2020 through 2021, the percentage of small loans to businesses with revenues of $1 million or less was near to the percentage of businesses with revenues of $1 million or less but exceeded the aggregate percentage of all reporting lenders.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Community Development Lending

The bank was a leader in making CD loans. CD lending further supported the bank's Outstanding performance under the Lending Test.

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 was excellent. The bank made 26 CD loans totaling $332.1 million, which represented 169.3 percent of allocated tier 1 capital. By dollar volume, 98.6 percent of the loans supported affordable housing, 0.8 percent funded economic development activities, and 0.6 percent funded revitalization and stabilization efforts. These loans were responsive to identified community credit needs.

The following are examples of the bank's CD loans that illustrate the complexity, leadership, or responsiveness of the bank's CD lending:

- The bank made a $59.4 million construction to permanent loan for the development of a 420-unit multifamily, LIHTC project. All units were income restricted to persons earning 80 percent or less of the area median income. This development included a complex financing structure, which included capital contributions from state and local housing authorities. This CD loan demonstrated the bank's responsiveness by addressing affordable housing needs.

- The bank made a $32.4 million construction to permanent loan for the development of a 195-unit multifamily housing complex. All units were income restricted to persons earning 60 percent or less of the area median income. This project qualified for and was awarded LIHTC. This complex CD loan demonstrated the bank's responsiveness by addressing affordable housing needs through the LIHTC.

- The bank made a $30.9 million loan construction to permanent loan for the development of a 208-unit multifamily housing complex. All units were income restricted to persons earning 60 percent or less of the area median income. The project qualified for and was awarded LIHTC. This complex CD loan demonstrated the bank's leadership role by addressing affordable housing needs through the LIHTC.

- The bank made a $12.3 million loan to provide permanent financing for a multifamily housing complex. The housing complex consisted of 184 affordable housing units. All units were income restricted to persons earning 60 percent or less of the area median income. This complex CD loan demonstrated the bank's responsiveness by addressing affordable housing needs through the LIHTC.

Broader Statewide or Regional Area

In addition, CBNA made 13 CD loans totaling $249.6 million in the broader statewide and regional area whose purpose, mandate, or function included serving CBNA's AA. The broader statewide and regional area lending further supported the overall Outstanding Lending Test rating for the state of Nevada.

Product Innovation and Flexibility

The bank made limited use of innovative or flexible lending practices in order to serve AA credit needs. As shown in the table below, the bank originated or purchased 31 loans under its flexible lending programs totaling $6.7 million. Refer to the Flexible and Innovative Lending Products section for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (000s)
Deed Restriction	3	$428
Federal Housing Authority (FHA)	5	$1,121
Home Possible	3	$397
Home Ready	7	$1,708
Home Run	4	$869
Lender Paid Assistance (LPA) Program	8	$1,835
Veteran Affairs, Department of (VA)	1	$332
Total	**31**	**$6,691**

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Las Vegas MSA AA was excellent.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Las Vegas MSA	7	17,067	5	33,622	12	100.0	50,689	100.0	0	0
Total	**7**	**17,067**	**5**	**33,622**	**12**	**100.0**	**50,689**	**100.0**	**0**	**0**

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.
** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank had an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. The combined prior and current period dollar volume represented 25.8 percent of allocated tier 1 capital.

The bank exhibited excellent responsiveness to credit and community development needs. A substantial majority of the dollar volume of the bank's current and prior period investment transactions supported affordable housing, a primary need in the AA. A substantial majority of the grants supported community services to primarily low- and moderate-income individuals. By dollar volume, 96.3 percent of total investments and grants supported affordable housing and 3.7 percent funded community services to low-

and moderate-income individuals and families. The bank occasionally used innovative or complex investments to support CD initiatives.

The following examples demonstrate the bank's responsiveness to community needs:

- The bank made a $25.7 million investment in a mortgage-backed security where the proceeds were used to finance a 272-unit multifamily affordable housing project. All units were income restricted to households with income levels at or below 60 percent of the area medium income.

- The bank provided $50,000 grant to a nonprofit organization providing and managing affordable housing and support services for low-income seniors and families. This funding helped provide emergency door-to-door food delivery to senior residents, purchased pandemic supplies for on-site property staff, and covered unexpected operating expenses that arose from COVID-19.

- The bank made a $6 million investment in a fund with a purpose of affordable housing. The investment provided funding in a 350-unit apartment complex where a majority of the units are designated as affordable units for low- and moderate-income individuals and families.

Broader Statewide or Regional Area

In addition, CBNA made one prior period investment totaling $8.4 million to organization in the broader statewide and regional area whose purpose, mandate, or function included serving CBNA's AA. The broader statewide and regional area investments further supported the overall Outstanding Investment Test rating for the state of Nevada.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Las Vegas MSA AA was adequate.

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated area Deposits in AA	# of BANK Branches	% of Rated area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Las Vegas MSA	100.0	8	100.0	0.0	25.0	62.5	12.5	6.8	23.8	39.7	29.5

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

CBNA's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies. CBNA had no branches in low-income geographies. Examiners considered the additional accessibility provided by a branch in a middle-income geography that was proximate to a moderate-income geography and served customers from low- and moderate-income geographies at a higher rate based on usage data provided by the bank.

ADS positively impacted the accessibility of service delivery systems. CBNA offered several ADS including telephone banking, online banking, mobile banking, bill pay, and ATMs which provided additional delivery availability and access to banking services to both retail and business customers. Bank data indicated that a majority of households in low- or moderate-income geographies used online banking, mobile banking, and ATM services during 2022 with usage rates by households in low- and moderate-income geographies increasing compared to 2019 for bill pay, online banking, mobile banking. Additionally in 2022, ADS usage by households in low- and moderate-income census tracts was comparable to or higher than usage rates by households in middle- and upper-income census tracts. CBNA operated 21 deposit-taking ATMs in the AA with 19.1 percent in moderate-income geographies. CBNA did not operate any deposit-taking ATMs in low-income geographies.

To the extent changes have been made, the bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation, CBNA closed one branch in an upper-income geography. CBNA did not open any branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies or individuals. Branches were generally open from 10:00 a.m. to 5:00 p.m. on Monday through Friday and from 10:00 a.m. to 2:00 p.m. on Saturday. All branches in moderate-income geographies offered Saturday hours compared with 83.3 percent of the branches in middle- and upper-income geographies.

Community Development Services

The bank provided few if any CD services.

Bank employees provided six qualified CD service activities to two organizations with six qualified hours within this AA during the evaluation period benefiting 189 low- and moderate-income individuals and families. The bank's assistance was responsive to identified needs in the AA for homebuyer education.

Commonwealth of Puerto Rico

CRA rating for the Commonwealth of Puerto Rico: Outstanding
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:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The overall geographic distribution of lending was good, and the borrower distribution of lending was excellent.
- CBNA was a leader in making CD loans, which further supported the bank's Outstanding performance under the Lending Test.
- CBNA had an excellent level of qualified CD investments and grants which were responsive to community needs. CBNA provided an adequate level of CD services.

Description of Institution's Operations in Puerto Rico

The bank delineated one AA within Puerto Rico consisting of the San Juan-Bayamon-Caguas, PR MSA (San Juan MSA) in its entirety. Refer to the table in appendix A for additional details.

CBNA operated one branch within this AA, representing 0.2 percent of total branches. The branch is a corporate branch, which is separate from the bank's retail branch network that is accessible to consumers. The bank does not offer consumer products, including home mortgages. There were no deposit-taking ATMs within this AA. CBNA had $9.6 billion of deposits in Puerto Rico with $6 billion of these deposits being International Banking Entity (IBE)s deposits. IBE deposits can only come from nonresidents of Puerto Rico and whose primary locations are outside of the commonwealth. CBNA had $3.7 billion in adjusted deposits within this AA, which represented 1.2 percent of the bank's total adjusted deposits. During the evaluation period, CBNA originated or purchased less than 0.1 percent of its total dollar volume of home mortgage loans and small loans to businesses in this AA.

Based on the June 30, 2022, FDIC Summary of Deposit Market Share Report, CBNA had $9.6 billion in deposits and ranked third out of five FDIC-insured depository institutions with a 12.7 percent deposit market share. The top two banks by deposit market share are Banco Popular De Puerto Rico with 108 branches and a 62.9 percent and Firstbank Puerto Rico with 46 branches and a 14.7 percent.

The following tables provide a summary of the demographics, including housing and business information, for the San Juan MSA AA.

Table A – Demographic Information of the Assessment Area

Assessment Area: San Juan MSA 2020-2021

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	598	5.0	26.8	36.0	25.8	6.5
Population by Geography	2,263,582	3.8	26.5	40.4	29.0	0.2
Housing Units by Geography	983,154	3.9	26.3	39.3	30.0	0.4
Owner-Occupied Units by Geography	548,972	1.8	24.4	41.2	32.6	0.1
Occupied Rental Units by Geography	245,270	8.8	28.6	37.2	24.8	0.6
Vacant Units by Geography	188,912	3.9	28.8	36.9	29.5	1.0
Businesses by Geography	20,604	4.8	23.5	24.7	44.6	2.4
Farms by Geography	230	6.1	31.3	30.0	31.7	0.9
Family Distribution by Income Level	558,600	26.5	15.0	15.7	42.8	0.0
Household Distribution by Income Level	794,242	28.0	13.9	14.6	43.5	0.0
Median Family Income MSA - 41980 San Juan-Bayamón-Caguas, PR MSA		$25,617	Median Housing Value			$140,983
			Median Gross Rent			$499
			Families Below Poverty Level			37.8%

Source: 2015 ACS and 2021 D&B Data
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification.

Table A – Demographic Information of the Assessment Area

Assessment Area: San Juan MSA 2022

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	625	5.9	23.8	33.6	29.3	7.4
Population by Geography	2,081,265	4.7	25.3	36.5	32.2	1.3
Housing Units by Geography	975,065	5.3	25.1	35.7	32.3	1.6
Owner-Occupied Units by Geography	518,854	2.7	23.7	37.6	35.0	1.0
Occupied Rental Units by Geography	248,955	10.1	27.1	32.4	28.3	2.2
Vacant Units by Geography	207,256	6.0	26.4	34.9	30.7	2.1
Businesses by Geography	9,240	7.7	18.0	23.5	44.5	6.3
Farms by Geography	100	8.0	36.0	21.0	30.0	5.0
Family Distribution by Income Level	513,695	25.6	15.4	16.4	42.6	0.0
Household Distribution by Income Level	767,809	27.5	14.5	14.7	43.3	0.0
Median Family Income MSA - 41980 San Juan-Bayamón-Caguas, PR MSA		$28,312	Median Housing Value			$130,672
			Median Gross Rent			$532
			Families Below Poverty Level			35.8%

Source: 2020 U.S. Census and 2022 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.

There were no home mortgage loans originated or purchased in this AA during the evaluation period, therefore examiners did not perform a housing affordability analysis.

Economic Data

According to the September 2022 Moody's Analytics report, the area economy is driven by the federal government, state capital, and tourism. Construction and logistics have been the fastest-growing industries. In 2017, Hurricane Maria made landfall in Puerto Rico and severely impacted the area. After this hurricane, the consumer-driven industries experienced job losses, many residents were displaced and left the island, and tourism temporarily declined. The leisure, hospitality, and large tourism industries, particularly the cruises arriving at the Port of Old San Juan, were impacted by the COVID-19 pandemic, and have not rebounded as well as the rest of the island. In 2022, Hurricane Fiona made landfall in Puerto Rico, again, impacting the economy. Disaster aid related to Fiona has not been as helpful to the economy as it was after Hurricane Maria due to the tighter job market. Some of the area's weaknesses include out-migration of young workers, difficulty in retaining pharmaceutical firms, and the high dependence on government jobs. The recent hurricanes and frustrations with public services on the island have contributed to the net out-migration. The top industries are the government, professional and business services, retail trade, and education and health services. The largest employers are Walmart Inc., Popular, Supermercados Econo Inc., Metro Pavia Health System, and HIMA San Pablo. Unemployment data for this area was not available on the BLS website.

Community Contacts

Examiners reviewed and considered four community contact interviews that were conducted during the evaluation period. Two contacts were with organizations that focused on economic development, one was with a CDFI, and one focused on community and humanitarian services such as workforce development, affordable housing, and education in the San Juan MSA AA. The contacts indicated economic conditions are improving slowly after COVID-19 and the natural disasters. One representative stated the major sources of employment are state and municipal government, retailers and department stores, restaurants, and self-employment. In September 2022, Hurricane Fiona caused widespread power outages in the entirety of Puerto Rico and significant flooding. One contact discussed the affordable housing needs and the shortage of inventory due, in part, to the high number of abandoned or dilapidated properties and the lack of available credit for restoration of low- and moderate-income housing. The greatest affordable housing need is in areas of lowest economic development, which include the south and central rural areas of the island. Some challenges identified during these contacts include decreasing population, an aging population, and limited access to credit due to only having four large banks. One contact indicated lending to low- and moderate-income communities has been very limited and has gotten worse since the pandemic.

These contacts identified the following needs within the community:

- Funding to support small business lending programs and create new small business loan programs
- Small dollar loans for startups and small businesses
- Financial literacy education to both individuals and businesses
- Working capital, microloans, and credit for nonprofits to rehabilitate and restore low- and moderate-income housing
- Loans for the construction or rehabilitation of essential business structures

- Investment in essential community infrastructure projects such as water treatment plants and power plants
- Working capital to fund construction and remediations post disasters
- Funding for mitigation projects in recovery years, including liquidity to operate contracts prior to federal fund reimbursement.
- Affordable housing
- Housing counseling, especially foreclosure prevention counseling

Scope of Evaluation in Puerto Rico

Examiners conducted a full-scope review of the San Juan MSA AA, which is the only AA in Puerto Rico. There were no home mortgage loans originated or purchased in this AA during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PUERTO RICO

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
San Juan MSA	0	4,244	0	4	4,248	100.0	100.0
Total	**0**	**4,244**	**0**	**4**	**4,248**	**100.0**	**100.0**

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
San Juan MSA	0	16,844	0	93,336	110,180	100.0	100.0
Total	**0**	**16,844**	**0**	**93,336**	**110,180**	**100.0**	**100.0**

Based on the June 30, 2022, FDIC Summary of Market Share Report, CBNA ranked third out of five FDIC-insured depository institutions (top 60 percent) with a 12.7 percent deposit market share.

For small loans to businesses, CBNA's market share of 10.5 percent ranked third out of 41 lenders (top 7 percent). The top two lenders were Banco Popular De Puerto Rico with 53.4 percent market share and American Express with 19.8 percent. The bank's lending performance, relative to the number of lenders

in this AA, is stronger than the bank's deposit base, which further supported the overall excellent responsiveness for Lending Activity.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA.

Small Loans to Businesses

Refer to Table Q in the Commonwealth of Puerto Rico 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 the tables, the overall geographic distribution of small loans to businesses was good.

For 2020-2021, only 4.8 percent of businesses was located in low-income geographies while 23.5 percent of businesses was located in moderate-income geographies. In 2022, only 7.7 percent of businesses was located in low-income geographies while 18 percent were located in moderate-income geographies. As a result, more weight was given to performance in moderate-income geographies.

For 2020 through 2021, the percentage of small loans to businesses in low-income geographies was well below the percentage of businesses located in those geographies and was below the aggregate percentage of all reporting lenders. The percentage of small loans to businesses in moderate-income geographies was near to the percentage of businesses located in those geographies and exceeded the aggregate percentage of all reporting lenders. This analysis included two PPP loans totaling $11,100 to businesses located in low- and moderate-income geographies that provided support during the COVID-19 pandemic.

The bank's lending performance in the 2022 period was stronger than the 2020 through 2021 period. The percentage of small loans to businesses in low-income geographies exceeded the aggregate percentage of all reporting lenders. The percentage of small loans to businesses in moderate-income geographies exceeded the percentage of businesses located in those geographies.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AA. Examiners did not identify any unexplained conspicuous gaps in the full-scope area reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among businesses of different sizes.

Small Loans to Businesses

Refer to Table R in the Commonwealth of Puerto Rico section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables, the overall borrower distribution of small loans to businesses was excellent.

The bank's totals included three PPP loans totaling $31,900 that supported small businesses during the COVID-19 pandemic, all with reported gross annual revenue.

For 2020 through 2021, the percentage of small loans to businesses with revenues of $1 million or less exceeded both the percentage of businesses with revenues of $1 million or less and the aggregate percentage of all reporting lenders.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Community Development Lending

The bank was a leader in making CD loans. CD lending further supported the bank's Outstanding performance under the Lending Test.

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 was excellent. The bank made four CD loans totaling $93.3 million, which represented 24.7 percent of allocated tier 1 capital. By dollar volume, 100 percent of the loans supported affordable housing.

The following example of the bank's CD loans illustrates the complexity, leadership, or responsiveness of the bank's CD lending:

- The bank originated a $43.9 million loan to finance affordable housing projects in San Juan, Puerto Rico. This complex transaction included projects for four separate properties, with a combined total of 855 newly created units which were supported by four individual HUD HAP contracts. All of the units qualified as affordable housing and are responsive to AA affordable housing needs.

Broader Statewide or Regional Area

In addition, CBNA made two CD loans totaling $3.6 million in the broader statewide and regional area whose purpose, mandate, or function included serving CBNA's AA. The broader statewide and regional area lending further supported the overall Outstanding Lending Test rating for the Commonwealth of Puerto Rico.

Product Innovation and Flexibility

The bank makes no use of innovative or flexible lending practices in order to serve AA credit needs.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the San Juan MSA AA was excellent.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
San Juan MSA	4	42,546	6	1,119	10	100.0	43,665	100.0	0	0
Total	**4**	**42,546**	**6**	**1,119**	**10**	**100.0**	**43,665**	**100.0**	**0**	**0**

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.
** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank had an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. The combined prior and current period dollar volume represented 11.6 percent of allocated tier 1 capital.

The bank exhibited excellent responsiveness to credit and community development needs. Though CBNA had no current period investments, the bank made six charitable donations totaling $1.1 million. A substantial majority of the dollar volume of the bank's prior period investment transactions supported affordable housing, a primary need in the AA. A substantial majority of the grants made during the evaluation period supported community services to primarily low- and moderate-income individuals, activities that revitalize or stabilize, and economic development. By dollar volume, 97.4 percent of total investments and grants supported affordable housing, 1.8 percent funded community services to low- and moderate-income individuals and families, and less than 0.8 percent supported economic development and revitalization and stabilization efforts. The bank occasionally used innovative or complex investments to support CD initiatives.

The following examples demonstrate the bank's use of complex investments or responsiveness to community needs:

- A prior period investment with a book value of $15.6 million at the end of the evaluation period demonstrated the bank's long-term commitment to support community development activities. The prior investment supported affordable housing with an investment in a LIHTC fund that supported Puerto Rico's affordable housing revitalization.

- The bank provided a $367,000 grant to a CDFI intermediary with a mission to provide access to financial services for low- and moderate-income individuals and communities. The grant was responsive to the need for community services.

- The bank provided a $150,000 grant to a foundation that has a focus on providing affordable housing and access to critical infrastructure for residents of some of the poorest and most disenfranchised communities within the AA. The grant was responsive to the need for activities that revitalize or stabilize an area.

- The bank provided a $50,000 grant to a CDFI that has a focus on improving economic self-sufficiency through business training, technical assistance, and access to financing for new and expanding businesses. The grant was responsive to economic development needs.

Broader Statewide or Regional Area

In addition, CBNA made seven investments totaling $1.1 million to organizations in the broader statewide and regional area whose purpose, mandate, or function included serving CBNA's AA. The broader statewide and regional area investments further supported the overall Outstanding Investment Test for the Commonwealth of Puerto Rico.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the San Juan MSA AA was adequate.

Retail Banking Services

An analysis of retail banking services was not relevant in this context. CBNA operated a single branch in the AA with no deposit-taking ATMs. The branch exclusively served corporate clients and did not offer retail banking services to consumers. Consequently, the evaluation under the Service Test was entirely based on the bank's performance in delivering community development services.

Community Development Services

The bank provided an adequate level of CD services.

Bank employees provided eight qualified CD service activities to two organizations with 12 qualified hours during the evaluation period. Additionally, one employee served on the board of a community development organization in 2020. The bank's assistance was responsive to identified needs in the AA, particularly with community services and financial literacy for low- and moderate-income students.

Service activity examples during the evaluation period include:

- CBNA employees conducted financial literacy activities for elementary students. In total, 11 bank employees dedicated eight hours to conducting seven financial education sessions for 91 elementary school students from low- and moderate-income families through the Teach Children to Save. saving money.

State of South Dakota

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

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The overall geographic distribution of lending was good and borrower distribution of lending was excellent.
- CBNA was a leader in making CD loans, which further supported the bank's Outstanding performance under the Lending Test. The bank made extensive use of complex CD loans that were responsive to addressing community needs.
- CBNA had an excellent level of qualified CD investment and grants which were responsive to the community needs.
- Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the bank's AA. CBNA was a leader in providing CD services responsive to community needs.

Description of Institution's Operations in the State of South Dakota

The bank delineated one AA in the state of South Dakota consisting of the Sioux Falls, SD MSA in its entirety. Refer to the table in appendix A for a list of counties reviewed.

CBNA operated one branch within this AA, representing 0.2 percent of total branches, and one deposit-taking ATM within this AA, representing less than 0.1 percent of total deposit-taking ATMs. CBNA had $443.8 billion in deposits that are considered non-retail, non-consumer deposits that were domiciled at the main office in Sioux Falls, SD. CBNA had $38.7 million in adjusted deposits within this AA, which represented less than 0.1 percent of the bank's total adjusted deposits. During the evaluation period, CBNA originated or purchased less than 0.1 percent of its total dollar volume of home mortgage loans and small loans to businesses in this AA.

Based on the June 30, 2022, FDIC Summary of Deposit Market Share Report, CBNA had $443.8 billion in deposits and ranked first out of 40 FDIC-insured depository institutions with a 64.3 percent deposit market share. The other top two banks were Wells Fargo Bank with 10 branches and a 33.2 percent deposit market share and Metabank with one branch and a 0.8 percent.

The following tables provide a summary of the demographics, including housing and business information, for the Sioux Falls MSA AA.

Table A – Demographic Information of the Assessment Area Assessment Area: Sioux Falls MSA 2020-2021						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	57	0.0	29.8	49.1	21.1	0.0
Population by Geography	242,731	0.0	27.8	50.7	21.5	0.0
Housing Units by Geography	100,015	0.0	30.6	48.9	20.5	0.0
Owner-Occupied Units by Geography	63,268	0.0	20.0	55.3	24.8	0.0
Occupied Rental Units by Geography	30,682	0.0	51.0	36.5	12.5	0.0
Vacant Units by Geography	6,065	0.0	38.6	45.7	15.7	0.0
Businesses by Geography	29,601	0.0	35.1	38.1	26.7	0.0
Farms by Geography	1,669	0.0	8.6	69.0	22.4	0.0
Family Distribution by Income Level	61,621	19.0	18.1	24.4	38.5	0.0
Household Distribution by Income Level	93,950	22.0	18.1	18.9	41.0	0.0
Median Family Income MSA - 43620 Sioux Falls, SD MSA		$72,948	Median Housing Value			$157,049
			Median Gross Rent			$720
			Families Below Poverty Level			7.1%

Source: 2015 ACS and 2021 D&B Data
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification.

Table A – Demographic Information of the Assessment Area Assessment Area: Sioux Falls MSA 2022						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	64	3.1	25.0	51.6	18.8	1.6
Population by Geography	276,730	1.7	22.8	54.2	20.7	0.5
Housing Units by Geography	111,182	2.8	25.8	52.8	17.6	1.0
Owner-Occupied Units by Geography	69,174	1.0	19.1	56.9	23.0	0.0
Occupied Rental Units by Geography	35,356	6.1	35.5	46.0	9.2	3.1
Vacant Units by Geography	6,652	4.0	44.5	46.1	5.4	0.0
Businesses by Geography	36,684	9.4	24.1	43.0	20.8	2.6
Farms by Geography	1,831	2.2	13.8	65.9	17.8	0.3
Family Distribution by Income Level	66,662	18.6	18.1	25.0	38.3	0.0
Household Distribution by Income Level	104,530	22.5	16.9	19.6	41.0	0.0
Median Family Income MSA - 43620 Sioux Falls, SD MSA		$84,874	Median Housing Value			$203,781
			Median Gross Rent			$826
			Families Below Poverty Level			5.3%

Source: 2020 U.S. Census and 2022 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.

To assess the affordability of housing, examiners compared an estimated mortgage payment for the median home to the expected incomes for low- and moderate-income households within Sioux Falls MSA and for both analysis periods.

Based on the information in the 2020-2021 table above, the median housing value for the Sioux Falls MSA AA was $157,049. Low-income families earned less than $36,474 and moderate-income families earned less than $58,358. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of $912 for low-income borrowers and $1,459 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would have been $843. Based on these calculations, housing is affordable for low- and moderate-income borrowers during 2020-2021.

Based on the information in the 2022 table above, the median housing value for the Sioux Falls MSA AA was $203,781. Low-income families earned less than $42,437 and moderate-income families earned less than $67,899. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of $1,061 for low-income borrowers and $1,697 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would have been $1,094. Based on these calculations, low-income borrowers would be challenged to qualify for and afford home mortgage financing in this MSA during 2022.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 7.1 percent of families were living below the poverty level in 2020-2021 and 5.3 percent of families were living below the poverty level in 2022.

Economic Data

Information from the October 2022 Moody's Analytics report indicated the economy is in the late expansion stage of the business cycle and job growth was twice the U.S. pace over the past half of the year. The consumer and public service sectors experienced growth and that offset the weaknesses in the healthcare and financial service industries, which are the main economic drivers for the area. Housing prices have decelerated in proportion with the state and nation. Economic strengths for the area include low business costs, increasing population trends, strong labor force growth, and it is a regional hub for education and healthcare. The high concentration of financial service jobs poses an economic vulnerability. The top industries are education and health services, retail trade, professional and business services, and financial activities. The top employers are Sanford Health, Avera Health, Smithfield Foods, Hy-Vee Inc., Wells Fargo, and Citibank.

According to the BLS, the unemployment rate for the Sioux Falls, SD MSA was 2.5 percent as of January 2020. Unemployment levels significantly increased to 8.4 percent in April 2020 due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, rates have declined to 1.9 percent as of December 2022. The national unemployment rate was 3.5 percent as of December 2022.

Community Contacts

Examiners reviewed and considered three community contact interviews that were conducted during the evaluation period. One interview was with a Development Foundation whose mission is to improve the economy of the Sioux Falls region. More specifically, the organization facilitates economic development activity, creates jobs, and focuses on workforce and talent development, housing, and childcare. One contact was with a Small Business Development Center whose mission is to promote economic development in the state of South Dakota by connecting small business owners, primarily start-up businesses, with the funding and consulting they need to develop their businesses. One interview was with a Housing and Redevelopment Commission whose mission is to improve the quality of life for the Sioux Falls Community, specifically its lower income residents by administering housing assistance payments programs, promoting the development of affordable, decent, and safe housing opportunities, and economic self-sufficiency. Roughly 50 percent of the individuals who qualify for the Housing Choice Voucher Program are elderly or disabled, and most families that use the program are single-parent households. These three contacts identified the following needs within the community:

- Affordable housing, both owner-occupied and rental properties
- Financing for affordable multifamily housing projects
- Landlords that accept and allow renters to use Housing Choice Voucher programs
- Housing assistance for homeless individuals who are receiving mental health treatment
- Long term leases with landlords that ensure rates will not rise passed a specific threshold for the term of the lease
- Additional childcare and financial assistance for childcare
- Support for start-up businesses
- Workforce development training for manufacturing jobs

The contacts indicated there are many financial institutions serving the community, institutions have been responsive to the needs of the local community, and one contact felt the community needs are currently being met.

Scope of Evaluation in the State of South Dakota

Examiners conducted a full-scope review of the Sioux Falls MSA AA, which is the only AA in the state of South Dakota. Examiners placed more emphasis on small loans to businesses versus home mortgage loans in arriving at the overall conclusion.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTH DAKOTA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Sioux Falls MSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Sioux Falls MSA	73	511	0	2	586	100.0	100.0
Total	**73**	**511**	**0**	**2**	**586**	**100.0**	**100.0**

Dollar Volume of Loans* (000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Sioux Falls MSA	13,500	3,666	0	9,036	26,202	100.0	100.0
Total	**13,500**	**3,666**	**0**	**9,036**	**26,202**	**100.0**	**100.0**

Based on the June 30, 2022, FDIC Summary of Deposit Market Share Report, CBNA had $443.8 billion in deposits and ranked first out of 40 FDIC-insured depository institutions with a 64.3 percent deposit market share. The FDIC deposit market share in the Sioux Falls MSA is inflated for CBNA due to the "main office" deposits housed in the one branch. Examiners utilized adjusted deposits of $38.7 million to assess lending activity. Based on the adjusted deposits of $38.7 million, CBNA ranked 31 out of 40 FDIC-insured depository institutions with a 0.01 percent deposit market share.

For home mortgage loans, CBNA's market share of 0.2 percent ranked 54th out of 220 lenders. The top three lenders were Plains Commerce Bank with 14.2 percent market share, First Premier Bank with 9.4 percent, Levo Federal Credit Union with 5.8 percent.

For small loans to businesses, CBNA's market share of 3.3 percent ranked 10th out of 91 lenders. The top three lenders were JPMorgan Chase Bank with 14.9 percent market share, American Express with 14.3 percent, and Capital One with 9.5 percent. Based on the adjusted deposits, the ranking of small business lending market share is higher than the ranking for deposit market share and supports the overall excellent responsiveness for Lending Activity.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA.

Home Mortgage Loans

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

Based on the data in the tables, the overall geographic distribution of home mortgage loans was excellent. Examiners placed more weight on lending performance in moderate-income census tracts, as there were more owner-occupied units located in moderate-income census tracts than low-income census tracts. Additionally, there were no low-income census tracts in the AA during the 2020 through 2021 analysis period.

For 2020 through 2021, the percentage of home mortgage loans in moderate-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period. The 2022 analysis period included low-income geographies and the bank's home mortgage lending performance in the low-income geographies was excellent.

Small Loans to Businesses

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

Based on the data in the tables, the overall geographic distribution of small loans to businesses was good. For 2020-2021, 35.1 percent of businesses was located in moderate-income geographies. In 2022, 9.4 percent of businesses was located in low-income geographies while 24.1 percent was located in moderate-income geographies. As a result, more weight was given to performance in moderate-income geographies.

For 2020 through 2021, the percentage of small loans to businesses in moderate-income geographies was near to the percentage of businesses located in those geographies and exceeded the aggregate percentage of all reporting lenders. This analysis included five PPP loans totaling $17,476 to businesses located in low- and moderate-income geographies that provided support during the COVID-19 pandemic.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period. The 2022 analysis period included low-income geographies and the bank's small business lending performance in the low-income geographies was poor while performance in the moderate-income geographies was excellent.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AA. Examiners did not identify any unexplained conspicuous gaps in the full-scope area reviewed.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

Based on the data in the tables, the overall borrower distribution of home mortgage loans was excellent.

For 2020 through 2021, the percentage of home mortgage loans to low-income borrowers near to the percentage of those families and exceeded the aggregate percentage of all reporting lenders.

The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of those families and the aggregate percentage of all reporting lenders.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Businesses

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

Based on the data in the tables, the overall borrower distribution of small loans to businesses was excellent. Examiners placed more weight on the bank's lending performance relative to aggregate lending performance due to the level of PPP lending and constraints posed by the COVID-19 pandemic.

During the evaluation period, the bank did not originate or purchase PPP loans that supported small businesses during the COVID-19 pandemic.

For 2020 through 2021, the percentage of small loans to businesses with revenues of $1 million or less was near to the percentage of businesses with revenues of $1 million or less but exceeded the aggregate percentage of all reporting lenders.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Community Development Lending

The bank was a leader in making CD loans. CD lending further supported the bank's Outstanding performance under the Lending Test.

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 was excellent. The bank made two CD loans totaling $9 million, which represented 226.1 percent of the bank's allocated tier 1 capital. By dollar volume, 100 percent of the loans supported affordable housing. These loans were responsive to identified community credit needs.

The following is an example of the bank's CD loans to illustrate the complexity and responsiveness of the bank's CD lending:

- The bank made a $6.7 million loan to finance the construction of a new multifamily housing complex. Additionally, the bank made an additional $2.3 million loan for the permanent financing of the project. All units were income restricted to persons earning 60 percent or less of the area median income. This complex CD loan demonstrated the bank's responsiveness by addressing affordable housing needs through the LIHTC.

Broader Statewide or Regional Area

In addition, CBNA made one CD loan totaling $13.8 million in the broader statewide and regional area whose purpose, mandate, or function included serving CBNA's AA. The broader statewide and regional area lending further supported the overall Outstanding Lending Test rating for the state of South Dakota.

Product Innovation and Flexibility

The bank made extensive use of innovative or flexible lending practices in order to serve AA credit needs. As shown in the table below, the bank originated or purchased seven loans under its flexible lending programs totaling $1.3 million. Refer to the Flexible and Innovative Lending Products section for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount (000s)
Home Ready	7	$1,306
Total	**7**	**$1,306**

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Sioux Falls MSA AA was excellent.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Sioux Falls MSA	5	11,722	20	30,451	25	100.0	42,173	100.0	0	0
Total	5	11,722	20	30,451	25	100.0	42,173	100.0	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.
** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank had an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. The combined prior and current period dollar volume represented 1055.2 percent of adjusted tier 1 capital.

The bank exhibited excellent responsiveness to credit and community development needs. A substantial majority of the dollar volume of the bank's current and prior period investment transactions supported affordable housing, a primary need in the AA. A substantial majority of the grants supported community services to primarily low- and moderate-income individuals. By dollar volume, 98.9 percent of total investments and grants supported affordable housing, 0.9 percent funded community services to low- and moderate-income individuals and families, and 0.2 percent supported revitalization and stabilization efforts. The bank occasionally used innovative or complex investments to support CD initiatives.

The following examples demonstrate the bank's responsiveness to community needs:

- Nine mortgage-backed securities totaling $30 million through a housing authority focused on affordable housing programs that provide mortgage and down payment assistance, housing construction and rehabilitation, homelessness prevention, and rental assistance.

- The bank provided a $35,200 grant to an organization providing affordable housing to low- and moderate-income individuals and families.

- The bank provided a $70,000 community services related grant to an organization providing homeownership, rental education, and home counseling services targeted primarily to low- and moderate-income individuals and families.

Broader Statewide or Regional Area

In addition, CBNA made 11 investments totaling $5.6 million to organizations in the broader statewide and regional area whose purpose, mandate, or function included serving CBNA's AA. The broader statewide and regional area investments further supported the overall Outstanding Investment Test rating for the state of South Dakota.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Sioux Falls MSA AA was good.

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated area Deposits in AA	# of BANK Branches	% of Rated area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Sioux Falls MSA	100.0	1	100.0	0.0	0.0	100.0	0.0	1.7	22.8	54.2	20.7

CBNA operated one branch with a deposit-taking ATM in the Sioux Falls MSA AA during the evaluation period. The branch, located at CBNA corporate offices, was accessible to the public but catered primarily to CBNA employees. CBNA did not operate any branches in low- or moderate-income geographies. ADS usage had a neutral impact on the Service Test rating. The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies or individuals. CBNA maintained standard business hours and offered traditional banking products and services at the branch which was open from 9:00 a.m. to 4:00 pm, Monday through Friday.

Community Development Services

The bank was a leader in providing CD services.

Bank employees provided 34 qualified CD service activities to eight organizations with 360 qualified hours within this AA during the evaluation period. Additionally, nine employees served nine community development organizations in various capacities including through leadership roles as a board member or committee representative. The bank's assistance was responsive to identified needs in the AA, particularly with financial and technical assistance to community service organizations and financial literacy education.

Service activity examples during the evaluation period include:

- A senior level employee served as board chair throughout the evaluation prior of a CDFI which quickly converted to an online platform during the pandemic to provide training for new homebuyers and proactively reached out to support clients to ensure they were able to complete the training necessary to accomplish their goals of homeownership. This employee also served on the board throughout the evaluation period including two years as board chair for a community service organization focused on developing low- or moderate-income entrepreneurs and communities in rural South Dakota.

- In total, three bank employees served on the board for a majority of the evaluation period of a non-profit organization committed to assisting low- and moderate-income individuals and families seeking relocation aid. The organization enabled free-of-cost moves for those impacted by domestic violence, the elderly, people with disabilities, and families transitioning into affordable housing.

- CBNA employees conducted financial literacy activities for elementary students. In total, 67 bank employees provided 23 financial education activities to 941 low- or moderate-income elementary school students including two sessions through the Teach Children to Save.

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:	January 1, 2020 to December 31, 2022	
Bank Products Reviewed:	Home mortgage, small business, community development loans, qualified investments, and community development services	
Affiliates	**Affiliate Relationship**	**Products Reviewed**
CitiMortgage, Inc. Citicorp USA, Inc. (CUSA)	Subsidiary Subsidiary	Home Mortgage Loans CD Loans and Investments
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	**Type of Exam**	**Other Information**
MMSAs		
New York-Newark, NY-NJ-CT-PA Combined Statistical Area (New York CSA)	Full-scope	CT: Fairfield County NJ: Bergen, Essex, Hudson, Passaic counties NY: Bronx, Kings, Nassau, New York, Queens, Richmond, Rockland, Suffolk, and Westchester counties
Washington Washington-Arlington-Alexandria, DC-VA-MD-WV Metropolitan Statistical Area (DC MMSA)	Full-scope	DC: District of Columbia MD: Montgomery, and Prince George's counties VA: Arlington, Fairfax counties and Alexandria, Fairfax, and Falls Church cities
State		
California		
Los Angeles-Long Beach, CA Combined Statistical Area (Los Angeles CSA)	Full-scope	Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties
San Jose-San Francisco-Oakland, CA Combined Statistical Area (San Jose CSA)	Full-scope	Alameda, Contra Costa, Marin, Merced, Napa, San Francisco, San Joaquin, San Mateo, Santa Clara, Santa Cruz, Sonoma, and Stanislaus counties
Bakersfield, CA Metropolitan Statistical Area (Bakersfield MSA)	Limited-scope	Kern County
Fresno-Madera-Hanford, CA Combined Statistical Area (Fresno CSA)	Limited-scope	Fresno and Kings counties
Sacramento-Roseville-Folsom, CA Metropolitan Statistical Area (Sacramento MSA)	Limited-scope	Sacramento County
San Diego-Chula Vista-Carlsbad, CA Metropolitan Statistical Area (San Diego MSA)	Limited-scope	San Diego County
Florida		
Miami-Fort Lauderdale-Pompano Beach, FL Metropolitan Statistical Area (Miami MSA)	Full-scope	Broward, Miami-Dade, and Palm Beach counties

Jacksonville, FL Metropolitan Statistical Area (Jacksonville MSA)	Limited-scope	Duval County
Illinois		
Chicago-Naperville-Elgin, IL-IN-WI Metropolitan Statistical Area (Chicago MSA)	Full-scope	Cook, DuPage, Kane, Lake, McHenry, and Will counties
Nevada		
Las Vegas-Henderson-Paradise, NV Metropolitan Statistical Area (Las Vegas MSA)	Full-scope	Clark County
Puerto Rico		
San Juan-Bayamon-Caguas, PR Metropolitan Statistical Area (San Juan MSA)	Full-scope	Aguas Buenas , Aibonito, Barceloneta, Barranquitas, Bayamón, Caguas, Canóvanas, Carolina, Cataño, Cayey, Ceiba, Ciales, Cidra, Comerío, Corozal, Dorado, Fajardo, Florida, Guaynabo, Gurabo, Humacao, Juncos, Las Piedras, Loíza, Luquillo, Manatí, Maunabo, Morovis, Naguabo, Naranjito, Orocovis, Río Grande, San Juan, San Lorenzo, Toa Alta, Toa Baja, Trujillo Alto, Vega Alta, Vega Baja, and Yabucoa Municipios
South Dakota		
Sioux Falls, SD Metropolitan Statistical Area (Sioux Falls MSA)	Full-scope	Lincoln, McCook, Minnehaha, and Turner counties

Appendix B: Summary of MMSA and State Ratings

RATINGS Citibank, N.A.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/ Multistate Rating
Citibank, N.A.	Outstanding	Outstanding	High Satisfactory	Outstanding
MMSA or State:				
New York CSA	Outstanding	Outstanding	Outstanding	Outstanding
DC MMSA	Outstanding	Outstanding	High Satisfactory	Outstanding
California	Outstanding	Outstanding	High Satisfactory	Outstanding
Florida	Outstanding	Outstanding	High Satisfactory	Outstanding
Illinois	Outstanding	Outstanding	Low Satisfactory	Outstanding
Nevada	Outstanding	Outstanding	Low Satisfactory	Outstanding
Puerto Rico	Outstanding	Outstanding	Low Satisfactory	Outstanding
South Dakota	Outstanding	Outstanding	High Satisfactory	Outstanding

(*) 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 low- and moderate-income 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 income that is less than 50 percent of the area median income or a median family income that is less than 50 percent, in the case of a geography.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

Table O. **Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

Table P. **Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.

Table Q. **Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to $1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank's assessment area.

Table R. **Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to $1 million) originated and purchased by the bank to businesses with revenues of $1 million or less to: 1) the percentage distribution of businesses with revenues of greater than $1 million; and 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2020-21

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
Full-Scope:																			
New York CSA	28,223	20,034,942	100.0	463,639	3.0	2.3	3.8	13.5	12.4	13.3	35.9	27.3	33.4	47.5	57.9	49.4	0.1	0.2	0.1
Total	**28,223**	**20,034,942**	**100.0**	**463,639**	**3.0**	**2.3**	**3.8**	**13.5**	**12.4**	**13.3**	**35.9**	**27.3**	**33.4**	**47.5**	**57.9**	**49.4**	**0.1**	**0.2**	**0.1**

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%
CITIBANK N.A. (10000001461) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2022

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
Full-Scope:																			
New York CSA	9,617	8,065,591	100.0	265,465	3.1	3.4	4.2	14.5	15.1	15.2	36.9	30.5	34.4	44.9	50.4	45.6	0.5	0.6	0.5
Total	**9,617**	**8,065,591**	**100.0**	**265,465**	**3.1**	**3.4**	**4.2**	**14.5**	**15.1**	**15.2**	**36.9**	**30.5**	**34.4**	**44.9**	**50.4**	**45.6**	**0.5**	**0.6**	**0.5**

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21
	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
Full-Scope:																			
New York CSA	28,223	20,034,942	100.0	463,639	27.3	2.6	2.8	15.8	13.3	11.8	16.9	14.8	20.3	40.1	64.8	51.6	0.0	4.4	13.5
Total	**28,223**	**20,034,942**	**100.0**	**463,639**	**27.3**	**2.6**	**2.8**	**15.8**	**13.3**	**11.8**	**16.9**	**14.8**	**20.3**	**40.1**	**64.8**	**51.6**	**0.0**	**4.4**	**13.5**

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
	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
Full-Scope:																			
New York CSA	9,617	8,065,591	100.0	265,465	25.6	5.4	4.1	15.6	19.0	13.8	17.2	16.0	20.2	41.6	56.0	47.0	0.0	3.6	14.9
Total	**9,617**	**8,065,591**	**100.0**	**265,465**	**25.6**	**5.4**	**4.1**	**15.6**	**19.0**	**13.8**	**17.2**	**16.0**	**20.2**	**41.6**	**56.0**	**47.0**	**0.0**	**3.6**	**14.9**

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0% CITIBANK N.A. (10000001461) excluded from Aggregate

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-21
	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
Full-Scope:																			
New York CSA	64,487	1,972,281	100.0	695,323	8.0	6.4	7.2	17.9	18.6	17.4	28.1	29.4	28.9	44.7	44.6	44.9	1.3	1.1	1.5
Total	**64,487**	**1,972,281**	**100.0**	**695,323**	**8.0**	**6.4**	**7.2**	**17.9**	**18.6**	**17.4**	**28.1**	**29.4**	**28.9**	**44.7**	**44.6**	**44.9**	**1.3**	**1.1**	**1.5**

Source: 2021 D&B Data; 01/01/2020 — 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "—" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022
	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
Full-Scope:																			
New York CSA	30,122	194,834	100.0	626,098	8.3	7.4	7.5	17.8	21.8	17.3	28.7	33.6	29.8	42.5	35.7	42.6	2.6	1.5	2.9
Total	**30,122**	**194,834**	**100.0**	**626,098**	**8.3**	**7.4**	**7.5**	**17.8**	**21.8**	**17.3**	**28.7**	**33.6**	**29.8**	**42.5**	**35.7**	**42.6**	**2.6**	**1.5**	**2.9**

Source: 2022 D&B Data; 01/01/2022 — 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "—" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21
	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
Full-Scope:											
New York CSA	64,487	1,972,281	100.0	695,323	91.3	75.2	36.0	3.5	17.7	5.3	7.0
Total	**64,487**	**1,972,281**	**100.0**	**695,323**	**91.3**	**75.2**	**36.0**	**3.5**	**17.7**	**5.3**	**7.0**

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
	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
Full-Scope:											
New York CSA	30,122	194,834	100.0	626,098	91.8	84.3	47.9	3.1	13.7	5.1	2.0
Total	**30,122**	**194,834**	**100.0**	**626,098**	**91.8**	**84.3**	**47.9**	**3.1**	**13.7**	**5.1**	**2.0**

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2020-21**

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
Full-Scope:																			
DC MMSA	3,377	2,278,859	100.0	276,943	4.7	5.6	5.0	15.8	14.4	14.5	34.7	25.0	34.9	44.7	54.6	45.4	0.2	0.4	0.3
Total	**3,377**	**2,278,850**	**100.0**	**276,943**	**4.7**	**5.6**	**5.0**	**15.8**	**14.4**	**14.5**	**34.7**	**25.0**	**34.9**	**44.7**	**54.6**	**45.4**	**0.2**	**0.4**	**0.3**

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2022**

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
Full-Scope:																			
DC MMSA	1,194	1,011,152	100.0	119,854	4.7	5.6	5.2	17.3	17.1	17.6	33.8	24.5	34.9	43.9	52.5	42.2	0.2	0.3	0.2
Total	**1,194**	**1,011,152**	**100.0**	**119,854**	**4.7**	**5.6**	**5.2**	**17.3**	**17.1**	**17.6**	**33.8**	**24.5**	**34.9**	**43.9**	**52.5**	**42.2**	**0.2**	**0.3**	**0.2**

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21
	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
Full-Scope:																			
DC MMSA	3,377	2,278,859	100.0	276,943	22.9	11.6	6.5	16.1	20.0	16.1	19.2	11.7	20.5	41.9	55.8	36.7	0.0	0.9	20.3
Total	**3,377**	**2,278,859**	**100.0**	**276,943**	**22.9**	**11.6**	**6.5**	**16.1**	**20.0**	**16.1**	**19.2**	**11.7**	**20.5**	**41.9**	**55.8**	**36.7**	**0.0**	**0.9**	**20.3**

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
	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
Full-Scope:																			
DC MMSA	1,194	1,011,152	100.0	119,854	22.3	11.8	8.7	16.2	20.8	19.5	19.3	10.5	21.1	42.2	56.4	35.3	0.0	0.6	15.4
Total	**1,194**	**1,011,152**	**100.0**	**119,854**	**22.3**	**11.8**	**8.7**	**16.2**	**20.8**	**19.5**	**19.3**	**10.5**	**21.1**	**42.2**	**56.4**	**35.3**	**0.0**	**0.6**	**15.4**

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-21
	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
Full-Scope:																			
DC MMSA	10,949	152,389	100.0	137,833	5.5	6.1	5.4	17.7	20.9	17.4	34.3	34.4	34.7	42.0	38.1	41.8	0.6	0.4	0.6
Total	**10,949**	**152,389**	**100.0**	**137,833**	**5.5**	**6.1**	**5.4**	**17.7**	**20.9**	**17.4**	**34.3**	**34.4**	**34.7**	**42.0**	**38.1**	**41.8**	**0.6**	**0.4**	**0.6**

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022
	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
Full-Scope:																			
DC MMSA	7,082	46,353	100.0	127,934	5.5	5.9	5.3	19.3	23.4	18.1	33.8	34.6	34.2	40.7	35.9	41.8	0.7	0.1	0.6
Total	**7,082**	**46,353**	**100.0**	**127,934**	**5.5**	**5.9**	**5.3**	**19.3**	**23.4**	**18.1**	**33.8**	**34.6**	**34.2**	**40.7**	**35.9**	**41.8**	**0.7**	**0.1**	**0.6**

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2020-21**

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
Full-Scope:											
DC MMSA	10,949	152,389	100.0	137,833	88.8	76.5	45.3	4.0	13.6	7.1	9.9
Total	**10,949**	**152,389**	**100.0**	**137,833**	**88.8**	**76.5**	**45.3**	**4.0**	**13.6**	**7.1**	**9.9**

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2022**

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
Full-Scope:											
DC MMSA	7,082	46,353	100.0	127,934	90.2	85.5	49.4	3.4	13.0	6.4	1.6
Total	**7,082**	**46,353**	**100.0**	**127,934**	**90.2**	**85.5**	**49.4**	**3.4**	**13.0**	**6.4**	**1.6**

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%, CITIBANK N.A. (10000001461) excluded from Aggregate

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2020-21**

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
Full-Scope:																			
Los Angeles CSA	17,149	14,402,062	50.2	1,018,980	2.6	2.5	2.3	18.6	17.1	16.6	30.8	20.9	30.4	47.9	59.0	50.4	0.1	0.5	0.3
San Jose CSA	13,963	12,573,237	40.9	578,034	3.8	4.1	3.7	16.9	15.9	15.9	37.4	31.9	36.5	41.8	47.8	43.7	0.1	0.3	0.1
Limited-Scope:																			
Bakersfield MSA	125	21,274	0.4	44,023	5.6	7.2	3.3	15.8	19.2	9.8	32.3	22.4	29.0	46.2	51.2	57.1	0.1	0.0	0.8
Fresno CSA	275	60,507	0.8	53,831	3.0	2.9	2.1	23.2	25.1	16.3	22.8	19.6	20.1	51.0	52.4	61.5	0.0	0.0	0.0
Sacramento MSA	656	222,876	1.9	106,024	6.9	6.6	7.9	24.4	21.0	22.3	36.0	37.2	35.8	32.7	35.2	33.9	0.1	0.0	0.1
San Diego MSA	1,994	1,608,265	5.8	215,863	2.8	3.0	2.8	15.1	13.9	14.2	35.5	25.5	34.0	46.6	57.5	49.0	0.0	0.0	0.0
Total	**34,162**	**28,888,221**	**100.0**	**2,016,755**	**3.2**	**3.3**	**3.1**	**18.1**	**16.6**	**16.3**	**33.2**	**26.0**	**32.5**	**45.4**	**53.8**	**47.9**	**0.1**	**0.4**	**0.2**

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2022**

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
Full-Scope:																			
Los Angeles CSA	4,113	4,713,407	54.9	419,552	1.6	1.9	1.9	18.3	18.1	18.0	34.1	20.5	33.8	45.6	58.7	45.7	0.4	0.8	0.6
San Jose CSA	2,618	3,516,542	35.0	201,849	3.0	3.2	3.2	17.3	16.0	17.3	39.0	33.8	38.7	40.0	46.5	40.3	0.6	0.5	0.5
Limited-Scope:																			
Bakersfield MSA	35	27,396	0.5	23,768	3.8	2.9	3.3	21.8	37.1	17.1	30.3	17.1	31.6	43.5	42.9	47.4	0.7	0.0	0.5
Fresno CSA	72	20,992	1.0	27,012	5.0	4.2	3.8	19.5	26.4	17.7	27.1	22.2	26.7	48.5	47.2	51.8	0.0	0.0	0.0
Sacramento MSA	152	116,305	2.0	46,330	5.3	8.6	6.3	23.9	27.0	25.3	39.6	19.7	35.9	31.0	44.7	32.1	0.2	0.0	0.3
San Diego MSA	498	541,751	6.7	82,558	2.4	2.4	2.4	15.8	14.1	15.6	37.2	29.5	37.6	44.4	54.0	44.1	0.2	0.0	0.2
Total	**7,488**	**8,936,393**	**100.0**	**801,069**	**2.4**	**2.6**	**2.6**	**18.2**	**17.4**	**18.0**	**35.7**	**25.7**	**35.2**	**43.3**	**53.6**	**43.6**	**0.4**	**0.6**	**0.5**

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2020-21**

	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**
Full-Scope:																			
Los Angeles CSA	17,149	14,402,062	50.2	1,018,980	23.9	4.9	3.1	16.5	15.5	8.5	17.6	11.7	17.8	42.0	66.7	51.8	0.0	1.3	18.8
San Jose CSA	13,963	12,573,237	40.9	578,034	23.8	6.1	4.6	16.2	16.3	11.9	18.3	12.8	20.1	41.7	63.9	51.5	0.0	0.9	11.8
Limited-Scope:																			
Bakersfield MSA	125	21,274	0.4	44,023	24.8	4.8	1.8	16.4	10.4	8.5	16.1	24.0	19.2	42.7	60.8	49.4	0.0	0.0	21.1
Fresno CSA	275	60,507	0.8	53,831	25.0	8.0	2.0	16.1	14.5	9.0	16.5	20.7	19.2	42.5	54.2	49.2	0.0	2.5	20.7
Sacramento MSA	656	222,876	1.9	106,024	26.7	11.3	5.0	17.3	17.5	16.4	18.6	26.2	24.8	37.4	44.1	38.7	0.0	0.9	15.2
San Diego MSA	1,994	1,608,265	5.8	215,863	23.6	7.7	3.1	16.9	27.3	9.4	17.8	8.9	18.4	41.7	54.3	49.9	0.0	1.7	19.2
Total	**34,162**	**28,888,221**	**100.0**	**2,016,755**	**24.0**	**5.7**	**3.6**	**16.5**	**16.5**	**10.0**	**17.8**	**12.4**	**19.0**	**41.7**	**64.3**	**50.7**	**0.0**	**1.2**	**16.8**

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

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Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2022**

	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**
Full-Scope:																			
Los Angeles CSA	4,113	4,713,407	54.9	419,552	23.1	3.8	4.3	16.7	10.8	8.3	18.4	9.7	17.1	41.7	74.7	51.7	0.0	0.9	18.5
San Jose CSA	2,618	3,516,542	35.0	201,849	23.0	6.5	5.4	16.5	13.3	11.0	18.8	10.0	18.3	41.6	68.9	52.1	0.0	1.2	13.3
Limited Scope:																			
Bakersfield MSA	35	27,396	0.5	23,768	23.5	8.6	2.5	17.1	34.3	10.0	17.5	20.0	21.1	42.0	34.3	47.7	0.0	2.9	18.8
Fresno CSA	72	20,992	1.0	27,012	24.1	9.7	2.7	16.4	19.4	9.6	17.7	19.4	20.6	41.8	51.4	48.9	0.0	0.0	18.2
Sacramento MSA	152	116,305	2.0	46,330	26.1	9.2	5.6	18.1	19.7	16.0	19.2	11.8	24.3	36.6	57.9	39.4	0.0	1.3	14.7
San Diego MSA	498	541,751	6.7	82,558	22.8	7.6	4.3	17.3	21.7	8.8	18.7	6.0	18.5	41.2	62.2	53.7	0.0	2.4	14.7
Total	**7,488**	**8,936,393**	**100.0**	**801,069**	**23.3**	**5.2**	**4.5**	**16.8**	**12.8**	**9.6**	**18.5**	**9.7**	**18.2**	**41.4**	**71.1**	**51.1**	**0.0**	**1.1**	**16.6**

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0% CITIBANK N.A. (10000001461) excluded from Aggregate

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Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2020-21**

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
Full-Scope:																			
Los Angeles CSA	93,604	1,077,887	63.8	765,991	4.8	4.8	4.5	20.2	24.6	20.1	26.9	30.8	27.3	46.6	39.2	46.4	1.5	0.6	1.7
San Jose CSA	28,755	440,465	19.6	309,200	8.4	7.9	7.9	18.8	20.9	18.8	32.9	35.7	33.8	39.4	35.3	38.3	0.5	0.3	1.2
Limited Scope:																			
Bakersfield MSA	2,570	19,601	1.8	19,566	5.4	6.1	4.1	19.7	19.3	16.9	26.7	30.0	24.7	47.4	44.0	52.5	0.8	0.5	1.8
Fresno CSA	3,206	44,071	2.2	26,214	5.9	5.2	4.4	26.9	25.7	21.9	21.5	24.4	23.6	44.5	44.0	48.5	1.2	0.7	1.6
Sacramento MSA	4,766	39,374	3.2	43,907	12.4	12.1	11.6	28.4	28.0	25.2	29.3	31.1	30.3	27.2	28.3	30.7	2.7	0.5	2.3
San Diego MSA	13,852	140,343	9.4	118,477	5.6	7.0	5.1	14.7	19.4	13.8	34.7	35.2	34.2	44.9	38.3	46.1	0.1	0.1	0.8
Total	**146,753**	**1,761,741**	**100.0**	**1,283,355**	**6.1**	**5.9**	**5.6**	**19.7**	**23.4**	**19.4**	**29.2**	**32.0**	**29.5**	**43.8**	**38.2**	**44.0**	**1.1**	**0.5**	**1.5**

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
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Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022**

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
Full-Scope:																			
Los Angeles CSA	54,927	297,917	64.1	732,869	3.3	3.4	3.0	19.3	23.9	19.7	29.5	34.4	30.6	45.7	37.2	44.5	2.2	1.1	2.2
San Jose CSA	15,103	83,728	17.6	272,556	5.7	6.2	5.4	17.9	21.0	18.3	34.5	38.2	35.6	38.6	33.5	37.7	3.3	1.2	2.9
Limited-Scope:																			
Bakersfield MSA	1,843	8,077	2.1	20,063	5.3	5.9	3.9	20.2	23.5	17.1	28.1	28.5	28.8	40.9	39.7	45.3	5.6	2.4	4.9
Fresno CSA	2,054	11,835	2.4	25,842	7.8	7.1	5.9	22.7	21.6	21.2	28.1	27.1	26.7	40.4	43.5	44.9	0.9	0.7	1.3
Sacramento MSA	2,849	15,378	3.3	43,050	10.2	9.1	9.8	30.2	25.6	25.1	32.0	36.2	33.2	25.3	28.3	30.2	2.3	0.9	1.8
San Diego MSA	8,961	51,311	10.5	113,825	3.8	4.8	3.3	17.7	20.0	16.3	34.0	37.0	33.8	43.7	37.6	45.3	0.8	0.5	1.3
Total	**85,737**	**468,246**	**100.0**	**1,208,205**	**4.3**	**4.4**	**3.9**	**19.4**	**23.0**	**19.2**	**31.2**	**35.1**	**32.0**	**42.8**	**36.5**	**42.6**	**2.3**	**1.0**	**2.3**

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21
	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
Full-Scope:											
Los Angeles CSA	93,604	1,077,887	63.8	765,991	90.3	80.1	42.6	3.8	11.2	6.0	8.7
San Jose CSA	28,755	440,465	19.6	309,200	88.6	76.3	45.8	4.3	13.2	7.1	10.5
Limited-Scope:											
Bakersfield MSA	2,570	19,601	1.8	19,566	87.6	79.9	37.6	3.6	11.1	8.8	9.0
Fresno CSA	3,206	44,071	2.2	26,214	87.3	76.9	37.8	3.9	14.0	8.8	9.0
Sacramento MSA	4,766	39,374	3.2	43,907	89.0	79.7	46.1	3.1	10.2	7.9	10.2
San Diego MSA	13,852	140,343	9.4	118,477	90.1	79.8	43.7	3.7	11.5	6.3	8.8
Total	**146,753**	**1,761,741**	**100.0**	**1,283,355**	**89.7**	**79.3**	**43.4**	**3.9**	**11.7**	**6.5**	**9.1**

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
	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
Full-Scope:											
Los Angeles CSA	54,927	297,917	64.1	732,869	91.4	86.1	49.4	3.2	11.1	5.4	2.8
San Jose CSA	15,103	83,728	17.6	272,556	89.8	84.1	52.9	3.7	13.0	6.5	2.9
Limited-Scope:											
Bakersfield MSA	1,843	8,077	2.1	20,063	88.7	86.6	44.1	3.1	9.0	8.2	4.4
Fresno CSA	2,054	11,835	2.4	25,842	88.9	83.4	45.4	3.3	14.2	7.9	2.4
Sacramento MSA	2,849	15,378	3.3	43,050	91.0	86.8	53.5	2.5	9.8	6.6	3.4
San Diego MSA	8,961	51,311	10.5	113,825	91.2	86.2	49.4	3.1	11.5	5.7	2.3
Total	**85,737**	**468,246**	**100.0**	**1,208,205**	**90.9**	**85.8**	**50.2**	**3.3**	**11.4**	**5.9**	**2.8**

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
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Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2020-21**

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
Full-Scope:																			
Miami MSA	3,275	2,948,887	96.7	258,889	2.6	2.1	2.1	23.2	20.3	19.1	32.9	21.1	32.4	41.2	55.6	46.0	0.2	0.9	0.4
Limited-Scope:																			
Jacksonville MSA	112	29,475	3.3	53,643	5.8	0.0	3.1	23.6	23.2	20.0	39.8	29.5	39.9	30.8	47.3	36.9	0.0	0.0	0.0
Total	**3,387**	**2,978,362**	**100.0**	**312,532**	**3.0**	**2.1**	**2.3**	**23.2**	**20.4**	**19.2**	**33.8**	**21.4**	**33.7**	**39.8**	**55.3**	**44.5**	**0.1**	**0.8**	**0.3**

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2022**

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
Full-Scope:																			
Miami MSA	1,443	1,679,694	95.2	161,008	2.9	3.3	2.4	21.8	24.6	20.4	32.1	21.4	32.0	42.2	48.9	44.1	1.0	1.8	1.1
Limited-Scope:																			
Jacksonville MSA	72	22,996	4.8	35,637	5.8	12.5	4.5	25.2	30.6	26.9	36.8	26.4	39.7	31.4	30.6	28.1	0.7	0.0	0.8
Total	**1,515**	**1,702,690**	**100.0**	**196,645**	**3.3**	**3.7**	**2.8**	**22.3**	**24.9**	**21.6**	**32.7**	**21.7**	**33.4**	**40.7**	**48.1**	**41.2**	**1.0**	**1.7**	**1.0**

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

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Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21
	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
Full-Scope:																			
Miami MSA	3,275	2,948,887	96.7	258,889	23.1	2.8	2.4	17.0	13.2	9.5	17.7	12.7	18.0	42.2	63.2	52.3	0.0	8.0	17.8
Limited-Scope:																			
Jacksonville MSA	112	29,475	3.3	53,643	25.1	8.0	5.6	18.1	13.4	16.6	19.7	14.3	20.4	37.2	52.7	33.6	0.0	11.6	23.8
Total	**3,387**	**2,978,362**	**100.0**	**312,532**	**23.4**	**3.0**	**2.9**	**17.1**	**13.2**	**10.7**	**18.0**	**12.8**	**18.4**	**41.5**	**62.9**	**49.1**	**0.0**	**8.1**	**18.8**

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
	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
Full-Scope:																			
Miami MSA	1,443	1,679,694	95.2	161,008	22.5	4.9	3.1	17.6	12.1	9.2	18.0	11.4	16.7	41.9	65.0	53.4	0.0	6.6	17.6
Limited-Scope:																			
Jacksonville MSA	72	22,996	4.8	35,637	24.5	12.5	7.5	19.7	23.6	19.4	19.8	11.1	22.3	36.1	45.8	30.4	0.0	6.9	20.4
Total	**1,515**	**1,702,690**	**100.0**	**196,645**	**22.7**	**5.2**	**3.9**	**17.9**	**12.7**	**11.1**	**18.3**	**11.4**	**17.7**	**41.1**	**64.1**	**49.2**	**0.0**	**6.6**	**18.1**

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-21
	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
Full-Scope:																			
Miami MSA	30,203	340,945	92.7	395,476	4.1	3.7	4.5	22.2	24.1	23.4	28.3	27.2	28.6	44.1	44.0	42.2	1.2	1.0	1.4
Limited-Scope:																			
Jacksonville MSA	2,379	14,104	7.3	30,000	6.5	6.3	6.7	25.8	29.5	25.3	33.8	34.6	32.3	33.9	29.5	35.4	0.0	0.0	0.3
Total	**32,582**	**355,049**	**100.0**	**425,476**	**4.4**	**3.9**	**4.6**	**22.6**	**24.5**	**23.5**	**28.8**	**27.7**	**28.8**	**43.2**	**42.9**	**41.7**	**1.1**	**0.9**	**1.3**

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022
	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
Full-Scope:																			
Miami MSA	21,174	116,618	93.0	371,167	2.9	2.9	2.9	22.1	21.6	21.9	29.2	29.9	29.5	43.1	43.7	43.1	2.7	1.9	2.7
Limited-Scope:																			
Jacksonville MSA	1,588	7,982	7.0	29,756	6.9	7.6	7.0	26.8	28.3	23.3	36.5	37.1	36.8	27.0	24.9	30.2	2.7	2.1	2.7
Total	**22,762**	**124,600**	**100.0**	**400,923**	**3.2**	**3.2**	**3.2**	**22.5**	**22.1**	**22.0**	**29.9**	**30.4**	**30.0**	**41.7**	**42.4**	**42.1**	**2.7**	**1.9**	**2.7**

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
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Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21
	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
Full-Scope:											
Miami MSA	30,203	340,945	92.7	395,476	94.4	78.4	41.0	1.9	14.6	3.7	7.0
Limited-Scope:											
Jacksonville MSA	2,379	14,104	7.3	30,000	91.6	80.8	39.7	2.5	10.8	5.9	8.4
Total	**32,582**	**355,049**	**100.0**	**425,476**	**94.1**	**78.6**	**40.9**	**1.9**	**14.3**	**3.9**	**7.1**

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
	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
Full-Scope:											
Miami MSA	21,174	116,618	93.0	371,167	95.0	84.8	50.4	1.6	14.0	3.4	1.2
Limited-Scope:											
Jacksonville MSA	1,588	7,982	7.0	29,756	92.7	86.6	46.8	2.0	12.2	5.3	1.3
Total	**22,762**	**124,600**	**100.0**	**400,923**	**94.8**	**84.9**	**50.2**	**1.6**	**13.9**	**3.6**	**1.2**

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2020-21**

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
Full-Scope:																			
Chicago MSA	5,651	1,936,630	100.0	447,521	4.5	5.4	3.2	18.0	18.0	13.7	34.4	22.6	32.4	43.0	53.8	50.5	0.1	0.2	0.1
Total	**5,651**	**1,936,630**	**100.0**	**447,521**	**4.5**	**5.4**	**3.2**	**18.0**	**18.0**	**13.7**	**34.4**	**22.6**	**32.4**	**43.0**	**53.8**	**50.5**	**0.1**	**0.2**	**0.1**

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%, CITIBANK N.A. (10000001461) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2022**

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
Full-Scope:																			
Chicago MSA	1,707	969,583	100.0	214,997	4.5	5.6	4.4	18.6	18.0	17.1	35.9	25.2	35.1	40.7	50.7	43.2	0.2	0.5	0.3
Total	**1,707**	**969,583**	**100.0**	**214,997**	**4.5**	**5.6**	**4.4**	**18.6**	**18.0**	**17.1**	**35.9**	**25.2**	**35.1**	**40.7**	**50.7**	**43.2**	**0.2**	**0.5**	**0.3**

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21
	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
Full-Scope:																			
Chicago MSA	5,651	1,936,630	100.0	447,521	23.5	8.5	6.2	16.3	18.0	15.9	18.5	18.3	20.8	41.7	53.4	41.1	0.0	1.8	16.0
Total	**5,651**	**1,936,630**	**100.0**	**447,521**	**23.5**	**8.5**	**6.2**	**16.3**	**18.0**	**15.9**	**18.5**	**18.3**	**20.8**	**41.7**	**53.4**	**41.1**	**0.0**	**1.8**	**16.0**

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
	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
Full-Scope:																			
Chicago MSA	1,707	969,583	100.0	214,997	23.0	17.5	10.0	16.5	20.3	21.0	19.1	13.8	20.6	41.3	47.4	31.8	0.0	1.1	16.7
Total	**1,707**	**969,583**	**100.0**	**214,997**	**23.0**	**17.5**	**10.0**	**16.5**	**20.3**	**21.0**	**19.1**	**13.8**	**20.6**	**41.3**	**47.4**	**31.8**	**0.0**	**1.1**	**16.7**

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-21
	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
Full-Scope:																			
Chicago MSA	25,872	334,392	100.0	292,769	6.2	5.4	7.1	16.8	18.6	19.0	28.1	31.5	29.8	48.4	44.3	43.6	0.5	0.2	0.5
Total	**25,872**	**334,392**	**100.0**	**292,769**	**6.2**	**5.4**	**7.1**	**16.8**	**18.6**	**19.0**	**28.1**	**31.5**	**29.8**	**48.4**	**44.3**	**43.6**	**0.5**	**0.2**	**0.5**

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
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Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022
	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
Full-Scope:																			
Chicago MSA	16,114	94,987	100.0	250,849	5.9	5.7	4.6	17.1	19.1	16.2	30.8	33.9	33.6	45.6	40.9	45.0	0.5	0.3	0.6
Total	**16,114**	**94,987**	**100.0**	**250,849**	**5.9**	**5.7**	**4.6**	**17.1**	**19.1**	**16.2**	**30.8**	**33.9**	**33.6**	**45.6**	**40.9**	**45.0**	**0.5**	**0.3**	**0.6**

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
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Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21
	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
Full-Scope:											
Chicago MSA	25,872	334,392	100.0	292,769	86.8	75.6	41.6	5.1	15.3	8.2	9.1
Total	**25,872**	**334,392**	**100.0**	**292,769**	**86.8**	**75.6**	**41.6**	**5.1**	**15.3**	**8.2**	**9.1**

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
	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
Full-Scope:											
Chicago MSA	16,114	94,987	100.0	250,849	89.5	83.6	51.0	3.9	14.3	6.5	2.1
Total	**16,114**	**94,987**	**100.0**	**250,849**	**89.5**	**83.6**	**51.0**	**3.9**	**14.3**	**6.5**	**2.1**

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

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Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2020-21**

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
Full-Scope:																			
Las Vegas MSA	587	338,078	100.0	155,149	1.9	2.2	1.3	16.9	15.2	12.0	41.7	33.4	42.8	39.5	49.2	43.9	0.0	0.0	0.0
Total	**587**	**338,078**	**100.0**	**155,149**	**1.9**	**2.2**	**1.3**	**16.9**	**15.2**	**12.0**	**41.7**	**33.4**	**42.8**	**39.5**	**49.2**	**43.9**	**0.0**	**0.0**	**0.0**

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2022**

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
Full-Scope:																			
Las Vegas MSA	257	151,532	100.0	81,010	2.4	3.9	2.2	15.7	19.5	15.7	42.7	33.9	40.1	39.0	42.4	41.8	0.2	0.4	0.1
Total	**257**	**151,532**	**100.0**	**81,010**	**2.4**	**3.9**	**2.2**	**15.7**	**19.5**	**15.7**	**42.7**	**33.9**	**40.1**	**39.0**	**42.4**	**41.8**	**0.2**	**0.4**	**0.1**

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
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Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21
	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
Full-Scope:																			
Las Vegas MSA	587	338,078	100.0	155,149	20.7	9.7	5.0	18.4	18.9	14.3	20.5	16.5	20.5	40.5	52.5	37.7	0.0	2.4	22.6
Total	**587**	**338,078**	**100.0**	**155,149**	**20.7**	**9.7**	**5.0**	**18.4**	**18.9**	**14.3**	**20.5**	**16.5**	**20.5**	**40.5**	**52.5**	**37.7**	**0.0**	**2.4**	**22.6**

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
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Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
	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
Full-Scope:																			
Las Vegas MSA	257	151,532	100.0	81,010	20.9	14.4	5.2	18.0	18.3	14.6	20.2	10.9	21.8	40.9	55.3	39.5	0.0	1.2	18.8
Total	**257**	**151,532**	**100.0**	**81,010**	**20.9**	**14.4**	**5.2**	**18.0**	**18.3**	**14.6**	**20.2**	**10.9**	**21.8**	**40.9**	**55.3**	**39.5**	**0.0**	**1.2**	**18.8**

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
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The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-21
	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
Full-Scope:																			
Las Vegas MSA	4,642	43,079	100.0	73,338	3.8	3.6	3.0	20.8	20.7	18.2	38.7	39.0	38.7	36.1	36.5	39.5	0.6	0.2	0.7
Total	**4,642**	**43,079**	**100.0**	**73,338**	**3.8**	**3.6**	**3.0**	**20.8**	**20.7**	**18.2**	**38.7**	**39.0**	**38.7**	**36.1**	**36.5**	**39.5**	**0.6**	**0.2**	**0.7**

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022
	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
Full-Scope:																			
Las Vegas MSA	2,899	16,000	100.0	70,409	3.5	3.9	3.2	25.1	23.2	21.3	34.1	35.7	35.1	37.0	37.0	40.0	0.3	0.2	0.4
Total	**2,899**	**16,000**	**100.0**	**70,409**	**3.5**	**3.9**	**3.2**	**25.1**	**23.2**	**21.3**	**34.1**	**35.7**	**35.1**	**37.0**	**37.0**	**40.0**	**0.3**	**0.2**	**0.4**

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
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Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21
	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
Full-Scope:											
Las Vegas MSA	4,642	43,079	100.0	73,338	86.8	73.3	42.2	4.3	14.0	8.9	12.8
Total	**4,642**	**43,079**	**100.0**	**73,338**	**86.8**	**73.3**	**42.2**	**4.3**	**14.0**	**8.9**	**12.8**

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
	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
Full-Scope:											
Las Vegas MSA	2,899	16,000	100.0	70,409	91.8	81.9	48.0	2.6	15.9	5.6	2.2
Total	**2,899**	**16,000**	**100.0**	**70,409**	**91.8**	**81.9**	**48.0**	**2.6**	**15.9**	**5.6**	**2.2**

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
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Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21
	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
Full-Scope:																			
San Juan MSA	0	0	0.0	21,305	1.8	0.0	1.4	24.4	0.0	16.6	41.2	0.0	35.4	32.6	0.0	46.1	0.1	0.0	0.5
Total	**0**	**0**	**0.0**	**21,305**	**1.8**	**0.0**	**1.4**	**24.4**	**0.0**	**16.6**	**41.2**	**0.0**	**35.4**	**32.6**	**0.0**	**46.1**	**0.1**	**0.0**	**0.5**

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
	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
Full-Scope:																			
San Juan MSA	0	0	0.0	15,562	2.7	0.0	3.0	23.7	0.0	17.8	37.6	0.0	34.0	35.0	0.0	43.6	1.0	0.0	1.7
Total	**0**	**0**	**0.0**	**15,562**	**2.7**	**0.0**	**3.0**	**23.7**	**0.0**	**17.8**	**37.6**	**0.0**	**34.0**	**35.0**	**0.0**	**43.6**	**1.0**	**0.0**	**1.7**

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21
	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
Full-Scope:																			
San Juan MSA	0	0	0.0	21,305	26.5	0.0	0.6	15.0	0.0	5.3	15.7	0.0	12.1	42.8	0.0	52.2	0.0	0.0	29.7
Total	**0**	**0**	**0.0**	**21,305**	**26.5**	**0.0**	**0.6**	**15.0**	**0.0**	**5.3**	**15.7**	**0.0**	**12.1**	**42.8**	**0.0**	**52.2**	**0.0**	**0.0**	**29.7**

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
	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
Full-Scope:																			
San Juan MSA	0	0	0.0	15,562	25.6	0.0	0.8	15.4	0.0	8.2	16.4	0.0	15.1	42.6	0.0	50.2	0.0	0.0	25.8
Total	**0**	**0**	**0.0**	**15,562**	**25.6**	**0.0**	**0.8**	**15.4**	**0.0**	**8.2**	**16.4**	**0.0**	**15.1**	**42.6**	**0.0**	**50.2**	**0.0**	**0.0**	**25.8**

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-21
	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
Full-Scope:																			
San Juan MSA	2,208	8,798	100.0	34,476	4.8	2.5	3.1	23.5	21.9	16.5	24.7	35.5	28.4	44.6	39.6	48.7	2.4	0.5	3.2
Total	**2,208**	**8,798**	**100.0**	**34,476**	**4.8**	**2.5**	**3.1**	**23.5**	**21.9**	**16.5**	**24.7**	**35.5**	**28.4**	**44.6**	**39.6**	**48.7**	**2.4**	**0.5**	**3.2**

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022
	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
Full-Scope:																			
San Juan MSA	2,036	8,046	100.0	20,161	7.7	3.7	2.9	18.0	19.1	13.7	23.5	35.9	24.5	44.5	39.2	49.2	6.3	2.2	9.6
Total	**2,036**	**8,046**	**100.0**	**20,161**	**7.7**	**3.7**	**2.9**	**18.0**	**19.1**	**13.7**	**23.5**	**35.9**	**24.5**	**44.5**	**39.2**	**49.2**	**6.3**	**2.2**	**9.6**

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21
	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
Full-Scope:											
San Juan MSA	2,208	8,798	100.0	34,476	72.8	84.3	24.4	13.9	6.7	13.3	8.9
Total	**2,208**	**8,798**	**100.0**	**34,476**	**72.8**	**84.3**	**24.4**	**13.9**	**6.7**	**13.3**	**8.9**

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
	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
Full-Scope:											
San Juan MSA	2,036	8,046	100.0	20,161	60.9	91.2	53.5	22.2	5.2	17.0	3.6
Total	**2,036**	**8,046**	**100.0**	**20,161**	**60.9**	**91.2**	**53.5**	**22.2**	**5.2**	**17.0**	**3.6**

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			
2020-21																			
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**
Full-Scope:																			
Sioux Falls MSA	51	8,512	100.0	18,297	0.0	0.0	0.0	20.0	21.6	15.0	55.3	47.1	52.4	24.8	31.4	32.6	0.0	0.0	0.0
Total	**51**	**8,512**	**100.0**	**18,297**	**0.0**	**0.0**	**0.0**	**20.0**	**21.6**	**15.0**	**55.3**	**47.1**	**52.4**	**24.8**	**31.4**	**32.6**	**0.0**	**0.0**	**0.0**

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			
2022																			
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**
Full-Scope:																			
Sioux Falls MSA	22	4,988	100.0	11,305	1.0	4.5	1.0	19.1	45.5	16.7	56.9	31.8	59.0	23.0	18.2	23.4	0.0	0.0	0.0
Total	**22**	**4,988**	**100.0**	**11,305**	**1.0**	**4.5**	**1.0**	**19.1**	**45.5**	**16.7**	**56.9**	**31.8**	**59.0**	**23.0**	**18.2**	**23.4**	**0.0**	**0.0**	**0.0**

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2020-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Sioux Falls MSA	51	8,512	100.0	18,297	19.0	15.7	7.2	18.1	33.3	20.3	24.4	5.9	20.8	38.5	13.7	33.2	0.0	31.4	18.6
Total	**51**	**8,512**	**100.0**	**18,297**	**19.0**	**15.7**	**7.2**	**18.1**	**33.3**	**20.3**	**24.4**	**5.9**	**20.8**	**38.5**	**13.7**	**33.2**	**0.0**	**31.4**	**18.6**

Source: 2015 ACS ; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2022**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Sioux Falls MSA	22	4,988	100.0	11,305	18.6	18.2	7.3	18.1	31.8	20.1	25.0	9.1	23.1	38.3	31.8	34.5	0.0	9.1	15.0
Total	**22**	**4,988**	**100.0**	**11,305**	**18.6**	**18.2**	**7.3**	**18.1**	**31.8**	**20.1**	**25.0**	**9.1**	**23.1**	**38.3**	**31.8**	**34.5**	**0.0**	**9.1**	**15.0**

Source: 2020 U.S. Census ; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2020-21**

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
Full-Scope:																			
Sioux Falls MSA	288	2,473	100.0	8,462	0.0	0.0	0.0	35.1	30.6	29.6	38.1	37.8	40.9	26.7	31.6	28.9	0.0	0.0	0.6
Total	**288**	**2,473**	**100.0**	**8,462**	**0.0**	**0.0**	**0.0**	**35.1**	**30.6**	**29.6**	**38.1**	**37.8**	**40.9**	**26.7**	**31.6**	**28.9**	**0.0**	**0.0**	**0.6**

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022**

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
Full-Scope:																			
Sioux Falls MSA	223	1,193	100.0	6,781	9.4	4.0	4.8	24.1	30.0	23.2	43.0	44.8	47.4	20.8	20.2	21.9	2.6	0.9	2.7
Total	**223**	**1,193**	**100.0**	**6,781**	**9.4**	**4.0**	**4.8**	**24.1**	**30.0**	**23.2**	**43.0**	**44.8**	**47.4**	**20.8**	**20.2**	**21.9**	**2.6**	**0.9**	**2.7**

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2020-21**

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
Full-Scope:											
Sioux Falls MSA	288	2,473	100.0	8,462	87.0	83.0	52.9	4.1	12.2	8.9	4.9
Total	**288**	**2,473**	**100.0**	**8,462**	**87.0**	**83.0**	**52.9**	**4.1**	**12.2**	**8.9**	**4.9**

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%, CITIBANK N.A. (10000001461) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2022**

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
Full-Scope:											
Sioux Falls MSA	223	1,193	100.0	6,781	89.3	84.8	51.4	3.2	13.9	7.5	1.3
Total	**223**	**1,193**	**100.0**	**6,781**	**89.3**	**84.8**	**51.4**	**3.2**	**13.9**	**7.5**	**1.3**

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%. CITIBANK N.A. (10000001461) excluded from Aggregate

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.