



PUBLIC DISCLOSURE

August 14, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

City National Bank
Charter Number: 14695

555 South Flower Street
Los Angeles, CA 90071

Office of the Comptroller of the Currency
350 South Grand, 11th Floor
Los Angeles, CA 90071

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

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Overall CRA Rating

Institution's CRA Rating: This institution is rated Satisfactory.

The following table indicates the performance level of **City National Bank** with respect to the Lending, Investment, and Service Tests:

Performance Levels	City National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory	X		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 performance in California and, more specifically, performance in the Los Angeles-Long Beach combined statistical area (CSA). The overall rating is a blend of state ratings; however, a substantial majority of deposits and lending activity are in the Los Angeles-Long Beach CSA.
 - Good level of lending activity;
 - Adequate geographic distribution of loans;
 - Adequate borrower distribution of loans; and
 - A relatively high level of community development (CD) loans, which has a significant positive impact on the Lending Test.
- The Investment Test rating is based on performance in California and, more specifically, performance in the Los Angeles-Long Beach CSA. The overall rating is a blend of state ratings; however, a substantial majority of deposits and lending activity are in the Los Angeles-Long Beach CSA.
 - Excellent level of CD investments that are responsive to assessment area (AA) needs.
- The Service Test rating is based on performance in California and, more specifically, performance in the Los Angeles-Long Beach CSA. The overall rating is a blend of state ratings; however, a substantial majority of deposits and lending activity are in the Los Angeles-Long Beach CSA.
 - Retail delivery systems are reasonably accessible to geographies and individuals in the AA; and
 - Significant level of CD services, which has a significant positive impact on the Service Test.

Lending in Assessment Area

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

The bank originated and purchased 87.6 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	6,472	82.7	1,358	17.3	7,830	6,918,399	82.9	1,423,717	17.1	8,342,116
Small Business	8,774	91.6	800	8.4	9,574	1,980,447	90.7	203,827	9.3	2,184,274
Small Farm	4	50.0	4	50.0	8	415	74.1	145	25.9	560
Total	15,250	87.6	2,162	12.4	17,412	8,899,261	84.5	1,627,689	15.5	10,526,950

Loan Data as of December 31, 2018. Rated area refers to either state or multi-state MA rating area.

Mortgage and small business lending volumes are sufficient to conduct an analysis of geographic distribution of these loan products. The volume of small farm loans is too low to analyze.

Description of Institution

City National Bank (CNB or bank) is a \$50.7 billion interstate financial institution headquartered in Los Angeles, California. CNB is a wholly owned subsidiary of RBC USA Holdco Corporation (RBC), a \$142 billion holding company headquartered in New York, New York.

CNB is a full-service banking institution with operations in California, Georgia, Minnesota, Nevada, New York, Tennessee, and the District of Columbia. CNB is a relationship driven bank, focused on providing their business clients with complete banking solutions. CNB has a large wealth management portfolio that offers numerous investment options and platforms. The bank's primary focus is business lending and commercial banking. CNB offers commercial loans as well as small business loans through the Small Business Administration (SBA). CNB offers unsecured consumer loan products only as an accommodation for business and wealth management customers. Since its last evaluation, CNB expanded its residential mortgage lending program and significantly increased its mortgage lending during the evaluation period. During the evaluation period, CNB has originated or purchased \$8.3 billion in mortgages. CNB's loan purchases include loans from PennyMac and Habitat for Humanity-San Diego during the evaluation period.

According to the June 30, 2018 FDIC Summary of Deposit Report, CNB had total deposits of \$42.3 billion. As of December 31, 2018, CNB had \$35.8 billion in loans and \$4.1 billion of Tier 1 Capital. Total loans represented 70.7 percent of total assets as of December 31, 2018. The loan portfolio by

dollar volume consists of 54.7 percent real estate, 24.8 percent commercial, 2.1 percent consumer loans, and 18.4 percent other. Of the total number of reported loans (HMDA and small business) originated or purchased during the evaluation period, 45 percent are residential mortgage loans and 55 percent are commercial loans.

CNB operates 72 branches serving 11 AAs in California, Georgia, Minnesota, Nevada, New York, Tennessee, and the District of Columbia. Since the last evaluation, CNB expanded its footprint into two new AAs and corresponding states with the opening of one de novo branch in each of Minneapolis, MN (May 2017) and the District of Columbia (February 2018). In California, the bank serves two combined statistical areas [the Los Angeles-Long Beach CSA (Los Angeles CSA) and a portion of the San Jose-San Francisco-Oakland CSA (San Jose CSA)], the San Diego-Carlsbad metropolitan statistical area (MSA) (San Diego MSA), and the City of Santa Barbara. In Nevada, the bank serves the Las Vegas-Henderson-Paradise MSA (Las Vegas MSA) and a portion of the Reno-Carson City-Fernley CSA (Reno CSA). The bank serves one AA in each of Georgia [portion of the Atlanta-Sandy Springs-Roswell MSA (Atlanta MSA)]; Minnesota [portion of the Minneapolis-St Paul-Bloomington MSA (Minneapolis MSA)]; New York [portion of the New York-Jersey City-White Plains metropolitan division (MD) (New York MD)]; and the District of Columbia [portion of the Washington-Arlington-Alexandria MD].

There are no legal, financial, or other factors impeding the ability of the bank to meet credit needs in its communities. CNB received a “Satisfactory” rating in its previous OCC CRA examination dated July 11, 2016.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation covers home mortgage loans and small loans to businesses originated or purchased between January 1, 2016, and December 31, 2018. Small farm lending and consumer lending were not evaluated because they are not primary loan products as the volume of originations are too low. Primary loan products for purposes of this evaluation are products in which the bank originated at least 20 loans in an AA during the evaluation period. This evaluation also includes CD loans, qualified investments, and CD services for the period beginning January 1, 2016, through December 31, 2018.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AA within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (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. 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 bank’s performance in California carries substantial weight in the overall rating, and performance in the Los Angeles-Long Beach CSA carries the most weight in the overall state rating. California housed 80.6 percent of total branches, held 86.8 percent of total deposits, and generated 85.2 percent of the total number of loans analyzed in this evaluation. The Los Angeles-Long Beach CSA housed 75.9 percent of total California branches, held 88.1 percent of total California deposits, and generated 15.5 percent of the total number of loans analyzed.

The Lending Test analysis places slightly more weight to small business lending than to home mortgage lending based on the number of loans granted for each product. During the evaluation period, home mortgage lending represented approximately 42.4 percent of the number, and 77.7 percent of the dollar volume of total reportable lending in the AAs. CRA reportable small business lending represented 58.0 percent of the number and 22.3 percent of the total dollar volume of reportable lending in the AAs. While dollar volume by product is weighted more towards home mortgage lending, the number of small loans to businesses is significant and reflective of CNB’s strategy to provide smaller dollar business financing.

The MMSA and state ratings are based on performance in all bank AAs. Refer to the “Scope” section under each State and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC does not have 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 OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution’s next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of California

CRA rating for the State of California: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Good level of lending activity;
- Adequate geographic distribution of loans;
- Adequate borrower distribution of loans;
- A relatively high level of CD loans, which has a significant positive impact on the Lending Test;
- Excellent level of CD investments that are responsive to AA needs;
- Retail delivery systems are reasonably accessible to geographies and individuals in the AA; and
- Leader in providing CD services, which has a significant positive impact on the Service Test.

Description of Institution's Operations in California

CNB delineated four AAs within California and include the Los Angeles-Long Beach CSA (Los Angeles CSA), the San Diego MSA, a portion of the San Jose-Oakland-San Francisco CSA (San Jose CSA AA), and the City of Santa Barbara (Santa Barbara AA). California represents the largest rated area by deposits and loans. CNB had approximately \$31.4 billion of deposits in California, representing 86.8 percent of total deposits. CNB operates 58 branches and 59 ATMs within California, representing 80.6 percent of the bank's branches and 83.1 percent of the bank's ATMs. The bank originated and purchased approximately \$8.9 billion, or 86.5 percent of total reported loans and CD loans during the evaluation period in California. The bank's primary loan product in California is home mortgage (42.1 percent) and small loans to businesses (57.9 percent).

Los Angeles-Long Beach, CA CSA

The Los Angeles CSA includes the Los Angeles-Long Beach Glendale MD (Los Angeles County); the Anaheim-Irvine-Orange MD (Orange County); the Riverside-San Bernardino MSA (Riverside and San Bernardino Counties); and the Oxnard-Thousand Oaks-Ventura MSA (Ventura County). According to

the June 30, 2018 FDIC Summary of Deposit Report, CNB ranked six out of 134 FDIC-insured institutions in the Los Angeles CSA with a deposit market share of 4.6 percent. The top three depository institutions are Bank of America, National Association (NA); Wells Fargo Bank, NA; and JPMorgan Chase Bank, NA with a combined deposit market share of 47.9 percent. In 2017, CNB ranked 96 of 951 in HMDA mortgages with 0.19 percent market share. The top five lenders, holding 24 percent market share, are Wells Fargo Bank, NA; JPMorgan Chase Bank, NA; Bank of America, NA; Quicken Loans; and Flagstar Bank, FSB. In 2017, CNB ranked 20 out 268 small business lenders with a 0.3 percent market share of small business loans. The top five small business lenders are American Express, FSB; Chase Bank USA, NA; Bank of America, NA; Citibank, NA; and Wells Fargo Bank, NA with a combined market share of 70.9 percent.

Demographics

The following table provides a summary of the demographic profile of the Los Angeles CSA by categorizing the AA characteristics into their respective census tracts based on income level. The table reflects a moderate level of low- and moderate-income (LMI) census tracts, which total 37 percent of the AA. The demographic data also reflects a very low percentage of home ownership in LMI geographies compared to the population distribution in those areas.

Table A – Demographic Information of the Assessment Area

Assessment Area: Los Angeles-Long Beach CSA 2018 Census

Demographic Characteristics	#	Low % of #	Moderate	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	1,280,973	4.9	20.5	27.7	45.4	1.6
Farms by Geography	17,480	3.7	20.5	32.4	42.8	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 MSA - 11244 Anaheim-Santa Ana-Irvine, CA MD		\$86,003	Median Housing Value			\$449,452
Median Family Income MSA - 31084 Los Angeles-Long Beach-Glendale, CA MD		\$62,703	Median Gross Rent			\$1,330
Median Family Income MSA - 37100 Oxnard-Thousand Oaks-Ventura, CA MSA		\$86,766	Median Housing Value			13.1%
Median Family Income MSA - 40140 Riverside-San Bernardino-Ontario, CA MSA		\$61,507				

Source: 2015 ACS Census and 2018 D&B Data

Due to rounding, totals may not equal 100.0

(*) The NA category consists of geographies that have not been assigned an income classification.

Community Contacts

OCC reviewed four recent community contacts to determine community credit needs and opportunities for financial institutions to help address these needs. The contacts included two housing organizations and two economic development organizations. The contacts identified affordable housing and access to capital for business as critical needs. Opportunities for banks to address the needs include:

- More loans and investments as the lending gap is being filled by more expensive nonbank lenders.
- Partnering with Community Development Financial Institutions (CDFIs) to penetrate business lending markets and more small business lending particularly to startup businesses and businesses with less than two years business history.
- More commercial real estate (CRE) loans and microloans for working capital, tenant improvements, and equipment financing.
- Partnering with and/or provide financial support to community-based organizations involved in new transportation and commercial corridors.
- Leverage investments/debt with Qualified Opportunity Zones funds and promote investment in these funds by wealth clients.
- Affordable mortgages with competitive rates and down payment assistance or low-down payment with no purchased mortgage insurance.
- Affordable credit building products, including second-chance loans and small consumer loans.
- Credit counseling and financial literacy, and affordable streamlined mortgage loans.
- Follow-up/individualized services for attendees of homebuyer workshops and pairing attendee with homebuying opportunities.
- Grants and financial support to CD nonprofits, job skills training, financial literacy, and micro-loans for small businesses.
- No-cost checking and savings products for unbanked/underbanked individuals.
- Support of, and partnership with CD organizations, including those that work to address homelessness and poverty.

Los Angeles-Long Beach-Glendale MD

Economic Data

Based on the May 2019 Moody's Analytics report, employment growth in the Los Angeles-Long Beach-Glendale economy has slowed, but average hourly earnings growth is increasing faster than the U.S. average. The continued U.S.-China trade war could have a negative effect on Los Angeles ports, which handle over half of all maritime trade with China. Tourism in the area will continue to grow with spending up 5 percent in 2018 and expected to continue at a similar pace in 2019. Los Angeles is also preparing for the 2028 Olympics with the addition of several new hotels.

Some of the largest employers in the Los Angeles-Long Beach-Glendale area includes the University of California-Los Angeles, Kaiser Permanente, and the University of Southern California. The unemployment rate declined from 6.6 to 4.7 percent between 2015 and 2018. The population growth was flat during this time. Median household income increased from \$59,300 to \$67,300, and personal income growth increased an average of 3.3 percent per year between 2015 and 2018.

Housing

Housing prices are rising, but this is not resulting in increased home building as evidenced by the modest increase in building permits; home sales are declining because of the increased prices. Land shortages will also contribute to elevated real estate prices. The Census' 5-year (2013-2017) American Community Survey (ACS) statistics estimated an affordability ratio for Los Angeles County of 8.1 compared to the State of California at 6.6 and the U.S. at 3.4. The affordability ratio measures homeownership opportunity by dividing the median value of owner-occupied housing by the median household income of the area. Home ownership levels in Los Angeles County are 56 percent compared to 55 percent for the State of California and 64 percent for the U.S. based on ACS data. Median rent levels suggest rental housing is not affordable for LMI residents in the AA.

Anaheim-Santa Ana-Irvine MD

Economic Data

Based on the May 2019 Moody's Analytics report, the Anaheim-Santa Ana-Irvine economy is growing at a slow pace and is well below the national average having outperformed the nation since 2012. Construction has slowed, and retail payrolls are down. However, professional services are growing, and low wage industries such as leisure/hospitality are growing. The tech industry continues to expand for both established firms and start-ups. Business services added twice the number of workers in 2018 than in 2017 and start-ups raised \$1.7 billion in 2018, more than double the amount raised in 2017. Anaheim is the most tourism-dependent metro area behind only Orlando. The addition of new attractions to Disneyland should ensure solid performance in the future.

The largest employers in the Anaheim-Santa Ana-Irvine area are Disneyland Resort, The Walt Disney Company, and the University of California-Irvine. The unemployment rate declined from 4.5 to 2.9 percent between 2015 and 2018. The population growth averaged 0.3 percent per year during this time. Median household income increased from \$79,800 to \$89,300, and personal income growth increase an average of 4.1 percent per year between 2015 and 2018.

Housing

Single-family housing is overvalued, and there is a healthy demand for office space in the Anaheim-Santa Ana-Irvine area. Permits for single- and multi-family housing have been on the decline. The Census' 5-year (2013-2017) ACS statistics estimated an affordability ratio for Orange County at 7.6

compared to the State of California at 6.6 and the U.S. at 3.4. The affordability ratio measures homeownership opportunity by dividing the median value of owner-occupied housing by the median household income of the area. Home ownership levels in Orange County are 57 percent compared to 55 percent for the State of California and 64 percent for the U.S. based on ACS data. Median rent levels suggest rental housing is not affordable for low-income residents in the AA.

Oxnard-Thousand Oaks-Ventura MSA

Economic Data

Based on the March 2019 Moody's Analytics report, Oxnard-Thousand Oaks-Ventura area growth is slowing and trails California and U.S. averages. Hiring is limited as high-skill service industries struggle to recruit workers. Private industries hiring is at a 1.5-year low. Goods producing industry hiring is solid. Military spending increases in 2019 will benefit the area with the presence of the Ventura County Naval Base and the Channel Island Air National Guard Station. The area's well-established tech industry will expand at an accelerated pace, which provides high wage jobs for the area. Lower business cost and an educated workforce attract computer design firms to the area. Retail and leisure/hospitality will see above average new job growth along with increasing wages in a tight labor market, which has seen hourly wages increase 19 percent since 2015.

The largest employers in the Oxnard-Thousand Oaks-Ventura area are Ventura Naval Base, Amgen Inc., and Bank of America. The unemployment rate declined from 5.6 to 3.8 percent between 2015 and 2018. The population growth averaged 0.2 percent per year during this time. Median household income increased from \$79,200 to \$84,900, and personal income growth increased an average of 3.6 percent per year between 2015 and 2018.

Housing

The slowdown in the labor market is negatively affecting real estate as house price appreciation is decelerating and single-family home sales and construction are decreasing. Single- and multi-family housing permits spiked in 2017 and continued in 2018 because of the release of pent up demand and the replacement of insured properties destroyed by wildfires. The Census' 5-year (2013-2017) ACS statistics estimated an affordability ratio for Ventura County at 6.3 compared to the State of California at 6.6 and the U.S. at 3.4. The affordability ratio measures homeownership opportunity by dividing the median value of owner-occupied housing by the median household income of the area. Home ownership levels in Santa Clara County are 63 percent compared to 55 percent for the State of California and 64 percent for the U.S. based on ACS data. Median rent levels suggest rental housing is not affordable for LMI residents in the AA.

Riverside-San Bernardino-Ontario MSA

Economic Data

Based on the May 2019 Moody's Analytics report, the Riverside-San Bernardino-Ontario economy is strong. The job market has slowed due to the slowdown at the Ports of Los Angeles and Long Beach, but there has been a large influx of new residents from the coastal areas leaving the higher cost areas. These new residents have increased housing prices and consumer related industries. The healthcare industry is expected to add more jobs than other industries, but because of the area's reliance on military funds and the young population growth, this area will be focused in wellness centers and retreats. The largest employers in the Riverside-San Bernardino-Ontario area are Stater Brothers Markets, Arrowhead Regional Medical Center, and U.S. Marine Corps. Air Ground Combat Center. The unemployment rate declined from 6.6 to 4.2 percent between 2015 and 2018. The population growth averaged 1.2 percent per year during this time. Median household income increased from \$56,300 to \$64,000, and personal income growth increased an average of 4.8 percent per year between 2015 and 2018.

Housing

Housing affordability is on the decline as people move inland from the increasing costs of the Pacific Coast. Housing affordability will be a major draw to millennials entering their prime home-buying years as they choose to commute to Los Angeles and Orange counties from Riverside for better housing options. The Census' 5-year (2013-2017) ACS statistics estimated an affordability ratio for Riverside County and San Bernardino County at 5.0 and 4.9, respectively, compared to the State of California at 6.6 and the U.S. at 3.4. The affordability ratio measures homeownership opportunity by dividing the median value of owner-occupied housing by the median household income of the area. Home ownership levels in Riverside County and San Bernardino County are 65 and 59 percent, respectively, compared to 55 percent for the State of California and 64 percent for the U.S. based on ACS data. Median rent levels suggest rental housing is not affordable for low-income residents in the AA.

San Jose-San Francisco-Oakland, CA CSA (part)

The San Francisco CSA includes the San Francisco-Redwood City-South San Francisco MD (San Francisco and San Mateo County); the Oakland-Hayward-Berkeley MD (Alameda and Contra Costa Counties); and the San Jose-Sunnyvale-Santa Clara MSA (Santa Clara County). According to the June 30, 2018 FDIC Summary of Deposit report, CNB ranked 16 out of 78 FDIC-insured institutions in the San Francisco CSA with a deposit market share of 0.6 percent. The top three depository institutions are Bank of America, NA; Wells Fargo Bank, NA; and Silicon Valley Bank with a combined deposit market share of 57.0 percent. In 2017, CNB ranked 186 of 724 in HMDA mortgages with 0.05 percent market share. The top five lenders, holding 33 percent market share, are Wells Fargo Bank, NA; JPMorgan Chase Bank, NA; Bank of America, NA; Quicken Loans; and MUFG Union Bank, NA. In 2017, CNB ranked 40 out 183 small business lenders with a 0.11 percent market share of small business loans. The

top five small business lenders are Chase Bank USA, NA; American Express, FSB; Bank of America, NA; Wells Fargo Bank, NA; and Citibank, NA with a combined market share of 73.5 percent.

Demographics

The following table provides a summary of the demographic profile of the San Jose CSA by categorizing the AA characteristics into their respective census tracts based on income level. The table reflects a moderate level of LMI census tracts, which total 32 percent of the AA. The demographic data also reflects a low percentage of home ownership in LMI geographies compared to the population distribution in those areas.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,296	11.3	21.2	31.8	34.4	1.2
Population by Geography	6,138,694	10.9	21.7	33.6	33.5	0.4
Housing Units by Geography	2,297,563	10.5	20.5	33.3	35.2	0.5
Owner-Occupied Units by Geography	1,178,268	4.7	16.6	34.4	44.2	0.1
Occupied Rental Units by Geography	999,746	16.8	25.0	32.3	25.0	0.8
Vacant Units by Geography	119,549	15.2	20.9	30.9	32.0	1.0
Businesses by Geography	478,413	10.1	17.5	30.5	41.3	0.6
Farms by Geography	6,633	7.2	18.3	34.3	40.1	0.1
Family Distribution by Income Level	1,429,046	24.3	15.8	18.2	41.7	0.0
Household Distribution by Income Level	2,178,014	26.1	14.8	16.4	42.7	0.0
Median Family Income MSA - 36084 Oakland-Hayward-Berkeley, CA MD		\$93,822	Median Housing Value			\$665,731
Median Family Income MSA - 41884 San Francisco-Redwood City-South San Francisco, CA		\$103,742	Median Gross Rent			\$1,574
Median Family Income MSA - 41940 San Jose-Sunnyvale-Santa Clara, CA MSA		\$107,126	Median Housing Value			7.2%
<i>Source: 2015 ACS Census and 2018 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Community Contacts

OCC reviewed three recent community contacts to determine community credit needs and opportunities for financial institutions to help address these needs. In addition, the OCC and the FDIC hosted a listening session with a number of community groups and advocates in 2017 to discuss current economic trends, community development challenges, the needs of their LMI clients, and potential opportunities for banks to engage in CD activities. The contacts identified affordable housing and access to capital for businesses as critical needs. Opportunities for banks to address the needs include:

- Small dollar loans for small businesses (\$500 - \$50 thousand) and funding for Micro lending programs.
- Small business loans including term loans and lines of credit for small businesses needing working capital and mom and pop shops and bodegas as well as for property improvements and expansion.
- Partnering with nonprofits to address capital constraints and provide additional access to capital to vital neighborhood businesses.
- Flexible branch hours and low-cost products tailored to low-income individuals and people that work multiple jobs or veterans.
- Product-oriented educational outreach and banking education to inform the unbanked and underbanked community that banks are safe.
- Formal referral partnerships to refer non-qualifying applicants to nonprofits to help secure funding and help prevent lending from predatory sources.
- Grants and loan capital to nonprofit organizations for operating costs, financing programs, and investment and grants targeted to social service needs and education. Examples include grants for operations, loan loss reserves, small businesses, foreclosure prevention, financial education, and technical assistance. Multi-year grant commitments.
- Customized financial literacy events for unique community needs, such as for refugees, small businesses, and consumers by partnering with nonprofit organizations
- Multiple Down Payment Assistance (DPA) programs since most DPA programs, alone, do not provide sufficient down payment funds for a median priced home in the San Francisco Bay Area.

San Francisco-Redwood City-South San Francisco MD

Economic Data

Based on the March 2019 Moody's Analytics report, the San Francisco-Redwood City-South San Francisco area growth has accelerated in the last year led by professional/business services, information, and finance industries. The area continues to attract the tech industry because of its workforce and venture capital resources. However, some companies are also leaving the area due to the increasing costs of operating in the area.

The largest employers in the San Francisco-Redwood City-South San Francisco area are the University of California-San Francisco, Genentech Inc., and Wells Fargo. The unemployment rate has declined from 3.5 percent in 2015 to 2.4 percent in 2018. Population growth has averaged 0.7 percent per year during this same time. Median household income has increased from \$98,300 in 2015 to \$118,300 in 2018, and personal income growth has increased at an average of 5.3 percent per year from 2015-2018.

Housing

Multi-family permits are rising in response to increasing housing prices and rents. There are a number of San Francisco based tech companies expected to make IPOs during 2019. This could create homebuyers

increasing demand on the housing market and increasing housing prices. The Census' 5-year (2013-2017) ACS statistics estimated an affordability ratio for San Francisco County and San Mateo County as 9.6 and 8.7, respectively, compared to the State of California at 6.6 and the U.S. at 3.4. The affordability ratio measures homeownership opportunity by dividing the median value of owner-occupied housing by the median household income of the area. Home ownership levels in San Francisco County and San Mateo County were 37 and 60 percent, respectively, compared to 55 percent for the State of California and 64 percent for the U.S. based on ACS data. Median rent levels suggest rental housing is not affordable for low-income residents in the AA.

Oakland-Hayward-Berkeley MD

Economic Data

Based on the May 2019 Moody's Analytics report, the Oakland-Hayward-Berkeley area economy is slowing. The labor market is tightening, and job growth is at 1.5 percent year-over-year, which is less than half of the pace of the U.S. This is benefiting workers whose wages are outpacing the U.S. U.S. trade tariffs on Chinese goods could reduce activity at the Port of Oakland if the tariffs remain for an extended period of time. Tech firms are expected to expand into the Oakland area as a cheaper alternative to San Francisco with several tech firms already establishing themselves there. The Oakland metro area will benefit with the average tech job in the Bay Area averaging \$150 thousand.

The largest employers in the Oakland-Hayward-Berkeley area are the University of California-Berkeley, Safeway Inc., and Kaiser Permanente. The unemployment rate declined from 4.8 to 3.1 percent between 2015 and 2018. The population growth averaged 0.7 percent per year during this time. Median household income increased from \$83,600 to \$100,100, and personal income growth increase an average of 6 percent per year between 2015 and 2018.

Housing

Multi-family permits are rising in response to increasing housing prices and rents. The Census' 5-year (2013-2017) ACS statistics estimated an affordability ratio for Contra Costa County and Alameda County at 5.9 and 7.6, respectively, compared to the State of California at 6.6 and the U.S. at 3.4. The affordability ratio measures homeownership opportunity by dividing the median value of owner-occupied housing by the median household income of the area. Home ownership levels in San Francisco County and San Mateo County were 66 and 53 percent, respectively, compared to 55 percent for the State of California and 64 percent for the U.S. based on ACS data. Median rent levels suggest rental housing is not affordable for low-income residents in the AA.

San Jose-Sunnyvale-Santa Clara MSA

Economic Data

Based on the March 2019 Moody's Analytics report, the economy in the San Jose-Sunnyvale-Santa Clara is solid but has cooled from recent years. Manufacturing and information industries were key drivers to job growth. Consumer industries are healthy, and residential building permits have picked up since mid-2018. Tech firms will continue to anchor the economy with established firms in the area drawing more tech firms to the area. San Jose ranks as one of the most expensive metro areas in the country.

The largest employers in the San Jose-Sunnyvale-Santa Clara area are Apple, Alphabet Inc., and Stanford University. The unemployment rate declined from 4.3 to 2.7 percent between 2015 and 2018. The population growth averaged 0.4 percent per year during this time. Median household income increased from \$102,800 to \$122,900, and personal income growth increase an average of 7.5 percent per year between 2015 and 2018.

Housing

City officials are focusing on residential real estate while also capping the expansion of commercial office space. There has also been approval to raise the limit on building heights by 35 feet to 150 feet in different parts of San Jose, increasing the likelihood of more residential and non-residential building. The Census' 5-year (2013-2017) ACS statistics estimated an affordability ratio for Santa Clara County at 7.8 compared to the State of California at 6.6 and the U.S. at 3.4. The affordability ratio measures homeownership opportunity by dividing the median value of owner-occupied housing by the median household income of the area. Home ownership levels in Santa Clara County are 57 percent compared to 55 percent for the State of California and 64 percent for the U.S. based on ACS data. Median rent levels suggest rental housing is not affordable for low-income residents in the AA.

Scope of Evaluation in California

The Los Angeles CSA and the San Jose CSA AAs received full-scope reviews. These two areas accounted for the majority of lending (93.7 percent of number) and deposits (98.3 percent of dollar amount) amongst the AAs in California. The San Diego MSA and City of Santa Barbara AAs received limited scope reviews. The bank's primary purpose in California is home mortgage and small loans to businesses.

CNB maintains branch operations in each county in the Los Angeles CSA, which is made up of three MSAs, and one of these MSAs is made up of two MDs. CNB maintains branch operations in five counties in the San Jose CSA and includes a portion of two contiguous MSAs, with one of the MSAs being made up of two MDs. AAs located in the same MSA or CSA, if applicable, are combined, analyzed, and presented as one AA for purposes of this evaluation.

The evaluation focused on HMDA lending, small business lending, CD loans, qualified investments, and retail and CD services. Loans reported pursuant to the HMDA and CRA data collection requirements for 2016-2018 were included in the review. The review included both loan originations and purchases. All peer aggregate lending data used in the analysis is from 2016-2017. Aggregate lending data for 2018 was not available. OCC considered information from recently completed community contacts in these AAs.

Refer to the table in Appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CALIFORNIA

LENDING TEST

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

Based on full- and limited-scope reviews, the bank's overall lending performance in the State of California is good.

Conclusions for Areas Receiving Full-Scope Reviews

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

Lending Activity

Lending levels reflect good responsiveness to credit needs in the bank's AAs taking into account the number and dollar amount of home mortgage, small business, small farm, and CD lending activities relative to its capacity based on deposits, competition, and market presence. CNB has multiple locations in California. A substantial majority of the bank's deposits, home mortgages, and small loans to businesses by both number and dollar are in the Los Angeles CSA. Therefore, the bank's performance in the Los Angeles CSA received most of the weight when assessing the bank's overall Lending Test performance. Based on loan volumes, small business loans are higher by number; home mortgages are higher by dollar.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Los Angeles CSA	4,414	6,329	4	234	10,981	82.6	88.1
San Jose CSA	684	724	0	73	1,481	11.1	10.2
San Diego MSA	337	436	0	21	794	6.0	1.7
City of Santa Barbara	27	14	0	1	42	0.3	0.0
Total	5,462	7,503	4	329	13,298	100.0	100.0

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

Dollar Volume of Loans (000's)*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Los Angeles CSA	4,964,784	1,372,919	415	850,146	7,188,263	80.5	88.1
San Jose CSA	523,768	213,563	0	321,264	1,058,596	11.8	10.2
San Diego MSA	432,957	118,242	0	50,431	601,630	6.7	1.7
City of Santa Barbara	76,102	6,893	0	3,000	85,995	1.0	0.0
Total	5,997,611	1,711,617	415	1,224,841	8,934,484	100.0	100.0

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

Los Angeles CSA

There is strong competition for deposits and loans. The banking industry is highly competitive in the CSA and includes branches of national and regional banks, local community banks, credit unions, and other nonbank financial institutions. According to the June 30, 2018 FDIC Summary of Deposit Report, there were 134 financial service providers with branches in the CSA. CNB ranked sixth in deposits with a total of \$27.7 billion, resulting in 4.6 percent of the market share. CNB's percentile rank of deposits was 95.5 percent. As of year-end 2017, using home mortgage market share information based on a review of the 951 lenders with loans in the CSA, CNB ranked 96th with less than one percent (0.19 percent) of the market share by number of home loans. CNB's percentile rank of mortgage loans was 90.0 percent. The three largest deposit competitors (Bank of America, NA; Wells Fargo, NA; and JPMorgan Chase Bank, NA) were also the top lending competitors in the CSA. These three institutions accounted for 47.9 percent of total deposits and 17.8 percent of the home mortgage loans originated or purchased in the CSA.

CNB's small business lending activity is excellent given the institution's ranking and average loan size in comparison to the competition in the CSA. Although CNB's market share percentage is less than one percent (0.33 percent), the institution ranked 20th with an average loan size of \$261 thousand. CNB's percentile rank of small business loans was 92.5 percent. Of the 268 lenders in the area, 257 have market shares that are less than one percent. The top five lenders are large institutions with a market share ranging from 9.8 to 22.30 percent and a consolidated total of 70.9 percent.

San Jose CSA

There is strong competition for deposits and loans. The banking industry is highly competitive in the AA and includes branches of national and regional banks, local community banks, credit unions, and other nonbank financial institutions. According to the June 30, 2018 FDIC Summary of Deposit Report, there were 78 financial service providers with branches in the AA. CNB ranked 16th in deposits with a total of \$3.2 billion, resulting in 0.64 percent of the market share. The three largest deposit competitors (Bank of America, NA; Wells Fargo, NA; and Silicon Valley Bank) combined market share totaled 57.0 percent. As of year-end 2017 using home mortgage market share information based on a review of the 724 lenders with loans in the AA, CNB ranked 186th with less than one percent (0.05 percent) of the market share by number of home loans. The top three mortgage competitors (Wells Fargo, NA; JPMorgan

Chase Bank, NA; and Bank of America, NA) combined mortgage market share totaled 26.2 percent of the home mortgage loans originated or purchased in the AA.

CNB's small business lending activity is good given the institution's ranking and average loan size in comparison to the competition in the AA. Although CNB's market share percent is less than one percent (0.11 percent), the institution ranked 40th with an average loan size of \$336 thousand. Of the 183 lenders in the area, 173 have market shares that are less than one percent. The top five lenders are large institutions with a market share ranging from 10 to 19.4 percent and a consolidated total of 73.5 percent.

Distribution of Loans by Income Level of the Geography

Overall, the bank exhibits adequate geographic distribution of loans in the Los Angeles CSA and a good geographic distribution of loans in the San Jose CSA.

Home Mortgage Loans

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

Based on the data in Table O, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation period in the Los Angeles CSA and the San Jose CSA AAs is adequate relative to area demographics and aggregate data.

Los Angeles CSA

The bank's overall geographic distribution of home mortgage loans in the Los Angeles CSA is adequate. The bank's performance in low-income census tracts and moderate-income census tracts is adequate. This performance is below but relative to the area demographics and aggregate data for the Los Angeles CSA. Home ownership is limited in low-income census tracts. Based upon a review of all housing units in the Los Angeles CSA, 44 percent are rental units. The percentage of owner-occupied homes in low-income census tracts only represents 2.6 percent of the owner-occupied housing units in the Los Angeles CSA by geography. The percentage of owner-occupied homes in moderate-income census tracts represents 18.6 percent of the owner-occupied housing units in the Los Angeles CSA by geography. Based upon a review of rental units, 34.6 percent are in moderate-income census tracts. In addition, 26.1 percent of vacant units by geography are in moderate-income census tracts. The bank's performance in 2016 was weaker than its performance in 2017-18.

San Jose CSA

The bank's overall geographic distribution of home mortgage loans in the San Jose CSA is excellent. The bank's lending activity in low-income and moderate-income census tracts reflects excellent performance. The bank's lending activity in both the low-income and moderate-income geographies in the San Jose CSA significantly exceeds area demographics and aggregate data. The percentage of

owner-occupied homes in low-income census tracts represents 4.7 percent of the owner-occupied housing units in the San Jose CSA by geography. The percentage of owner-occupied homes in moderate-income census tracts represents 16.6 percent of the owner-occupied housing units in the San Jose CSA by geography. The bank's performance in 2016 was stronger than its performance in 2017-18.

Small Loans to Businesses

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

Based on the data in Table Q, the bank's overall geographic distribution of small loans to businesses for the Los Angeles CSA and the San Jose CSA AAs is adequate relative to area demographics and aggregate data.

Los Angeles CSA

The bank's overall geographic distribution of small loans to businesses in the Los Angeles CSA is adequate. The bank's lending activity in low-income census tracts is poor. Based upon area geographic data, 4.3 percent of the bank's small loans to business are in low-income census tracts. This performance is below but relative to area demographics and aggregate data for the Los Angeles CSA. Opportunities for small loans to businesses in low-income census tracts are limited and highly competitive. Only 4.9 percent of the businesses in the Los Angeles CSA are in low-income census tracts. The bank's lending activity in moderate-income census tracts is adequate. Based upon area geographic data, 15.5 percent of the bank's small loans to business are in moderate-income census tracts. This performance is below but relative to area demographics and aggregate data for the Los Angeles CSA. The bank's performance in 2016 was stronger than its performance in 2017-18.

San Jose CSA

The bank's overall geographic distribution of small loans to businesses in the San Jose CSA is excellent. The bank's lending activity in low-income and moderate-income census tracts reflect excellent performance. The percentage of bank loans in low-income and moderate-income census tracts total 19.4 percent and 23.2 percent, respectively, for the evaluation period of 2017-18, which exceeds area demographics and aggregate data. The bank's performance in 2016 was consistent with its performance in 2017-18.

Lending Gap Analysis

OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of loans of CNB's home mortgage and small business lending activity over the evaluation period. The analysis did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution in its AAs.

Home Mortgage Loans

Based on the data in Table P, the bank's overall borrower distribution of home mortgage loan originations and purchases for the evaluation period is adequate. 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.

Los Angeles CSA

The bank exhibits a poor distribution of home mortgage loans to individuals of different income levels during the 2017-18 review period. When determining the rating, OCC's analysis considered the relative high housing costs compared to LMI family incomes in the AA throughout the evaluation period. The median housing value was \$449,452 compared to the median family income of only \$62,703. It would be difficult to afford a home at the median family income level. The relative high housing costs in the AA negatively impact LMI borrowers' abilities to qualify for a home mortgage. The proportion of home mortgage loans to low-income borrowers was significantly weaker than the proportion of low-income families in the AA. The proportion of home mortgage loans to moderate-income borrowers was lower than the moderate-income families in the AA. The bank's performance was lower than the aggregate distribution of home mortgage loans to both low-income and to moderate-income borrowers. CNB's performance in 2016 was weaker than their performance in 2017-18.

San Jose CSA

The bank exhibits adequate distribution of home mortgage loans to individuals of different income levels during the 2017-18 review period. When determining the rating, the OCC considered the relative high housing costs compared to LMI family incomes in the AA throughout the evaluation period. The median housing value was \$665,731 compared to the median family income of only \$107,126. It would be difficult to afford a home at the median family income level. The proportion of home mortgage loans to low-income borrowers was significantly weaker than the proportion of low-income families in the AA. The proportion of home mortgage loans to moderate-income borrowers was weaker than the moderate-income families in the AA. The bank's performance was comparable to the aggregate distribution of home mortgage loans to both low-income and to moderate-income families. CNB's performance in 2016 was weaker than their performance in 2017-18.

Small Loans to Businesses

Refer to Table R in the State of California section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Based on the data in Table R, the OCC concluded the distribution of the bank's originations and purchases of small loans to businesses by revenue is adequate.

Los Angeles CSA

The bank exhibits an adequate distribution of loans to businesses of different sizes in the Los Angeles CSA when considering aggregate data with demographic data and the bank's market share for this product. The OCC's analysis determined that the proportion of small loans to businesses with revenues of \$1 million or less is less than the proportion of businesses with revenues less than a \$1 million in the AA. Unreported revenue information adversely impacted this analysis. Approximately 11 percent of the bank's business borrowers and 7.6 percent of the AA businesses did not report revenue information which prevented the OCC from determining the revenue category of the business. CNB's performance in 2016 was weaker than their performance in 2017-18. In 2016, 18.3 percent of the bank's business borrowers did not report revenue information.

San Jose CSA

The bank exhibits an adequate distribution of loans to businesses of different sizes in the San Jose CSA when considering aggregate data with demographic data and the bank's market share for this product. The OCC analysis determined the proportion of small loans to businesses with revenues of \$1 million or less is less than the proportion of businesses with revenues less than a \$1 million in the AA. Unreported revenue information adversely impacted this analysis. Approximately 10.3 percent of the bank's business borrowers and 8.4 percent of the AA businesses did not report revenue information which prevented the OCC from determining their revenue category. In addition, in 2016, 8.1 percent of the AA businesses and 15.1 percent of bank's business borrowers did not report revenue information. CNB's performance in 2016 was weaker than their performance in 2017-18.

Community Development Lending

CNB has made a relatively high level of CD loans.

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

Los Angeles CSA

CNB has made a relatively high level of CD loans in the Los Angeles CSA.

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

The level of CD lending in the Los Angeles CSA is excellent. CNB made 234 CD loans in its AA for a total of \$850.1 million, which represents 31.5 percent of Tier 1 Capital. CD lending performance had a significantly positive impact on the Lending Test rating. The loans were responsive to the identified affordable housing and small business lending needs in the AA. The bank made 16 CD loans totaling \$52.6 million (6 percent) that were particularly responsive to the identified need for affordable housing. The bank also made 132 CD loans totaling \$508.6 million (60 percent) for the purpose of economic development, which are responsive to the identified need for access to capital for small business and for small business assistance. Additionally, the bank made 86 CD loans totaling \$289.0 million (34 percent) for the primary purpose of community services to assist LMI individuals.

Examples of CD loans in the AA include:

- A \$28.5 million 10-year mini-perm loan to refinance an existing loan to a community development corporation with subsidiaries that provide products and services to the underserved communities of East Los Angeles. The subsidiaries include home insulation services and energy-saving guidance for senior citizens and low-income families, as well as a state-chartered commercial bank and CDFI.
- A \$20.0 million secured revolving line of credit to supplement working capital for a nonprofit financial intermediary for affordable housing developers in the greater Los Angeles metropolitan area. The organization offers supportive permanent housing through rehabilitation and renovation of housing units to provide homes to veterans and families recovering from homelessness.
- The renewal of a \$15.0 million secured line of credit and a \$5.0 million line increase to support permanent working capital needs and sales growth. The company qualifies as a small business under SBA size standards and is located in low-income census tract in Oxnard, CA. The company provides jobs for 150 employees, 85 percent of whom are LMI.
- A \$1.5 million unsecured revolving line of credit to support real estate programs sponsored through a local affordable housing organization. The organization makes real estate loans to prospective and existing homeowners in distressed areas of Los Angeles County who would not qualify for traditional mortgage financing.
- An \$80,000 revolving line of credit for working capital needs to cover various program expenses while approved corporate and government grant payments are processed. The borrower is a

Community Housing Development Organization under HUD regulations for the City of San Bernardino and the town of Apple Valley. The organization provides homebuyer education and financial literacy; foreclosure prevention services; home loans, construction, and rehabilitation and real estate services.

San Jose CSA

CNB has made a relatively high level of CD loans in the San Jose CSA.

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

The level of CD lending in the San Jose CSA is excellent. CNB made 73 CD loans in its AA for a total of \$321.3 million, which represents 103 percent of Tier 1 Capital. CD lending performance had a significantly positive impact on the Lending Test rating. The loans were responsive to the identified affordable housing and small business lending needs in the AA. The bank made two CD loans totaling \$11.4 million (4 percent), which were particularly responsive to the identified need for affordable housing. The bank also made 49 CD loans totaling \$189.3 million (59 percent) for the purpose of economic development, which are responsive to the identified need for access to capital for small business and for small business assistance. Additionally, the bank made 22 CD loans totaling \$120.6 million (37 percent) for the primary purpose of community services to LMI individuals.

Examples of CD loans in the AA include:

- A \$38.0 million term loan to refinance existing bond debt for a 30-bed hospital expansion, seismic retrofit, and major equipment purchases. The hospital is a "safety net hospital" that provides a significant level of care to low-income, uninsured, and vulnerable populations.
- A \$9.4 million mini-perm loan to finance the purchase of a new headquarters building for nonprofit housing development and management organizations. The organization acquires, develops, rehabilitates, and manages low-income housing.
- A \$3.0 million loan to fund small- and micro-loans to small businesses that do not have access to traditional credit markets. The borrower is a nonprofit certified CDFI whose mission is to enhance the well-being of working people by helping them earn, save, and invest in future businesses.
- A \$2.0 million revolving line of credit to support working capital needs of a local affiliate of a self-help housing developer that provides home ownership opportunities for LMI families. The organization also provides homeownership education and zero interest loans to eligible home buyers.

Product Innovation and Flexibility

CNB makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. Innovative or flexible loan programs offered were effective in helping the bank address community credit needs. The bank purchased a significant number of loans under the San Diego Habitat for Humanity housing program. From January 1, 2017 to December 31, 2018, CNB purchased 60 zero interest loans totaling \$8.4 million with an average loan size of \$140 thousand.

The program helps participants with home ownership. The three primary criteria for home ownership include a need for safe affordable housing, the ability to repay the loan, and the ability to contribute back to the program by working in various aspects of Habitat for Humanity home projects. Need has a unique definition. It is the need for shelter and can be determined by many factors, such as lack of space, overcrowded housing, rental costs that are over 50 percent of a family's monthly income, unsafe living conditions, dangerous environments, problems with major utilities, or other general structural problems.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the San Diego MSA is consistent with the bank's overall "High Satisfactory" performance for the State of California when considering community development lending activity and innovative products. The bank's performance in the City of Santa Barbara AA is weaker than the bank's overall performance rating. The bank's borrower distribution in the Santa Barbara AA is significantly weaker than the proportion of lending to low-income families in the AA. Performance in the Santa Barbara AA, however, has no impact on the overall Lending Test conclusion given the very limited deposit operations in the AA.

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

INVESTMENT TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

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

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

CNB exhibits excellent responsiveness to credit and community economic development needs. In terms of dollar volume, 95.9 percent of the bank's investments and grants during the evaluation period were allocated to affordable housing, an identified need of the AA. CNB makes significant use of innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Los Angeles CSA	99	79,444	494	200,431	593	68.2	279,875	65.3	45	20,715
San Jose CSA	51	29,046	111	48,018	162	18.6	77,064	18.0	28	4,906
San Diego MSA	23	12,181	42	6,654	65	7.5	18,835	4.4	11	8,148
City of Santa Barbara	0	0	15	3,789	15	1.7	3,789	0.9	0	0
CA Not in AA	24	27,286	12	23,679	34	3.9	50,965	11.4	18	12,452

* 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

Prior period investments totaled \$79.4 million with an additional \$8.5 million in binding and unfunded commitments still outstanding. During the current period, the bank funded \$182.9 million in Low-Income Housing Tax Credit (LIHTC) that benefitted the Los Angeles CSA. Additionally, CNB purchased \$4.2 million in affordable housing securities, funded \$2.7 million in small business investment company (SBIC) loans with additional unfunded commitments of \$7.3 million, and made direct equity investments totaling \$2.8 million in affordable housing, economic development, and community service groups with additional unfunded commitments of \$7.1 million. The bank also made grants totaling \$8.7 million during this time. Total investment activity in the AA represents 10.4 percent of allocated Tier 1 Capital based on the AA's share of bank deposits with 2.9 percent coming in the prior period and 7.5 percent invested in the current period.

Notable investments in the AA include a \$5 million commitment to an SBIC fund that funds loans to small businesses. Of the \$5 million commitment, \$1.1 million is funded, and there is a binding commitment to find an additional \$3.9 million. The bank also funded an additional \$4 million in LIHTC, which in part funded the construction of the Bell Oasis Apartments, providing 64 permanent supportive housing units for the homeless and disabled veterans. The bank also provided technical assistance to facilitate a \$960 thousand affordable housing grant through FHLB San Francisco for the same Bell Oasis project. Please see the CD services section for additional details. An additional \$4.6 million in LIHTC was used to fund the construction of a 49-unit building that will provide housing and support services for chronically homeless adults with recurring substance abuse and mental health disorders. An additional \$10.1 million in LIHTC funded the construction of 100 units of affordable housing with 75 units set aside for veterans with physical or mental disabilities and 25 units set aside for homeless tenants with mental illness. Fourteen of the units are also set aside for tenants with HIV/AIDS.

San Bernardino Riverside

The bank also invested \$2 million in an SBIC who invested in a small aerospace business providing economic development to an LMI area in the AA.

Ventura

The bank funded \$6.4 million in LIHTC used to fund the rehabilitation of a 92-unit apartment complex that will provide housing to LMI tenants in the AA.

San Jose CSA

Prior period investments totaled \$29 million with an additional \$4.9 million in binding and unfunded commitments still outstanding. During the current period, the bank funded \$45.9 million in LIHTC and \$2 million in direct equity investments to benefit affordable housing projects. The bank also made grants totaling \$1.1 million benefitting the AA. Total investment activity in the AA represents 24.7 percent of allocated Tier 1 Capital based on the AA's share of bank deposits with 9.3 percent coming in the prior period and 15.4 percent invested in the current period.

One project of note is a \$6 million LIHTC used to fund the renovation of a 108-unit apartment building providing affordable housing for seniors. The project is considered transit-oriented as it is 0.1 miles from light rail and bus lines.

Santa Clara

The bank funded a \$6 million LIHTC used to renovate a 195-unit senior living facility providing housing to LMI residents.

Alameda

The bank funded a \$10.2 million LIHTC used to develop a transit-oriented development in the AA. The development will include a 110-unit apartment community consisting of 50 percent workforce units and 50 percent income restricted LMI units. The bank also funded an additional \$2.2 million in LIHTC used to renovate a 99-unit apartment complex that provides housing to LMI seniors in the AA.

California Statewide

The OCC also considered statewide and regional projects based on the bank's Outstanding performance in the AA. The bank funded a total of \$49 million outside of its AA in the State of California. Of this amount, \$1.4 million went to SBIC economic development projects; \$4.2 million was an equity investment in affordable housing projects, \$157 thousand was an equity investment in a community service project, and the remaining balance was invested in current and prior period LIHTC for affordable housing. This investment activity further supports the bank's Investment Test performance in the state.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the San Diego MSA and the City of Santa Barbara is stronger than the bank's overall performance under the Investment Test in the full-scope areas. The performance in this area is stronger based on the investment total as a percentage of allocated Tier 1 Capital based on the AA's share of bank deposits. The San Diego MSA activity totaled 36.1 percent for the evaluation period with 12.76 percent coming in the current period and 23.4 percent invested in the prior period. The City of Santa Barbara does not have a physical branch but has a deposit taking ATM preventing the allocation of specific deposits to this AA to measure against investment performance. Deposits are allocated to branches in the Los Angeles CSA. The additional \$3.8 million investment in the City of Santa Barbara further strengthens the already Outstanding performance in the State of California.

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 AAs is good.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the in the Los Angeles CSA and San Jose CSA AAs. Based on the Distribution of Branch Delivery Systems table below and performance context considerations, CNB's retail service performance is adequate in the Los Angeles CSA and good in the San Jose CSA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	# of BANK Branches	% of Rated Area Branches in AA	Branches				Population			
	% of Rated Area Deposits 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	94.1	44	75.9	0.0	4.5	22.7	63.6	7.6	28.6	29.4	33.8
San Jose CSA	4.2	9	15.5	22.2	22.2	11.1	44.4	10.9	21.7	33.6	33.5
San Diego MSA	1.7	5	8.6	0.0	0.0	0.0	100.0	8.9	23.6	32.5	34.7
City of Santa Barbara	0.0	0***	0.0	0.0	0.0	0.0	100.0	6.6	20.9	19.1	53.4

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

Deposit data as of June 30, 2018. * One deposit-taking ATM is located in this AA.

Distribution of Branch Openings/Closings (2016-2018)							
California							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upper	NA
Los Angeles CSA	2	4	0	0	-1	0	-1
San Jose CSA	0	2	-1	-1	0	0	0
San Diego MSA	0	2	0	0	-1	-1	0
City of Santa Barbara	0	0	0	0	0	0	0

Los Angeles CSA

As of December 31, 2018, CNB operates 44 branches in the Los Angeles CSA. There are 47 ATMs, including a full-service offsite ATM and 2 offsite cash-dispensing ATMs. There are no branches located in low-income census tracts, but there is one cash-dispensing ATM. There are two branches in moderate-income census tracts. The percentage of branches is significantly less than the population in LMI areas. However, the branch distribution is adequate and comparable to demographics with the following considerations:

- There are 10 branches which directly border LMI geographies and also serve LMI areas. This is based on an analysis of loan originations in the adjacent LMI census tracts.
- There have been changes to the branch census tract demographic information. There are three branches previously identified as LMI using 2010 census data that are currently designated as middle-income using the ACS.

CNB's opening and closing of branches has not affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. Since the last evaluation, the bank opened two branches in upper-income geographies and closed three branches in upper- or middle-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. While there are variations in opening and closing times, branches are generally open Monday through Thursday from 9:00am to 4:00pm and on Fridays from 9:00am to 6:00pm. In addition to traditional in-bank services, the bank offers alternative delivery systems and products. These include mobile banking, remote deposit capture, online banking, and bill-pay. No significant weight was placed on these alternative systems as no usage data was available. To provide more affordable alternative products for LMI individuals in the Los Angeles CSA, CNB developed a Safe Check checking account with no overdraft fees and lowered the minimum balance requirements for the personal savings account. The impact of these alternative products was limited. The

bank has opened 328 Safe Check accounts and increased the number of personal savings accounts by 1,600.

San Jose CSA

As of December 31, 2018, CNB operates nine full-service branches and seven full-service ATMs in the San Jose. The geographic distribution of branches is good, with a larger percentage of branches located in LMI census tracts compared to the demographic population.

CNB's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. Since the last evaluation, the bank closed two branches in LMI census tracts. After the closures, the branch distribution in LMI geographies remained in excess of the demographic data. There were no branch openings during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. The branches are open customary banking hours, Monday through Thursday from 9:00am to 4:00pm and Fridays from 9:00am to 5:00pm. In addition to traditional in-bank services, the bank offers alternative delivery systems and products. These include mobile banking, remote deposit capture, online banking, and bill-pay. No significant weight was placed on these alternative systems as no usage data was available.

Community Development Services

CNB is a leader in providing CD services, and this activity has a significantly positive impact on the Service Test performance.

Los Angeles CSA

The institution is a leader in providing CD services in the Los Angeles CSA. During the evaluation period, CNB had 515 employees provide over 10 thousand service hours to 164 organizations. Sixty-six employees had leadership positions serving on boards or committees for community organizations.

Examples of leadership include the following:

- Skid Row Housing Trust – This organization provides permanent, supporting housing to formerly homeless individuals in Los Angeles.
- Harbor Interfaith Services – This organization provides services including shelter, transitional housing, food, job placement, and life skills training to homeless and LMI individuals in the South Bay area of Los Angeles.
- Pacific Coast Regional SBDC– Board membership for this CDFI provides lending, consulting, and education for small business owners.

CNB employees provided 7,967 hours for community services for LMI individuals, including financial education for young adults; 1,570 service hours for affordable housing organizations; and 471 service

hours for economic development organizations. Highlights of the bank's CD service activity include the following:

- EVERFI and CNB Partnership – In 2016, EVERFI and CNB launched a CNB Dollars + \$ense program. During this review period, the program reached over 23 thousand high school students throughout California who have completed 92 thousand hours of financial education.
- Volunteer Income Tax Assistance (VITA) Program – CNB supports this program which provides free tax preparation assistance for LMI in Los Angeles. CNB assisted more than 17 thousand LMI taxpayers during the review period.
- Federal Home Loan Bank of San Francisco (FHLBSF) Affordable Housing Program (AHP) and AHEAD Programs - CNB provided 688 hours of technical assistance to facilitate grant subsidies under the AHP. During the period, this technical assistance resulted in 25 grants totaling \$18.5 million. As an example, CNB facilitated a \$960 thousand subsidy for the Bell Oasis apartments, an affordable housing project targeted to homeless individuals. Employees also provided assistance on 14 additional projects which did not receive grants. Under the FHLB AHEAD program which targets economic development projects for LMI areas, bank employees provided 95 hours of technical assistance on 15 potential projects. The technical assistance resulted in \$199 thousand in grants.

The bank's excellent CD service performance had a positive impact on the bank's overall Service Test rating in the Los Angeles CSA. CNB's service performance resulted in increased access to credit for LMI individuals or LMI geographies.

San Jose CSA

The bank provides relatively high level of CD services in the San Jose CSA. During the assessment period, CNB employees provided 940 hours of CD service. Most service hours were leadership positions in organizations providing services for LMI individuals. Examples include a board membership for a food bank; Board Chairman for a youth organization that supports LMI; and board membership for an organization which supports LMI youth through education, financial, and job training programs. The CD service hours include 168 hours of employee technical assistance for FHLBSF AHP and AHEAD projects within this AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the San Diego MSA and City of Santa Barbara AAs is weaker than the overall performance under the Service Test in the full-scope areas. This is based on a geographic branch distribution which is significantly less than demographic data, with no branches located in LMI census tracts in the San Diego MSA. In the City of Santa Barbara, CNB does not have any full-service branches but maintains one full-service ATM in an upper income census tract. With only 1.7 percent of area deposits generated from the limited scope areas, the weaker performance did not impact the bank's overall performance under the Service Test.

State Rating

State of Georgia

CRA rating for the State of Georgia: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Needs to Improve

The major factors that support this rating include:

- Good level of lending activity;
- Good geographic distribution of loans;
- Good borrower distribution of loans;
- A relatively high level of CD loans, which has a significant positive impact on the Lending Test;
- Excellent level of CD investments that are responsive to AA needs;
- Retail delivery systems are unreasonably inaccessible to portions of the AAs; and
- Adequate level of CD services.

Description of Institution's Operations in Georgia

CNB delineated one AA within Georgia and includes the counties of Fulton and DeKalb (Atlanta MSA), which are part of the Atlanta-Sandy Springs-Roswell MSA. CNB had approximately \$110.2 million of deposits in Georgia, representing 0.3 percent of total deposits and operates one branch within Georgia, representing 1.0 percent of the bank's branches. The bank originated and purchased approximately \$112.3 million, or 0.9 percent of total reported loans and CD loans during the evaluation period in Georgia. The bank's primary loan product in the Georgia is home mortgage (67.6 percent) and small loans to businesses (32.4 percent).

According to the June 30, 2018 FDIC Summary of Deposit Report, CNB ranked 27 out of 48 FDIC-insured institutions in the Atlanta MSA with a deposit market share of 0.11 percent. The top three depository institutions are SunTrust Bank; Bank of America, NA; and Wells Fargo Bank, NA with a combined deposit market share of 76.0 percent. RBC Bank (Georgia), NA, an affiliate of CNB, ranks fourth with 4.44 percent deposit market share. In 2017, CNB ranked 256 of 616 in HMDA mortgages with 0.03 percent market share. The top five lenders, holding 26.6 percent market share, are Wells Fargo Bank, NA; Quicken Loans; SunTrust Mortgage; JPMorgan Chase Bank, NA; and Fidelity Bank. In 2017, CNB ranked 68 out 151 small business lenders with a 0.02 percent market share of small business

loans. The top five small business lenders are American Express, FSB; Bank of America, NA; Wells Fargo Bank, NA; Chase Bank USA, NA; and Capital One Bank (USA), NA with a combined market share of 68.1 percent.

Demographic

The following table provides a summary of the demographic profile of the Atlanta MSA by categorizing the AA characteristics into their respective census tracts based on income level. The table reflects a high level of LMI census tracts, which total 45 percent of the AA. The demographic data also reflects a very low percentage of home ownership in low-income geographies compared to the population distribution in those areas.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	349	20.1	24.9	14.6	38.4	2.0
Population by Geography	1,700,234	14.7	26.7	16.7	40.9	0.9
Housing Units by Geography	750,979	15.8	26.3	15.8	41.8	0.3
Owner-Occupied Units by Geography	344,356	7.0	22.3	18.4	52.2	0.1
Occupied Rental Units by Geography	302,997	22.5	29.2	13.4	34.2	0.7
Vacant Units by Geography	103,626	25.1	31.2	14.3	29.1	0.3
Businesses by Geography	178,459	8.9	20.2	15.1	54.2	1.5
Farms by Geography	2,137	8.7	21.2	18.3	51.5	0.3
Family Distribution by Income Level	363,947	25.1	15.2	15.3	44.3	0.0
Household Distribution by Income Level	647,353	26.7	16.0	16.1	41.1	0.0
Median Family Income MSA - 12060 Atlanta-Sandy Springs-Roswell, GA MSA		\$67,322	Median Housing Value			\$225,658
			Median Gross Rent			\$1,011
			Families Below Poverty Level			13.8%
<i>Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Community Contacts

OCC reviewed three recent community contacts to determine community credit needs and opportunities for financial institutions to help address these needs. The contacts included one housing organization and two economic development organizations. The contacts identified affordable housing and access to capital for business as critical needs. Opportunities for banks to address the needs include:

- Partner with local affordable housing organization to assist in affordable housing programs, including down payment assistance to eligible homebuyers, investment funds to help the nonprofit

acquire, rehabilitate, and preserve affordable housing stock, and/or financial support for various programs offers by the nonprofit.

- More funding for CD services whereas, program-related investments are a critical source of funding
- Committee and more board engagement of bank personnel, which is an important element in these partnerships.
- High demand for SBA loans.
- Financing for the development of more housing units and rehabilitation of substandard housing units.
- Investment in small business development funds.

Economic Data

Based on the May 2019 Moody's Analytics report, the Atlanta MSA economy remains healthy, but the pace of job gains has slowed due to higher labor costs and difficulty finding qualified workers. Job growth in tech firms and financial services have fallen behind peers in the region, and average hourly earnings have stalled though Atlanta still boasts above average compensation. Construction job growth is outperforming peers in the specialty trades and residential building sectors. Growth in mixed-use projects has been seen in response to demands for living space, commercial structures, and desirable amenities including the Centennial Yards project in downtown Atlanta.

The largest employers in the Atlanta MSA are Delta Airlines Inc., Wal-Mart Stores Inc., and the Home Depot. The unemployment rate has declined significantly from 5.7 percent in 2015 to 3.8 percent in 2018. Population growth has averaged 1.5 percent per year during this same time. Median income has increased from \$59,700 to \$66,800 from 2015-2018, and personal income has grown at an average of 4.8 percent per year during this time.

Housing

The Census' 5-year (2013-2017) ACS statistics estimated an affordability ratio for Fulton and DeKalb Counties of 4.4 and 3.1, respectively, compared to the State of Georgia at 3.0 and the U.S. at 3.4. The affordability ratio measures homeownership opportunity by dividing the median value of owner-occupied housing by the median household income of the area. Home ownership levels in Fulton and DeKalb county represent 51 and 54 percent of the housing inventory compared to 63 percent for the State of Georgia and 64 percent for the U.S. based on ACS data. Median rent levels suggest rental housing is not affordable for low-income residents in the AA.

Scope of Evaluation in Georgia

The Atlanta MSA is CNB's only AA in Georgia and, therefore, it received a full-scope review. A limited portion of the bank's overall lending, investments, and services were conducted in the Atlanta MSA; therefore, the performance in this AA received less weight in determining the bank's overall CRA rating. The Atlanta MSA accounts for 0.9 percent of the total number of loans and 0.3 percent of total

deposits. The bank’s primary lending products in Georgia are home mortgage and small loans to businesses.

CNB maintains branch operations in two counties in the Atlanta MSA, Fulton and DeKalb counties. CNB maintains branch operations in only Fulton County but delineated DeKalb County based on its adjacency to Fulton County and the level of deposits from, and lending activity in that county.

The evaluation focused on HMDA lending, small business lending, CD loans, qualified investments, and retail and CD services. Loans reported pursuant to the HMDA and CRA data collection requirements for 2016-2018 were included in the review. The review included both loan originations and purchases. All peer aggregate lending data used in the analysis is from 2016-2017. Aggregate lending data for 2018 was not available. OCC considered information from recently completed community contacts in these AAs.

Refer to the table in Appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN GEORGIA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflect good responsiveness to AA credit needs in its AAs taking into account the number and amount of home mortgage, small business, small farm, and CD loans relative to its capacity based on deposits, competition, and market presence. CNB has one location in Georgia. Based on loan volumes, primary weight for ratings were placed on the bank’s home mortgages followed by small business loan activity.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Atlanta MSA	94	45	0	7	146	100.0	100.0

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

Dollar Volume of Loans (000's)*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Atlanta MSA	45,097	9,859	0	57,343	112,299	100.0	100.0

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

There is strong competition for deposits and loans in this well-established market. The banking industry is highly competitive in this market and includes branches of national and regional banks, local community banks, credit unions, and other nonbank financial institutions. According to the FDIC Summary of Deposits as of June 30, 2018, there were 48 financial service providers with branches in the AA. CNB ranked 27th in deposits with a total of \$110 million with less than one percent (0.11) of the market share due to the strong competitiveness of the market. The three largest deposit competitors (SunTrust Bank; Bank of America, NA; and Wells Fargo Bank, NA) combined market share total 76.01 percent. As of year-end 2017, using home mortgage market share information based on a review of the 616 lenders with loans in the AA, CNB ranked 256th with less than one percent (0.03 percent) of the market share by number of home loans. The top five home mortgage originators/purchasers (Wells Fargo Bank, NA; Quicken Loans; Sun Trust Mortgage; JPMorgan Chase Bank, NA; and Fidelity Bank) combined market share totals 26.6 percent with individual percentages ranging from 3.5 to 10.9 percent.

CNB's small business lending activity is adequate given the institution's ranking and average loan size in comparison to the competition in the AA. CNB's market share percent is less than one percent (0.02 percent) and ranked 68th with an average loan size of \$226 thousand. Of the 151 lenders in the AA, only 13 have market shares greater than one percent. The top five lenders are large institutions with a consolidated total of 68.1 percent and individual market shares ranging from 6.2 to 33.7 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in the Atlanta MSA.

Home Mortgage Loans

Based on the data in Table O, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation period in the Atlanta MSA is excellent relative to area demographics and aggregate data. Refer to Table O in the State of Georgia section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The bank's overall geographic distribution of home mortgage loans in the Atlanta MSA is excellent. The bank's performance in both low-income and moderate-income census tracts is excellent. The proportion of home mortgage loans in low-income and moderate-income geographies significantly exceeds the proportion of owner-occupied housing units and the aggregate distribution of loans. The percentage of owner-occupied homes in low-income census tracts represents 7 percent of the owner-occupied housing units in the AA by geography. The percentage of owner-occupied homes in moderate-income census tracts represents 22.3 percent of the owner-occupied housing units in the AA by geography. The bank's performance in 2016 was weaker than its performance in 2017-18.

Small Loans to Businesses

Based on the data in Table Q, the bank's overall geographic distribution of small loans to businesses in the Atlanta MSA is poor relative to area demographics and aggregate data. Refer to Table Q in the State of Georgia section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The bank's lending activity in the low-income and moderate-income census tracts is poor when considering both demographic and aggregate data. The bank's performance is significantly less than area demographics and the aggregate for activity in both low-income and moderate-income census tracts. Based upon area geographic data, 20.2 percent of the businesses in the AA are in moderate-income census tracts. Opportunities for small loans to businesses in low-income census tracts are limited and highly competitive. Only 8.9 percent of the businesses in the Atlanta MSA are in low-income census tracts. The majority of businesses (54.2 percent) in the AA are in upper-income census tracts. The bank's performance in 2016 was similar to its performance in 2017-18.

Lending Gap Analysis

OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of loans of CNB's home mortgage and small business lending activity over the evaluation period. The analysis did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and businesses of different sizes given the product lines offered by the institution in its AAs.

Home Mortgage Loans

Based on the data in Table P, the bank's overall borrower distribution of home mortgage loan originations and purchases for the evaluation period is excellent. Refer to Table P in the State of Georgia section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

CNB's distribution of home mortgages to individuals of different income levels during the 2017-18 review period is excellent when considering the affordability of mortgages and competition in the Atlanta AA. The median family income was at \$67,322 with the median housing value at \$225,658. In addition, 13.8 percent of the families live below the poverty level, and 25.1 percent of the families live at the low-income level. The bank exhibited excellent performance in relation to lending to moderate-income borrowers. The bank exhibited good performance in relation to lending to low-income borrowers. The bank's proportion of home mortgage loans to low-income borrowers was less than area demographic data but significantly exceeded aggregate data and represented 133.3 percent of the ratio. The proportion of home mortgage loans to moderate-income borrowers significantly exceeded both area

demographics data and aggregate data. The bank's performance in 2016 was weaker than its performance in 2017-18.

Small Loans to Businesses

Based on the data in Table R, the distribution of the bank's originations and purchases of small loans to businesses by revenue is adequate. Refer to Table R in the State of Georgia 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.

The bank exhibits an adequate distribution of loans to business of different sizes in the Atlanta MSA when considering aggregate data, demographic data, and the bank's market share for this product. The bank's percentage of loans originated or purchased to businesses with revenues of \$1 million or less is near to the aggregate small business lending data for the AA. However, for demographic data, the OCC's analysis determined the proportion of small loans to businesses with revenues of \$1 million or lower than the proportion of businesses with revenues less than a \$1 million in the AA. Unreported revenue information adversely impacted this analysis. Approximately 38.5 percent of the bank's borrowers and 8.6 percent of businesses in the AA did not report revenue information, which prevented the OCC from determining the revenue category of all businesses. The bank's performance in 2016 was stronger than its performance in 2017-18.

Community Development Lending

CNB has made a relatively high level of CD loans.

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

The level of CD lending in the Atlanta MSA is excellent. CNB made seven CD loans in its AA for a total of \$57.3 million, which represents more than five times allocated Tier 1 Capital of the AA. CD lending performance had a significantly positive impact on the Lending Test rating. The loans were responsive to the identified affordable housing and small business lending needs in the AA. The bank made two CD loans totaling \$11.2 million (19.5 percent), which were particularly responsive to the identified need for affordable housing. The bank also made four CD loans totaling \$46.1 million (80.4 percent) for the purpose of economic development, which were responsive to the identified need for access to capital for small business and for small business assistance. Additionally, the bank made one CD loan totaling \$60 thousand for the primary purpose of community services to LMI individuals.

Examples of CD loans in the AA include:

- \$10.0 million unsecured 60-day bridge loan between the closing on the purchase of a portfolio of 117 homes and the completion of the approved financing from the permanent lender. The

borrowing entity is an investment collaboration. One partner is a nonprofit that provides financial literacy to underserved communities, and another partner has pledged \$30 million to the investment collaboration. The purpose of the loan is to help improve the financial position of the nonprofit's constituents by providing rental housing to those that also participate in the nonprofit's financial literacy program.

- \$3.0 million SBA 504 loan and related bridge loan to finance the purchase of a 100,380 square foot office and warehouse property in a moderate-income census tract in Fulton County. The property will house the operations of an e-commerce retailer of products that are sold via a variety of online channels, such as Amazon, eBay, Walmart, and many other smaller e-commerce channels. The borrower is presently operating out of leased facilities in North Carolina, and the Atlanta facility will replace the North Carolina location. The borrower qualifies as a small business under SBIC size standards and has a total of 14 employees, up from nine reported when the credit facility was approved. This loan helped to bring jobs into an LMI geography and provide jobs to LMI individuals.
- \$60 thousand commercial credit card for business expenses. Borrower is a nonprofit organization with a mission to promote self-sufficiency and equity for immigrants, refugees, and the underprivileged through comprehensive health and social services, capacity building, and advocacy. The borrower is the first, largest, and oldest organization in the Southeast (Atlanta) to focus on issues and concerns of Asian Americans, especially women, children, and families with low incomes.

Product Innovation and Flexibility

CNB makes no use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank did not offer innovative or flexible loan programs in the State of Georgia. The bank's geographic and borrower performance indicate the bank's existing products effectively address community credit needs.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Atlanta MSA is excellent. CNB has an excellent level of qualified CD investment and grants, particularly those that are not routinely provided by private investors, occasionally in a leadership position.

CNB exhibits excellent responsiveness to credit and community economic development needs. In terms of dollar volume, 99.5 percent of the bank's investments and grants during the evaluation period were allocated to affordable housing, an identified need of the AA. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Atlanta MSA	2	6,107	26	2,767	28	96.6	8,874	89.2	1	110
GA Statewide of Regional Area	1	1,079	0	0	1	3.4	1,079	10.8	1	80

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

During the evaluation period, the bank funded \$8.8 million in LIHTC that benefitted the AA. The bank also made grants totaling \$60 thousand during this time and has unfunded and binding commitments totaling \$110 thousand. Total investment activity in the AA represents 82.6 percent of allocated Tier 1 Capital based on the AA's share of bank deposits with 56.9 percent coming in the prior period and 25.8 percent invested in the current period.

One notable investment is \$2.7 million in LIHTC used to revitalize 22 two- and three-story buildings that will provide 107 affordable housing units, including 83 units of Section-8 rental assisted housing in the AA.

The analysis also considered statewide and regional projects based on the bank's Outstanding performance in the AA. The bank funded a total of \$1.1 million in LIHTC outside of its AA in the State of Georgia in the prior period and has a binding commitment to fund an additional \$80 thousand in LIHTC in future periods. This investment activity further supports the bank's Investment Test performance in the state.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on the full-scope review, the bank's performance in the Atlanta MSA is poor. The bank's CD service performance had a neutral impact on the overall Service Test conclusion in the Atlanta AA.

Retail Banking Services

Delivery systems are unreasonably inaccessible to portions of the AA, particularly LMI geographies and/or LMI individuals. Based on the Distribution of Branch Delivery Systems Table below and performance context considerations, CNB's retail service performance in this AA is very poor.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Atlanta MSA	100.0	1	100.0	0.0	0.0	0.0	100.0	14.7	26.7	16.7	40.9

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

Distribution of Branch Openings/Closings (2016-2018)							
Georgia							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upper	NA
Atlanta MSA	0	0	0	0	0	0	0

As of December 31, 2018, CNB operates one branch in the Atlanta MSA and zero ATMs. The bank's branch and alternative delivery systems were not effective in providing services across the community. The geographic branch distribution is significantly less than demographic data of the population. The branch is located in an upper-income census tract on an upper floor of an office building. The branch location contributes to the unreasonable inaccessibility of branch services to portions of the AA, particularly LMI geographies and/or LMI individuals.

There were no branch openings or closings in the AA throughout the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. The branch has customary banking hours, open Monday through Thursday 9:00am to 4:00pm and on Friday 9:00am to 5:00pm. In addition to traditional in-bank services, the bank offers alternative delivery systems and products. These include mobile banking, remote deposit capture, online banking, and bill-pay. No significant weight was placed on these alternative systems as no usage data was available.

Community Development Services

CNB provides an adequate level of CD services considering the limited presence in the AA. One CNB employee provided 44 community service hours to a Title I school. The employee provided financial literacy education to LMI students using CNB's Dollars + \$ense Financial Education program. The program instills money management skills and provides a foundation for making good choices to manage future finances. The CNB employee also provided the school with technical assistance for

fundraising and donor development. The performance under the CD service test had a positive impact on the overall Service Test rating.

State Rating

State of Minnesota

CRA rating for the State of Minnesota: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Good level of lending activity;
- Excellent geographic distribution of loans;
- Excellent borrower distribution of loans;
- Few, if any CD loans, which has a neutral impact on the Lending Test, given this is a new AA;
- Excellent level of CD investments that are responsive to AA needs;
- Retail delivery systems are reasonably accessible to geographies and individuals in the AA; and
- Leader in providing CD services.

Description of Institution's Operations in Minnesota

CNB delineated one AA within Minnesota and includes Hennepin County (Minneapolis MSA), which are part of the Minneapolis-St. Paul-Bloomington MSA. CNB had approximately \$4.0 million of deposits in Minnesota, representing 0.01 percent of total deposits, and operates one branch within Minnesota, representing 1.0 percent of the bank's branches. The bank originated and purchased approximately \$36.1 million, or 0.9 percent of the total number of reported loans and CD loans during the evaluation period in Minnesota. The bank's primary loan product in the Minneapolis MSA is home mortgage, which represents 96 percent of reportable loans in the AA. Small loans to businesses represent only 4 percent of reportable loans.

According to the June 30, 2018 FDIC Summary of Deposit Report, CNB ranked 67 out of 71 FDIC-insured institutions in the Minneapolis MSA with only a nominal deposit market share. The top three depository institutions are Wells Fargo Bank, NA; U.S. Bank NA; and Bank of America, NA with a combined deposit market share of 80.2 percent. In 2017, CNB ranked 177 of 530 in HMDA mortgages with 0.04 percent market share. The top five lenders, holding 36.8 percent market share, are Wells Fargo Bank, NA; U.S. Bank NA; JPMorgan Chase Bank, NA; Bell Bank; and Alerus Financial, NA. In 2017, CNB ranked 97 out of 122 small business lenders with a nominal market share of small business loans.

The top five small business lenders are U.S. Bank NA; American Express, FSB; Wells Fargo Bank, NA; Chase Bank USA, NA; and Capital One Bank (USA), NA with a combined market share of 72.8 percent.

Demographic

The following table provides a summary of the demographic profile of the Minneapolis MSA by categorizing the AA characteristics into their respective census tracts based on income level. The table reflects a moderate level of LMI census tracts, which total 33.1 percent of the AA. The demographic data also reflects a very low percentage of home ownership in LMI geographies compared to the population distribution in those areas.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	299	10.7	22.4	39.1	26.8	1.0
Population by Geography	1,197,776	10.0	19.8	38.3	31.4	0.5
Housing Units by Geography	518,332	9.2	19.9	40.1	30.1	0.8
Owner-Occupied Units by Geography	307,395	3.5	15.5	42.0	38.8	0.2
Occupied Rental Units by Geography	182,801	17.9	27.0	37.4	16.0	1.8
Vacant Units by Geography	28,136	14.1	21.8	36.6	25.7	1.7
Businesses by Geography	101,037	7.0	15.5	41.8	35.0	0.7
Farms by Geography	1,726	2.8	13.5	42.9	40.4	0.3
Family Distribution by Income Level	283,946	21.8	16.3	20.0	41.8	0.0
Household Distribution by Income Level	490,196	26.1	16.2	17.2	40.4	0.0
Median Family Income MSA - 33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA		\$85,636	Median Housing Value			\$249,469
			Median Gross Rent			\$978
			Families Below Poverty Level			8.1%

*Source: 2015 ACS Census and 2018 D&B Data
Due to rounding, totals may not equal 100.0
(* The NA category consists of geographies that have not been assigned an income classification.*

Community Contacts

OCC reviewed one recent community contact to determine community credit needs and opportunities for financial institutions to help address these needs. The contact was a city representative. The contact stated that small businesses have difficulty gaining access to financing.

Economic Data

Based on the May 2019 Moody’s Analytics report, the Minneapolis MSA economy has slowed sharply due to a tight labor market and labor shortages. Job growth has fallen below the Midwest average for the

first time in eight years and is affecting all industries. Worker shortages are driving earnings higher, which are up 3.7 percent from a year ago. A total of \$186 million will be invested in local medical centers expanding hospital services and keeping job growth in line with the U.S. rate.

The largest employers in the Minneapolis MSA are Allina Health System, Target Corp., and University of Minnesota. The unemployment rate has declined slightly from 3.4 in 2015 to 2.7 in 2018. Population growth has averaged 1 percent per year during this same time. Median income has increased from \$71,100 to \$78,500 from 2015-2018, and personal income has grown at an average of 4.1 percent per year during this time.

Housing

The housing market has been strong but expected to cool in the coming quarters, with increased inventory in the new home market at 5.5 months of supply while the existing housing market remains tight with 1.6 months of inventory. The Census' 5-year (2013-2017) ACS statistics estimated an affordability ratio for Hennepin County of 3.4 compared to the State of Minnesota at 3.0 and the U.S. at 3.4. The affordability ratio measures homeownership opportunity by dividing the median value of owner-occupied housing by the median household income of the area. Home ownership levels in the AA represent 62 percent of the housing inventory compared to 72 percent for the State of Minnesota and 64 percent for the U.S. based on ACS data. Median rent levels suggest rental housing is affordable for LMI residents in the AA.

Scope of Evaluation in Minnesota

The Minneapolis MSA is CNB's only AA in Minnesota and, therefore, it received a full-scope review. A very limited portion of the bank's overall lending, investments, and services were conducted in the Minneapolis MSA; therefore, the performance in this AA received less weight in determining the bank's overall CRA rating. The Minneapolis MSA accounts for 0.9 percent of the total number of loans and 0.01 percent of total deposits. The bank's primary lending products in Minnesota are home mortgage and small loans to businesses.

The evaluation focused on HMDA lending, small business lending, CD loans, qualified investments, and retail and CD services. Loans reported pursuant to the HMDA and CRA data collection requirements for 2016-2018 were included in the review. The review included both loan originations and purchases. All peer aggregate lending data used in the analysis is from 2016-2017. Aggregate lending data for 2018 was not available. OCC considered information from a recently completed community contact in this AA.

Refer to the table in Appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MINNESOTA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Minneapolis MSA is good.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs in its AAs taking into account the number and amount of home mortgage, small business, small farm, and community development relative to its capacity based on deposits, competition, and market presence. Based on loan volumes, primary weight for ratings was placed on the bank's home mortgages loan activity. This analysis only considers lending activity between 2017 and 2018 as the bank did not have branch operation in the market until 2017.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Minneapolis MSA	140	6	0	0	146	100.0	100.0

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

Dollar Volume of Loans (000's)*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Minneapolis MSA	33	3	0	0	36	100.0	100.0

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

Competition in the Minneapolis MSA is strong and diverse for deposits and loans in this well-established market. The banking industry is highly competitive in this market and includes branches of national and regional banks, local community banks, credit unions, and other nonbank financial institutions. According to the FDIC Summary of Deposits Report as of June 30, 2018, there were 71 financial service providers with branches in the AA. CNB only ranked 67th in deposits with zero market share and \$4.0 million in deposits. The three largest deposit competitors (Wells Fargo N.A., U.S. Bank, and Bank of America) combined market share total 80.3 percent; Wells Fargo has 54.6 percent of the deposit market share. As of year-end 2017, using home mortgage market share information based on a review of the 530 lenders with loans in the AA, CNB ranked 177th with less than one percent (0.04 percent) of the market share by number of home loans. The top five home mortgage originators/purchasers (Wells Fargo, NA; U.S. Bank, NA; JPMorgan Chase Bank, NA; Bell Bank; and Alerus Financial, NA) combined market share total 36.8 percent with individual percentages ranging from 3.1 to 13.7 percent.

CNB's small business lending activity is limited given the institution's ranking and average loan size in comparison to the competition in the AA. CNB ranked 97^h with zero market share and an average loan size of \$551 thousand. In this highly competitive market of the 122 lenders in the AA, only 11 have market shares greater than one percent. The top three lenders are large institutions with a consolidated total of 60.3 percent and individual market shares ranging from 16.0 to 22.3 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in its Minneapolis MSA.

Home Mortgage Loans

Based on the data in Table O, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation period in the Minneapolis MSA is excellent relative to area demographics and aggregate data. Refer to Table O in the State of Minnesota section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The bank's overall geographic distribution of home mortgage loans in the Minneapolis MSA is excellent. The bank's performance in both low-income and moderate-income census tracts is excellent. The proportion of home mortgage loans in low-income and moderate-income geographies significantly exceeds the proportion of owner-occupied housing units and the aggregate distribution of loans. The percentage of owner-occupied homes in low-income census tracts only represents 3.5 percent of the owner-occupied housing units in the AA by geography. The percentage of owner-occupied homes in moderate-income census tracts represents 15.5 percent of the owner-occupied housing units in the AA by geography.

Small Loans to Businesses

Based on the data in Table Q, the bank's overall geographic distribution of small loans to businesses in the Minneapolis MSA is very poor relative to area demographics and aggregate data. Refer to Table Q in the state of Minnesota section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The bank's overall geographic distribution of small loans to businesses in the Minneapolis MSA is very poor; however, small business lending is too low to derive statistically valid conclusions. The bank's lending activity in the low-income and moderate-income census tracts is very poor when considering both demographic and aggregate data. The bank's performance is significantly less than area demographics and the aggregate for activity in both low-income and moderate-income census tracts. Based upon area geographic data, 15.5 percent of the businesses in the AA are in moderate-income census tracts. Small loans to businesses opportunities in low-income census tracts are limited and highly

competitive. Only 7.0 percent of the businesses in the Minneapolis MSA are in low-income census tracts. The majority of the businesses (41.8 percent) in the AA are in middle-income census tracts.

Lending Gap Analysis

The OCC reviewed summary reports and maps and analyzed CNB's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. The OCC did not identify any unexplained conspicuous gaps.

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 given the product lines offered by the institution in its AAs.

Home Mortgage Loans

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

CNB's distribution of home mortgages to individuals of different income levels during the 2017-18 review period is excellent when considering the affordability of mortgages and competition in the Minneapolis MSA. The median family income was at \$85,636 with the median housing value at \$249,469. In addition, 8.1 percent of the families live below the poverty level, and 21.8 percent of the families live at the low-income level. The bank exhibited excellent performance in relation to lending to moderate-income borrowers. The bank exhibited good performance in relation to lending to low-income borrowers. The bank's proportion of home mortgage loans to low-income borrowers was less than area demographic data but significantly exceeds aggregate data. The proportion of home mortgage loans to moderate-income borrowers significantly exceeds both area demographics data and aggregate data.

Small Loans to Businesses

Based on the data in Table R, the distribution of the bank's originations and purchases of small loans to businesses by revenue is adequate. Refer to Table R in the state of Minnesota 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.

The bank exhibits an adequate distribution of loans to business of different sizes in the Minneapolis MSA when considering aggregate data, demographic data, and the bank's market share for this product. However, small business lending is too low to derive statistically valid conclusions. However, for demographic data, the OCC's analysis determined that the proportion of small loans to businesses with

revenues of \$1 million is significantly lower than the proportion of businesses demographic data. Unreported revenue information adversely impacted this analysis. Approximately 9.3 percent of the bank's borrowers and 20 percent of businesses in the AA did not report revenue information which prevented the OCC from determining the revenue category of all businesses.

Community Development Lending

CNB has made few if any CD loans in the Minneapolis MSA.

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

CNB did not grant any CD loans in the Minneapolis MSA during the evaluation period. Given that CNB has only maintained branch operations since May 2017, the lack of CD lending does not negatively affect the overall lending test performance.

Product Innovation and Flexibility

The bank did not offer innovative or flexible loan programs in the State of Minnesota. The bank's geographic and borrower performance indicate the bank's existing products effectively address community credit needs.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Minneapolis MSA is excellent. CNB has an excellent level of qualified CD investment and grants, particularly those that are not routinely provided by private investors, occasionally in a leadership position.

CNB exhibits excellent responsiveness to credit and community economic development needs. In terms of dollar volume, 99.5 percent of the bank's investments and grants during the evaluation period were allocated to affordable housing, an identified need of the AA. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Minneapolis MSA	0	0	9	4,740	9	100	4,740	100	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

During the evaluation period, the bank funded \$4.7 million in LIHTC and made grants totaling \$40 thousand, both benefitting the AA. Total investment activity in the AA represents 12 times allocated Tier 1 Capital based on the AA's share of bank deposits.

The bank's single investment in the AA funded a LIHTC used to renovate two properties in the AA with a total of 86 units of housing available to LMI families.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Minneapolis MSA is adequate. The bank's CD service performance has a positive impact on the overall Service Test conclusion in this AA.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution's AA. Based on the Distribution of Branch Delivery Systems table below and performance context considerations, the bank's retail service performance is adequate.

Distribution of Branch Delivery System as of December 31, 2018											
Assessment Area	Deposits	Branches – Minnesota						Population			
		# 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	
Minneapolis MSA	100.0	1	100.0	0.0	0.0	100.0	0.0	10.0	19.8	38.3	31.4

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

Distribution of Branch Openings/Closings (2016-2018)							
Minnesota							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upper	NA
Minneapolis MSA	1	0	0	0	+1	0	0

As of December 31, 2018, CNB operates one branch and one full-service ATM in the AA. The branch is located in a middle-income census tract, which represents the largest percentage of the population in the AA. The branch is located in an urban area that is along public transit lines that serve the entire area, including LMI census tracts. Loan data demonstrates that the branch originates loans in LMI areas within the AA. In addition, 35 percent of the families within the moderate-income census tract where the branch is located are LMI.

The Minneapolis branch opened during the performance evaluation period in May 2017. CNB's opening of this branch has not affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. The branch has traditional banking business hours, open Monday through Friday 9:00am to 4:00pm. The full-service ATM is available 24 hours. In addition to traditional in-bank services, the bank offers alternative delivery systems and products. These include mobile banking, remote deposit capture, online banking, and bill-pay. No significant weight was placed on these alternative systems as no usage data was available.

Community Development Services

CNB is a leader in providing CD services in the AA. During 2017 and 2018, a CNB employee provided 208 service hours to an organization that helps LMI women attain self-sufficiency through the creation and growth of profitable and sustainable small businesses. The employee served as an advisor and assisted clients in developing business plans for starting their small businesses.

State Rating

State of Nevada

CRA rating for the State of Nevada: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Adequate level of lending activity;
- Good geographic distribution of loans;
- Good borrower distribution of loans based on performance in the limited-scope AA;
- Adequate level of CD loans;
- Excellent level of CD investments that are responsive to AA needs;
- Retail delivery systems are reasonably accessible to geographies and individuals in the AA; and
- Relatively high level of CD services.

Description of Institution's Operations in Nevada

CNB delineated two AAs within Nevada that include the Las Vegas-Henderson-Paradise MSA (Las Vegas MSA) and a portion of Reno-Carson City-Fernley CSA (Reno CSA). Nevada is the third largest rated area by deposits and loans but only represents a small percentage of the bank's activity. CNB had approximately \$810 million of deposits in Nevada, representing 2.2 percent of total deposits. CNB operates seven branches within Nevada, representing 9.7 percent of the bank's branches. The bank originated and purchased approximately \$243 million, or 4.7 percent of total reported loans and CD loans during the evaluation period in Nevada. The bank's primary loan products in Nevada are home mortgage (41.8 percent) and small loans to businesses (58.2 percent). The Reno CSA was selected for a full-scope review as this AA has never had a full-scope review.

Reno CSA

CNB maintains branch operations in Douglas County (Garnerville Ranchos Micropolitan Statistical Area), Washoe County (part of Reno MSA), and the City of Carson City. These counties along with Carson City are part of the Reno-Carson City-Fernley CSA. CNB had approximately \$289.5 million of deposits in Nevada, representing 0.8 percent of total deposits and operates three branches within the AA,

representing 4.2 percent of the bank's branches. The bank originated and purchased approximately \$64.6 million, or 1.7 percent of total number of reported loans and CD loans during the evaluation period in the AA. The bank's primary loan products in Nevada are home mortgage (39.0 percent by number of loans) and small loans to businesses (61.0 percent by number of loans).

According to the June 30, 2018 FDIC Summary of Deposit Report, CNB ranked 9 out of 17 FDIC-insured institutions in the Reno CSA with a deposit market share of 2.32 percent. The top three depository institutions are Wells Fargo Bank, NA; Bank of America, NA; and U.S. Bank, NA with a combined deposit market share of 70.6 percent. In 2017, CNB ranked 115 of 326 in HMDA mortgages with 0.08 percent market share. The top five lenders, holding 38.3 percent market share, are Guild Mortgage Company; Wells Fargo Bank, NA; U.S. Bank, NA; Quicken Loans; and Prime Lending. In 2017, CNB ranked 18 out of 100 small business lenders with a 0.34 percent market share of small business loans. The top five small business lenders are American Express, FSB; Wells Fargo Bank, NA; Citibank, NA; Bank of America, NA; and U.S. Bank, NA with a combined market share of 63.0 percent.

Demographics

The following table provides a summary of the demographic profile of the Reno CSA by categorizing the AA characteristics into their respective census tracts based on income level. The table reflects a low level of LMI census tracts, which total 24.5 percent of the AA. The demographic data also reflects a very low percentage of home ownership in LMI geographies compared to the population distribution in those areas.

Table A - Demographic Information of the Assessment Area

Assessment Area: Reno CSA 2018

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	143	7.0	17.5	37.1	32.2	6.3
Population by Geography	536,760	7.0	19.3	41.5	31.1	1.1
Housing Units by Geography	233,661	7.8	19.7	39.2	32.4	0.9
Owner-Occupied Units by Geography	120,309	2.1	13.0	43.2	41.5	0.3
Occupied Rental Units by Geography	87,409	14.9	29.2	36.9	17.5	1.5
Vacant Units by Geography	25,943	10.2	18.7	28.7	40.6	1.9
Businesses by Geography	33,851	6.9	23.4	29.6	35.8	4.3
Farms by Geography	834	4.3	14.3	38.0	42.1	1.3
Family Distribution by Income Level	129,414	20.8	17.2	20.7	41.3	0.0
Household Distribution by Income Level	207,718	24.1	15.7	17.7	42.5	0.0
Median Family Income MSA - 16180 Carson City, NV MSA		\$58,947	Median Housing Value			\$228,110
Median Family Income MSA - 39900 Reno, NV MSA		\$65,722	Median Gross Rent			\$941
Median Family Income Non-MSAs - NV		\$61,350	Families Below Poverty Level			10.0%

Source: 2015 ACS Census and 2018 D&B Data

Due to rounding, totals may not equal 100.0

(*) The NA category consists of geographies that have not been assigned an income classification.

Community Contacts

OCC reviewed two recent community contacts to determine community credit needs and opportunities for financial institutions to help address these needs. The contacts represented economic development organizations. The contacts identified access to capital for business as a critical need. Opportunities for banks to address this need include:

- More lending by existing banks.
- Participation in a forwarding LOC program offered by the U.S. SBA.
- Loans to small businesses for growth and loans to start-ups and smaller businesses.

Economic Data

Based on the March 2019 Moody's Analytics report, the Reno MSA is growing rapidly and adding new jobs at the fastest pace in the West and at more than three times the national average. New jobs are concentrated in the building and expansion of Tesla's battery manufacturing plant. Net hiring in high paying professional and technical services surged in 2018, and leisure/hospitality has been flat. Air travel through the Reno-Tahoe International Airport has increased 25 percent since 2014. This increased visitor volume will increase retail spending and leisure/hospitality payrolls, and new flight routes will attract firms looking for convenient connectivity.

The largest employers in the Reno CSA are Tesla, the University of Nevada, and Renown Health in addition to a collection of hospitality and leisure services centered in the casino/gaming industry. The unemployment rate has seen a significant decline from 6.3 percent in 2015 to 3.8 percent in 2018. Population growth has averaged 1.7 percent during this period. Median income has increased from \$55,800 to \$64,300, and personal income growth has averaged 6.7 percent per year.

Housing

New residents moving to Reno have increased housing demand over the last five years. Demand slowed in 2018 partly due to increased housing prices, which have increased at twice the national rate. The Census' 5-year (2013-2017) ACS statistics estimated an affordability ratio for Douglas, Washoe, and Carson City Counties of 5.1, 4.6, and 4.4, respectively, compared to the State of Nevada at 3.9 and the U.S. at 3.4. The affordability ratio measures homeownership opportunity by dividing the median value of owner-occupied housing by the median household income of the area. Home ownership levels in Douglas, Washoe, and Carson City Counties are 69, 58, and 55 percent of the county housing inventory, respectively, compared to 55 percent for the State of Nevada and 64 percent for the U.S. based on ACS data. Median rent levels suggest rental housing is not affordable for LMI residents in the AA.

Scope of Evaluation in Nevada

The Reno CSA was selected for a full-scope review as this AA has never had a full-scope review. While the Las Vegas MSA holds 64 percent of state deposits and 73 percent of state loans and received a limited scope review, the overall performance is weighted to performance in the Las Vegas MSA.

The evaluation focused on HMDA lending, small business lending, CD loans, qualified investments, and retail and CD services. Loans reported pursuant to the HMDA and CRA data collection requirements for 2016-2018 were included in the review. The review included both loan originations and purchases. All peer aggregate lending data used in the analysis is from 2016-2017. Aggregate lending data for 2018 was not available. OCC considered information from recently completed community contacts in this AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEVADA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on full-scope reviews, the bank's performance in the Reno CSA is adequate.

Lending Activity

Lending levels reflect good responsiveness to credit needs in its AAs taking into account the number and amount of home mortgage, small business, small farm, and community development relative to its capacity based on deposits, competition, and market presence. CNB has seven locations in Nevada. Although a substantial majority of the bank's deposits, home mortgages, and small loans to businesses by both number and dollar are in the Las Vegas MSA, the Reno CSA received a full-scope review for analysis purposes. A limited-scope review was performed for the Las Vegas MSA. Based on loan product volumes, small business loans are higher by total number of loans and home mortgage loans are higher by total dollar amount of loans.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Reno CSA	104	163	0	1	268	36.7	35.8
Las Vegas MSA	200	260	0	3	463	63.3	64.2
Total	304	423	0	4	731	100.0	100.0

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

Dollar Volume of Loans (000's)*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Reno CSA	36,204	27,626	0	780	63,830	26.6	35.8
Las Vegas MSA	109,548	63,613	0	5,200	173,161	73.4	64.2
Total	145,752	91,239	0	5,980	242,971	100.0	100.0

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

The Reno CSA AA consists of 17 financial service providers, which includes branches of national and regional banks, local community banks, credit unions, and other nonbank financial institutions. According to the FDIC Summary of Deposits as of June 30, 2018, CNB only ranked 9th in deposits with 2.32 percent market share and a total of \$298.5 million. The three largest deposit competitors (Wells Fargo, Bank of America, and U.S. Bank) combined market share total 70.6 percent. Wells Fargo had 40.4 percent. As of year-end 2017, using home mortgage market share information based on a review of the 326 lenders with loans in the AA, CNB ranked 115th with less than one percent (0.08 percent) of the market share by number of home loans. The top five home mortgage originators/purchasers (Guild Mortgage Company, Wells Fargo, U.S. Bank, Quicken Loan, and Prime Lending) combined market share total 38.3 percent with individual percentages ranging from 2.8 to 11.0 percent.

CNB's small business lending activity is good given the institution's ranking and average loan size in comparison to the competition in the AA. CNB ranked 18th with market percent less than one (0.34 percent) and an average loan size of \$218 thousand. In this highly competitive market of the 100 lenders in the AA, only 12 have market shares greater than one percent. The top three lenders are large institutions with a consolidated total of 41.38 percent and individual market shares ranging from 12.2 to 15.2 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its Reno CSA AA.

Home Mortgage Loans

Based on the data in Table O, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation period in the Reno CSA is excellent relative to area demographics and aggregate data. 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.

The bank's overall geographic distribution of home mortgage loans in the Reno CSA is excellent. The bank's performance in both low-income and moderate-income census tracts is excellent. The proportion of home mortgage loans in low-income and moderate-income geographies significantly exceeds the proportion of owner-occupied housing units and the aggregate distribution of loans. The percentage of

owner-occupied homes in low-income census tracts only represents 2.1 percent of the owner-occupied housing units in the AA by geography. The percentage of owner-occupied homes in moderate-income census tracts represents 13 percent of the owner-occupied housing units in the AA by geography. The bank's performance in 2016 was weaker than its performance in 2017-18.

Small Loans to Businesses

Based on the data in Table Q, the bank's overall geographic distribution of small loans to businesses in the Reno CSA is adequate relative to area demographics and aggregate data. 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.

The bank's overall geographic distribution of small loans to businesses in the Reno CSA is adequate. The bank's lending activity in the low-income and moderate-income census tracts is adequate when considering both demographic and aggregate data. The bank's performance is significantly less than area demographics and the aggregate for activity in both low-income and moderate-income census tracts. Based upon area geographic data, 23.4 percent of the businesses in the AA are in moderate-income census tracts. Opportunities for small loans to businesses in low-income census tracts are limited and highly competitive. Only 6.9 percent of the businesses in the Reno CSA are in low-income census tracts. The majority of the businesses (35.8 percent) in the AA are in upper-income census tracts. The bank's performance in 2016 was weaker than its performance in 2017-18.

Lending Gap Analysis

OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of loans of CNB's home mortgage and small business lending activity over the evaluation period. The analysis did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution in its AAs.

Home Mortgage Loans

Based on the data in Table P, the bank's overall borrower distribution of home mortgage loan originations and purchases for the evaluation period is adequate. 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.

The bank exhibits a good distribution of home mortgage loans to individuals of different income levels during the 2017-18 review period. The bank's performance of lending to moderate-income borrowers

was excellent. The bank's performance of lending to low-income borrowers was poor. When determining the rating, consideration was given to the relatively high housing costs compared to LMI family incomes in the AA throughout the evaluation period. The median housing value was \$228,110 compared to the median family income of only \$65,722. It would be difficult to afford a home at the median family income level. The relative high housing costs in the AA negatively impacts LMI borrowers' abilities to qualify for a home mortgage. The proportion of home mortgage loans to moderate-income borrowers exceeds the aggregate indicator and was near to demographic data for the AA. The proportion of home mortgage loans to low-income borrowers was significantly weaker than the proportion of low-income families in the AA. CNB's performance in 2016 was weaker than their performance in 2017-18.

Small Loans to Businesses

Based on the data in Table R, the distribution of the bank's originations and purchases of small loans to businesses by revenue is poor. 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.

The bank exhibits poor distribution of loans to business of different sizes in the Reno CSA when considering aggregate data with demographic data and the bank's market share for this product. The proportion of small loans to businesses with revenues of \$1 million or less is less than the proportion of businesses by demographics and the aggregate indicator for businesses with revenues less than a \$1 million in the AA. Unreported revenue information adversely impacted this analysis. Approximately 12 percent of the bank's business borrowers and 12.2 percent of the AA businesses did not report revenue information which prevented the OCC from determining the revenue category of all businesses. CNB's performance in 2016 was similar to their performance in 2017-18. In 2016, 17.4 percent of the bank's business borrowers did not report revenue information.

Community Development Lending

CNB has made a low level of CD loans in the Reno CSA.

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

The level of CD lending in the Reno CSA AA is adequate. CNB granted one credit facility of \$780 thousand for economic development, creating new jobs for LMI individuals. CD lending represented 3.0 percent of allocated Tier 1 Capital. The loan was responsive to the economic development needs in the AA. CD lending performance had a neutral impact on the Lending Test rating.

Product Innovation and Flexibility

The bank did not offer innovative or flexible loan programs in the State of Nevada. The bank's geographic and borrower performance indicate that the bank's existing products effectively address community credit needs.

Conclusions for Area Receiving a Limited-Scope Review

Based on limited-scope reviews, the bank's performance under the Lending Test in the Las Vegas MSA is consistent with the bank's overall "Low Satisfactory" performance for the State of Nevada. The bank's borrower distribution of home mortgages in the Las Vegas MSA is significantly stronger than the proportion of lending to low-income and moderate-income families based upon the aggregate indicator in the AA, but other performance factors are consistent with performance in the Reno CSA.

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

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 Reno CSA is excellent. CNB has an excellent level of qualified CD investment and grants, particularly those that are not routinely provided by private investors, occasionally in a leadership position.

CNB exhibits excellent responsiveness to credit and community economic development needs. In terms of dollar volume, 99.3 percent of the bank's investments and grants during the evaluation period were allocated to affordable housing, an identified need of the AA. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Las Vegas MSA	5	5,404	42	13,428	47	58.0	18,832	73.2	4	2,442
Reno CSA	2	1,580	31	4,815	33	40.7	6,394	24.8	1	28
NV Statewide or Regional Area	1	510	0	0	1	1.2	510	2.0	1	16

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

During the evaluation period, the bank funded \$1.6 million in LIHTC that benefitted the Reno CSA AA and purchased \$4.7 million in MBS backed by loans made to LMI borrowers. The bank also made grants totaling \$71 thousand during this time and has unfunded and binding commitments totaling \$28 thousand that benefit LIHTC. Total investment activity in the AA represents 22.7 percent of allocated Tier 1 Capital based on the AA's share of bank deposits with 5.6 percent coming in the prior period and 15.1 percent invested in the current period.

The bank's single investment in the AA was a mutual fund backed by single-family residences and one multi-family residence for LMI families.

Consideration was also given to statewide and regional projects based on the bank's Outstanding performance in the AA. The bank funded a total of \$510 thousand in LIHTC outside of its AA in the State of Nevada in the prior period and has a binding commitment to fund an additional \$16 thousand in LIHTC in future periods. This investment activity further supports the bank's Investment Test performance in the state.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Las Vegas MSA is stronger than the bank's overall performance under the Investment Test in the full-scope area. The performance in this area is stronger based on the investment total as a percentage allocated Tier 1 Capital based on the AA's share of bank deposits. The Las Vegas MSA activity totaled 37.2 percent for the evaluation period with 26.5 percent coming in the current period and 10.7 percent invested in the prior period.

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 Reno CSA is adequate. The performance under the CD services has a positive impact on the overall rating for this AA.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution's AA. Based on the Distribution of Branch Delivery Systems table below and performance context considerations, the bank's retail service performance is adequate.

Distribution of Branch Delivery System as of December 31, 2018											
Assessment Area	Deposits	Branches - Nevada						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
Full Review:											
Reno CSA	35.8	3	42.9	0.0	0.0	66.6	33.3	7.0	19.3	41.5	31.1
Limited Review:											
Las Vegas MSA	64.2	4	57.1	0.0	25.0	25.0	50.0	5.0	25.3	39.2	30.3

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

Distribution of Branch Openings/Closings (2016-2018)							
Nevada							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upper	NA
Full Review:							
Reno CSA	0	0	0	0	0	0	0
Limited Review:							
Las Vegas MSA	0	1	0	0	-1	0	0

As of December 31, 2018, CNB operates three branches and three ATMs within the Reno CSA. All of the branches are full-service locations with full-service ATMs. Two branches are located in middle-income census tracts, and the third in an upper-income census tract. The branch distribution is below demographic data for LMI areas. However, two branches are located adjacent to moderate-income census tracts in which the bank originated loans. In addition, census tract demographic data for two branches shows that 46 percent and 35 percent of families residing in those tracts are LMI. Given these factors, the branch distribution is considered adequate in the Reno CSA.

There were no branch openings or closings in the AA throughout the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or individuals. The branches have typical business hours, open Monday through Friday 9:00am to 5:00pm. In addition to traditional in-bank services, the bank offers alternative delivery systems and products. These include mobile banking, remote deposit capture, online banking, and bill-pay. No significant weight was placed on these alternative systems as no usage data was available.

Community Development Services

The bank provided a relatively high level of CD services in the Reno CSA AA. During the evaluation period, nine CNB employees provided 296 hours to eight service organizations. Most hours (94 percent) were for organizations with programs supporting the LMI population. The remaining hours (6 percent) represented an employee that served on the Board Finance Committee for the Northern NV Development Authority addressing economic development needs. In addition, employees provided 37 hours of technical assistance for a FHLBSF AHP project. This assistance facilitated a \$320 thousand subsidy for the Sonoma Springs development providing 32 units of affordable housing. CNB's performance under the CD services had a positive impact on the overall Service Test performance.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Las Vegas MSA is stronger than the overall performance under the Service Test in the full-scope area. This geographic distribution of branches within moderate-income census tracts is consistent with area demographics. In addition, CNB provided a good level of CD services with 388 hours. Employee technical assistance for the FHLB AHP program facilitated four grants totaling \$4 million for 474 units of affordable housing. As a majority of the deposits in Nevada are located within the Las Vegas MDA, the stronger performance had a positive impact on the overall Service Test.

State Rating

State of New York

CRA rating for the State of New York: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory/Low Satisfactory

The major factors that support this rating include:

- Adequate level of lending activity;
- Poor geographic distribution of loans;
- Adequate borrower distribution of loans;
- A relatively high level of CD loans, which has a significant positive impact on the Lending Test;
- Excellent level of CD investments that are responsive to AA needs;
- Retail delivery systems are reasonably accessible to geographies and individuals in the AA; and
- Relatively high level of CD services.

Description of Institution's Operations in New York

CNB delineated one AA within New York and includes the county of New York (New York MSA), which is part of the New York-Jersey City-White Plains MD. CNB had approximately \$3.5 billion of deposits in New York, representing 9.6 percent of total deposits and operates three branches within New York, representing 4.2 percent of the bank's branches. The bank originated and purchased approximately \$872.2 million, or 5.4 percent of total number of reported loans and CD loans during the evaluation period in New York. The bank's primary loan products in New York are home mortgage (34.2 percent) and small loans to businesses (65.8 percent).

According to the June 30, 2018 FDIC Summary of Deposit Report, CNB ranked 14 out of 90 FDIC-insured institutions in the New York MD with a deposit market share of 0.85 percent. The top three depository institutions are JPMorgan Chase Bank, NA; BNY Mellon, NA; and Goldman Sachs Bank USA with a combined deposit market share of 60.3 percent. In 2017, CNB ranked 20 of 258 in HMDA mortgages with 0.73 percent market share. The top five lenders, holding 57.6 percent market share, are Wells Fargo Bank, NA; JPMorgan Chase Bank, NA; Citibank, NA; Bank of America, NA; and First Republic Bank. In 2017, CNB ranked 26 out 182 small business lenders with a 0.19 percent market share of small business loans. The top five small business lenders are American Express, FSB; Chase

Bank USA, NA; Bank of America, NA; Citibank, NA; and Capital One Bank (USA), NA with a combined market share of 76.6 percent.

New York MD

Demographic

The following table provides a summary of the demographic profile of the New York MD by categorizing the AA characteristics into their respective census tracts based on income level. The table reflects a moderate level of LMI census tracts, which total 33 percent of the AA. The demographic data also reflects a very low percentage of home ownership in LMI geographies compared to the population distribution in those areas.

Table A - Demographic Information of the Assessment Area						
Assessment Area: New York MD 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	288	15.3	17.7	6.9	54.9	5.2
Population by Geography	1,629,507	18.4	19.4	6.3	54.9	0.9
Housing Units by Geography	862,289	13.5	14.9	6.5	64.1	1.0
Owner-Occupied Units by Geography	172,079	3.0	6.8	5.1	84.0	1.1
Occupied Rental Units by Geography	578,340	18.0	18.5	7.1	55.4	1.0
Vacant Units by Geography	111,870	6.7	8.8	5.1	78.4	0.9
Businesses by Geography	203,700	5.8	6.3	3.1	78.6	6.3
Farms by Geography	813	6.5	5.3	4.2	81.2	2.8
Family Distribution by Income Level	310,166	26.7	11.5	10.6	51.1	0.0
Household Distribution by Income Level	750,419	26.8	10.9	12.4	49.8	0.0
Median Family Income MSA - 35614 New York-Jersey City-White Plains, NY-NJ MD		\$72,047	Median Housing Value			\$764,242
			Median Gross Rent			\$1,649
			Families Below Poverty Level			14.1%

Source: 2015 ACS Census and 2018 D&B Data
 Due to rounding, totals may not equal 100.0
 (*) The NA category consists of geographies that have not been assigned an income classification.

Community Contacts

OCC reviewed two recent community contacts to determine community credit needs and opportunities for financial institutions to help address these needs. The contacts included one housing organization and a community services organization. The contacts identified affordable housing and banking services as critical needs. Opportunities for banks to address the needs include:

- Affordable first-time homebuyer loan programs and low interest rate home improvement loans.
- Student loans.

- More bank branches and bank services in underserved areas as an alternative to check cashers.
- Grants for down payment assistance to low-income individuals.

Economic Data

Based on the May 2019 Moody's Analytics report, the New York MD economy is nearing a slowdown. Growth in the area is concentrated in low-wage industries such as healthcare and leisure/hospitality. The healthcare industry is expected to be a key driver for the New York economy going forward with hospital employment accounting for half of new jobs created in 2018. A low uninsured rate and aging population are driving demand. The outlook has become slightly negative with the cancellation of plans to build Amazon's second headquarters in Long Island City; however, Google plans to dramatically expand its footprint in Chelsea.

The largest employers in the New York MD are centered in the health care, professional business services, and finance industries. Top employers include Montefiore Health System, Mount Sinai Health System, JP Morgan Chase & Co., and Bank of America. The unemployment rate has steadily declined between 2015 and 2018 from 5.5 to 4.0 percent. Population growth is flat during this period. Median income has also increased during this period from \$63,300 to \$71,300 with average annual personal income growth of 5.1 percent.

Housing

The housing market is stagnant with both housing prices and housing starts showing little to no growth in recent years. Homebuilding hit a 5-year low in 2018 due to an overbuilt ultra-luxury segment. The Census' 5-year (2013-2017) ACS statistics estimated an affordability ratio for the county of 11.5 compared to the State of New York at 4.7 and the U.S. at 3.4. The affordability ratio measures homeownership opportunity by dividing the median value of owner-occupied housing by the median household income of the area. Home ownership levels in the AA represent 24 percent of the housing inventory compared to 54 percent for the State of New York and 64 percent for the U.S. based on ACS data. This low ownership figure is a reflection of the high cost of real estate in the area. Median rent levels suggest rental housing is not affordable for low- or moderate-income residents in the AA.

Scope of Evaluation in New York

The New York MD is CNB's only AA in New York and, therefore, it received a full-scope review. New York is the second largest rated area by deposits and loans but only represents a small percentage of the bank's activity. CNB had approximately \$3.5 billion of deposits in New York, representing 9.6 percent of total deposits. CNB operates three branches within New York, representing 4.2 percent of the bank's branches; therefore, the performance in this AA received less weight in determining the bank's overall CRA rating. The bank's primary lending products in New York are home mortgage and small loans to businesses.

The evaluation focused on HMDA lending, small business lending, CD loans, qualified investments, and retail and CD services. Loans reported pursuant to the HMDA and CRA data collection requirements for 2016-2018 were included in the review. The review included both loan originations and purchases. All peer aggregate lending data used in the analysis is from 2016-2017. Aggregate lending data for 2018 was not available. OCC considered information from recently completed community contacts in this AA.

Refer to the table in Appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK

LENDING TEST

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

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

Conclusions for Area Receiving a Full-Scope Review

Lending Activity

Lending levels reflect an adequate responsiveness to credit needs in its AAs taking into account the number and amount of home mortgage, small business, small farm, and CD lending activities relative to its capacity based on deposits, competition, and market presence. CNB has three locations in New York. Based on loan volumes, small business loans are higher by number and home mortgages are higher by dollar. As such, equal weighting is given to each loan product. The analysis focused on the bank's activity in 2017 and 2018.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
New York MD	286	551	0	12	849	100.0	100.0

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

Dollar Volume of Loans (000's)*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
New York MD	602,676	135,911	0	133,600	872,187	100.0	100.0

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

The New York MD consists of 90 financial service providers, which includes branches of national and regional banks, local community banks, credit unions, and other nonbank financial institutions. According to the FDIC Summary of Deposits Report as of June 30, 2018, CNB ranked 14th in deposits among three offices with 0.85 percent market share and a total of \$9.6 billion. The three largest deposit competitors (JPMorgan Chase Bank, NA; BNY Mellon, NA; and Goldman Sachs Bank USA) have a

combined market share totaling 60.3 percent, with JPMorgan Chase Bank, NA having 41.7 percent. As of year-end 2017, using home mortgage market share information based on a review of the 258 lenders with loans in the AA, CNB ranked 20th with less than one percent (0.73 percent) of the market share by number of home loans. The top five home mortgage originators/purchasers (Wells Fargo Bank, NA; JPMorgan Chase Bank, NA; Citibank, NA; Bank of America, NA; and First Republic Bank) combined market share total 57.6 percent with individual percentages ranging from 6.0 to 17.6 percent.

CNB's small business lending activity is adequate given the institution's ranking and average loan size in comparison to the competition in the AA. CNB ranked 26th with market share of less than one percent (0.19 percent) and an average loan size of \$257 thousand. In this highly competitive market of the 182 lenders in the AA, only 11 have market shares greater than one percent. The top three lenders are large institutions with a combined market share of 68.2 percent and individual market shares ranging from 5.7 to 44.6 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibits a poor geographic distribution of loans in its New York MD.

Home Mortgage Loans

Based on the data in Table O, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation period in the New York MD is poor relative to area demographics and aggregate data. Refer to Table O in the New York section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The bank's overall geographic distribution of home mortgage loans in the New York MD is poor. The bank's performance in low-income and moderate-income census tracts is poor. The proportion of home mortgage loans in low-income and moderate-income geographies is well below the proportion of owner-occupied housing units and the aggregate distribution of loans. Home ownership is limited in the low-income census tracts. Based upon a review of all housing units in the New York MD, 67 percent are rental units. The percentage of owner-occupied homes in low-income census tracts represents only 3 percent of the owner-occupied housing units in the AA by geography. The percentage of owner-occupied homes in moderate-income census tracts represents 6.8 percent of the owner-occupied housing units in the AA by geography. Based upon a review of rental units, 18 percent are in low-income census tracts. The bank's performance in 2016 was weaker than its performance in 2017-18.

Small Loans to Businesses

Based on the data in Table Q, the bank's overall geographic distribution of small loans to businesses in the New York MD is poor relative to area demographics and aggregate data. Refer to Table Q in the

New York MD section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The bank's overall geographic distribution of small loans to businesses in the New York MD is poor when considering area demographics, competition and limited opportunities to lend in low-income and moderate-income census tracts. The bank's lending activity in LMI census tracts is poor. Based upon area geographic data, 6.3 percent of the bank's small loans to business are in moderate-income census tracts. Opportunities for small loans to businesses in low-income census tracts are limited and highly competitive. Only 5.8 percent of the businesses in the New York MD are in low-income census tracts. The majority (78.6 percent) of the AA businesses are in the upper-income census tracts. The bank's percentage of loans in LMI census tracts is significantly below area demographics and the aggregate indicator. The bank's performance in 2016 was stronger than its performance in 2017-18.

Lending Gap Analysis

OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of loans of CNB's home mortgage and small business lending activity over the evaluation period. The analysis did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution in its AAs.

Home Mortgage Loans

Based on the data in Table P, the bank's overall borrower distribution of home mortgage loan originations and purchases for the evaluation period is poor. Refer to Table P in the New York section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

CNB's distribution of home mortgages to individuals of different income levels during the 2017-18 review period is poor versus very poor when considering the affordability of mortgages and competition in the New York MD. The bank exhibited poor performance in relation to lending to LMI borrowers. The relative high housing costs and lack of sufficient down payment assistance programs in the AA negatively impacts LMI borrower's ability to qualify for a home mortgage. The analysis considered the relatively high housing costs compared to LMI family incomes in the AA. It would be difficult to afford a mortgage at both the low-income and the moderate-income levels. The median family income was \$72,047 with the median housing value at \$764,242. In addition, 14.1 percent of the families live below the poverty level, and 26.7 percent of the families live at the low-income level. Approximately 11.5 percent of the families live at the moderate-income level. The bank's proportion of home mortgage loans

to low-income and moderate-income borrowers is significantly below both the area demographic data and the aggregate indicator. The bank's performance in 2016 was similar to its performance in 2017-18.

Small Loans to Businesses

Based on the data in Table R, the distribution of the bank's originations and purchases of small loans to businesses by revenue is adequate. Refer to Table R in the New York 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.

The bank exhibits an adequate distribution of loans to business of different sizes in the New York MD when considering aggregate data, demographic data, and the bank's market share for this product. The proportion of small loans to businesses with revenues of \$1 million or less is lower than the proportion of demographic businesses with revenues less than a \$1 million in the AA. Unreported revenue information adversely impacted this analysis. Approximately 8.8 percent of the businesses in the AA and 9.3 of the AA businesses did not report revenue information which prevented the determination of the revenue category of all businesses. The bank's performance in 2016 was stronger than its performance in 2017-18.

Community Development Lending

CNB has made a relatively high level of CD loans in the New York MD.

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

The level of CD lending in the New York MD is excellent. CNB made 12 CD loans in its AA for a total of \$133.6 million, which represents 14.3 percent of Tier 1 Capital. CD lending performance had a significantly positive impact on the Lending Test rating. The loans were responsive to credit and CD needs. The bank made two CD loans totaling \$53.0 million (40 percent) for community and health services targeting LMI individuals. The bank also made nine CD loans totaling \$40.6 million (30 percent) for the purpose of economic development, which is responsive to the identified needs for access to capital for small business and for small business assistance. Additionally, the bank made one CD loan totaling \$40.0 million (30 percent) for the primary purpose of neighborhood revitalization/stabilization.

Examples of CD loans in the AA include:

- \$50 million secured revolving line of credit represented the renewal of a \$13 million with an increase in the commitment amount. The facility is used to bridge temporary timing differences between collection of receivables and payment of expenses. Borrower is a non-profit

organization with the mission of providing comprehensive and affordable health care coverage for low-income individuals and families in New York.

- \$5 million revolving line of credit in a business development corporation (BDC). The proceeds are used to fund small business loans that are referred to the BDC by the member banks.
- \$3 million unsecured business line to a CDFI to make low-cost loans for renovation or expansion of community-based health centers in LMI areas in New York City.

Product Innovation and Flexibility

CNB makes no use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank did not offer innovative or flexible loan programs in the state of New York. The bank’s geographic and borrower performance indicate that the bank’s existing products effectively address community credit needs.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the New York MD is excellent. CNB has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

CNB exhibits good responsiveness to credit and community economic development needs. In terms of dollar volume, 99.7 percent of the bank’s investments and grants during the evaluation period were allocated to affordable housing, an identified need of the AA. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
New York MD	7	12,247	35	30,328	42	89.4	42,575	90.9	6	3,003
NY Statewide or Regional Area	5	4,237	0	0	5	10.6	4,237	9.1	3	2,269

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

During the evaluation period, the bank funded \$35.9 million in LIHTC that benefitted the AA and invested \$6.6 million in bonds secured by LMI housing loans in the Manhattan area. The bank also made grants totaling \$436,400 in the evaluation period and has unfunded and binding commitments totaling \$3 million to fund LIHTC projects and equity investments for economic development in the AA. Total investment activity in the AA represents 10.7 percent of allocated Tier 1 Capital based on the

AA’s share of bank deposits with 3.1 percent coming in the prior period and 7.6 percent invested in the current period.

Investments in the AA included a \$2 million bond purchase secured by an LMI housing project offering 1,520 units of affordable housing in Manhattan. Another \$11 million was invested in a LIHTC project consisting of 195 units of affordable housing and supportive housing for homeless seniors. An additional \$11 million funded a LIHTC project to construct a 116-unit multifamily affordable housing residence in the AA.

Consideration was also given to statewide and regional projects based on the bank’s Outstanding performance in the AA. The bank funded a total of \$4.2 million in LIHTC outside of its AA in the State of New York in the prior period and has a binding commitment to fund an additional \$2.3 million in LIHTC in future periods. This investment activity further supports the bank’s Investment Test performance in the state.

SERVICE TEST

Based on a full-scope review, the bank’s performance in New York is Low Satisfactory. The bank’s performance under the CD services had a positive impact on the overall rating.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the New York MD is adequate. The bank’s performance under the CD services had a positive impact on the overall rating.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution’s AA. Based on the Distribution of Branch Delivery Systems table below and performance context considerations, the bank’s retail service performance is adequate.

Distribution of Branch Delivery System as of December 31, 2018											
Assessment Area	Deposits	Branches – New York						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 MD	100.0	3	100.0	0.0	0.0	0.0	66.6	18.4	19.4	6.3	54.9

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

Distribution of Branch Openings/Closings (2016-2018)							
New York							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upper	NA
New York MD	1	0	0	0	0	+1	0

As of December 31, 2018, CNB operates three full-service branches and three full-service ATMs within the New York MD. Two of the branches are located in upper-income census tracts, and the third branch is in a census tract with no income designation. While the geographic distribution is significantly below current demographic data, one branch changed from a moderate-income census tract to one with no-designation. Another branch changed from no-designation to upper-income. As of the 2010 Census, the percentage of the population in low-, moderate-, middle-, upper-, and NA-census tracts was 7.1 percent, 28.6 percent, 31.1 percent, 32.9 percent, and 0.3 percent, respectively. The bank's branch distribution as of 2016, was 33.3 percent in moderate-income tracts, 33.3 percent in upper-income tracts, and 33.3 percent in tracts with unknown income and reflected very good distribution relative to the population. In addition, the branches are located in urban areas accessible to individuals of all income levels via public transit. When considering the significant demographic changes surrounding existing branch locations and previously good branch distribution, the overall branch distribution is adequate.

CNB's opening and closing of branches has not affected the accessibility of its delivery systems, particularly LMI geographies and/or to LMI individuals. During the assessment period, CNB opened one branch in June 2016 in an upper-income census tract. At the time of branch opening, the geographic distribution of existing branches was good and exceeded demographics for LMI areas. The bank did not close any branches during the assessment period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or individuals. Two branches are located in Midtown Manhattan and are accessible at the street-level. The third branch is located near the World Financial Center on an upper floor of an office building. The branches have standard business hours, open Monday through Thursday 8:30am to 5:00pm and Friday 8:30am to 6:00pm. In addition to traditional in-bank services, the bank offers alternative delivery systems and products. These include mobile banking, remote deposit capture, online banking, and bill-pay. No significant weight was placed on these alternative systems as no usage data was available.

Community Development Services

CNB provides a relatively high level of CD services in the New York MD AA given its limited geographical presence. During the review period, ten CNB employees provided CD services totaling

366 hours to five organizations. Three employees had leadership positions at community development organizations. Examples of service hours include the following:

- Serving as an advisor on a board for an organization which provides education in the arts for under-resourced schools and LMI communities.
- Service hours as a team leader for a national organization which combats homelessness through practical training and employment resources for achieving independence.
- Providing financial education at a sanctuary for families which focuses on LMI women.

The bank's performance under the CD services had a positive impact on the overall Service Test performance.

State Rating

State of Tennessee

CRA rating for the State of Tennessee: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Adequate level of lending activity;
- Good geographic distribution of loans;
- Good borrower distribution of loans;
- Adequate level of CD loans;
- Excellent level of CD investments that are responsive to AA needs;
- Retail delivery systems are accessible to geographies and individuals in the AA; and
- Limited level of CD services.

Description of Institution's Operations in Tennessee

CNB delineated one AA within Tennessee and includes the County of Davidson (Nashville MSA), which is part of the Nashville-Davidson—Murfreesboro--Franklin MSA. CNB had approximately \$367.6 million of deposits in Tennessee, representing 1.0 percent of total deposits and operates one branch within Tennessee, representing 1.0 percent of the bank's branches. The bank originated and purchased approximately \$94.2 million, or 2.4 percent of the total number of reported loans and CD loans during the evaluation period in Tennessee. The bank's primary loan products in Tennessee are home mortgage (42.9 percent of the number) and small loans to businesses (57.1 percent of the number).

According to the June 30, 2018 FDIC Summary of Deposit Report, CNB ranked 15 out of 33 FDIC-insured institutions in the Nashville MSA with a deposit market share of 1.03 percent. The top three depository institutions are Bank of America, NA; Pinnacle Bank; and Regions Bank with a combined deposit market share of 52.4 percent. In 2017, CNB ranked 113 of 556 in HMDA mortgages with 0.11 percent market share. The top five lenders, holding 22.3 percent market share, are Wells Fargo Bank, NA; SunTrust Mortgage; Franklin American Mortgage Co; Quicken Loans; and SWBC Mortgage Corp. In 2017, CNB ranked 23 out of 128 small business lenders with a 0.47 percent market share of small business loans. The top five small business lenders are American Express, FSB; Chase Bank USA, NA;

Bank of America, NA; Pinnacle Bank; and U.S. Bank, NA with a combined market share of 56.9 percent.

Demographic

The following table provides a summary of the demographic profile of the Nashville MSA by categorizing the AA characteristics into their respective census tracts based on income level. The table reflects a high level of LMI census tracts, which total 42 percent of the AA. The demographic data also reflects a low percentage of home ownership in LMI geographies compared to the population distribution in those areas.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	161	17.4	27.3	30.4	23.0	1.9
Population by Geography	658,506	14.1	28.0	33.2	24.4	0.2
Housing Units by Geography	290,647	13.8	27.2	33.1	25.9	0.0
Owner-Occupied Units by Geography	143,045	7.7	21.0	38.0	33.3	0.0
Occupied Rental Units by Geography	121,166	19.9	34.2	28.3	17.6	0.0
Vacant Units by Geography	26,436	19.6	28.3	28.3	23.7	0.0
Businesses by Geography	51,471	12.6	24.1	25.2	36.1	2.0
Farms by Geography	799	7.9	25.5	32.3	32.9	1.4
Family Distribution by Income Level	146,749	26.1	17.9	19.2	36.7	0.0
Household Distribution by Income Level	264,211	26.6	18.2	18.2	37.0	0.0
Median Family Income MSA - 34980 Nashville-Davidson--Murfreesboro--Franklin, TN MSA		\$66,404	Median Housing Value			\$201,214
			Median Gross Rent			\$887
			Families Below Poverty Level			13.8%
<i>Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Community Contacts

OCC reviewed one recent community contact to determine community credit needs and opportunities for financial institutions to help address these needs. The contact was a housing organization. The contact identified lending, services, and investments as needs. Opportunities for banks to address the needs include:

- Loans for rehabilitation of distressed housing properties and construction loans to develop affordable housing.
- Loans to construct community facilities.
- Loans for environmental clean-up or redevelopment of an industrial site.

- Technical assistance and financial services for organizations facilitating affordable housing construction, rehabilitation, or development and to organizations providing credit counseling and home buyer education.
- Investment in organizations or investment vehicles that lend or facilitate lending to promote community development.

Economic Data

Based on the April 2019 Moody's Analytics report, the Nashville MSA is one of the region's fastest-growing large economies. Job growth ranks fourth in southern areas with populations of 1 million or more, and jobs are expected to be added in the future. Businesses in the professional services, financial services, technology, and healthcare sectors will fuel mid- and high-wage job gains supporting continued office construction in the area. Tourism in the area will drive job gains in leisure/hospitality and construction. Increased tourism has prompted the construction of thousands of new hotel rooms and a \$1.2 billion expansion of the Nashville International Airport to accommodate more travelers. A tight labor market with only 2.5 percent unemployment in 2019 will slow the rapid growth of the leisure/hospitality industry, but growth is expected to outpace peers in the region.

The largest employers in the Nashville MSA are the Vanderbilt Medical Center, HCA, and Nissan North America. The healthcare management sector also makes up a significant portion of the other top employers in the area including Saint Thomas Health Services, Community Health Systems, and National Healthcare Corp. The unemployment rate has steadily declined between 2015 and 2018 from 4.5 to 2.7 percent. This has been accompanied by a steady increase in population growth of 1.8 percent per year during the same period. Median income has also increased during this period from \$56,900 to \$66,500 with average annual personal income growth of 5.9 percent.

Housing

The housing market is exceptionally strong. Housing prices have increased 32 percent between 2015 and 2018. Housing price appreciation has slowed over the last year as housing starts have increased due to a surge in multi-family building. The Census' 5-year (2013-2017) ACS statistics estimated an affordability ratio for the county of 3.4 compared to the State of Tennessee at 3.1 and the U.S. at 3.4. The affordability ratio measures homeownership opportunity by dividing the median value of owner-occupied housing by the median household income of the area. Home ownership levels in the AA represent 54 percent of the housing inventory compared to 66 percent for the State of Tennessee and 64 percent for the U.S. based on ACS data. Median rents suggest rental housing is affordable for low-income residents.

Scope of Evaluation in Tennessee

The Tennessee MSA is CNB's only AA in Tennessee and, therefore, it received a full-scope review. A limited portion of the bank's overall lending, investments, and services were conducted in the Tennessee

MSA; therefore, the performance in this AA received less weight in determining the bank’s overall CRA rating. The bank’s primary lending products in Tennessee are home mortgage and small loans to businesses.

The evaluation focused on HMDA lending, small business lending, CD loans, qualified investments, and retail and CD services. Loans reported pursuant to the HMDA and CRA data collection requirements for 2016-2018 were included in the review. The review included both loan originations and purchases. All peer aggregate lending data used in the analysis is from 2016-2017. Aggregate lending data for 2018 was not available. OCC considered information from recently completed community contacts in this AA.

Refer to the table in Appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TENNESSEE

LENDING TEST

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

Based on a full-scope review, the bank’s performance in the Nashville MSA AA is good.

Conclusions for Area Receiving a Full-Scope Review

Lending Activity

Lending levels reflect an adequate responsiveness to credit needs in its AAs taking into account the number and amount of home mortgage, small business, small farm, and community development relative to its capacity based on deposits, competition, and market presence. CNB has one location in Tennessee. Based on loan volumes, small business loans are higher by number, and home mortgages are higher by dollar. As such, each loan product was given equal weighting. The analysis focused on the bank’s activity in 2017 and 2018.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Nashville MSA	162	216	0	1	379	100.0	100.0

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

Dollar Volume of Loans (000's)*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Nashville MSA	69,736	22,479	0	2,000	94,215	100.0	100.0

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

The Nashville MSA is competitive for deposits and loans in which includes branches of national and regional banks, local community banks, credit unions, and other nonbank financial institutions. According to the FDIC Summary of Deposits Report as of June 30, 2018, there were 33 financial service providers with branches in the AA. CNB ranked 15th in deposits with a total of \$368 million with 1.03 percent of the market share. The three largest deposit competitors (Bank of America, NA; Pinnacle Bank; and Regions Bank) combined market share total 52.4 percent. As of year-end 2017, using home mortgage market share information based on a review of the 556 lenders with loans in the AA, CNB ranked 113th with less than one percent (0.11 percent) of the market share by number of home loans. The top five home mortgage originators/purchasers (Wells Fargo, NA; SunTrust Mortgage; Franklin American Mortgage; Quicken Loans; and SWBC Mortgage Corp) combined market share total 22.3 percent with individual percentages ranging from 3.0 to 8.2 percent.

CNB's small business lending activity is adequate given the institution's ranking and average loan size in comparison to the competition in the AA. CNB's market share percent is less than one percent (0.47 percent) and ranked 23rd with an average loan size of \$97 thousand. Of the 128 lenders in the AA, only 17 have market shares greater than one percent. The top five lenders are large institutions with a consolidated total of 56.9 percent and individual market shares ranging from 7.3 to 21.0 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its Nashville MSA.

Home Mortgage Loans

Based on the data in Table O, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation period in the Nashville MSA is excellent relative to area demographics and aggregate data. Refer to Table O in the State of Tennessee section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The bank's overall geographic distribution of home mortgage loans in the Nashville MSA is excellent. The bank's performance in both low-income and moderate-income census tracts is excellent. The proportion of home mortgage loans in low-income and moderate-income geographies significantly exceed the proportion of owner-occupied housing units and the aggregate distribution of loans. The percentage of owner-occupied homes in low-income census tracts represents 7.7 percent of the owner-occupied housing units in the AA by geography. The percentage of owner-occupied homes in moderate-income census tracts represents 21 percent of the owner-occupied housing units in the AA by geography. The bank's performance in 2016 was weaker than its performance in 2017-18.

Small Loans to Businesses

Based on the data in Table Q, the bank's overall geographic distribution of small loans to businesses in the Nashville MSA is adequate relative to area demographics and aggregate data. Refer to Table Q in the State of Tennessee section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The bank's overall geographic distribution of small loans to businesses in the Nashville MSA is good. The bank's lending activity in the low-income census tracts is excellent and exceeds area demographics and the aggregate indicator. The bank's lending activity in the moderate-income census tracts is very poor when considering both demographic and aggregate data. The bank's performance is significantly less than area demographics and the aggregate activity for lending in low-income census tracts. Based upon area geographic data, 24.1 percent of the businesses in the AA are in moderate-income census tracts. The majority of the businesses (36.1 percent) in the AA are in upper-income census tracts. The bank's performance in 2016 was similar to its performance in 2017-18.

Lending Gap Analysis

OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of loans of CNB's home mortgage and small business lending activity over the evaluation period. The analysis did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and businesses of different sizes given the product lines offered by the institution in its AAs.

Home Mortgage Loans

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

CNB's distribution of home mortgages to individuals of different income levels during the 2017-18 review period is good when considering the affordability of mortgages and competition in the Nashville MSA. The median family income was at \$66,404 with the median housing value at \$201,214. In addition, 13.8 percent of the families live below the poverty level and 26.1 percent of the families live at the low-income level. The bank exhibited good performance in relation to lending to moderate-income borrowers. The bank exhibited adequate performance in relation to lending to low-income borrowers.

The bank's proportion of home mortgage loans to low-income borrowers is below area demographic data but significantly exceeds aggregate data. The proportion of home mortgage loans to moderate-income borrowers is below area demographic data and the aggregate indicator. The bank's performance in 2016 was weaker than its performance in 2017-18.

Small Loans to Businesses

Based on the data in Table R, the distribution of the bank's originations and purchases of small loans to businesses by revenue is good. Refer to Table R in the State of Tennessee 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.

The bank exhibits good distribution of loans to business of different sizes in the Nashville MSA when considering aggregate data, demographic data, and the bank's market share for this product. The bank's percentage of loans originated or purchased to businesses with revenues of \$1 million or less significantly exceeds the aggregate indicator for small business lending activity in the AA. Based upon area geographic data, 37.4 percent of the bank's small loans to business are in low-income census tracts. This performance exceeds the area demographics and aggregate data for Tennessee. Approximately 12.3 percent of the bank's borrowers and 7.2 percent of businesses in the AA did not report revenue information which prevented the determination of the revenue category of all businesses. The bank's performance in 2016 was stronger than its performance in 2017-18.

Community Development Lending

CNB has made an adequate level of CD loans.

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

The level of CD lending in the Nashville MSA is good. CNB made one CD loan in its AA for a total of \$2.0 million, which represents 5.6 percent of Tier 1 Capital. CD lending performance had a positive impact on the Lending Test rating. The loan was responsive to the economic development needs in the AA. The CD loan was a revolving line of credit for \$2.0 million to a small business start-up located in a low-income census tract in Nashville. The purpose of the line was to expand the business and create new jobs for LMI individuals.

Product Innovation and Flexibility

CNB makes no use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank did not offer innovative or flexible loan programs in the state of Tennessee. The bank's geographic and borrower performance indicate the bank's existing products effectively address community credit needs.

INVESTMENT TEST

The bank’s performance under the Investment Test in Tennessee is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Nashville MSA is excellent. CNB has an excellent level of qualified CD investment and grants, particularly those that are not routinely provided by private investors, occasionally in a leadership position.

CNB exhibits excellent responsiveness to credit and community economic development needs. In terms of dollar volume, 97.7 percent of the bank’s investments and grants during the evaluation period were allocated to affordable housing, an identified need of the AA. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Nashville MSA	3	4,913	9	2,098	12	85.7	7,011	74.0	2	1,101
TN Statewide or Regional Area	2	2,464	0	0	2	14.3	2,464	26.0	2	1,117

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

During the evaluation period, the bank funded \$4.9 million in LIHTC that benefitted the AA and invested \$2.1 million in bonds used to fund LMI housing. The bank also made grants totaling \$20 thousand during the evaluation period and has an unfunded but binding commitment to advance an additional \$1.1 million in future periods to LIHTC funds. Total investment activity in the AA represents 19.6 percent of allocated Tier 1 Capital based on the AA’s share of bank deposits with 13.7 percent coming in the prior period and 5.9 percent invested in the current period.

One investment of note is a Federal National Mortgage Association (FNMA) Delegated Underwriting and Servicing (DUS) bond the bank funded that was used to fund a multi-family housing project providing 72 rental housing units for LMI individuals in the Nashville area.

Consideration was also given to statewide and regional projects based on the bank’s Outstanding performance in the AA. The bank invested \$2.5 million in communities outside of its AA in the State of Tennessee, including \$1.4 million to an SBIC and \$1.1 to a LIHTC fund. This investment activity further supports the bank’s Investment Test performance in the state.

SERVICE TEST

The bank’s performance under the Service Test in Tennessee is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Nashville MSA is good.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the institution's AA. Based on the Distribution of Branch Delivery Systems table below and performance context considerations, the bank's retail service performance is good.

Distribution of Branch Delivery System as of December 31, 2018											
Assessment Area	Deposits	Branches – Tennessee						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
Nashville MSA	100.0	1	100.0	100.0	0.0	0.0	0.0	14.1	28.0	33.2	24.4

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

Distribution of Branch Openings/Closings (2016-2018)							
Tennessee							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upper	NA
Nashville MSA	0	0	0	0	0	0	0

As of December 31, 2018, CNB operated one branch located in the Nashville MSA and no ATMs. The branch is located in a low-income census tract and is accessible to geographies and individuals of different income levels. As there is no ATM at this location, certain services are confined to branch operating hours.

There were no branch openings or closings in the AA throughout the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. The branch is open Monday through Thursday 9:00am to 4:00pm and Friday 9:00am to 5:00pm. In addition to traditional in-bank services, the bank offers alternative delivery systems and products. These include mobile banking, remote deposit capture, online banking, and bill-pay. No significant weight was placed on these alternative systems as no usage data was available.

Community Development Services

CNB provides a limited level of CD services in the Nashville MSA. During the assessment period, one employee provided six hours of financial education to an organization with a primary purpose of teaching financial literacy for LMI students. Three employees provided eight hours of financial education at a Title I elementary school.

State Rating

District of Columbia

CRA rating for the State of District of Columbia: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Adequate level of lending activity;
- Adequate geographic distribution of loans;
- Adequate borrower distribution of loans;
- Few, if any CD loans, which has a neutral impact on the Lending Test given that this is a new AA;
- Excellent level of CD investments that are responsive to AA needs;
- Retail delivery systems are accessible to geographies and individuals in the AA; and
- Relatively high level of CD services.

Description of Institution's Operations in District of Columbia

CNB delineated District of Columbia as its AA. The AA includes only District of Columbia County, which is part of the Washington-Arlington-Alexandria MD. CNB had approximately \$6.9 million of deposits in the District of Columbia, representing 0.02 percent of total deposits and operates one branch within the District of Columbia, representing 1.0 percent of the bank's branches. The bank originated and purchased approximately \$30.9 million, or 0.3 percent of total number of reported loans and CD loans during the evaluation period in the District of Columbia. The bank's primary loan products in the AA are home mortgage (44.4 percent) and small loans to businesses (55.6 percent).

According to the June 30, 2018 FDIC Summary of Deposit Report, CNB ranked 25 out of 30 FDIC-insured institutions in the District of Columbia with a deposit market share of 0.01 percent. The top three depository institutions are Bank of America, NA; Wells Fargo Bank, NA; and PNC Bank, NA with a combined deposit market share of 56.7 percent. In 2017, CNB ranked 177 of 396 in HMDA mortgages with 0.04 percent market share. The top five lenders, holding 30.3 percent market share, are Wells Fargo Bank, NA; SunTrust Mortgage; First Savings Mortgage Corp.; Caliber Home Loans; and JPMorgan Chase Bank, NA. In 2017, CNB ranked 47 out 107 small business lenders with a 0.07 percent market share of small business loans. The top five small business lenders are American Express, FSB; Chase

Bank USA, NA; Bank of America, NA; PNC Bank, NA; and Capital One Bank (USA), NA with a combined market share of 66.8 percent.

The following table provides a summary of the demographic profile of the District of Columbia by categorizing the AA characteristics into their respective census tracts based on income level. The table reflects a high level of LMI census tracts, which total 48 percent of the AA. The demographic data also reflects a very low percentage of home ownership in low-income geographies compared to the population distribution in those areas.

Table A - Demographic Information of the Assessment Area						
Assessment Area: District of Columbia 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	179	32.4	16.2	16.8	30.7	3.9
Population by Geography	647,484	30.6	14.6	17.0	33.9	4.0
Housing Units by Geography	303,312	28.9	13.2	16.9	38.3	2.7
Owner-Occupied Units by Geography	112,750	17.3	15.6	20.6	45.2	1.4
Occupied Rental Units by Geography	160,640	35.4	11.6	14.8	34.5	3.7
Vacant Units by Geography	29,922	37.7	13.0	14.1	33.1	2.0
Businesses by Geography	61,023	11.3	21.1	14.9	48.4	4.3
Farms by Geography	342	15.8	14.0	19.3	48.2	2.6
Family Distribution by Income Level	118,737	35.7	14.1	14.1	36.1	0.0
Household Distribution by Income Level	273,390	35.6	15.5	15.3	33.6	0.0
Median Family Income MSA - 47894 Washington-Arlington-Alexandria, DC- VA-MD-WV MD		\$106,762	Median Housing Value			\$497,077
			Median Gross Rent			\$1,381
			Families Below Poverty Level			14.3%
<i>Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (* The NA category consists of geographies that have not been assigned an income classification.</i>						

Community Contacts

Comments were provided by nine community organizations during an Interagency CRA Listening Session hosted by the OCC, FDIC, and the Richmond Federal Reserve. The attendees included representatives of housing organizations, community service organizations, economic development organizations, and housing and consumer protection advocates. The representatives identified affordable housing and access to capital for business as critical needs. Opportunities for banks to address the needs include:

- Small business loans other than credit card loans.
- Small business education and fair access to credit for minority-owned businesses.
- Subsidies in addition to capital to support affordable housing development.
- More HUD housing counselors.

- Access to credit.
- Programs that transition from renting to owning.
- Grant support for nonprofits.
- Housing and re-entry programs for folks coming out of prison.
- More access to banking services.
- Revamping small business and expanding minority- and women-owned small businesses.

Economic Data

Based on the May 2019 Moody's Analytics report, the District of Columbia is in late stage expansion and job growth is slowing. Most jobs have been added in either the low-wage leisure/hospitality and education/healthcare industries or in high-wage business/professional services and information tied to federal government spending. Growth can be expected in upcoming quarters from the effects of the Amazon headquarters opening nearby in Virginia and the \$500 million per year in funding dedicated to improving the Metro system in the area.

The largest employers in the District of Columbia are MedStar Health, Marriott International, and Inova Health System. The unemployment rate has declined from 6.9 percent in 2015 to 5.6 percent in 2018. Population growth has averaged 1.3 percent per year during this same time. Personal income growth has increased at an average of 4.1 percent per year from 2015-2018.

Housing

The District of Columbia market has a shortage of affordable housing as its single-family market is one of the most overpriced in the nation. These home prices are not likely to soften as high earning households tied to Amazon's move into the community. The Census' 5-year (2013-2017) ACS statistics estimated an affordability ratio for the District of Columbia is 6.9 compared to the U.S. at 3.4. The affordability ratio measures homeownership opportunity by dividing the median value of owner-occupied housing by the median household income of the area. Home ownership levels in 42 percent of the housing inventory compared to 64 percent for the U.S. based on ACS data. Median rent levels suggest rental housing is not affordable for low-income residents in the AA.

Scope of Evaluation in District of Columbia

The District of Columbia is an individual ratings area and, therefore, it received a full-scope review. This is a new AA for the bank. A limited portion of the bank's overall lending, investments, and services were conducted in the District of Columbia; therefore, the performance in this AA received less weight in determining the bank's overall CRA rating. The District of Columbia accounts for 0.3 percent of the total number of loans and 0.02 percent of total deposits. The bank's primary lending products in the AA are home mortgage and small loans to businesses.

The evaluation focused on HMDA lending, small business lending, CD loans, qualified investments, and retail and CD services. Loans reported pursuant to the HMDA and CRA data collection requirements for 2016-2018 were included in the review. The review included both loan originations and purchases. All peer aggregate lending data used in the analysis is from 2016-2017. Aggregate lending data for 2018 was not available. OCC considered information from recently completed community contacts in this AA.

Refer to the table in Appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN DISTRICT OF COLUMBIA

LENDING TEST

The bank's performance under the Lending Test in District of Columbia is rated Low Satisfactory.

Based on a full-scope review, the bank's performance in the District of Columbia is adequate.

Conclusions for Area Receiving a Full-Scope Review

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs in its AAs taking into account the number and amount of home mortgage, small business, small farm, and CD loans relative to its capacity based on deposits, competition, and market presence. CNB has one location in the District of Columbia. Based on loan volumes, small business loans are higher by number and home mortgages are higher by dollar. As such, each loan product is given equal weighting. The analysis focused on the bank's activity in 2018. The bank did not have branch operations in the AA until 2018.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
District of Columbia	24	30	0	0	54	100.0	100.0

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

Dollar Volume of Loans (000's)*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
District of Columbia	24,287	6,501	0	0	30,788	100.0	100.0

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

There is strong competition for deposits and loans in this well-established market. The banking industry is highly competitive in this market and includes branches of national and regional banks, local community banks, credit unions, and other nonbank financial institutions. According to the FDIC Summary of Deposits Report as of June 30, 2018, there were 30 financial service providers with branches in the AA. CNB ranked 25th in deposits with a total of \$6.9 million with less than one percent

(0.01 percent) of the market share. The three largest deposit competitors (Bank of America, NA; Wells Fargo, NA; and PNC Bank, NA) combined market share total 56.7. As of year-end 2017, using home mortgage market share information based on a review of the 396 lenders with loans in the AA, CNB ranked 177th with less than one percent (0.04 percent) of the market share by number of home loans. The top three home mortgage originators/purchasers (Wells Fargo, NA; SunTrust Mortgage; and First Savings Mortgage) have a combined market share only total 21.9 percent with individual percentages ranging from 4.6 to 12.3 percent due to the competitiveness of the market.

CNB's small business lending activity is adequate given the institution's ranking and average loan size in comparison to the competition in the AA. CNB's market share percentage is less than one percent (0.07 percent) and ranked 47th with an average loan size of \$261 thousand. Of the 107 lenders in the AA, only 13 have market shares greater than one percent. The top five lenders are large institutions with a consolidated total of 66.8 percent and individual market shares ranging from 6.5 to 34.1 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in the District of Columbia.

Home Mortgage Loans

Based on the data in Table O, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation period in the District of Columbia is poor relative to area demographics and aggregate data. Refer to Table O in the District of Columbia section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The bank's overall geographic distribution of home mortgage loans in the District of Columbia is poor. The bank's performance in low-income census and moderate-income census tracts is poor. This performance is well below the area demographics and aggregate data for the District of Columbia. Home ownership is limited in the low-income census tracts. Based upon a review of all housing units in the District of Columbia, 53 percent are rental units. The percentage of owner-occupied homes in low-income census tracts represents 17.3 percent of the owner-occupied housing units in the AA by geography. The percentage of owner-occupied homes in moderate-income census tracts represents 15.6 percent of the owner-occupied housing units in the AA by geography. Based upon a review of rental units, 35.4 percent are in low-income census tracts. In addition, 37.7 percent of vacant units by geography are in low-income census tracts.

Small Loans to Businesses

Based on the data in Table Q, the bank's overall geographic distribution of small loans to businesses in the District of Columbia is adequate relative to area demographics and aggregate data. Refer to Table Q

in the District of Columbia section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The bank's overall geographic distribution of small loans to businesses in the District of Columbia is adequate. The bank's lending activity in low-income census tracts poor. Based upon area geographic data, 4.3 percent of the bank's small loans to business are in low-income census tracts. This performance is well below the area demographics and aggregate data for the District of Columbia. The bank's lending activity in low-income census tracts is adequate given limited opportunities to lend to small businesses in low-income census tracts and the high level of competition. Only 11.3 percent of the businesses in the District of Columbia are in low-income census tracts. The bank's lending activity in moderate-income census tracts is good. Based upon area geographic data, 21.1 percent of the bank's small loans to business are in moderate-income census tracts. This performance is comparable to both area demographics and aggregate data.

Lending Gap Analysis

OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of loans of CNB's home mortgage and small business lending activity over the evaluation period. The analysis did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and businesses of different sizes given the product lines offered by the institution in its AAs.

Home Mortgage Loans

Based on the data in Table P, the bank's overall borrower distribution of home mortgage loan originations and purchases for the evaluation period is adequate. Refer to Table P in the District of Columbia 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.

CNB's distribution of home mortgages to individuals of different income levels during the 2017-18 review period is adequate when considering the affordability of mortgages and competition in the District of Columbia. The bank exhibited adequate performance in lending to low-income borrowers. The bank exhibited poor performance in relation to lending to moderate-income borrowers. The relative high housing costs and lack of sufficient down payment assistance programs in the AA negatively impacts LMI borrowers' abilities to qualify for a home mortgage. This analysis considers the relatively high housing costs compared to LMI family incomes in the AA. It would be difficult to afford a mortgage at both the low-income and the moderate-income levels. The median family income was \$107,000 with the median housing value at \$497,000. In addition, 14.3 percent of the families live below the poverty level, and 35.7 percent of the families live at the low-income level with annual

income of \$53,800 or less. Approximately 14.1 percent of the families live at the moderate-income level with annual income between \$53,800 and \$86,080. The bank's proportion of home mortgage loans to low-income borrowers is below area demographic data but is comparable to aggregate data. The proportion of home mortgage loans to moderate-income borrowers is below both the moderate-income family demographic and aggregate data.

Small Loans to Businesses

Based on the data in Table R, the distribution of the bank's originations and purchases of small loans to businesses by revenue is adequate. Refer to Table R in the District of Columbia 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.

The bank exhibits an adequate distribution of loans to business of different sizes in the District of Columbia when considering aggregate data, demographic data, and the bank's market share for this product. The proportion of small loans to businesses with revenues of \$1 million or less is lower than the proportion of businesses with revenues less than a \$1 million in the AA. Unreported revenue information adversely impacted this analysis. Approximately 15.6 percent of the bank's small business borrowers in the AA did not report revenue information which prevented the inclusion of these loans in this analysis.

Community Development Lending

CNB has made few, if any CD loans in the District of Columbia.

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

CNB did not grant any CD loans in the District of Columbia during the evaluation period. Given that CNB has only maintained branch operations since February 2018, the lack of CD lending does not negatively impact the overall lending test performance.

Product Innovation and Flexibility

CNB makes no use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank did not offer innovative or flexible loan programs in the District of Columbia. The bank's geographic and borrower performance indicate the bank's existing products adequately address community credit needs.

INVESTMENT TEST

The bank's performance under the Investment Test in the District of Columbia is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review the bank's performance in the District of Columbia AA is excellent.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
District of Columbia	0	0	13	1,355	13	100	1,355	100	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

CNB has an excellent level of qualified CD investment and grants, particularly those that are not routinely provided by private investors, occasionally in a leadership position. CNB exhibits excellent responsiveness to credit and community economic development needs. In terms of dollar volume, 97.7 percent of the bank's investments and grants during the evaluation period were allocated to affordable housing, an identified need of the AA. CNB makes occasional use of innovative and/or complex investments to support CD initiatives.

During the evaluation period, the bank funded \$1.3 million in a LIHTC fund. The bank also made 12 grants totaling \$42 thousand. The bank's current period investment and grant activity equaled 200.7 percent of allocated Tier 1 Capital based on the AA's share of bank deposits. The bank's single investment is \$1.3 million in LIHTC used to fund the new construction of 42 units of LMI housing with 39 units set aside for tenants transitioning from homelessness.

SERVICE TEST

The bank's performance under the Service Test in District of Columbia is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the District of Columbia AA is good.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the institution's AA. Based on the Distribution of Branch Delivery Systems table below and performance context considerations, the bank's retail service performance is good.

Distribution of Branch Delivery System as of December 31, 2018											
Assessment Area	Deposits	Branches – District of Columbia						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
District of Columbia	100.0	1	100.0	0.0	100.0	0.0	0.0	30.6	14.6	17.0	33.9

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

Distribution of Branch Openings/Closings (2016-2018)							
District of Columbia							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upper	NA
District of Columbia	1	0	0	+1	0	0	0

As of December 31, 2018, CNB operated one full-service branch with one full-service ATM in the District of Columbia. The branch is located in a moderate-income census tract. The branch distribution in moderate-income geographies significantly exceeds the percent of the population in moderate-income census tracts. The branch distribution is good compared to demographic information and considering the bank's limited presence in the AA.

The bank opened the District of Columbia branch in February 2018 during this assessment period. The opening of this branch has improved the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. There were no branch closings in the AA.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. The branch has standard business hours, open Monday through Friday 8:30am to 5:00pm. The ATM is accessible 24-hours. In addition to traditional in-bank services, the bank offers alternative delivery systems and products. These include mobile banking, remote deposit capture, online banking, and bill-pay. No significant weight was placed on these alternative systems as no usage data was available.

Community Development Services

CNB provides a relatively high level of CD services considering the limited presence in the AA during this assessment period. Since the branch opened in 2018, two bank employees provided 61 hours for community service organizations. A bank employee served on the board of an organization with over 30 programs targeted to LMI individuals. Another employee taught business skills and financial education for a program targeted to schools with LMI students.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	01/01/16 to 12/31/18	
Bank Products Reviewed:	Home mortgage, small business Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
California		
Los Angeles-Long Beach CSA	Full-scope	Counties of Los Angeles, Orange, Riverside, San Bernardino, and Ventura
San Jose-San Francisco-Oakland CSA	Full-scope	Counties of Alameda, Contra Costa, San Francisco, San Mateo, and Santa Clara
San Diego-Carlsbad MSA	Limited-scope	County of San Diego
City of Santa Barbara	Limited-scope	City of Santa Barbara
Georgia		
Atlanta-Sandy Springs-Roswell MSA	Full-scope	Counties of DeKalb and Fulton
Minnesota		
Minneapolis-St Paul-Bloomington MSA	Full-scope	County of Hennepin
Nevada		
Reno-Carson City-Fernley CSA	Full-scope	Counties of Douglas, Washoe and Carson City
Las Vegas-Henderson-Paradise MSA	Limited-scope	County of Clark
New York		
New York-Jersey City-White Plains MD	Full-scope	County of New York
Tennessee		
Nashville-Davidson--Murfreesboro--Franklin MSA	Full-scope	County of Davidson
District of Columbia		
District of Columbia	Full-scope	District of Columbia

Appendix B: Summary of MMSA and State Ratings

RATINGS City National Bank				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
City National Bank	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
MMSA or State:				
California	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Georgia	High Satisfactory	Outstanding	Needs to Improve	Satisfactory
Minnesota	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Nevada	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory
New York	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Tennessee	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
District of Columbia	Low Satisfactory	Outstanding	High Satisfactory	Satisfactory

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always

equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

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

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

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

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

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

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

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

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

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

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

employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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

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

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

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

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

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

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased loans are treated the same as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,

and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography –** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower -** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2017-18		
Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing	% Bank Loans	Aggregate	% of Owner-Occupied Housing	% Bank Loans	Aggregate	% of Owner-Occupied Housing	% Bank Loans	Aggregate	% of Owner-Occupied Housing	% Bank Loans	Aggregate	
Los Angeles - Long Beach CSA	3,267	3,506,278	79.9	2.6	1.8	2.8	18.6	15.8	19.2	30.8	10.4	31.9	47.9	72.0	45.9	0.1	0.1	0.3	
San Jose - San Francisco - Oakland CSA	563	379,745	13.8	4.7	11.5	6.1	16.6	32.3	19.1	34.4	16.2	35.6	44.2	40.0	39.0	0.1	0.0	0.2	
San Diego - Carlsbad MSA	246	251,579	6.0	2.8	6.5	3.5	15.1	35.0	16.4	35.5	11.8	35.7	46.6	46.7	44.3	0.0	0.0	0.0	
City of Santa Barbara	15	29,422	0.3	0.0	0.0	0.8	9.9	26.7	14.1	11.3	6.7	13.0	78.8	66.7	72.1	0.0	0.0	0.0	
Total	4,091	4,167,024	100.0	3.1	3.4	3.6	17.6	19.2	18.8	32.1	11.3	33.1	47.1	66.0	44.3	0.1	0.1	0.2	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																2016		
	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing	% Bank Loans	Aggregate	% of Owner-Occupied Housing	% Bank Loans	Aggregate	% of Owner-Occupied Housing	% Bank Loans	Aggregate	% of Owner-Occupied Housing	% Bank Loans	Aggregate
Los Angeles - Long Beach CSA	1,147	1,458,506	83.7	2.5	0.4	2.2	18.5	2.6	16.5	32.4	10.5	32.4	46.6	86.5	48.8	0.0	0.0	0.1
San Jose - San Francisco - Oakland CSA	121	144,023	8.8	4.8	4.1	5.1	15.5	4.1	15.8	38.7	19.8	39.8	41.0	71.9	39.3	0.0	0.0	0.0
San Diego - Carlsbad MSA	91	181,378	6.6	3.3	15.4	3.2	14.3	13.2	13.2	38.8	16.5	38.1	43.6	54.9	45.5	0.0	0.0	0.0
City of Santa Barbara	12	46,680	0.9	0.5	0.0	1.8	8.9	0.0	11.0	16.8	25.0	17.1	73.8	75.0	70.1	0.0	0.0	0.0
Total	1,371	1,830,587	100.0	3.1	1.8	3.0	17.3	3.4	15.9	34.5	11.8	34.9	45.1	83.0	46.1	0.0	0.0	0.1

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2017-18		
Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	% Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	
Los Angeles - Long Beach CSA	3,267	3,506,278	79.9	23.9	0.9	2.4	16.5	3.1	8.0	17.6	6.5	17.6	42.0	70.5	56.9	0.0	19.0	15.2	
San Jose - San Francisco - Oakland CSA	563	379,745	13.8	24.3	3.2	3.3	15.8	8.0	9.9	18.2	17.2	18.7	41.7	59.1	57.4	0.0	12.4	10.7	
San Diego - Carlsbad MSA	246	251,579	6.0	23.6	6.5	2.4	16.9	8.1	8.6	17.8	7.7	20.3	41.7	58.9	55.2	0.0	18.7	13.5	
City of Santa Barbara	15	29,422	0.3	17.3	0.0	1.5	13.8	0.0	3.3	16.8	0.0	8.5	52.1	66.7	74.7	0.0	33.3	12.0	
Total	4,091	4,167,024	100.0	23.9	1.6	2.6	16.4	4.1	8.5	17.8	8.0	18.2	42.0	68.2	56.9	0.0	18.2	13.9	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																2016		
Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	% Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate
Los Angeles - Long Beach CSA	1,147	1,458,506	83.7	23.0	0.2	1.9	16.9	0.6	7.3	18.6	1.4	16.7	41.4	82.4	57.3	0.0	15.4	16.9
San Jose - San Francisco - Oakland CSA	121	144,023	8.8	23.4	0.8	2.4	16.3	0.0	9.2	19.0	5.0	18.6	41.3	82.6	58.9	0.0	11.6	11.0
San Diego - Carlsbad MSA	91	181,378	6.6	22.4	0.0	1.5	17.6	1.1	6.3	18.7	3.3	17.5	41.3	52.7	55.9	0.0	42.9	18.8
City of Santa Barbara	12	46,680	0.9	17.7	0.0	1.5	13.9	0.0	3.7	16.3	0.0	10.2	52.1	75.0	72.4	0.0	25.0	12.1
Total	1,371	1,830,587	100.0	23.0	0.2	1.9	16.8	0.6	7.6	18.7	1.8	17.2	41.5	80.4	57.6	0.0	17.0	15.7

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2017-18	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Los Angeles - Long Beach CSA	4,410	909,741	84.5	535,254	4.9	4.3	4.5	20.5	15.5	20.2	27.7	21.0	27.7	45.4	56.1	46.4	1.6	3.1	1.2
San Jose - San Francisco - Oakland CSA	505	140,761	9.7	180,285	10.1	19.4	9.3	17.5	23.2	17.9	30.5	27.3	31.9	41.3	29.5	40.5	0.6	0.6	0.5
San Diego - Carlsbad MSA	299	82,353	5.7	90,218	5.5	5.7	4.7	15.2	9.4	14.4	35.1	29.8	34.9	44.0	55.2	45.9	0.2	0.0	0.1
City of Santa Barbara	7	3,048	0.1	5,666	1.0	0.0	0.7	32.8	0.0	34.9	12.5	0.0	11.3	52.9	100.0	52.2	0.8	0.0	0.9
Total	5,221	1,135,903	100.0	811,423	6.2	5.8	5.6	19.3	15.9	19.1	29.1	22.1	29.3	44.3	53.5	45.0	1.2	2.6	0.9

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2016	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Los Angeles - Long Beach CSA	1,919	463,178	84.1	668,237	5.6	5.4	4.6	20.7	15.4	18.9	29.3	21.5	28.7	43.4	56.3	47.1	1.0	1.4	0.7
San Jose - San Francisco - Oakland CSA	219	72,802	9.6	251,563	11.5	24.7	8.8	16.6	17.4	16.7	32.7	29.7	34.9	39.1	28.3	39.6	0.1	0.0	0.0
San Diego - Carlsbad MSA	137	35,889	6.0	123,509	5.7	3.7	4.4	15.5	12.4	14.1	35.2	37.2	34.4	43.3	46.7	47.1	0.2	0.0	0.1
City of Santa Barbara	7	3,845	0.3	7,790	16.8	0.0	12.1	21.0	28.6	19.8	14.6	14.3	14.4	46.7	57.1	52.5	0.9	0.0	1.1
Total	2,282	575,714	100.0	1,051,099	7.1	7.1	5.7	19.1	15.5	17.8	30.7	23.2	30.8	42.2	53.1	45.3	0.6	1.2	0.4

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Business	% Bank Loans	
Los Angeles - Long Beach CSA	4,410	909,741	84.5	535,254	86.6	37.3	52.6	5.8	51.7	7.6	11.0	
San Jose - San Francisco - Oakland CSA	505	140,761	9.7	180,285	85.4	29.1	53.7	6.1	60.6	8.4	10.3	
San Diego - Carlsbad MSA	299	82,353	5.7	90,218	87.4	28.4	51.3	5.2	60.5	7.4	11.0	
City of Santa Barbara	7	3,048	0.1	5,666	85.4	42.9	49.5	6.1	42.9	8.5	33.3	
Total	5,221	1,135,903	100.0	811,423	86.4	36.0	52.7	5.8	53.0	7.8	11.0	
<i>Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>												

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016	
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	% Business	% Bank Loans	
Los Angeles - Long Beach CSA	1,919	463,178	84.1	668,237	86.6	30.0	44.2	5.9	51.7	7.5	18.3	
San Jose - San Francisco - Oakland CSA	219	72,802	9.6	251,563	85.6	26.0	38.8	6.3	58.9	8.1	15.1	
San Diego - Carlsbad MSA	137	35,889	6.0	123,509	87.6	17.5	42.1	5.1	71.5	7.2	10.9	
City of Santa Barbara	7	3,845	0.3	7,790	85.1	57.1	41.0	6.2	28.6	8.7	14.3	
Total	2,282	575,714	100.0	1,051,099	86.5	28.9	42.6	5.9	53.5	7.6	17.6	
<i>Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>												

GEORGIA

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2017-18		
Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
Atlanta-Sandy Springs-Alpharetta MSA	89	36,779	100.0	7.0	13.5	7.0	22.3	42.7	21.0	18.4	9.0	18.0	52.2	34.8	53.9	0.1	0.0	0.1	
Total	89	36,779	100.0	7.0	13.5	7.0	22.3	42.7	21.0	18.4	9.0	18.0	52.2	34.8	53.9	0.1	0.0	0.1	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2016		
Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
Atlanta-Sandy Springs-Alpharetta MSA	5	8,318	100.0	7.1	0.0	4.6	19.7	20.0	16.1	26.4	0.0	23.6	46.8	80.0	55.7	0.0	0.0	0.0	
Total	5	8,318	100.0	7.1	0.0	4.6	19.7	20.0	16.1	26.4	0.0	23.6	46.8	80.0	55.7	0.0	0.0	0.0	

*Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2017-18		
Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
#	\$	% of Total	% Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate		
Atlanta-Sandy Springs-Alpharetta MSA	89	36,779	100.0	25.1	5.6	4.2	15.2	21.3	12.6	15.3	18.0	16.8	44.3	39.3	50.6	0.0	15.7	15.8	
Total	89	36,779	100.0	25.1	5.6	4.2	15.2	21.3	12.6	15.3	18.0	16.8	44.3	39.3	50.6	0.0	15.7	15.8	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2016		
Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
#	\$	% of Total	% Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate		
Atlanta-Sandy Springs-Alpharetta MSA	5	8,318	100.0	24.9	0.0	3.7	15.7	0.0	10.3	16.4	0.0	15.1	42.9	80.0	53.5	0.0	20.0	17.5	
Total	5	8,318	100.0	24.9	0.0	3.7	15.7	0.0	10.3	16.4	0.0	15.1	42.9	80.0	53.5	0.0	20.0	17.5	

*Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																	2017-18		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Atlanta-Sandy Springs-Alpharetta MSA	31	6,603	100.0	52,036	8.9	3.2	6.9	20.2	9.7	17.6	15.1	12.9	12.9	54.2	54.8	61.6	1.5	19.4	1.0
Total	31	6,603	100.0	52,036	8.9	3.2	6.9	20.2	9.7	17.6	15.1	12.9	12.9	54.2	54.8	61.6	1.5	19.4	1.0

*Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																	2016		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Atlanta-Sandy Springs-Alpharetta MSA	14	3,256	100.0	54,027	8.3	0.0	6.1	19.3	42.9	15.6	23.7	14.3	20.8	48.6	42.9	57.5	0.1	0.0	0.0
Total	14	3,256	100.0	54,027	8.3	0.0	6.1	19.3	42.9	15.6	23.7	14.3	20.8	48.6	42.9	57.5	0.1	0.0	0.0

*Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Business	% Bank Loans	
Atlanta-Sandy Springs-Alpharetta MSA	31	6,603	100.0	52,036	86.1	51.6	53.3	5.3	32.3	8.6	38.5	
Total	31	6,603	100.0	52,036	86.1	51.6	53.3	5.3	32.3	8.6	38.5	

*Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016	
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	% Business	% Bank Loans	
Atlanta-Sandy Springs-Alpharetta MSA	14	3,256	100.0	54,027	85.6	57.1	50.6	5.6	21.4	8.8	21.4	
Total	14	3,256	100.0	54,027	85.6	57.1	50.6	5.6	21.4	8.8	21.4	

*Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

MINNESOTA

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2017-18		
Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
#	\$	% of Total	% 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		
Minneapolis-St Paul - Bloomington MSA	140	33,239	100.0	3.5	6.4	4.9	15.5	30.0	17.2	42.0	32.1	42.1	38.8	31.4	35.6	0.2	0.0	0.3	
Total	140	33,239	100.0	3.5	6.4	4.9	15.5	30.0	17.2	42.0	32.1	42.1	38.8	31.4	35.6	0.2	0.0	0.3	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2017-18		
Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
#	\$	% of Total	% Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate		
Minneapolis-St Paul - Bloomington MSA	140	33,239	100.0	21.8	14.3	8.5	16.3	39.3	20.1	20.0	16.4	20.5	41.8	20.0	34.7	0.0	10.0	16.2	
Total	140	33,239	100.0	21.8	14.3	8.5	16.3	39.3	20.1	20.0	16.4	20.5	41.8	20.0	34.7	0.0	10.0	16.2	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																	2017-18		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Minneapolis-St Paul - Bloomington MSA	6	2,841	100.0	29,012	7.0	0.0	6.4	15.5	0.0	14.7	41.8	83.3	41.5	35.0	16.7	36.9	0.7	0.0	0.4
Total	6	2,841	100.0	29,012	7.0	0.0	6.4	15.5	0.0	14.7	41.8	83.3	41.5	35.0	16.7	36.9	0.7	0.0	0.4

*Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2017-18	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Business	% Bank Loans		
Minneapolis-St Paul - Bloomington MSA	6	2,841	100.0	29,012	82.8	40.0	55.8	7.9	50.0	9.3	20.0		
Total	6	2,841	100.0	29,012	82.8	40.0	55.8	7.9	50.0	9.3	20.0		

*Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

NEVADA

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2017-18		
Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
#	\$	% of Total	% 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		
Reno - Carson City - Fernley CSA	95	32,513	34.5	2.1	2.1	2.0	13.0	26.3	10.1	43.2	22.1	45.6	41.5	49.5	42.0	0.3	0.0	0.2	
Las Vegas - Henderson - Paradise MSA	180	93,073	65.5	1.9	1.1	1.1	16.9	22.8	12.4	41.7	26.1	43.7	39.5	50.0	42.6	0.0	0.0	0.1	
Total	275	125,586	100.0	2.0	1.5	1.3	15.9	24.0	12.0	42.1	24.7	44.1	40.0	49.8	42.5	0.1	0.0	0.1	

*Source: 2015 ACS Census 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2016		
Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
#	\$	% of Total	% 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		
Reno - Carson City - Fernley CSA	9	3,691	31.0	2.7	0.0	1.5	14.6	0.0	10.7	42.5	11.1	43.5	40.2	88.9	44.3	0.0	0.0	0.0	
Las Vegas - Henderson - Paradise MSA	20	16,475	69.0	1.7	0.0	0.9	15.5	0.0	9.0	45.7	25.0	45.1	37.1	75.0	45.0	0.0	0.0	0.0	
Total	29	20,166	100.0	2.0	0.0	1.0	15.3	0.0	9.4	44.9	20.7	44.8	37.8	79.3	44.9	0.0	0.0	0.0	

*Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2017-18		
	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	% Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	
Reno - Carson City - Fernley CSA	95	32,513	34.5	20.8	0.0	3.8	17.2	16.8	13.1	20.7	11.6	22.5	41.3	55.8	45.6	0.0	15.8	15.0	
Las Vegas - Henderson - Paradise MSA	180	93,073	65.5	20.7	3.9	3.7	18.4	23.9	15.0	20.5	8.3	21.4	40.5	38.3	38.5	0.0	25.6	21.4	
Total	275	125,586	100.0	20.7	3.5	3.7	18.1	21.5	14.6	20.6	9.5	21.6	40.6	44.4	40.0	0.0	22.2	20.1	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2016		
	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	% Families	% Bank Loans	Aggregate	% of Households	% Bank Loans	Aggregate	% of Households	% Bank Loans	Aggregate	% of Households	% Bank Loans	Aggregate	% of Households	% Bank Loans	Aggregate	
Reno - Carson City - Fernley CSA	9	3,691	31.0	20.5	0.0	3.8	17.5	0.0	14.0	20.4	11.1	22.3	41.5	77.8	42.6	0.0	11.1	17.3	
Las Vegas - Henderson - Paradise MSA	20	16,475	69.0	20.1	0.0	3.7	18.0	0.0	14.1	22.0	0.0	19.6	39.9	90.0	37.2	0.0	10.0	25.4	
Total	29	20,166	100.0	20.2	0.0	3.7	17.9	0.0	14.1	21.7	3.4	20.2	40.2	86.2	38.4	0.0	10.3	23.6	

*Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2016		
	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	% Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	
Reno - Carson City - Fernley CSA	9	3,691	31.0	20.5	0.0	3.8	17.5	0.0	14.0	20.4	11.1	22.3	41.5	77.8	42.6	0.0	11.1	17.3	
Las Vegas - Henderson - Paradise MSA	20	16,475	69.0	20.1	0.0	3.7	18.0	0.0	14.1	22.0	0.0	19.6	39.9	90.0	37.2	0.0	10.0	25.4	
Total	29	20,166	100.0	20.2	0.0	3.7	17.9	0.0	14.1	21.7	3.4	20.2	40.2	86.2	38.4	0.0	10.3	23.6	

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2017-18	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Reno - Carson City - Fernley CSA	117	19,644	38.1	13,410	6.9	4.3	5.8	23.4	15.4	21.3	29.6	28.2	29.4	35.8	48.7	40.5	4.3	3.4	3.0
Las Vegas - Henderson - Paradise MSA	190	45,665	61.9	43,273	3.8	7.9	2.9	22.4	15.8	19.2	38.2	50.5	38.1	35.0	25.8	39.4	0.7	0.0	0.4
Total	307	65,309	100.0	56,683	4.6	6.5	3.6	22.6	15.6	19.7	36.1	42.0	36.1	35.2	34.5	39.6	1.5	1.3	1.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2016	
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
Reno - Carson City - Fernley CSA	46	7,982	39.7	19,925	8.1	2.2	4.8	24.3	2.2	18.8	32.6	47.8	31.3	31.1	39.1	42.9	3.9	8.7	2.1
Las Vegas - Henderson - Paradise MSA	70	17,948	60.3	47,832	5.1	8.6	2.9	21.0	12.9	16.3	42.4	52.9	42.0	31.5	25.7	38.9	0.0	0.0	0.0
Total	116	25,930	100.0	67,757	5.8	6.0	3.5	21.9	8.6	17.0	39.9	50.9	38.8	31.4	31.0	40.1	1.0	3.4	0.6

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Reno - Carson City - Fernley CSA	117	19,644	38.1	13,410	81.0	30.8	49.8	6.8	57.3	12.2	12.0	
Las Vegas - Henderson - Paradise MSA	190	45,665	61.9	43,273	84.3	34.2	50.4	5.5	57.9	10.1	7.9	
Total	307	65,309	100.0	56,683	83.5	32.9	50.3	5.8	57.7	10.6	9.4	

*Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016	
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	
Reno - Carson City - Fernley CSA	46	7,982	39.7	19,925	80.5	32.6	40.2	7.1	50.0	12.3	17.4	
Las Vegas - Henderson - Paradise MSA	70	17,948	60.3	47,832	83.1	32.9	45.4	6.1	48.6	10.8	18.6	
Total	116	25,930	100.0	67,757	82.4	32.8	43.9	6.4	49.1	11.2	18.1	

*Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

NEW YORK

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2017-18		
Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
New York - Jersey City-White Plains MD	187	402,345	100.0	3.0	1.6	3.1	6.8	3.2	7.8	5.1	3.7	5.0	84.0	90.9	83.2	1.1	0.5	0.8	
Total	187	402,345	100.0	3.0	1.6	3.1	6.8	3.2	7.8	5.1	3.7	5.0	84.0	90.9	83.2	1.1	0.5	0.8	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2016		
Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
New York - Jersey City-White Plains MD	99	200,331	100.0	2.1	0.0	3.5	9.7	6.1	9.4	6.4	2.0	6.9	81.8	91.9	80.1	0.0	0.0	0.1	
Total	99	200,331	100.0	2.1	0.0	3.5	9.7	6.1	9.4	6.4	2.0	6.9	81.8	91.9	80.1	0.0	0.0	0.1	

*Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2017-18		
Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
#	\$	% of Total	% Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate		
New York - Jersey City-White Plains MD	187	402,345	100.0	26.7	0.0	0.3	11.5	0.5	1.2	10.6	2.1	5.8	51.1	72.2	80.5	0.0	25.1	12.2	
Total	187	402,345	100.0	26.7	0.0	0.3	11.5	0.5	1.2	10.6	2.1	5.8	51.1	72.2	80.5	0.0	25.1	12.2	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2016		
Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
#	\$	% of Total	% Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate		
New York - Jersey City-White Plains MD	99	200,331	100.0	27.9	0.0	0.3	12.6	0.0	1.2	11.4	1.0	5.5	48.1	83.8	80.1	0.0	15.2	13.0	
Total	99	200,331	100.0	27.9	0.0	0.3	12.6	0.0	1.2	11.4	1.0	5.5	48.1	83.8	80.1	0.0	15.2	13.0	

*Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																	2017-18		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
New York -Jersey City-White Plains MD	334	78,511	100.0	86,794	5.8	0.9	5.1	6.3	1.2	5.9	3.1	0.0	3.2	78.6	85.9	81.0	6.3	12.0	4.9
Total	334	78,511	100.0	86,794	5.8	0.9	5.1	6.3	1.2	5.9	3.1	0.0	3.2	78.6	85.9	81.0	6.3	12.0	4.9

*Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																	2016		
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	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
New York -Jersey City-White Plains MD	217	57,400	100.0	85,909	5.8	3.7	4.8	9.6	4.6	8.9	6.4	5.1	7.0	71.8	72.8	73.0	6.5	13.8	6.3
Total	217	57,400	100.0	85,909	5.8	3.7	4.8	9.6	4.6	8.9	6.4	5.1	7.0	71.8	72.8	73.0	6.5	13.8	6.3

*Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
New York -Jersey City-White Plains MD	334	78,511	100.0	86,794	79.8	38.3	46.3	11.4	52.4	8.8	9.3	
Total	334	78,511	100.0	86,794	79.8	38.3	46.3	11.4	52.4	8.8	9.3	

*Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016	
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	% Business	% Bank Loans	
New York -Jersey City-White Plains MD	217	57,400	100.0	85,909	79.2	36.4	39.9	11.9	50.7	8.9	12.9	
Total	217	57,400	100.0	85,909	79.2	36.4	39.9	11.9	50.7	8.9	12.9	

*Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

TENNESSEE

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2017-18		
Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
#	\$	% of Total	% 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		
Nashville - Davidson - Murfreesboro MSA	141	57,639	100.0	7.7	16.3	11.1	21.0	34.0	21.6	38.0	14.2	38.2	33.3	35.5	29.1	0.0	0.0	0.0	
Total	141	57,639	100.0	7.7	16.3	11.1	21.0	34.0	21.6	38.0	14.2	38.2	33.3	35.5	29.1	0.0	0.0	0.0	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2016		
Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
#	\$	% of Total	% 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		
Nashville - Davidson - Murfreesboro MSA	21	12,097	100.0	8.4	4.8	9.3	18.2	4.8	18.9	38.7	23.8	35.8	34.7	66.7	36.0	0.0	0.0	0.0	
Total	21	12,097	100.0	8.4	4.8	9.3	18.2	4.8	18.9	38.7	23.8	35.8	34.7	66.7	36.0	0.0	0.0	0.0	

*Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2017-18		
Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
#	\$	% of Total	% Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate		
Nashville - Davidson - Murfreesboro MSA	141	57,639	100.0	26.1	6.4	5.2	17.9	12.8	17.7	19.2	10.6	20.2	36.7	58.9	39.9	0.0	11.3	16.9	
Total	141	57,639	100.0	26.1	6.4	5.2	17.9	12.8	17.7	19.2	10.6	20.2	36.7	58.9	39.9	0.0	11.3	16.9	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2016		
Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
#	\$	% of Total	% Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate		
Nashville - Davidson - Murfreesboro MSA	21	12,097	100.0	25.7	0.0	5.5	18.4	0.0	17.2	20.2	0.0	18.5	35.7	66.7	40.1	0.0	33.3	18.7	
Total	21	12,097	100.0	25.7	0.0	5.5	18.4	0.0	17.2	20.2	0.0	18.5	35.7	66.7	40.1	0.0	33.3	18.7	

*Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-18**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Nashville - Davidson - Murfreesboro MSA	139	16,657	100.0	15,064	12.6	37.4	13.5	24.1	6.5	24.9	25.2	3.6	22.9	36.1	52.5	37.1	2.0	0.0	1.6
Total	139	16,657	100.0	15,064	12.6	37.4	13.5	24.1	6.5	24.9	25.2	3.6	22.9	36.1	52.5	37.1	2.0	0.0	1.6

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2016**

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
Nashville - Davidson - Murfreesboro MSA	77	5,822	100.0	16,137	13.8	70.1	14.5	22.0	2.6	23.6	25.5	0.0	21.6	36.8	27.3	38.8	1.9	0.0	1.5
Total	77	5,822	100.0	16,137	13.8	70.1	14.5	22.0	2.6	23.6	25.5	0.0	21.6	36.8	27.3	38.8	1.9	0.0	1.5

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Nashville - Davidson - Murfreesboro MSA	139	16,657	100.0	15,064	80.7	65.5	51.4	7.0	27.3	12.3	7.2	
Total	139	16,657	100.0	15,064	80.7	65.5	51.4	7.0	27.3	12.3	7.2	

*Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016	
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	% Business	% Bank Loans	
Nashville - Davidson - Murfreesboro MSA	77	5,822	100.0	16,137	79.9	74.0	45.6	7.4	19.5	12.7	6.5	
Total	77	5,822	100.0	16,137	79.9	74.0	45.6	7.4	19.5	12.7	6.5	

*Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

DISTRICT OF COLUMBIA

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2017-18		
Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
#	\$	% of Total	% 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		
District of Columbia	24	24,287	100.0	17.3	8.3	21.7	15.6	4.2	17.4	20.6	16.7	21.7	45.2	70.8	37.1	1.4	0.0	2.1	
Total	24	24,287	100.0	17.3	8.3	21.7	15.6	4.2	17.4	20.6	16.7	21.7	45.2	70.8	37.1	1.4	0.0	2.1	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2017-18		
Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
#	\$	% of Total	% Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate		
District of Columbia	24	24,287	100.0	35.7	4.2	6.1	14.1	4.2	14.4	14.1	4.2	20.9	36.1	79.2	45.6	0.0	8.3	13.0	
Total	24	24,287	100.0	35.7	4.2	6.1	14.1	4.2	14.4	14.1	4.2	20.9	36.1	79.2	45.6	0.0	8.3	13.0	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2017-18		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
District of Columbia	30	6,501	100.0	15,647	11.3	3.3	9.5	21.1	20.0	21.5	14.9	3.3	14.8	48.4	66.7	51.6	4.3	6.7	2.6	
Total	30	6,501	100.0	15,647	11.3	3.3	9.5	21.1	20.0	21.5	14.9	3.3	14.8	48.4	66.7	51.6	4.3	6.7	2.6	

*Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2017-18	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
District of Columbia	30	6,501	100.0	15,647	75.6	40.0	50.9	8.9	56.7	15.6	5.3		
Total	30	6,501	100.0	15,647	75.6	40.0	50.9	8.9	56.7	15.6	5.3		

*Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*