



PUBLIC DISCLOSURE

December 3, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

National Bank of New York City
Charter Number 15070

136-29 38th Avenue
Flushing, NY 11354

Office of the Comptroller of the Currency

340 Madison Avenue
New York, NY 10173

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: This institution is rated **Satisfactory**.

The Lending Test is rated: Satisfactory.

- The loan-to-deposit ratio is more than reasonable.
- A majority of loans, by number and dollar volume, are originated or purchased inside the assessment area (AA).
- The distribution of loans to businesses with gross annual revenue below \$1 million is reasonable.
- The distribution of home mortgage loans and small loans to businesses across geographies of different income levels, including low- and moderate-income (LMI) census tracts, is reasonable.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: 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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

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

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, home equity 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 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), loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/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. 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 it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

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.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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.

Rated Area: A rated area is a state or multi-state metropolitan 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 area, the institution will receive a rating for the multi-state metropolitan 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 One 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.

Description of Institution

National Bank of New York City (NBNYC or bank) was founded in 1963 and is headquartered in Flushing, New York (NY). The bank is a single state institution and is not a subsidiary of a holding company. As of December 31, 2017, the end date of this performance evaluation (PE), NBNYC had \$229.3 million in total assets, \$201.2 million in loans, and \$164.1 million in deposits.

NBNYC is a commercial bank that focuses on originating commercial real estate (CRE) loans, investor-owned real estate (IORR) loans secured by one- to four-family properties, and other loans to small businesses. The bank's net loans and leases represent 87.36 percent of average assets. The bulk of the bank's loan portfolio is CRE loans at \$172 million, or 85 percent of total loans. Total IORR loans is \$27 million or 13 percent of total loans, and total commercial and industrial loans is \$2.33 million or 1.16 percent of total loans. The bank's total tier one capital is \$42.3 million.

NBNYC has one AA, which includes all of Queens, Kings, and New York Counties in NY. The bank has one branch, located at its headquarters, and no ATMs. The bank faces significant competition from banks in its market area, including large national financial institutions. Based on the Federal Deposit Insurance Corporation's June 2017 Deposit Market Share Report, NBNYC's deposit base represents 0.01 percent of the AA market share. The bank's major competitors are JPMorgan Chase, Bank of America, Citibank, The Bank of New York Mellon, HSBC Bank, Goldman Sachs Bank, and TD Bank. Those banks alone represent 66 percent of the deposit market share for the AA.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA. The bank received a Satisfactory rating on its prior CRA PE dated September 9, 2013.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated the bank using the small bank performance criteria, which consists of a lending test. The evaluation period for the lending test is January 1, 2015 through December 31, 2017. Due to changes in census data effective in 2017, we evaluated the bank's 2017 lending performance separately from the bank's 2015 and 2016 lending performance. To evaluate the bank's lending performance, we reviewed home mortgage loans and small loans to businesses originated or purchased during the review period.

Selection of Areas for Full-Scope Review

The bank defines its AA as Queens, Kings, and New York Counties in NY. We completed a full-scope review for the bank's one AA. The counties are contiguous and are all part of the New York-Jersey City-White Plains NY-NJ Metropolitan Division (MD 35614). NBNYC's AA remains unchanged from its previous CRA evaluation. The AA complies with the CRA guidelines and does not arbitrarily exclude LMI geographies.

Ratings

NBNYC's overall rating is based on the full-scope review of its single AA.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any 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 Consumer Financial Protection Bureau, as applicable.

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

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

Conclusions with Respect to Performance Tests

LENDING TEST

The bank's performance under the lending test is satisfactory.

Loan-to-Deposit Ratio

NBNYC's loan-to-deposit ratio is more than reasonable. The bank's average loan-to-deposit ratio over the 18 quarters since the prior CRA evaluation was 121.68 percent. During this period, NBNYC's performance ranged from a low of 110.19 percent on June 30, 2014 to a high of 135.29 percent on December 31, 2016.

NBNYC's average loan-to-deposit ratio of 121.68 compares favorably in relation to that of peer banks. We selected a peer sample of five other financial institutions of similar size, location, and product offerings. The loan-to deposit ratio for the other five banks over the same 18 quarters averaged 79.27 percent and ranged from a low of 56.11 percent to a high of 117.50 percent.

Lending in Assessment Area

Based on the data in Table D below, we concluded the inside/outside ratio of the bank's originations and purchases of loans is reasonable and meets the standard for satisfactory performance. By number and dollar amount, a majority of the loan originations and purchases were inside the bank's AA. Table D below details the bank's lending activities inside and outside of its AA by number and dollar volume of loans.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total	Dollar Amount of Loans \$(000s)				Total
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	27	77.1	8	22.9	35	26,709	86.7	4,112	13.3	30,821
Small Business	25	62.5	15	37.5	40	15,179	62.9	8,948	37.1	24,127
Total	52	69.3	23	30.7	75	41,888	76.2	13,060	23.8	54,948

*Source: 1/1/2015-12/31/2017 Bank Data
Due to rounding, totals may not equal 100.0*

Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

Home Mortgage Loans

We did not analyze the bank's home mortgage loan lending performance with respect to lending to borrowers of different incomes as these loans were made to businesses and not natural persons.

Small Loans to Businesses

Based on the data in Tables R 2015-16 and 2017 located in Appendix C, we concluded the distribution of the bank's originations and purchases of small loans to businesses by revenue is reasonable.

For 2015 and 2016, the distribution of the bank's small loans to businesses by revenue is excellent. The proportion of bank loans to businesses with revenues under \$1 million was stronger than the proportion of small businesses, and significantly stronger than the aggregate distribution of loans to those businesses.

For 2017, the distribution of the bank's small loans to businesses by revenue is reasonable. The proportion of bank loans to businesses with revenues under \$1 million was weaker than the proportion of small businesses, and stronger than the aggregate distribution of loans to those businesses.

Geographic Distribution of Loans

Home Mortgage Loans

Based on the data in Tables O 2015-16 and 2017 located in Appendix C, we concluded the geographic distribution of the bank's home mortgage loan originations and purchases is excellent.

For 2015 and 2016, the distribution of the bank's home mortgage loans in LMI geographies is excellent. The proportion of bank loans to borrowers in low-income tracts was stronger than the proportion of owner-occupied housing units in low-income geographies. The proportion of bank loans to borrowers in moderate-income tracts was stronger than the proportion of owner-occupied housing units in moderate-income geographies. The bank's home mortgage lending was stronger than the aggregate distribution of loans in low-income geographies, and stronger than the aggregate distribution of loans in moderate-income geographies.

For 2017, the distribution of the bank's home mortgage loans in LMI geographies is excellent. The proportion of bank loans to borrowers in low-income tracts was stronger than the proportion of owner-occupied housing units in low-income geographies. The proportion of bank loans to borrowers in moderate-income tracts was stronger than the proportion of owner-occupied housing units in moderate-income geographies. The bank's home mortgage lending was stronger than the aggregate distribution of loans in

low-income geographies, and stronger than the aggregate distribution of loans in moderate-income geographies.

Our review of the geographic distribution of loans did not detect any conspicuous or unexplained gaps in the bank's lending patterns.

Small Loans to Businesses

Based on the data in Tables Q 2015-16 and 2017 located in Appendix C, and the following performance context considerations, we concluded the geographic distribution of the bank's originations and purchases of small loans to businesses is reasonable.

For 2015 and 2016, the distribution of the bank's small loans to businesses in LMI geographies is reasonable. The proportion of bank loans to businesses in low-income tracts was weaker than the proportion of businesses in low-income geographies. The proportion of bank loans to businesses in moderate-income tracts was stronger than the proportion of businesses in moderate-income geographies. The bank's small business lending was weaker than the aggregate distribution of loans in low-income geographies, and stronger than the aggregate distribution of loans in moderate-income geographies.

For 2017, the distribution of the bank's small loans to businesses in LMI geographies is poor. The proportion of bank loans to businesses in low-income tracts was weaker than the proportion of businesses in low-income geographies. The proportion of bank loans to businesses in moderate-income tracts was weaker than the proportion of businesses in moderate-income geographies. The bank's small business lending was weaker than the aggregate distribution of loans in low-income geographies and weaker than the aggregate distribution of loans in moderate-income geographies. The bank did not originate any small loans to businesses in LMI geographies in 2017. Although the bank's performance in 2017 was poor, the bank is a small lender in a highly competitive financial services market.

Responses to Complaints

NBNYC did not receive any complaints related to CRA during the evaluation period.

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 metropolitan and nonmetropolitan areas 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	Lending Test : 01/01/15 to 12/31/17	
Financial Institution		Products Reviewed
National Bank of New York City (NBNYC) Flushing, NY		Home Mortgage Loans Small Loans to Businesses
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	N/A	N/A
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
New York New York-Jersey City-White Plains, NY-NJ MD (35614)	Full-Scope	Queens, Kings, and New York Counties Please see Appendix B for additional information.

Appendix B: Community Profiles for Full-Scope Areas

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2017 NBNYC AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,718	10.7	29.5	31.4	25.2	3.3
Population by Geography	6,525,905	14.4	32.0	27.1	26.2	0.3
Housing Units by Geography	2,723,760	12.7	28.6	25.3	33.1	0.3
Owner-Occupied Units by Geography	785,357	3.9	20.7	34.5	40.6	0.2
Occupied Rental Units by Geography	1,677,492	17.4	32.8	21.7	27.8	0.4
Vacant Units by Geography	260,911	9.3	25.1	20.8	44.3	0.4
Businesses by Geography	443,639	8.7	20.6	20.1	47.4	3.3
Farms by Geography	2,050	6.4	18.5	23.5	49.9	1.8
Family Distribution by Income Level	1,423,260	30.4	16.1	15.8	37.8	0.0
Household Distribution by Income Level	2,462,849	30.0	14.3	15.4	40.4	0.0
Median Family Income MSA - 35614 New York-Jersey City-White Plains, NY-NJ MD		\$72,047	Median Housing Value			\$593,392
			Median Gross Rent			\$1,417
			Families Below Poverty Level			15.7%
<i>Source: 2015 ACS Census and 2017 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>						

NBNYC's AA includes all of Queens (Queens), Kings (Brooklyn), and New York (Manhattan) Counties in NY. The counties are contiguous and are all part of the New York-Jersey City-White Plains NY-NJ MD (35614) located in the New York-Newark-Jersey City, NY-NJ-PA Metropolitan Statistical Area (MSA 35620).

There are 1,718 census tracts in the bank's AA. The census tracts consist of 184 low-income tracts, 506 moderate-income tracts, 539 middle-income tracts, 433 upper-income tracts, and 56 that have not been assigned an income classification. The total population of the AA is 6,525,905, which includes 2,462,849 households and 1,423,260 of families. Of this population, 939,730 people (14.4 percent) reside in low-income geographies, 2,088,290 (32 percent) reside in moderate-income geographies, 1,768,520 (27.1 percent) reside in middle-income geographies, 1,709,788 (26.2 percent) reside in upper-income geographies, and 19,577 (0.3 percent) reside in geographies where income data was no available.

The median family income is \$72,047. Family distribution by income level is as follows: 30.4 percent are low-income, 16.1 percent are moderate-income, 15.8 percent are middle-income, and 37.8 percent are upper-income. Families below poverty level is 15.7 percent. The median housing value in this AA is \$593,392. This high median housing value constrains lending opportunities to LMI borrowers, as the proportion of properties affordable to LMI borrowers is

limited. The maximum income level for low-income borrowers is under \$37 thousand, making the median housing value greater than 16 times over the maximum low-income level. The maximum income level for moderate-income borrowers is under \$59 thousand making the median housing value greater than 10 times over the maximum moderate-income level.

During the last CRA evaluation in 2013, the AA experienced job losses but had seen a gradual return from the recession, mirroring state and national trends. Growth in employment in the AA following the turnaround, and especially from 2012 to 2013, was seen in Leisure and Hospitality, Education and Health Services, and Professional and Business Services. Job growth in the MSA as of August 2018 is meaningfully below the national pace for the first time in a decade. Recent softness has been concentrated in construction as building slows following a multi-year condominium boom; retail and public sector payrolls have slumped as well. However, the healthcare, education, and tourism industries remain solid contributors. While the MSA's financial condition is not in immediate danger, job and income growth are expected to disappoint relative to the U.S. and the Northeast.¹

The New York City unemployment rate, which stood at 8.7 percent as of July 2013, has fallen to 4.5 percent, which is equivalent to the unemployment rate in 2008, prior to the recession. The unemployment rate has continued to decline in the three boroughs that form the AA. In the borough of Queens (Queens County), the rate declined from 7.7 percent in July 2013 to 3.4 percent as December 31, 2017; in the borough of Brooklyn (Kings County), the rate has declined from 9.6 percent in July 2013 to 4.0 percent as of December 31, 2017; and in the borough of Manhattan (New York County), the rate declined from 7.2 percent in July 2013 to 3.5 percent as of December 31, 2017. In the MSA, a similar improvement was observed, with the unemployment rate of 8.0 percent as of August 2013 declining to a low of 4.0 percent as of year-end 2017, falling below the previous low of 5.3 percent in 2008.²

New York City's housing market is slowing in the AA, and transaction volume declined for four straight quarters as of August 2018; condominium prices are falling, and rental concessions are increasing. With more construction still planned, downward price pressures are expected to intensify and keep multifamily depressed on the heels of the worst 12-month period since 2014.³

During the evaluation, we contacted a community organization that empowers workers living in poverty to find and keep jobs through work-readiness, placement, and retention programs in NBNYC's AA. The organization indicated that affordable housing and living wage jobs are priorities for this region. The contact also indicated that the organization does receive outreach by local financial institutions in the form of grant money as well as financial literacy and career success workshops. However, local financial institutions could provide further assistance via increased investment in affordable housing and also job training programs that are more focused on the more vulnerable members of the community instead of the institutions' hiring needs.

¹ Source: Moody's Analytics

² Source: All unemployment rates are from the U.S. Bureau of Labor Statistics.

³ Source: Moody's Analytics

Appendix C: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas 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 Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Deposit data is compiled by the FDIC and is 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 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 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) throughout those geographies. Because small business data is 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 Revenues – Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. The table also presents aggregate peer data for the years the data is available.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2015-16**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
2015-2016 NBNYC AA	21	21,227	100.0	59,875	3.8	23.8	4.8	21.7	52.4	21.2	35.9	19	32.5	38.7	4.8	41.5	0.0	0.0	0.1
Total	21	21,227	100.0	59,875	3.8	23.8	4.8	21.7	52.4	21.2	35.9	19	32.5	38.7	4.8	41.5	0.0	0.0	0.1

Source: 2010 U.S. Census; 1/1/2015-12/31/2016 Bank Data; 2016 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
2017 NBNYC AA	6	7,271	100.0	55,334	3.9	16.7	5.5	20.7	66.7	21.1	34.5	0.0	31.7	40.6	16.7	41.4	0.2	0.0	0.2
Total	6	7,271	100.0	55,334	3.9	16.7	5.5	20.7	66.7	21.1	34.5	0.0	31.7	40.6	16.7	41.4	0.2	0.0	0.2

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2015-16**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
2015-2016 NBNYC AA	16	10,855	100.0	212,510	8.4	6.3	9.7	22.4	43.8	22.8	22.5	31.3	23.8	43.1	18.8	40.5	3.6	0.0	3.3
Total	16	10,855	100.0	212,510	8.4	6.3	9.7	22.4	43.8	22.8	22.5	31.3	23.8	43.1	18.8	40.5	3.6	0.0	3.3

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data.
 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**

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
2017 NBNYC AA	9	4,324	100.0	214,245	8.7	0.0	10.7	20.6	0.0	20.9	20.1	66.7	20.0	47.4	33.3	45.8	3.3	0.0	2.6
Total	9	4,324	100.0	214,245	8.7	0.0	10.7	20.6	0.0	20.9	20.1	66.7	20.0	47.4	33.3	45.8	3.3	0.0	2.6

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2015-16**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= IMM			Businesses with Revenues > IMM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
2015-2016 NBNYC AA	16	10,855	100.0	212,510	85.2	93.8	42.5	7.9	6.2	6.9	0.0
Total	16	10,855	100.0	212,510	85.2	93.8	42.5	7.9	6.2	6.9	0.0

*Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= IMM			Businesses with Revenues > IMM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
2017 NBNYC AA	9	4,324	100.0	214,245	85.5	66.7	49.7	7.8	33.3	6.8	0.0
Total	9	4,324	100.0	214,245	85.5	66.7	49.7	7.8	33.3	6.8	0.0

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