

PUBLIC VOLUME

STREAMLINED BUSINESS COMBINATION APPLICATION

to the

OFFICE OF THE COMPTROLLER OF THE CURRENCY

by

CITIZENS BANK, NATIONAL ASSOCIATION

for the purchase and assumption of certain assets and liabilities from
HSBC BANK USA, NATIONAL ASSOCIATION AND HSBC SECURITIES (USA) INC.

June 21, 2021

STREAMLINED BUSINESS COMBINATION APPLICATION

Checklist

Authority To File a Streamlined Submission

Check the following to certify the appropriateness of a streamlined submission. [NOTE: One or more must be checked to qualify for a streamlined submission. Otherwise, a complete "Interagency Bank Merger Act Application" is required.]

- ☐ 1. The transaction is a business combination between eligible banks, or between an eligible bank and an eligible depository institution, that are controlled by the same holding company, or that will be controlled by the same holding company prior to the combination.
- ☐ 2. The transaction is a business combination between an eligible bank and an interim bank chartered in a transaction in which a person or group of persons exchanges its shares of the eligible bank for shares of a newly formed holding company and receives after the transaction substantially the same proportional share interest in the holding company as it held in the eligible bank (except for changes in interests resulting from the exercise of dissenters' rights), and the reorganization involves no other transactions involving the bank.
- ☐ 3. At least one party to the transaction is an eligible bank, and all other parties to the transaction are eligible banks or eligible depository institutions, the resultant national bank will be well capitalized immediately following consummation of the transaction, and the total assets of the target institutions combined are no more than 50 percent of the total assets of the acquiring bank, as reported in each institution's Consolidated Report of Condition and Income filed for the quarter immediately preceding the filing of the application.
- ☒ 4. The acquiring bank is an eligible bank, the target is not an eligible bank or an eligible depository institution, the resultant national bank will be well capitalized immediately following consummation of the transaction, and the applicants in a prefiling communication request and obtain approval from the appropriate district office to use the streamlined application.¹
- ☒ 5. The acquiring bank is an eligible bank, the target bank is not an eligible bank or an eligible depository institution, the resultant bank will be well capitalized immediately following consummation of the transaction, and the total assets acquired do not exceed 10 percent of the total assets of the acquiring national bank, as reported in each institution's Consolidated Report of Condition and Income filed for the quarter immediately preceding the filing of the application.

Checklist of Attached Information

- ☒ Format of Submission
 - ☒ Complete paper submission or electronic transmittal (via email)

¹ Approval of the use of the streamlined process by the district office under standard 4 may not be used for a transaction that exceeds the size test in standard 3.

- _____ Combination paper and compact disk (CD) submission along with (1) a cover letter identifying the filer, the filing, the filename on the CD, and the word processing program used; and (2) any original page(s) of the application or attachments requiring signatures.
- ✓ Request for confidentiality, if applicable
- N/A Other corporate requests
- N/A Filing fee

Specific Information for Streamlined Application (as appropriate)

- ✓ Copy of the following documents:
 - ✓ Draft or, if available, executed merger or transaction agreement, including any amendments
 - ✓ Any board of directors' resolutions related to the transaction
 - N/A Interim charter's Articles of Association, names of organizers, and related documents, if applicable
- Financial information as of the end of the most recent quarter for the applicant, target, and resultant institution:
 - ✓ Balance sheet
 - ✓ Regulatory capital schedule
- _____ Confirmation of the public notice publication, including a statement containing the name and address of the newspaper in which the notice was published and dates of publication.
- ✓ Merger Screen for combinations where the acquiring national bank and target depository institution compete in any relevant geographic banking market.

Desired Action Date: November 15, 2021

STREAMLINED BUSINESS COMBINATION APPLICATION

Check all that apply:

Type of Filing

- ☐ Affiliate/Business Reorganization
☐ Combination with Interim
Depository Institution
☒ Nonaffiliate Combination
☐ Other _____

Form of Transaction

- ☐ Merger
☐ Consolidation
☒ Purchase and Assumption
☐ Purchase of Assets Only
☐ Other _____

Filed Pursuant To

- ☒ 12 USC 1828(c)
☐ 12 USC 1815(a)
☐ 12 USC 215, 215a
☐ 12 USC 215a-1
☐ 12 USC 215a-3
☐ 12 USC 215c
☐ Other

APPLICANT DEPOSITORY INSTITUTION

Citizens Bank, National Association 24571 (OCC Charter Number)
Name Charter/Docket Number

One Citizens Plaza

Street

Providence Rhode Island 02903
City State Zip Code

TARGET INSTITUTION

HSBC Bank USA, National Association 24522 (OCC Charter Number)
Name Charter/Docket Number

1800 Tysons Boulevard

Street

Tysons Virginia 22102
City State Zip Code

RESULTANT INSTITUTION (IF DIFFERENT THAN APPLICANT)

N/A

Name Charter/Docket Number

Street

City State ZIP Code

CONTACT PERSON

Gregory J. Lyons Partner, Debevoise & Plimpton LLP
Name Title/Employer

919 Third Avenue

Street

New York New York 10022
City State Zip Code

(212) 909-6566

Telephone Number

Fax Number

STREAMLINED BUSINESS COMBINATION APPLICATION

Overview

On May 26, 2021, Citizens Bank, National Association (“CBNA”), HSBC Bank USA, National Association (“HSBC”) and HSBC Securities (USA) Inc. (“HSI”) entered into a Purchase and Assumption Agreement (the “Agreement”) for the assumption of liabilities (including deposits) and acquisition of certain assets (including branches) relating to HSBC’s United States east coast branch operations and national online deposit business (the “Transaction”). Among other things, pursuant to the terms and conditions of the Agreement, CBNA agreed to assume aggregate deposit liabilities of approximately \$9.0 billion, acquire approximately \$2.2 billion in loans, acquire or lease 80 branch facilities of HSBC in the District of Columbia, Florida, Maryland, New Jersey, New York, and Pennsylvania (the “Branches”), and acquire ATM machines throughout these areas. The Branches will be re-branded as branches of CBNA immediately upon closing of the transaction. The Agreement also provides for CBNA’s acquisition of a related component of HSI’s retail wealth management business (the “Wealth Management Business”), which is expected to be transferred directly from HSI to CBNA’s wholly-owned direct financial subsidiary, Citizens Securities, Inc. (“CSI”).

I. Eligibility for OCC Streamlined Business Combination Application

OCC regulations provide that a filer may qualify for a streamlined business combination application if: (1) the acquiring bank is an “eligible bank,” (2) the target bank or savings association is not an eligible bank, (3) the resulting bank will be “well capitalized” immediately following consummation of the transaction, and (4) the total assets acquired do not exceed 10 percent of the total assets of the acquiring national bank, as reported in each institution’s Consolidated Report of Condition and Income (“Call Report”) filed for the quarter immediately preceding the filing of the application. 12 CFR § 5.33(j)(1)(iii).

Thus, for the reasons outlined below, and as previously confirmed by the OCC, CBNA qualifies for the streamlined business combination application.

1. As previously discussed with the OCC, CBNA qualifies as an “eligible bank” as such term is defined in 12 CFR § 5.3.
2. For the purposes of determining CBNA’s ability to utilize the streamlined business combination application process, we assume that HSBC is not an “eligible bank.”
3. Upon consummation of the Transaction, CBNA will continue to be “well capitalized.”
4. According to CBNA’s March 31, 2021 Call Report, CBNA had total assets of approximately \$187.182 billion. Upon closing, the assets being acquired are expected to have an estimated value of approximately \$2.2 billion, which is far less than the 10% threshold.

II. Closing; Closing Conditions

The Transaction is subject to the receipt of all required regulatory approvals and the satisfaction of certain customary closing conditions. The Agreement reflects a proposed closing date of the later to occur of (x) the Friday that is after the twentieth business day following the satisfaction or waiver of the conditions set forth in Article X of the Agreement (excluding any such conditions

that by their nature are to be satisfied at the closing, but subject to the satisfaction or waiver of such conditions) and (y) January 14, 2022, or such other date as CBNA and HSBC may agree in writing.

III. Permissibility and Implications of Transfer of Wealth Management Business to CSI

The Wealth Management Business to be transferred to CSI consists of standard brokerage and investment management-based retail wealth management businesses of the same nature as that in which CSI is currently authorized to engage in its capacity as a registered broker-dealer and investment advisor. The Wealth Management Business does not involve any institutional business, such as market making or underwriting. As such, CSI's acquisition of the Wealth Management Business is permissible under current CSI authority and would not result in any material changes to CSI's operations.

Although CSI is a "financial subsidiary" of CBNA, the transfer of the Wealth Management Business to CSI by CBNA does not have implications under the Federal Reserve Board's regulations governing transactions with affiliates. See 12 CFR part 223 ("Regulation W"). For the purposes of Regulation W, the term "financial subsidiary" expressly excludes any subsidiary of a member bank that is considered a financial subsidiary—as opposed to an operating subsidiary—solely because the subsidiary engages in the sale of insurance as agent or broker in a manner that is not permitted for national banks. *Id.* § 223.3(p)(2)(i). CSI satisfies the qualifications for this exclusion, because but for its engagement in the sale of insurance as agent or broker, CSI otherwise engages in activities that are permissible for CBNA to engage in itself. As a result, CSI is not treated as a "financial subsidiary" for the purposes of Regulation W, but is instead treated, like an operating subsidiary, as part of CBNA. See *id.* § 223.3(k) (stating that for the purposes of the definition of "depository institution," "an operating subsidiary of a depository institution is treated as part of the depository institution").

IV. Systemic Risk Analysis

Section 604 of the Dodd-Frank Wall Street Reform and Consumer Protection Act ("Dodd-Frank") requires banks to address the risk to the stability of the United States banking or financial system. See the Supplemental Addendum for a discussion of the factors considered by the OCC when assessing the systemic risk posed by a prospective transaction, as applied to the Transaction.

V. Safety and Soundness Capitalization

CBNA will not require additional capital to support the assumed deposits. CBNA Management expects that CBNA will remain well capitalized upon consummation of the Transaction.

STREAMLINED BUSINESS COMBINATION APPLICATION

1. Are there any material aspects of the transaction (for example, financing arrangements) that are not reflected in the agreement, or any features (for example, structure and significant terms and conditions) that are not customary or usual in the agreement?

Yes ☐ No ☒

If the answer is yes, explain.

All material aspects of the Transaction are reflected in the Agreement, available at Confidential Exhibit 1. The Transaction is a standard asset purchase and assumption of liabilities, including deposit liabilities, and consists of terms that are customary for the market.

2. Are there any issues regarding the permissibility under applicable state or federal laws or regulations of the proposed transaction (for example, nonbank activities, branching, qualified thrift lender's test, investment in bank premises)?

Yes ☐ No ☒

If the answer is yes, describe the issues.

There are no issues regarding the permissibility of the Transaction under applicable state or federal laws or regulations. The Transaction involves the purchase of assets and assumption of liabilities by one national bank of another national bank. All of the activities in which the Branches engage are permissible for CBNA.

With respect to Branches located in states in which CBNA currently maintains branches, CBNA's acquisition of such Branches is authorized by 12 U.S.C. § 36(c) and applicable state intrastate branching law. We have confirmed that there are no state laws that would otherwise prohibit CBNA from acquiring the Branches at those locations.

With respect to Branches located in states in which CBNA does not currently maintain branches, CBNA's acquisition of such Branches is permissible pursuant to the Riegle-Neal Interstate banking and Branching Efficiency Act of 1994 ("Riegle-Neal") and applicable state branching laws. See Appendix C for more information.

Additionally, the assets comprising the Wealth Management Business would be transferred directly from HSBC to CSI. See Agreement § 4.3. All of the Wealth Management Assets are permissible for CSI, and consistent with its current activities.

3. Will the applicant or resultant bank retain any nonconforming or impermissible assets or activities?

Yes ☐ No ☒

If the answer is yes, describe them, including the method of and anticipated time period for divestiture or disposal.

As discussed in response to Question 2 above, CBNA will not acquire any nonconforming or impermissible assets or activities.

4. Does the applicant anticipate any significant changes in products or services, including fee increases or branch closings, that would result from the consummation of the proposed transaction?

Yes ☐ No ☒

If the answer is yes, list those changes, including the anticipated effect on the community to be served. If any products or services will be discontinued, branches will be closed, or fees increased, describe and explain reasons.

CBNA does not anticipate that any significant changes in products or services, such as fee increases or branch closings, would result from the consummation of the Transaction. All of the products and services that CBNA would take on by virtue of the Transaction are of the type that it currently provides to its customers and would be provided consistently. Moreover, CBNA's intent on undertaking the Transaction is to expand its branch presence to be able to provide its products and services to a wider range of the population. Accordingly, CBNA does not anticipate closing any of the Branches, which it will be purchasing or leasing, as a result of the Transaction.

5. a. Will the proposed transaction affect the applicant's ability to meet the existing or anticipated needs of its community(ies) under the applicable criteria of the Community Reinvestment Act (CRA), including the needs of low- and moderate-income geographies and individuals?

Yes ☐ No ☒

If the answer is yes, discuss the effect.

The Transaction will not impact CBNA's ability to meet the existing or anticipated needs of its communities under the applicable criteria of the CRA, including the needs of low- and moderate-income geographies and individuals. Like CBNA, HSBC received overall ratings of "Outstanding" for each of the geographical areas in which the Branches are located in its most recent Community Reinvestment Act ("CRA") performance evaluation. CBNA's and HSBC's CRA programs offer similar products and services that are valued by our community partners.

Upon consummation of the Transaction, CBNA expects the Branches to continue this trend of meeting the existing and anticipated needs of their communities.

- 5b. Will the applicant's assessment area change?

Yes ☒ No ☐

If the answer is yes, describe the change.

Because the Transaction involves CBNA's acquisition of Branches located in geographies in which CBNA does not currently maintain branches, CBNA's CRA assessment area will expand to encompass additional geographies in accordance with the OCC's regulations at 12 CFR part 25. See Appendix A for further detail regarding CBNA's current assessment areas and the additional geographies to be incorporated into its assessment area as a result of the Transaction.

- 5c. At its most recent federal regulatory examination, did any of the combining institutions receive a CRA rating of "needs to improve" or "substantial noncompliance" institution-wide, or where applicable in a state or a multi-state MSA, or receive an evaluation of less than

satisfactory performance in an MSA or in the non-MSA portion of a state in which the acquiring bank is expanding as a result of the consolidation?

Yes ☐ No ☒

If the answer is yes, describe what actions, if any, have been taken to redress deficiencies in the institution's CRA record of performance since the examination.

Both CBNA and HSBC have received overall CRA ratings of "Outstanding" on their most recent examinations and neither has received any ratings specific to a particular state, multi-state MSA or other geographical area, less than "Satisfactory." Copies of each of CBNA's and HSBC's most recent CRA performance evaluations are provided as Appendix B.

6. Is the transaction subject to the Riegle-Neal Interstate Banking and Branching Efficiency Act of 1994?

Yes ☒ No ☐

If the answer is yes, discuss authority; compliance with state age limits and host state(s) filing requirements; and applicability of nationwide and statewide concentration limits. In addition, discuss any other restrictions that the states seek to apply (including state antitrust restrictions).

According to the Riegle-Neal Interstate Banking and Branching Efficiency Act of 1994 ("Riegle-Neal"), "[a]n interstate merger transaction may involve the acquisition of a branch of an insured bank without the acquisition of the bank only if the law of the State in which the branch is located permits out-of-state banks to acquire a branch of a bank in such State without acquiring the bank." 12 U.S.C. § 1831u(a)(4)(A). Of the 80 Branches to be acquired by CBNA as part of the Transaction, 10 are located across Florida, Maryland and the District of Columbia, where CBNA does not currently maintain any branches.² The permissibility of the acquisition of such Branches pursuant to Riegle-Neal and applicable state law, including discussion of authority, compliance with state age limits and host state filing requirements, and any other applicable state-level restrictions, is discussed for each location in Appendix C.

Applicability of nationwide and statewide concentration limits is discussed in Appendix D.

7. Will any banking offices that have not been certified as banking offices by the OCC: (a) be established or retained as branches, including the main office, and branches of the target institution; (b) be approved, but unopened branch(es) of the target institution, including the date the current federal and state agencies granted approval(s); and (c) be retained as branches in the applicant's original home state in the event the applicant is relocating its main office to another state.

Yes ☐ No ☒

If the answer is yes, provide the popular name, street address, city, county, state, and ZIP Code for each location being established or retained, approved and unopened, retained in

² CBNA's authority to acquire Branches located in the states where it currently maintains branches (New Jersey, New York, Pennsylvania and Virginia) is governed by 12 U.S.C. § 36(c). See response to Question 2 above.

the applicant's original home state in the event the applicant is relocating its main office to another state.

All of the Branches anticipated to be acquired pursuant to the Agreement have been operating as HSBC branches and thus subject to the OCC's regulatory requirements. See Appendix E for a list of each Branch, including its popular name, street address, city, county, state, and ZIP code. While not anticipated, if CBNA is unable to obtain a lease for a Branch for whatever reason, CBNA will promptly notify OCC that it will not be establishing a branch at that location.

8. Will the resultant national bank acquire any subsidiaries with activities or investments not previously approved by the OCC for either the acquiring or target banks?

Yes ☐ No ☒

If the answer is yes, provide the information and analysis for the activities of each subsidiary or investment that would be required if it were established pursuant to 12 CFR 5.34 or 5.39.

The Transaction does not involve the acquisition of any subsidiaries. The Wealth Management Business to be acquired by CSI is permissible for CSI and already part of its activities. Moreover, all assets and investments being acquired by CBNA are of the type that CBNA currently maintains and are consistent with its already existing activities.

9. Will the resultant bank avoid any commitments entered into by any of the combining institutions with community organizations, civic associations, or similar entities to provide banking services to the community?

Yes ☐ No ☒

If the answer is yes, describe the commitment, explain the reasons for not assuming the commitment, and the effect on the relevant community.

10. Will the applicant be or become affiliated with a company engaged in insurance activities that is subject to supervision by a state insurance regulator as a result of the transaction?

Yes ☐ No ☒

If the answer is yes, provide:

The name of company.

A description of the insurance activity in which the company is engaged and plans to conduct.

A list of each state and the lines of business in that state in which the company holds, or will hold, an insurance license. Indicate the state where the company holds a resident license or charter, as applicable.

The Transaction will not result in CBNA being or becoming affiliated with a company engaged in insurance activities that is subject to supervision by a state insurance regulator.

11. Provide a copy of (a) the draft or, if available, executed merger or transaction agreement, including any amendments; (b) any board of directors' resolutions related to the transaction;

and (c) interim charter, names of organizers, and related documents, if applicable; and (d) a copy of the pro forma balance sheet and regulatory capital schedule.

(a) See Confidential Exhibit 1
(b) See Confidential Exhibit 2

(c) N/A
(d) See Confidential Exhibit 3

Applicants for a nonaffiliate transaction also must complete items 12 through 14.

12. Do the acquiring bank and target compete in any relevant geographic market (see Bank Merger Screen)?

Yes ☒ No ☐

If the answer is yes,

Does the HHI for any relevant banking market increase by more than 200 points with a post-acquisition HHI of at least 1800?

Yes ☐ No ☒

Excluding markets in which the acquiring bank has 35 percent or more of the deposits, will the resultant bank have greater than 35 percent of the deposits in a relevant market?

Yes ☐ No ☒

A “yes” answer for either question will result in the application being removed from expedited processing for additional competitive review. In such circumstances, the applicant may consult the Competitive Review Appendix in the “Business Combinations” booklet of the *Comptroller’s Licensing Manual* for guidance on addressing competitive issues or contact the appropriate OCC District Licensing office directly for specific instructions.

CBNA and HSBC compete in two geographic markets with respect to the Branches³: (1) the Metro New York City, NY-NJ-CT-PA Banking Market, and (2) the Philadelphia, PA Banking Market. The Transaction will not raise material competitive issues in either market. See Appendix F for the Pro Forma Bank Merger Screens as calculated using CASSIDI. Note that the CASSIDI Pro Forma Bank Merger Screens incorrectly assume that CBNA would be acquiring all branches of HSBC such that HSBC would no longer have any deposits upon consummation of the Transaction. However, HSBC would be retaining some branches in these areas, and thus the actual changes to deposit concentration would be less than those identified in the CASSIDI Pro Forma Bank Merger Screens.

13. Does the proposed transaction involve a branch sale or any other divestiture of all or any portion of the bank, savings association, or nonbank company, or any other action to mitigate competitive effects?

Yes ☐ No ☒

³ CBNA also maintains a limited branch office in Virginia; however, CASSIDI does not appear to consider this as resulting in competition between the banks in the relevant market. That being said, according to the FDIC’s most recent Deposit Market Share Report, dated June 30, 2020, this limited branch maintained deposits of approximately \$405,000, and thus represents a negligible presence within the State of Virginia as compared to total statewide deposits of \$380 billion as of the same date. See Appendix D for more information.

If the answer is yes, discuss the timing of the branch sale or divestiture, purchaser, and other specific information.

14. Will any management interlocking relationships (12 USC 3201-3208) exist following consummation?

Yes ☐ No ☒

If the answer is yes, describe the management interlocking relationship, including a discussion of the permissibility of the interlock for relevant laws and regulations.

No new management interlocking relationships will result from the consummation of the Transaction.

CERTIFICATION

We hereby certify that our board of directors, by resolution, has authorized the filing of this application, and that to the best of our knowledge, it contains no misrepresentations or omissions of material facts. In addition, we agree to notify the agency if the facts described in the filing materially change prior to receiving a decision or prior to consummation. Any misrepresentation or omission of a material fact constitutes fraud in the inducement and may subject us to legal sanctions provided by 18 USC 1001 and 1007.

We acknowledge that approval of this application is in the discretion of the appropriate federal banking agency. Actions or communications, whether oral, written, or electronic, by an agency or its employees in connection with this filing, including approval of the application if granted, do not constitute a contract, either express or implied, or any other obligation binding upon the agency, other federal banking agencies, the United States, any other agency or entity of the United States, or any officer or employee of the United States. Such actions or communications will not affect the ability of any federal banking agency to exercise its supervisory, regulatory, or examination powers under applicable law and regulations. We further acknowledge that the foregoing may not be waived or modified by any employee or agent of a federal banking agency or of the United States.

Signed this 21 day of June, 2021.

Citizens Bank, National Association
(Applicant)

by


(Signature of Authorized Officer)⁴

John F. Woods

(Typed Name)

Vice Chairman and Chief Financial Officer

(Title)

⁴ In multiple-step combinations, applicants should ensure that authorized officers of the combining institutions sign.

CERTIFICATION

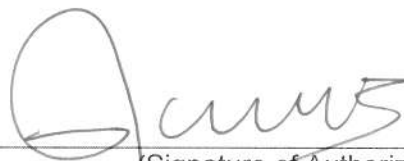
We hereby certify that our board of directors, by resolution, has authorized the filing of this application, and that to the best of our knowledge, it contains no misrepresentations or omissions of material facts. In addition, we agree to notify the agency if the facts described in the filing materially change prior to receiving a decision or prior to consummation. Any misrepresentation or omission of a material fact constitutes fraud in the inducement and may subject us to legal sanctions provided by 18 USC 1001 and 1007.

We acknowledge that approval of this application is in the discretion of the appropriate federal banking agency. Actions or communications, whether oral, written, or electronic, by an agency or its employees in connection with this filing, including approval of the application if granted, do not constitute a contract, either express or implied, or any other obligation binding upon the agency, other federal banking agencies, the United States, any other agency or entity of the United States, or any officer or employee of the United States. Such actions or communications will not affect the ability of any federal banking agency to exercise its supervisory, regulatory, or examination powers under applicable law and regulations. We further acknowledge that the foregoing may not be waived or modified by any employee or agent of a federal banking agency or of the United States.

Signed this 21 day of June, 2021.

HSBC Bank USA, National
Association*
(Target)

by



(Signature of Authorized Officer)

Michael Roberts

(Typed Name)

President and Chief Executive Officer

(Title)

HSBC Securities (USA), Inc.*
(Target)

by



(Signature of Authorized Officer)

Jason Henderson

(Typed Name)

President and Chief Executive Officer

(Title)

* Certification by the Target does not relate to material prepared and submitted by the Applicant.

Supplemental Addendum to Streamlined Business Combination Application

Dodd-Frank Section 604 Financial Stability Factors

The Bank Merger Act (“BMA” or the “Act”), 12 U.S.C. 1828(c)(5), requires the OCC to consider “the risk to the stability of the United States banking or financial system” when reviewing transactions subject to the Act. Pursuant to direction of the OCC staff, this Addendum briefly addresses the seven factors considered by the OCC when evaluating a BMA application under this review criterion.¹

1. Whether the proposed transaction would result in a material increase in risks to financial system stability due to an increase in size of the combining institutions.

The proposed Transaction would not result in a material increase in risks to financial system stability. Both institutions currently are well capitalized and both institutions will remain well capitalized after giving effect to the proposed Transaction. As of its most recent call report, CBNA is a \$187.18 billion-asset banking institution with approximately \$154.1 billion of deposits. Thus, the assumption by CBNA of approximately \$9.0 billion in deposit liabilities, as well as its acquisition of other assets and branch operations, will have no significant effect on the balance sheet or regulatory capital of CBNA.

2. Whether the proposed transaction would result in a reduction in the availability of substitute providers for the services offered by the combining institutions.

The proposed Transaction will not result in a reduction in the availability of substitute providers for the current services offered by CBNA and HSBC. The proposed Transaction is focused upon deposit, lending and wealth management products readily available in the retail banking and securities markets. CBNA will provide to the new customers resulting from the proposed Transaction the same broad range of high quality lending, deposit and wealth management products and services it provides across its current retail footprint. Additionally, as reflected in the Pro Forma Merger Screens at Appendix F, there will be minimal competitive impacts.

3. Whether the combined entity would engage in any business activities or participate in markets in a manner that, in the event of financial distress of the combined entity, would cause significant risks to other institutions.

The proposed Transaction will not result in a combined entity, but rather HSBC will continue to offer services in the United States. The proposed Transaction will focus primarily on CBNA providing products and services to retail customers, not other institutions. As a result, the proposed Transaction will not result in CBNA or CSI engaging in any business activities or participating in markets in a manner that would cause significant risks to other institutions in the event of financial distress.

4. Whether the proposed transaction would materially increase the extent to which the combining institutions contribute to the complexity of the financial system.

The proposed Transaction involves the acquisition of standard, retail deposit and lending business, as well as retail wealth management business. The non-complexity of the business

¹ See OCC, COMPTROLLER’S LICENSING MANUAL: BUSINESS COMBINATIONS, at 8 (July 2018).

being acquired, together with the lack of meaningful impact to competition in the overlapping banking markets and wide array of competitors generally, should not increase the complexity of the financial system.

5. Whether the proposed transaction would materially increase the extent of cross-border activities of the combining institutions.

The proposed Transaction does not involve the acquisition of any business involving cross-border activities.

6. Whether the proposed transaction would increase the relative degree of difficulty of resolving or winding up the combined institution's business in the event of failure or insolvency.

The proposed Transaction would not increase the relative degree of difficulty of resolving or winding up CBNA's business in the event of failure or insolvency. As discussed above, the proposed Transaction involves the acquisition of standard, retail deposit and lending business and wealth management business, all of which are key staples of CBNA's and CSI's offerings.

7. Any other factors that could indicate that the transaction poses a risk to the U.S. banking or financial system.

There are no other known factors that would indicate that the proposed Transaction poses a risk to the U.S. banking or financial system.

Index to Appendices/Exhibits to Streamlined Business Combination Application

Appendices

- A. CRA Assessment Areas
- B. CRA Performance Evaluations
 - 1. CBNA
 - 2. HSBC
- C. Riegle-Neal Permissibility
- D. Nationwide and Statewide Concentration Limits
- E. Banking Center Schedule
- F. CASSIDI Pro Forma Bank Merger Screens⁵
- G. Form of Public Notice
- H. Call Reports as of March 31, 2021
 - 1. CBNA
 - 2. HSBC

Confidential Exhibits (separately bound)

- 1. Purchase and Assumption Agreement
- 2. Board of Directors' Resolutions
 - 2.1. CBNA
 - 2.2. CFG
 - 2.3. HSBC North America Holdings Inc., HSBC USA Inc., HSBC Bank USA, N.A.
 - 2.4. HSBC Securities (USA) Inc.
- 3. CBNA Pro Forma Financials
 - 3.1. CBNA Pro Forma Balance Sheet as of March 31, 2021
 - 3.2. CBNA Pro Forma Regulatory Capital Schedule as of March 31, 2021

⁵ Note that the CASSIDI Pro Forma Bank Merger Screens incorrectly assume that CBNA would be acquiring all branches of HSBC such that HSBC would no longer have any deposits upon consummation of the Transaction. However, HSBC would be retaining some branches in these areas, and thus the actual changes to deposit concentration would be less than those identified in the CASSIDI Pro Forma Bank Merger Screens.

Appendix A

Current and Pro Forma Community Reinvestment Act Assessment Areas

Citizens Bank, N.A.
Multi State MSAs

Notes:

This projected assessment area list is as of 6/1/2021 and assumes no counties are exited because of the closure of a branch or deposit taking ATM before 1/1/2022. Final assessment area delineation is subject to change or realignment.

Green font = new to CBNA's assessment area as result of the Transaction

State	MSA	MD	County	County Name
Massachusetts	14460 Boston-Cambridge-Newton	14454 Boston	021	Norfolk
			023	Plymouth
			025	Suffolk
		15764 Cambridge-Newton-Framingham	009	Essex
			017	Middlesex
New Hampshire		40484 Rockingham-Strafford County	015	Rockingham
017			Strafford	
State	MSA	MD	County	County Name
New Jersey	35620 New York-Newark-Jersey City	35154 New Brunswick-Lakewood	023	Middlesex
		35614 New York-Jersey City-White Plains	003	Bergen
			017	Hudson
New York		35004 Nassau County-Suffolk County	059	Nassau
			103	Suffolk
		35614 New York-Jersey City-White Plains	005	Bronx
			047	Kings
			061	New York
			081	Queens
			085	Richmond
			119	Westchester
Pennsylvania		35084 Newark NJ-PA	103	Pike
State	MSA	MD	County	County Name
New Jersey	37980 Philadelphia-Camden-Wilmington	15804 Camden	005	Burlington
Pennsylvania			33874 Montgomery-Bucks-Chester County	007
		017		Bucks
		029		Chester
		091		Montgomery
		Delaware	37964 Philadelphia	045
101				Philadelphia
48864 Wilmington			003	New Castle
State	MSA	MD	County	County Name
Massachusetts	39300 Providence-Warwick		005	Bristol
Rhode Island			001	Bristol
			003	Kent
			005	Newport
			007	Providence
			009	Washington
State	MSA	MD	County	County Name
DC	47900 Washington-Arlington-Alexandria	47894 Washington-Arlington-Alexandria	001	District of Columbia
MD		23224 Frederick-Gaithersburg-Rockville	031	Montgomery
VA		47894 Washington-Arlington-Alexandria	013	Arlington
			059	Fairfax
			510	Alexandria city
State	MSA	MD	County	County Name
Massachusetts	49340 Worcester		027	Worcester
Connecticut			015	Windham
State	MSA	MD	County	County Name
Ohio	49660 Youngstown-Warren-Boardman		099	Mahoning
Pennsylvania			155	Trumbull
			085	Mercer

Citizens Bank, N.A.
MSAs by State

Notes:

This projected assessment area list is as of 6/1/2021 and assumes no counties are exited because of the closure of a branch or deposit taking ATM before 1/1/2022. Final assessment area delineation is subject to change or realignment.

Green font = new to CBNA's assessment area as result of the Transaction

State	MSA	MD	County	County Name
Connecticut	14860 Bridgeport-Stamford-Norwalk		001	Fairfield
	25540 Hartford-East Hartford-Middletown		003	Hartford
	35300 New Haven-Milford		007	Middlesex
	35980 Norwich-New London		009	New Haven
			011	New London
State	MSA	MD	County	County Name
Delaware	20100 Dover		001	Kent
	41540 Salisbury		005	Sussex
State	MSA	MD	County	County Name
Florida	33100 Miami-Fort Lauderdale-Pompano Beach	22744 Fort Lauderdale-Pompano Beach-Sunrise	011	Broward
		33124 Miami-Miami Beach-Kendall	086	Miami-Dade
State	MSA	MD	County	County Name
Massachusetts	12700 Barnstable Town		001	Barnstable
	38340 Pittsfield		003	Berkshire
	44140 Springfield		013	Hampden
			015	Hampshire
			011	Franklin
	99999 Non Metro MA		019	Nantucket
State	MSA	MD	County	County Name
Michigan	11460 Ann Arbor		161	Washtenaw
	19820 Detroit-Warren-Dearborn	19804 Detroit-Dearborn-Livonia	163	Wayne
		47664 Warren-Troy-Farmington Hills	093	Livingston
			099	Macomb
			125	Oakland
	29620 Lansing-East Lansing		065	Ingham
	40980 Saginaw		155	Shiawassee
			145	Saginaw
State	MSA	MD	County	County Name
New Hampshire	31700 Manchester-Nashua		011	Hillsborough
	99999 Non Metro NH		001	Bellknapp
			003	Carroll
			005	Cheshire
			007	Coos
			009	Grafton
			013	Merrimack
			019	Sullivan
State	MSA	MD	County	County Name
New York	10580 Albany-Schenectady-Troy		001	Albany
			083	Rensselaer
			091	Saratoga
			093	Schenectady
	13780 Binghamton		007	Broome
	15380 Buffalo-Cheektowaga		029	Erie
			063	Niagara
			113	Warren
	24020 Glens Falls		109	Tompkins
	27060 Ithaca		111	Ulster
	28740 Kingston			
	39100 Poughkeepsie-Newburgh-Middletown		027	Dutchess
			071	Orange
			051	Livingston
	40380 Rochester		055	Monroe
			069	Ontario
			117	Wayne
			053	Madison
	45060 Syracuse			

Citizens Bank, N.A.
MSAs by State

Notes:

This projected assessment area list is as of 6/1/2021 and assumes no counties are exited because of the closure of a branch or deposit taking ATM before 1/1/2022. Final assessment area delineation is subject to change or realignment.

Green font = new to CBNA's assessment area as result of the Transaction

State	MSA	MD	County	County Name
	45000 Syracuse		067	Onondaga
	46540 Utica-Rome		043	Herkimer
			065	Oneida
	99999 Non Metro NY		023	Cortland
			035	Fulton
			057	Montgomery
			077	Otsego
State	MSA	MD	County	County Name
Ohio	10420 Akron		153	Summit
	15940 Canton-Massillon		151	Stark
	17460 Cleveland-Elyria		035	Cuyahoga
			055	Geauga
			085	Lake
			093	Lorain
			103	Medina
	45780 Toledo		095	Lucas
			173	Wood
	99999 Non Metro OH		029	Columbiana
			145	Scioto
State	MSA	MD	County	County Name
Pennsylvania	11020 Altoona		013	Blair
	20700 East Stroudsburg		089	Monroe
	21500 Erie		049	Erie
	25420 Harrisburgh-Carlisle		041	Cumberland
			043	Dauphin
	29540 Lancaster		071	Lancaster
	38300 Pittsburgh		003	Allegheny
			005	Armstrong
			007	Beaver
			019	Butler
			125	Washington
			129	Westmoreland
	39740 Reading		011	Berks
	42540 Scranton-Wilkes-Barre		069	Lackawanna
			079	Luzerne
	44300 State College		027	Centre
	49620 York-Hanover		133	York
	99999 Non Metro PA		039	Crawford
			063	Indiana
			073	Lawrence
			087	Mifflin
			121	Venango
State	MSA	MD	County	County Name
Vermont	15540 Burlington-South Burlington		007	Chittenden
			011	Franklin
	99999 Non Metro VT		001	Addison
			003	Bennington
			021	Rutland
			023	Washington
			025	Windham
			027	Windsor
State	MSA	MD	County	County Name
Virginia	40060 Richmond		087	Henrico*
*We only recognize 4 tracts in the City of Glen Allen, VA as our assessment area, not the full county.				

Appendix B.1

CBNA Community Reinvestment Act Performance Evaluation (Sept. 30, 2019)



PUBLIC DISCLOSURE

September 30, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Citizens Bank, N.A.
Charter Number: 24571

One Citizens Plaza
Providence, RI 02903

Office of the Comptroller of the Currency

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

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

Table of Contents

Overall CRA Rating.....	3
Description of Institution.....	6
Scope of the Evaluation.....	7
Discriminatory or Other Illegal Credit Practices Review.....	8
Multistate Consolidated Statistical Area Rating	
Boston CSA.....	9
New York CSA.....	19
State Rating	
State of Connecticut.....	28
State of Delaware.....	36
State of Massachusetts.....	44
State of Michigan.....	52
State of New Hampshire.....	61
State of New York.....	68
State of Ohio.....	83
State of Vermont.....	92
Appendix A: Scope of Examination.....	A-1
Appendix B: Summary of MCSA and State Ratings.....	B-1
Appendix C: Definitions and Common Abbreviations.....	C-1
Appendix D: Tables of Performance Data.....	D-1

Overall CRA Rating

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

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

Performance Levels	Citizens Bank, N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	X
High Satisfactory			
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 Outstanding performance in all rating areas.
- The Investment Test rating is based on Outstanding performance in all rating areas.
- The Service Test rating is based on the significant weighting of the Boston Multistate Combined Statistical Area (MCSA). Outstanding performance was noted in five rating areas, including the Boston MCSA and High Satisfactory performance was noted in five rating areas.

Flexible and Innovative Lending Products

The bank offered several qualified Community Reinvestment Act (CRA) affordable mortgage products during the evaluation period. Some of the more significant products and volume of originations include:

- **Destination Home Loan Program-** Proprietary first mortgage offering low- and moderate-income (LMI) borrowers flexible underwriting terms and no requirement for mortgage insurance. To help ensure responsible homeownership, there is a requirement for home buyer education. CBNA partners with U.S. Department of Housing and Urban Development (HUD) approved housing counseling agencies to provide this service. During the evaluation period, CBNA originated 636 loans for \$103

million in its full-scope assessment areas (AA or AAs).

- **Closing Cost/Down Payment Assistance** – Provides first time homebuyers, specifically LMI borrowers and/or property located in a LMI geography, with grant funds of 3 percent up to a maximum of \$2500 (no lien on property or repayment required) to be used towards down payment and/or closing costs. During the evaluation period, CBNA originated 603 loans for \$1.6 million in its full-scope AAs.
- **Fannie Mae HomeReady** - Designed for LMI borrowers, with expanded eligibility (up to 97 percent loan-to-value) for financing homes in low-income communities. HomeReady loans provide affordable conventional financing with low down payments, flexible source of funds, and innovative underwriting flexibilities. This product can be used in conjunction with the Citizens Bank Closing Cost/Down Payment Assistance Program. During the evaluation period, CBNA originated 475 loans for \$74.5 million in its full-scope AAs.
- **Home Improvement Loans** - CBNA offered two unique home improvement loans. The EZ and EE Loans were designed for LMI owner-occupied households or borrowers residing in LMI geographies. At least 50 percent of either loan has to be used for home improvement and the remainder can be used to pay off existing debt. Both programs offer loan sizes of \$1,000 - \$10,000 and the maximum debt-to-income ratio is 45 percent. Neither program requires a property appraisal or to be collateralized. During the evaluation period, CBNA originated 1,066 loans for \$9.1 million in its full-scope AAs.
- **FHA and VA Programs** – Federal Housing Authority (FHA) and U.S. Department of Veteran Affairs (VA) insured loans have more flexible lending criteria than conventional mortgage loans. HUD provided mortgage insurance for FHA loans, which enabled the bank to offer additional loan options to borrowers who may not have qualified for a conventional mortgage. During the evaluation period, CBNA originated 1,475 FHA loans for \$282.8 million and 432 VA loans for \$78.4 million in its full-scope AAs.

Flexible and Innovative Retail Service Products

- **VantageLink** – Introduced in 2017, the platform enables small businesses to quickly and easily apply online for loans and lines of credit up to \$150,000. In most cases customers are notified of the approval decisions the same business day, and loans are funded within three business days. VantageLink also incorporates a unique “second look” component.
- **Fee Free Cash Advance** - As a service to those living in and around the communities CBNA serves, every branch, regardless of income designation, provides fee free advances on government issued payment cards equipped with cash advance capability. The service is not limited to CBNA customers; rather it is available to any person who presents valid identification at the time of the cash advance request.

Branch Closings

The primary reasons for the substantial majority of branch closings were the financial performance of those branches and/or non-renewal of contract for in-store branches. The bank provided the required branch closing notification.

“Near to” branches

The bank provided account opening reports of branches located in middle- and upper-income branches that were one quarter of a mile from a low- or moderate-income tract to determine if the “near to” branch(es) provided additional accessibility to LMI persons. Where accessibility improved, it is noted in the respective rating area.

Branch Hours/Retail Products

Branch hours and retail product offerings are generally consistent throughout the bank’s AAs. Where substantial differences were noted, they are discussed in the appropriate rating area. Standard hours are 9 a.m. to 4 p.m., Monday through Thursday, 9 a.m. to 5 p.m. on Friday, and 9 a.m. to 12 p.m. for those branches with Saturday hours.

Other Information

AAs – The Office of the Comptroller of the Currency (OCC) determined that all AAs consisted of whole geographies and met the requirements of the regulation. The areas reasonably reflected the different trade areas that CBNA’s branches service and did not arbitrarily exclude any LMI areas.

Lending Gap Analysis – The OCC reviewed summary reports and maps, and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in all full-scope AAs. The OCC did not identify any unexplained conspicuous gaps in any of the areas they reviewed.

Deposit Market Share - The OCC used summary deposit data reported to the Federal Deposit Insurance Corporation (FDIC) as of June 30, 2018, which was the most recent public data available during the evaluation period.

Lending in Assessment Area

An adequate percentage of the bank’s loans are in its AAs. The bank originated and purchased 50.3 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. It was noted that the bank engages in business indirect auto lending that is offered nationwide/outside of the bank’s traditional footprint, which had the effect of lowering the in/out performance ratio.

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	60,074	51.0	57,762	49.0	117,836	11,788,312	38.6	18,783,128	61.4	30,571,439
Small Business	30,889	48.9	32,231	51.1	63,120	1,677,647	50.8	1,621,920	49.2	3,299,567
Small Farm	0	0	0	0	0	0	0	0	0	0
Total	90,963	50.3	89,993	49.7	180,956	13,465,959	39.8	20,405,048	60.2	33,871,006

Description of Institution

CBNA is an interstate commercial bank headquartered in Providence, Rhode Island. CBNA is a wholly owned subsidiary of Citizens Financial Group. At December 31, 2018, CBNA was the 22nd largest U.S. bank based on asset size. Subsequent to the end of the evaluation period, Citizens Bank of Pennsylvania, a state-chartered affiliate bank, was merged into CBNA on January 3, 2019, adding over 340 branches and \$34 billion in assets to the national bank.

CBNA is a full-service commercial bank that offers a broad range of retail and commercial banking products and services to individuals, small businesses, middle-market companies, large corporations, and institutions. As of December 31, 2018, CBNA had 766 branch office locations and 1,244 ATMs (1,124 deposit taking) within its AAs. CBNA had ten rating areas that include eight state ratings and two MCSAs. The bank conducts operations in Rhode Island, Massachusetts, Connecticut, New Hampshire, Vermont, Delaware, New York, Michigan, and Ohio. At the request of the bank, community development (CD) investments made by CitizensOne CDC, a CBNA subsidiary, were considered in the evaluation.

The table below provides basic bank financial information as of the beginning of the first year (with the exception of Net Income) and end of the third year of the evaluation period:

Financial Information						
	1/1/2016			12/31/2018		
	Balance Sheet \$ (000s)	% of Total Loans		Balance Sheet \$ (000s)	% of Total Loans	% Growth/(Decline) in Period
Loan Mix						
Real Estate	32,944,559	41.3		41,085,692	41.2	+24.7
Commercial	21,936,021	27.5		30,270,665	30.3	+38.0
Individual	16,870,495	21.2		22,315,071	22.4	+32.3
Agricultural	0	0		0	0	0
All Other Loans and Leases	7,940,004	10.0		6,087,363	6.1	(-23.3)
Total Assets	108,064,717			129,426,633		+19.8
Total Deposits	77,576,145			93,888,356		+21.0
Net Income	881,152 (Year End 2016)			1,385,527		+57.2
Tier 1 Capital	10,754,020			11,994,323		+11.5

Source: FFIEC Call Reports

There are no legal, financial, or other impediments to CBNA's ability to help meet the credit needs within its communities.

CBNA received an Outstanding rating at its prior CRA evaluation by the OCC dated January 4, 2016.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses the bank's CRA performance under the large retail bank Lending, Investment, and Service Tests. The evaluation period is January 1, 2016, to December 31, 2018.

In evaluating the bank's lending performance, the OCC reviewed home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) and small loans to businesses reported under the CRA. All home mortgage products were reviewed, and conclusions reached in the aggregate. The bank made no reportable farm loans during the evaluation period.

Under the Lending Test, we performed separate analysis of 2016 data and 2017 to 2018 data, due to changes instituted by the 2015 American Community Survey (ACS), which updated income, population, and housing information. The ACS also resulted in changes to the income designations of some geographies. The changes became effective January 1, 2017.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MCSA, combined statistical area (CSA), or metropolitan statistical area (MSA) 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, except when part of a MCSA/CSA. 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 MCSA, CSA, and state ratings are based on performance in all bank AAs. The bank’s performance in each year of the evaluation periods was weighted equally. The Boston MCSA rating area carried the greatest emphasis in the OCC’s conclusions as this area represented CBNA’s most significant market with approximately 62 percent of bank deposits, 45 percent of HMDA and small loans to businesses originated and purchased, and 46 percent of the branch network. Refer to the “Scope” section under each MCSA and State 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 AA 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.

Multistate Consolidated Statistical Area Rating

Boston-Worcester-Providence-MA-RI-NH-CT Multistate Combined Statistical Area (Boston MCSA)

CRA rating for the Boston MCSA¹: Outstanding

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

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- Good geographic distribution of loans in its AA.
- Excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in making CD loans.
- Excellent level of qualified CD investment and grants and exhibits excellent responsiveness to credit and community economic development needs.
- Service delivery systems are readily accessible to geographies and individuals of different income levels.
- The bank is a leader in providing CD services.

Description of Institution's Operations in Boston MCSA

This AA consists of geographies in Massachusetts, New Hampshire, Connecticut, and Rhode Island and include a substantial portion of the Boston-Cambridge-Newton MA-NH MSA and the entire Barnstable Town MA MSA, Providence-Warwick RI-MA MSA, Worcester MA-CT MSA, and the Manchester-Nashua NH MSA. Within Massachusetts it includes Barnstable, Bristol, Essex, Middlesex, Norfolk, Sussex, and Worcester counties; in New Hampshire, Belknap, Hillsborough, Merrimack, Rockingham, and Strafford counties; in Connecticut, Windham county; and in Rhode Island, Bristol, Kent, Newport, Providence, and Washington counties.

This AA represents the largest retail market for the bank in terms of loans, deposits, and branches.

¹ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

CBNA had \$55.9 billion in deposits in the MCSA representing 61.9 percent of the bank's deposits. The local banking environment is highly competitive with 169 FDIC-insured institutions operating 2,441 branches. CBNA ranked third in deposit market share with 12.8 percent. The two banks ahead of CBNA are State Street Bank and Trust with 25.6 percent and Bank of America with 20.7 percent. CBNA operated 352 branches and 715 ATMs in the CSA, representing 46 percent of total branches and 57.5 percent of total ATMs.

The area poses a number of challenges to home mortgage lenders in the AA, including CBNA. The MCSA is a high-cost housing area, limiting access to affordable home ownership among LMI borrowers. The median housing value in the CSA is \$339,010 while the National Association of Realtors (NAR) 4Q2018 median sales price of a single-family home ranged from \$268,200 to \$460,300. One simplistic method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Assuming a 30-year mortgage with a 4.5 percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$47,942 (or less than 50 percent of the FFIEC adjusted median family income in the AA) could afford a \$218,573 mortgage with a payment of \$1,198 per month; a moderate-income borrower earning \$76,708 (or less than 80 percent of the FFIEC adjusted median family income in the AA) could afford a \$349,721 mortgage with a payment of \$1,918 per month.

The poverty level across the AA was considered in our evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial wherewithal to qualify for a home loan than those with income above poverty. In the Boston MCSA, the overall poverty level was 7.7 percent. However, in low-income tracts, the household poverty rate increases to 31 percent and in moderate-income tracts it increases to 17 percent. In middle- and upper-income tracts, the combined poverty level is 7 percent.

As part of the CRA evaluation, the OCC reviewed information from four community contacts made within the Boston MCSA to determine local economic conditions and community needs. These contacts included representatives from affordable housing organizations and community and economic development organizations. Needs identified include: affordable housing (including rental housing), financial education, small business loans (under \$50,000 and limited operating history), and low-cost deposit programs.

During the evaluation period, CBNA was recognized as a "Gold Tier Lender," the highest honor awarded by the Massachusetts Housing Partnership (MHP). The MHP is a statewide public non-profit affordable housing organization that works in concert with the Governor and the Department of Housing and Community Development to help increase the supply of affordable housing in Massachusetts. CBNA was bestowed this honor by MHP because of its steadfast support and commitment to the ONE Mortgage Program, which is designed to help LMI first time homebuyers achieve homeownership.

Boston MCSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Boston MCSA 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,768	11.1	19.2	39.8	28.1	1.8
Population by Geography	8,055,793	9.4	18.6	41.0	30.7	0.3
Housing Units by Geography	3,402,398	9.0	19.3	42.4	29.0	0.2
Owner-Occupied Units by Geography	1,931,765	3.2	13.7	46.4	36.5	0.1
Occupied Rental Units by Geography	1,143,685	18.7	28.3	34.8	17.8	0.5
Vacant Units by Geography	326,948	9.6	21.1	45.4	23.6	0.3
Businesses by Geography	574,907	7.3	15.3	39.8	36.9	0.6
Farms by Geography	14,141	2.5	10.2	46.5	40.7	0.1
Family Distribution by Income Level	1,972,895	22.8	16.5	20.0	40.7	0.0
Household Distribution by Income Level	3,075,450	26.0	14.7	16.6	42.6	0.0
Median Family Income MSA - 12700 Barnstable Town, MA MSA		\$80,751	Median Housing Value			\$339,010
Median Family Income MSA - 14454 Boston, MA MD		\$90,699	Median Gross Rent			\$1,134
Median Family Income MSA - 15764 Cambridge-Newton-Framingham, MA MD		\$100,380	Families Below Poverty Level			7.7%
Median Family Income MSA - 31700 Manchester-Nashua, NH MSA		\$85,966				
Median Family Income MSA - 39300 Providence-Warwick, RI-MA MSA		\$73,950				
Median Family Income MSA - 40484 Rockingham County-Strafford County, NH MD		\$90,150				
Median Family Income MSA - 49340 Worcester, MA-CT MSA		\$81,137				
Median Family Income Non-MSAs – NH		\$71,699				
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.						

Scope of Evaluation in Boston MCSA

The Boston MCSA received a full-scope review. This AA carried significant weight in the overall bank rating as it accounted for nearly 62 percent of bank deposits, 45 percent of HMDA

and small loans to businesses during the evaluation period, and 46 percent of the bank's branch network.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN BOSTON MCSA

LENDING TEST

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

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

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs when considering the competition.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Boston MCSA	28,090	13,743	0	76	41,909

Dollar Volume of Loans (000s)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Boston MCSA	6,659,843	807,112	0	778,034	8,244,989

CBNA ranked third in deposits with 12.8 percent market share. In overall home mortgage lending, CBNA ranked first with 6.7 percent market share. Wells Fargo Bank ranked second with 4.9 percent market share, and Bank of America ranked third with 3.6 percent market share. There are 768 mortgage lenders in the AA, many without a depository presence. There are 169 depository institutions in the AA. In small loans to businesses, CBNA ranked eighth with a 2.8 percent market share. The top three lenders are significant business credit card lenders which had a combined market share of 43.8 percent. The lead lender was American Express with 24.9 percent market share, followed by Bank of America with 11 percent market share, and Citibank with 7.9 percent market share.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O in the Boston MCSA 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 geographic distribution of home mortgage loans is good.

2017 to 2018

The proportion of loans in low-income geographies approximated the proportion of owner-occupied homes in those geographies and was well below the aggregate distribution of loans. The proportion of loans in moderate-income geographies approximated the proportion of owner-occupied homes in those geographies and was below aggregate distribution of loans.

2016

Performance was inconsistent with 2017 to 2018. The proportion of loans in both low- and moderate-income geographies approximated both the proportion of owner-occupied home in those geographies and the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table Q in the Boston MCSA 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 geographic distribution of small loans to businesses is excellent.

2017 to 2018

The proportion of loans in low-income geographies substantially met and in moderate-income geographies exceeded the proportion of businesses located in those geographies and exceeded the aggregate distribution of loans in both low- and moderate-income geographies.

2016

The proportion of loans in low-income geographies was below the proportion of businesses located in those geographies and approximated the aggregate distribution of loans. Performance in moderate-income geographies was consistent with 2017 to 2018.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P in the Boston MCSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases. The borrower distribution of home mortgage loans is excellent.

2017 to 2018

The proportion of loans to low-income borrowers was below the proportion of low-income families within the CSA but exceeded the aggregate distribution of loans. The distribution is

good to low-income borrowers considering the performance relative to all lenders. The proportion of loans to moderate-income borrowers exceeded both the proportion of moderate-income families and the aggregate distribution of loans. The high housing cost, limited availability of housing that low-income borrowers can afford to acquire, and poverty levels within the MCSA constrain lending opportunities to low-income borrowers.

2016

The proportion of loans to low-income borrowers was well below the proportion of low-income families but exceeded the aggregate distribution of loans. Performance to moderate-income borrowers was consistent with 2017 to 2018.

Small Loans to Businesses

Refer to Table R in the Boston MCSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses. The borrower distribution of small loans to businesses is excellent.

2017 to 2018

The proportion of loans to small businesses approximated the percentage of small businesses in the CSA and significantly exceeded the aggregate distribution of loans. Performance is excellent when considering the competition from the larger financial institutions in the MCSA that dominate the market and originate small business loans through credit cards.

2016

Performance was consistent with 2017 to 2018.

Community Development Lending

The bank is a leader in making 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 multifamily loans that also qualify as CD loans

CBNA demonstrated excellent responsiveness to CD lending needs and opportunities. CD loans include many complex projects where the bank often acted in a leadership role. The dollar volume of CD lending represents 10.5 percent of allocated Tier 1 Capital. During the evaluation period, CBNA originated one letter of credit in the Boston MCSA for \$3.4 million meeting LMI community service needs.

Examples include:

- \$10 million loan for a 217-unit affordable housing development, with all units allocated to tenants earning less than 80 percent of the area median income (AMI).

- \$8.3 million in construction and term financing for a 96-unit affordable housing development, with the majority of units allocated to tenants earning less than 80 percent of the AMI.
- \$4 million working capital line of credit to a healthcare organization located in a low-income geography that provides health and social services to primarily LMI individuals. Sixty-six percent of the organization's client base are recipients of state-funded Medicaid assistance.
- \$32.5 million loan to refurbish a large blighted factory in a state designated Economic Target Area and state designated Economically Distressed Area. The loan created over 24,000 square feet of commercial space and 27 units of affordable housing. This loan was one of the first to utilize the Massachusetts Workforce housing funds and historical tax credits.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

The MHP One program is a portfolio loan program. Loans are provided to LMI first-time homebuyers by lowering the monthly costs of homeownership. The participating lender underwrites the mortgage loan for up to 97 percent of the purchase price. A portion of the interest costs for eligible borrowers is paid by public funds. The borrower does not pay mortgage insurance and public funds provide a loan loss reserve for participating lenders. Public entities, including the Commonwealth of Massachusetts, acting through the Department of Housing and Community Development, the MHP, and individual cities and towns contribute to the pool of public funds for the interest subsidy and loan loss reserve payments. During the evaluation period, the bank originated 242 loans totaling \$61.8 million.

CBNA participates in a Connecticut Housing Finance Authority (CHFA) mortgage program in Connecticut. The program features a below market interest rate, low down payment requirements and a down payment assistance loan. The borrowers must meet income limit requirements and the property must have a sales price not to exceed the CHFA limits. The loans are financed through the sale of tax-exempt bonds. CBNA originated two loans totaling \$196.3 thousand.

INVESTMENT TEST

The institution's performance under the Investment Test in the Boston MCSA is Outstanding.

Based on a full-scope review, the institution's performance in the Boston MCSA is excellent.

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

The bank exhibits excellent responsiveness to credit and community economic development needs. The bank makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Boston MCSA	174	\$354,225	692	\$450,911	866	100	\$805,136	100	66	\$231,302

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

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

The combined prior and current period dollar volume represents 10.8 percent of allocated Tier 1 Capital. The bank's investments consisted of low-income housing tax credits (LIHTCs), mortgage backed securities (MBSs), equity investments, and grants. Examples include:

- \$33.2 million purchase of LIHTCs for the housing authority's affordable housing/redevelopment initiative involving apartments in Boston (Lower Roxbury), MA. The housing development consists of 92 units including 43 subsidized with HUD Section 8 Housing Assistance Program (HAP) and 22 units to households earning up to 60 percent of AMI. Fifteen units will be designated workforce housing and 12 units are market rate. This first phase of the redevelopment was considered highly complex and utilized multiple debt and equity financing sources, including those from the Commonwealth of Massachusetts, the City of Boston, and HUD.
- \$17.8 million funded towards an \$18.2 million commitment in a national multi-investor LIHTC fund. The bank's investment in the fund was directed towards the development of a 193-unit affordable housing apartment building in Providence, RI.
- \$15 million funded towards a \$17.3 million proprietary LIHTC investment for the redevelopment of a vacant, historic mill building in Providence, RI into a total of 60 units of housing; seven units will be for tenants earning up to 50 percent of AMI, 47 will be for tenants earning up to 60 percent of AMI, and six units are market rent. The project was considered complex and utilized multiple debt and equity financing sources, including the state of Rhode Island and the City of Providence funds.

SERVICE TEST

The institution's performance under the Service Test in Boston MCSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Boston MCSA is excellent.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the Boston MCSA.

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
Boston MCSA	100	352	100	7.1	19.3	42.9	30.4	9.4	18.6	41.0	30.7

The proportion of branches in low-income geographies is below the proportion of the low-income population in those geographies. The proportion of branches in moderate-income geographies exceeds the proportion of the moderate-income population in those geographies. The bank has 35 branches located in middle- and upper-income geographies that are within one quarter mile of low- and/or moderate-income geography, providing additional accessibility.

Access to retail banking services is further expanded through alternative delivery systems. Over the evaluation period, an average of 55 percent of customer households in low-income and 59 percent of customer households in moderate-income geographies utilized the bank's online/mobile banking platforms. The distribution of ATMs is excellent. The proportion of ATMs in low-income geographies is slightly below and in moderate-income geographies exceeds the proportion of population in those geographies.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Boston MCSA	8	21	-2	-4	-4	-3

The bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. Despite the net closures in LMI geographies, the remaining branches were readily accessible to LMI geographies and individuals.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. Branch operating hours are generally consistent throughout the Boston MCSA.

Community Development Services

CBNA is a leader in providing CD services in the Boston CSA.

During the evaluation period, 385 CBNA employees contributed 7,423 hours with 150 different organizations to provide CD services primarily targeted to LMI individuals. CD services also included participation on boards or committees of 86 CD organizations in the Boston CSA. Employees primarily provided financial literacy, mentoring, and technical assistance. Examples include:

- Bank employees facilitated 640 financial literacy sessions through the Money Smart Program, which is a comprehensive adult and youth financial education program delivered in several languages. The program covered banking products, importance of credit, and helping first time homebuyers with establishing a budget. More than 14,225 LMI individuals participated in the financial literacy sessions.
- Bank employees participated in 14 homebuyer training sessions through CBNA's partnership with Massachusetts Affordable Housing Alliance. More than 700 LMI individuals participated in the homebuyer training sessions, which teaches LMI individuals all of the steps involved in purchasing and owning a home. The partnership also resulted in originating 144 loans in 2018 under the MHP One Loan program.

Multistate Combined Statistical Area Rating

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

CRA rating for the New York MCSA²: Outstanding

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

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- Adequate geographic distribution of loans in its AA.
- Good distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in making CD loans.
- Excellent level of qualified CD investment and grants and exhibits excellent responsiveness to credit and community economic development needs.
- Service delivery systems are accessible to geographies and individuals of different income levels.
- The bank provides a significant level of CD services.

Description of Institution's Operations in New York MCSA

CBNA's AA consists of Dutchess, Orange and Westchester counties in New York, and Fairfield and New Haven counties in Connecticut.

CBNA had \$3.7 billion in deposits in the MCSA representing 4.1 percent of its deposits. CBNA ranked 12th in deposit market share with 1.8 percent. Major competitors include JPMorgan Chase, Peoples United Bank, Bank of America, N.A., Wells Fargo Bank, N.A., and Citibank, N.A. CBNA operated 27 branches and 37 ATMs in the MCSA, representing 3.5 percent of total branches and 3 percent of total ATMs.

The area poses a number of challenges to home mortgage lenders in the AA, including CBNA. The MCSA is a high-cost housing area, limiting access to affordable home ownership among LMI borrowers. The median housing value in the MCSA is \$373,639 while the NAR 4Q2018

² This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

median sales price of a single-family home ranged from \$226,800 to \$406,100. One simplistic method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Assuming a 30-year mortgage with a 4.5 percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$45,122 (or less than 50 percent of the FFIEC adjusted median family income in the AA) could afford a \$205,716 mortgage with a payment of \$1,128 per month; a moderate-income borrower earning \$72,196 (or less than 80 percent of the FFIEC adjusted median family income in the AA) could afford a \$329,150 mortgage with a payment of \$1,805 per month.

The poverty level across the AA was considered in our evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial wherewithal to qualify for a home loan than those with income above poverty. In the New York MCSA, the overall poverty level was 7.6 percent. However, in low-income tracts, the household poverty rate increases to 31 percent and in moderate-income tracts it increases to 17 percent. In middle- and upper-income tracts, the combined poverty level is 6 percent.

As part of the CRA evaluation, the OCC reviewed information from three community contacts made within the New York MCSA to determine local economic conditions and community needs. These contacts included representatives from affordable housing and small business organizations. Needs identified include: affordable housing, small dollar working capital loans, financial literacy, and support services for the homeless.

New York MCSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: NY MCSA 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	829	9.8	17.2	30.5	41.1	1.3
Population by Geography	3,623,134	8.4	17.9	30.1	43.2	0.3
Housing Units by Geography	1,437,771	8.5	18.6	31.8	41.1	0.0
Owner-Occupied Units by Geography	851,281	2.9	12.2	32.9	52.0	0.0
Occupied Rental Units by Geography	452,448	17.4	29.4	30.0	23.3	0.0
Vacant Units by Geography	134,042	14.2	23.0	31.2	31.6	0.1
Businesses by Geography	291,791	7.0	14.2	29.7	49.1	0.1
Farms by Geography	8,123	3.9	12.9	32.2	51.0	0.0
Family Distribution by Income Level	882,036	21.1	14.8	17.4	46.7	0.0
Household Distribution by Income Level	1,303,729	24.1	14.0	15.8	46.1	0.0
Median Family Income MSA - 14860 Bridgeport-Stamford-Norwalk, CT MSA		\$105,628	Median Housing Value			\$373,639
Median Family Income MSA - 20524 Dutchess County-Putnam County, NY MD		\$94,443	Median Gross Rent			\$1,259
Median Family Income MSA - 28740 Kingston, NY MSA		\$74,546	Families Below Poverty Level			7.6%
Median Family Income MSA - 35300 New Haven-Milford, CT MSA		\$80,739				
Median Family Income MSA - 35614 New York-Jersey City-White Plains, NY-NJ MD		\$72,047				
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.						

Scope of Evaluation in New York MCSA

The New York MCSA received a full-scope review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK MCSA

LENDING TEST

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

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

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs, given competition within the market.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
NY MCSA	3,681	2,140	0	6	5,827

Dollar Volume of Loans (000s)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
NY MCSA	1,372,673	133,926	0	57,368	1,563,967

CBNA ranked 12th in deposits with 1.8 percent market share. In overall HMDA lending, CBNA ranked seventh with a 2.7 percent market share. There are 653 mortgage lenders in the AA, many without a depository presence. The leading lender in this market was Wells Fargo with 8.1 percent market share, followed by JP Morgan Chase with 6.7 percent, and Quicken Loans with 4.7 percent. In small loans to businesses, CBNA ranked 18th with a market share of 0.8 percent. The top three lenders were significant credit card lenders with a combined market share of 51.4 percent; American Express with 30 percent; Chase Bank USA, NA with 12.5 percent; and Citigroup with 8.9 percent.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O in the New York MCSA 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 geographic distribution of home mortgage loans is adequate.

2017 to 2018

The proportion of loans in low-income geographies was below the proportion of owner-occupied homes in those geographies and was well below the aggregate distribution of loans. The proportion of loans in moderate-income geographies was below both the proportion of owner-occupied homes in those geographies and the aggregate distribution of loans.

2016

Performance in 2016 was inconsistent with 2017 to 2018. The proportion of loans in low-income geographies was significantly below the proportion of owner-occupied homes in those geographies and was well below the aggregate distribution of loans. The proportion of loans in moderate-income geographies was well below both the proportion of owner-occupied homes in those geographies and the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table Q in the New York MCSA 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 geographic distribution of small loans to businesses is good.

2017 to 2018

The proportion of loans in low-income geographies was below both the proportion of businesses located in those geographies and the aggregate distribution of loans. The proportion of loans in moderate-income geographies approximated the proportion of businesses located in those geographies and substantially met the aggregate distribution of loans.

2016

Performance was inconsistent with 2017 to 2018. The proportion of loans in low-income geographies was equal to the proportion of businesses located in those geographies and exceeded the aggregate distribution of loans. The proportion of loans in moderate-income geographies substantially met the proportion of businesses located in those geographies and exceeded the aggregate distribution of loans.

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.

Home Mortgage Loans

Refer to Table P in the New York MCSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases. The borrower distribution of home mortgage loans is adequate.

2017 to 2018

The proportion of loans to low-income borrowers was significantly below the proportion of low-income families, but substantially met the aggregate distribution of loans. Considering CBNA's performance relative to all lenders, the distribution is adequate to low-income borrowers. The proportion of loans to moderate-income borrowers was equal to the proportion of moderate-income families and approximated the aggregate distribution of loans. The high housing cost,

the limited availability of housing that low-income borrowers can afford to acquire, and poverty levels within the MCSA constrained the lending opportunities to low-income borrowers.

2016

Performance was inconsistent with 2017 to 2018. The proportion of loans to low-income borrowers was significantly below the proportion of low-income families and well below the aggregate distribution of loans. The proportion of loans to moderate-income borrowers was well below both the proportion of moderate-income families and the aggregate distribution of loans.

Small Loans to Businesses

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

2017 to 2018

The proportion of loans to small businesses exceeded the percentage of small businesses in the MCSA and significantly exceeded the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018.

Community Development Lending

The bank is a leader in making 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 multifamily loans that also qualify as CD loans.

CBNA demonstrated excellent responsiveness to CD lending needs and opportunities. CD loans include complex projects where the bank often acted in a leadership role. By dollar volume, 91.6 percent of these loans provide the primary benefit of affordable housing to LMI individuals (669 units created or rehabilitated), and 8.4 percent fund community services. The dollar volume of CD lending represents 11.7 percent of allocated Tier 1 Capital. Examples include:

- \$38 million loan for land acquisition to create a 102-unit affordable housing development in Stamford, CT. The project also utilized LIHTC financing.
- \$13.3 million loan for the rehabilitation of a 167-unit affordable housing development, with all units allocated to tenants earning less than 80 percent of the AMI. The development is located in White Plains, NY.

- \$3.6 million SBA 504 loan to purchase a warehouse and wholesale facilities for a local, bulk grocery provider. The building is located in The Bronx, NY and in a Historically Underutilized Business zone.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

CBNA participates in the State of New York Mortgage Agency (SONYMA) program that assists with the purchase of a home in the state of New York. The program features a below-market interest rate, low down payment requirements, no points, and no prepayment penalties. All SONYMA loans are financed through the sale of tax-exempt bonds, requiring borrowers to meet household income and purchase price limits. During the evaluation period CBNA originated 16 SONYMA loans totaling \$1.9 million.

INVESTMENT TEST

The institution's performance under the Investment Test in the New York MCSA is Outstanding.

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

CBNA has an excellent level of qualified CD investment and grants, often in a leadership position.

CBNA exhibits excellent responsiveness to credit and community economic development needs. The bank makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments*	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
New York MCSA	31	\$61,352	66	\$32,531	97	100	\$93,883	100	6	\$22,892

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

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

The combined prior and current period dollar volume represents 19.2 percent of allocated Tier 1 Capital. The bank's investments targeted affordable housing, a primary need in the AA. The investments focused on LIHTCs, MBSs, equity investments, and grants. Examples include:

- \$14.8 million proprietary LIHTC fund for the acquisition and rehabilitation of 167-units in White Plains, Westchester County, NY. The project will set aside 145 units for tenants with incomes at or below 60 percent of AML.
- \$5.6 million of a \$5.8 million commitment in a \$188 million multi-investor LIHTC fund. The investment was directed towards the second phase development of a 111-unit affordable housing apartment building in New Haven, CT.
- \$2.9 million of a \$3 million commitment in a \$171.5 million multi-investor LIHTC fund. The investment was directed toward the development of an 81-unit affordable housing apartment building in Meriden, CT.

SERVICE TEST

The institution's performance under the Service Test in the New York MCSA is rated High Satisfactory.

Based on a full-scope review, the institution's performance in the New York MCSA is good.

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
New York MCSA	100.0	27	100.0	0.0	22.2	48.2	29.6	8.4	17.9	30.1	43.2

No branches were located in low-income geographies. The distribution of branches in moderate-income geographies was excellent. The distribution of branches in moderate-income geographies exceeded the percentage of the population in moderate-income geographies. Within the AA, the bank had four branches in middle- and upper-income geographies that were within one quarter of a mile of LMI geographies. While those adjacent branches provided LMI individuals and individuals in LMI geographies additional access to the bank's retail banking services, it was not significant enough to affect the overall conclusion.

The bank provided additional access to retail banking services through alternative delivery systems, including ATMs and digital banking platforms (online banking/mobile banking). Over the three-year evaluation period, an average of 41 percent of customer households in low-income geographies utilized the bank's digital banking platforms. This usage percentage was higher at 49 percent for households in moderate-income geographies. In addition, the bank operated 34 deposit taking ATMs in the New York MCSA. ATM availability was poor in low-

income geographies and excellent in moderate-income geographies. The percentage of ATMs in low-income geographies was well below the percentage of the population in low-income geographies and the percentage of ATMs in moderate-income geographies exceeded the percentage of the population in moderate-income geographies.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
New York MCSA	1	5	0	-2	-3	+1

The bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. Despite the net closures in moderate-income geographies, the remaining branches remained accessible in moderate-income geographies and to LMI individuals.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. Branch operating hours were generally consistent throughout the New York MCSA.

Community Development Services

The bank provides a significant level of CD services.

CBNA employees provided 841 hours of services through participation with 15 CD organizations. During the evaluation period, 66 CBNA employees in the New York MCSA participated in CD services, primarily involved in providing financial literacy and education to LMI students and individuals and individuals located in LMI geographies. Other services involved providing board leadership on six boards for local non-profit organizations, participating in homebuyer's workshops, and offering technical support for local non-profit organizations. Examples include:

- Bank employees facilitated financial literacy sessions through the Money Smart Program. More than 2,000 LMI individuals participated in the financial literacy sessions.
- Bank employees provided homebuyer financial education classes that assisted 173 potential LMI homebuyers.

State Rating

State of Connecticut

CRA rating for the State of Connecticut³: Outstanding

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

The major factors that support this rating include:

- Lending levels reflect good responsiveness to AA credit needs.
- Adequate geographic distribution of loans in its AA.
- Excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in making CD loans.
- Excellent level of qualified CD investment and grants and exhibits excellent responsiveness to credit and community economic development needs.
- Service delivery systems are accessible to geographies and individuals of different income levels.
- The bank provides an adequate level of CD services.

Description of Institution's Operations in Connecticut

CBNA's delineated AA within Connecticut includes Hartford and Middlesex counties within the Hartford-West Hartford-East Hartford MSA and the Norwich-New London MSA in its entirety which consists of New London County. Operations within other counties in Connecticut are included in either the Boston MCSA or New York MCSA rating areas.

CBNA had \$1.8 billion in deposits in the state, which represents 2 percent of the bank's total deposits. Major competitors include Bank of America, Liberty Bank, Peoples United Bank, United Bank, and Webster Bank. CBNA operated 22 branches and 29 ATMs representing 2.9 percent of total branches and 2.3 percent of total ATMs.

As part of the CRA evaluation, the OCC reviewed information from two community contacts made within the CSA to determine local economic conditions and community needs. These

³ The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

contacts indicated a need for small dollar loans, consumer credit loans, and debt consolidation loans.

Hartford CSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Hartford CSA 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	327	15.9	15.0	37.3	30.0	1.8
Population by Geography	1,335,293	13.4	14.5	38.7	32.9	0.4
Housing Units by Geography	570,873	13.9	14.9	39.9	31.4	0.0
Owner-Occupied Units by Geography	344,499	4.3	10.9	43.9	41.0	0.0
Occupied Rental Units by Geography	174,475	30.3	22.5	32.8	14.3	0.0
Vacant Units by Geography	51,899	22.1	16.1	36.7	25.0	0.0
Businesses by Geography	101,486	10.3	12.0	40.7	36.7	0.3
Farms by Geography	3,197	3.3	7.8	42.7	46.2	0.0
Family Distribution by Income Level	339,626	22.8	16.9	20.4	39.9	0.0
Household Distribution by Income Level	518,974	26.0	15.0	17.4	41.6	0.0
Median Family Income MSA - 25540 Hartford-West Hartford-East Hartford, CT MSA		\$88,016	Median Housing Value			\$240,182
Median Family Income MSA - 35980 Norwich-New London, CT MSA		\$82,349	Median Gross Rent			\$1,011
			Families Below Poverty Level			8.0%
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.						

Scope of Evaluation in Connecticut

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CONNECTICUT

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

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

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Hartford CSA	1,433	1,465	0	5	2,903

Dollar Volume of Loans (000s)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Hartford CSA	287,681	80,999	0	51,525	420,142

CBNA ranked eighth in deposits with a 3.7 percent market share. Bank of America ranked first in deposits with 41.9 percent market share. In overall home mortgage lending, CBNA ranked seventh with a 2.8 percent market share. There are 463 mortgage lenders in the AA, many without a depository presence. There are 34 depository institutions in the AA. The leading lender in this market was Wells Fargo with 4.9 percent market share, followed by Webster Bank with 3.7 percent, and Quicken Loans with 3.4 percent. In small loans to businesses, CBNA ranked 14th with 1.6 percent market share. The top three lenders with a combined market share of 40.3 percent were American Express with 20.6 percent, US Bank with 10.5 percent, and Bank of America with 9.2 percent.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O in the state of Connecticut 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 geographic distribution of home mortgage loans is poor.

2017 to 2018

The proportion of loans in low-income geographies was below both the proportion of owner-occupied homes in those geographies and the aggregate distribution of loans. The proportion of loans in moderate-income geographies was well below the proportion of owner-occupied homes in those geographies and the aggregate distribution of loans.

2016

The proportion of loans in low-income geographies was significantly below both the proportion of owner-occupied homes in those geographies and the aggregate distribution of loans. The proportion of loans in moderate-income geographies was below the proportion of owner-occupied homes in those geographies and the approximated the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table Q in the state of Connecticut 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 geographic distribution of small loans to businesses is adequate.

2017 to 2018

The proportion of loans in both low- and moderate-income geographies was below both the proportion of businesses located in those geographies and the aggregate distribution of loans.

2016

The proportion of loans in low-income geographies was significantly below both the proportion of businesses located in those geographies and the aggregate distribution of loans. The proportion of loans in moderate-income geographies exceeded both the proportion of businesses located in those geographies and the aggregate distribution of loans.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P in the state of Connecticut section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases. The borrower distribution of home mortgage loans is excellent.

2017 to 2018

The proportion of loans to low-income borrowers was below the proportion of low-income families within the AA but exceeded the aggregate distribution of loans. Considering the higher performance relative to all lenders, the distribution is good to low-income borrowers. The proportion of loans to moderate-income borrowers exceeded both the proportion of moderate-income families and the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018.

Small Loans to Businesses

Refer to Table R in the state of Connecticut section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses. The borrower distribution of small loans to businesses is excellent.

2017 to 2018

The proportion of loans to small businesses exceeded both the percentage of small businesses in the CSA and the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018.

Community Development Lending

The bank is a leader in making 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 multifamily loans that also qualify as CD loans.

CBNA demonstrated excellent responsiveness to CD lending needs and opportunities. CD loans include complex projects where the bank often acted in a leadership role. The dollar volume of CD lending represents 21.6 percent of allocated Tier 1 Capital. Examples include:

- \$20.5 million loan to finance a property in Manchester, CT that led to the creation of 100 jobs for individuals earning below 60 percent of the AMI.
- \$950 thousand in term financing to a Community Development Financial Institution (CDFI) for a loan pool to create 400 units of affordable rental housing for LMI individuals in Connecticut.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

CBNA participates in the CHFA mortgage program described earlier under the Boston MCSA rating area. During the evaluation period, CBNA originated 35 CHFA totaling \$4 million.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

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

CBNA exhibits excellent responsiveness to credit and community economic development needs. The bank makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments*	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Hartford CSA	22	25,655	46	30,609	68	100	56,264	100	6	12,679

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

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

The combined prior and current period dollar volume represents 23.6 percent of allocated Tier 1 Capital. CD investments helped finance the development or preservation of over 550 units of affordable housing.

- Three investments totaling \$6.4 million in a multi-investor LIHTC fund. The investments helped to fund affordable housing apartment complexes in West Hartford (72 units), Suffield (48 units), and Middletown (32 units).
- \$5.3 million investment in a multi-investor LIHTC fund. The investment helped to fund the development of an apartment complex in Glastonbury. The complex is a 72-unit affordable housing development for senior citizens. Eligible households have an annual income at or below 60 percent AMI.
- \$1.4 million preferred stock investment in a CDFI. The investment was directed towards the development of 396-unit affordable housing complex in East Hartford.

SERVICE TEST

The institution's performance under the Service Test in the state of Connecticut is rated High Satisfactory.

Based on a full-scope review, the institution's performance in the Hartford CSA is good.

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Hartford CSA	100.0	22	100.0	13.6	4.5	45.5	36.4	13.4	14.5	38.7	32.9

The distribution of branches was excellent in low-income geographies and poor in moderate-income geographies. The percentage of branches in low-income geographies exceeded the percentage of the population in low-income geographies. The percentage of branches in moderate-income geographies was well below the percentage of the population in moderate-income geographies. The bank had no branches in middle- and upper-income geographies that were close enough to LMI geographies to provide additional access to retail banking services in LMI geographies or to LMI individuals.

The bank provided additional access to retail banking services through alternative delivery systems, including ATMs and digital banking platforms (online banking/mobile banking). Over the three-year evaluation period, an average of 53 percent of customer households in low-income geographies utilized the bank's digital banking platforms. This usage percentage was slightly higher at 55 percent for households in moderate-income geographies. The bank operated 29 deposit taking ATMs in the Hartford CSA. ATM availability was excellent in low-income geographies and good in moderate-income geographies. The percentage of ATMs in low-income geographies exceeded the percentage of the population in low-income geographies. The percentage of ATMs in moderate-income geographies was below the percentage of the population in moderate-income geographies. The bank had other ATMs in the Hartford CSA that do not accept deposits, but were available for cash withdrawals, money transfers, and balance inquiries during the operating hours of the business where the ATM was located.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Hartford CSA	0	5	0	0	-4	-1

The bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank closed five branches. The five closures were in middle- and upper-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals.

Community Development Services

The bank provides an adequate level of CD services.

CBNA employees provided 525 hours of services through participation with 11 organizations that meet the definition of CD. During the evaluation period, 45 CBNA employees in the CSA provided 115 CD services and 10 economic development activities throughout the CSA. Services primarily involve providing financial literacy, Volunteer Income Tax Assistance (VITA) tax assistance, and job placement assistance for LMI individuals located in LMI geographies. Other services involved providing board leadership for local non-profit organizations, assisting with economic development of neighborhoods, and offering technical support for local non-profit organizations. Examples include:

- Small business workshop sessions with CBNA board members and Small Business Relationship Managers.
- Bank employees provided financial literacy training through the Connecticut Money School program.

State Rating

State of Delaware

CRA rating for the State of Delaware⁴: Outstanding

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

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- Good geographic distribution of loans in its AA.
- Excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in making CD loans.
- Excellent level of qualified CD investment and grants and exhibits excellent responsiveness to credit and community economic development needs.
- Service delivery systems are readily accessible to geographies and individuals of different income levels.
- The bank provides a low level of CD services.

Description of Institution's Operations in Delaware

CBNA has two delineated AAs within Delaware. The Philadelphia CSA consists of New Castle County within the Philadelphia-Camden-Wilmington MMSA and Kent County within the Dover, DE MSA. The Salisbury MSA AA consists of Sussex County.

CBNA had \$1.1 billion in deposits in the state, which represented 1.3 percent of total deposits. Major competitors include PNC Bank, N.A., TD Bank, N.A., Wells Fargo Bank, N.A., and Wilmington Savings Fund Society, F.S.B. CBNA operated 23 branches and 35 ATMs representing 3 percent of total branches and 2.8 percent of total ATMs.

As part of the CRA evaluation, the OCC reviewed information from two community contacts made within the AA to determine local economic conditions and community needs.

⁴The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Philadelphia CSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Philadelphia CSA 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	164	5.5	26.8	43.3	22.6	1.8
Population by Geography	719,152	3.7	23.3	47.3	25.7	0.0
Housing Units by Geography	286,736	4.0	24.2	47.1	24.7	0.0
Owner-Occupied Units by Geography	181,860	1.7	19.2	48.8	30.3	0.0
Occupied Rental Units by Geography	80,979	7.8	33.4	44.0	14.8	0.0
Vacant Units by Geography	23,897	8.2	31.1	44.7	15.9	0.0
Businesses by Geography	49,492	4.3	25.6	45.0	25.0	0.0
Farms by Geography	1,441	1.1	15.6	58.8	24.4	0.0
Family Distribution by Income Level	175,255	20.9	17.6	21.0	40.4	0.0
Household Distribution by Income Level	262,839	23.7	16.3	18.4	41.6	0.0
Median Family Income MSA - 20100 Dover, DE MSA		\$64,252	Median Housing Value			\$236,054
Median Family Income MSA - 48864 Wilmington, DE-MD-NJ MD		\$80,707	Median Gross Rent			\$1,029
			Families Below Poverty Level			8.0%
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.						

Scope of Evaluation in Delaware

The Philadelphia CSA received a full-scope review. This area accounted for the large majority of loans, deposits, and branches within the state. The Salisbury MSA received a limited-scope review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN DELAWARE**LENDING TEST**

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

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs when considering competition and the bank's market presence.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Philadelphia CSA	1,214	723	0	5	1,942	71.4	78.3
Salisbury MSA	480	298	0	0	778	28.6	21.7

Dollar Volume of Loans* (000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Philadelphia CSA	220,821	35,835	0	17,460	274,116	64.9	78.3
Salisbury MSA	137,072	11,377	0	0	148,449	35.1	21.7

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

CBNA ranked 14th in deposits with 0.3 percent market share. In overall home mortgage lending, CBNA ranked 11th with 2.9 percent market share. There are 410 mortgage lenders in the AA, many without a depository presence. There are 36 depository institutions in the AA. The leading lender in this market was Wells Fargo with 7 percent market share followed by Lakeview Loan Servicing with 4.9 percent, and Wilmington Savings Society with 4 percent. In small loans to businesses, CBNA ranked 16th with 1.6 percent market share. The top three lenders with a combined market share of 39 percent were American Express with 20.2 percent, PNC Bank with 10.4 percent, and Chase Bank USA with 8.3 percent.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O in the state of Delaware 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 geographic distribution of home mortgage loans is good.

2017 to 2018

The proportion of loans in low-income geographies was significantly below the proportion of owner-occupied homes in those geographies and was well below the aggregate distribution of loans. The proportion of loans in moderate-income geographies approximated the proportion of owner-occupied homes in those geographies and substantially met the aggregate distribution of loans. The AA contained a limited number of low-income geographies. More emphasis was placed on performance in the moderate-income geographies.

2016

Performance was consistent with 2017 to 2018.

Small Loans to Businesses

Refer to Table Q in the state of Delaware 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 geographic distribution of small loans to businesses was adequate.

2017 to 2018

The proportion of loans in low-income geographies was below both the proportion of businesses located in those geographies and the aggregate distribution of loans. The proportion of loans in moderate-income geographies was below the proportion of businesses located in those geographies and approximated the aggregate distribution of loans. The AA contained a limited number of low-income geographies. More emphasis was placed on performance in the moderate-income geographies.

2016

Performance was inconsistent with 2017 to 2018. The proportion of loans in low-income geographies was significantly below both the proportion of businesses located in those geographies and the aggregate distribution of loans. The proportion of loans in moderate-income geographies exceeded both the proportion of businesses located in those geographies and the aggregate distribution of loans.

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.

Home Mortgage Loans

Refer to Table P in the state of Delaware 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 borrower distribution of home mortgage loans is excellent.

2017 to 2018

The proportion of loans to low-income borrowers was below the proportion of low-income families within the AA but significantly exceeded the aggregate distribution of loans. When considering the lending constraints within the CSA, due to high housing costs and the limited availability of housing that low-income borrowers can afford to acquire, the distribution is good to low-income borrowers. The proportion of loans to moderate-income borrowers significantly exceeded the proportion of moderate-income families and exceeded the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018.

Small Loans to Businesses

Refer to Table R in the state of Delaware 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 borrower distribution of small loans to businesses is excellent.

2017 to 2018

The proportion of loans to small businesses exceeded the percentage of small businesses in the CSA and significantly exceeded the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018.

Community Development Lending

The bank is a leader in making 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 multifamily loans that also qualify as CD loans.

CBNA demonstrated excellent responsiveness to CD lending needs and opportunities. CD loans include complex projects where the bank acted in a leadership role. The dollar volume of CD lending represents 14.7 percent of allocated Tier 1 Capital.

Examples include:

- \$11.8 million construction loan to rehabilitate a 108-unit affordable housing development targeted to low-income seniors in Newark, DE. Residents must earn 50 percent or below the AMI. The project financing also utilized LIHTC.
- \$2 million loan to a CDFI that engages in affordable housing development in the AA.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Salisbury MSA is weaker than the bank's overall performance under the Lending Test in the full-scope area. Both geographic and borrower distribution was weaker. The weaker performance did not impact the overall Lending Test rating.

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

INVESTMENT TEST

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

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

Conclusions for Area Receiving a Full-Scope Review

CBNA has an excellent level of qualified CD investment and grants, often in a leadership position.

CBNA exhibits excellent responsiveness to credit and community economic development needs. The bank makes limited 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)
Philadelphia CSA	24	5,058	26	2,021	50	79.4	7,079	69.9	0	0
Salisbury MSA	4	1,020	9	2,033	13	20.6	3,053	30.1	0	0

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

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

The combined prior and current period dollar volume represents 6 percent of allocated Tier 1 Capital. Most of the investments included pass through MBS that helped finance mortgages to low- and moderate-income borrowers.

Conclusions for Area Receiving a Limited-Scope Review

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

SERVICE TEST

The institution's performance under the Service Test in the state of Delaware is rated Outstanding.

Based on a full-scope review, the institution's performance in the Philadelphia CSA is excellent.

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Philadelphia CSA	78.3	19	85.2	5.3	21.0	47.4	26.3	3.7	23.3	47.3	25.7
Salisbury MSA	21.7	4	14.8	0.0	25.0	75.0	0.0	0.0	10.1	76.4	13.5

The distribution of branches was excellent in LMI geographies. The percentage of branches in both low- and moderate-income geographies exceeded the population in those geographies. Within the Philadelphia CSA, the bank had two branches in moderate- and upper-income geographies that were located within one quarter of a mile of LMI geographies. These adjacent branches provided LMI individuals and individuals in LMI geographies additional access to the bank's retail banking services.

Access to retail banking services was further expanded through alternative delivery systems, including ATMs and digital banking platforms (online banking/mobile banking). Over the three-year evaluation period, an average of 49 percent of customer households in low-income geographies utilized the bank's digital banking platforms to access banking services. In moderate-income geographies, utilization of the bank's digital platforms increased to an average of 57 percent of customer households. The bank operated 22 deposit-taking ATMs in the Philadelphia CSA. ATM availability was excellent in LMI geographies. The percentage of the bank's ATMs in LMI geographies exceeded the percentage of the population in those geographies.

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

The bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank closed one branch in an upper-income geography and opened one branch in a middle-income geography.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. In-store branches located in ACME grocery stores were open 10:00 am to 7:00 pm Monday through Friday, 10:00 am to 4:00 pm Saturday, and 11:00 am to 3:00 pm Sunday.

Community Development Services

The bank provides a low level of CD services.

CBNA employees provided 84 hours through participation with seven organizations that meet the definition of CD. During the evaluation period, seven CBNA employees in the CSA provided 25 CD services in the CSA. Services primarily involved providing financial literacy for LMI individuals located in LMI geographies. Other services involved providing board leadership for local non-profit organizations and offering technical support for local non-profit organizations. Examples include:

- Through a CDFI, the bank supports small business and CD for LMI individuals in LMI geographies in the CSA.
- Bank employees provided financial literacy to over 200 LMI individuals through the Money Smart Program.

Based on a limited-scope review, the bank's performance under the Service Test in the Salisbury MSA is consistent with the bank's overall performance under the Service Test in the state of Delaware.

State Rating

State of Massachusetts

CRA rating for the State of Massachusetts⁵: Outstanding

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

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- Excellent geographic distribution of loans in its AA.
- Excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in making CD loans.
- Excellent level of qualified CD investment and grants and exhibits excellent responsiveness to credit and community economic development needs.
- Service delivery systems are readily accessible to geographies and individuals of different income levels.
- The bank provides a significant level of CD services.

Description of Institution's Operations in Massachusetts

CBNA has two AAs within Massachusetts. They include the Springfield CSA and the Pittsfield MSA in their entirety. Operations within other geographies delineated within Massachusetts are included in the analysis of the Boston MCSA.

CBNA maintains approximately \$619 million in deposits in Massachusetts, representing approximately 0.7 percent of the bank's total deposits. Primary competitors include Berkshire Bank, TD Bank, N.A., and Bank of America, N.A. CBNA operated 23 branches and 25 ATMs representing 3 percent of total branches and 2 percent of total ATMs.

As part of the CRA evaluation, the OCC reviewed information from two community contacts made within the AA to determine local economic conditions and community needs. Identified needs were workforce development training and financial education for both individuals and small businesses.

⁵ The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Springfield CSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Springfield CSA 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	157	15.9	15.9	35.0	30.6	2.5
Population by Geography	699,944	13.3	15.5	35.4	33.3	2.6
Housing Units by Geography	288,606	12.8	16.1	38.5	32.5	0.1
Owner-Occupied Units by Geography	168,524	4.3	12.7	40.3	42.7	0.0
Occupied Rental Units by Geography	97,209	26.4	21.1	35.6	16.6	0.3
Vacant Units by Geography	22,873	17.9	20.1	36.9	24.8	0.4
Businesses by Geography	40,773	12.9	15.2	34.7	36.5	0.8
Farms by Geography	1,503	1.9	6.0	44.2	47.6	0.2
Family Distribution by Income Level	167,860	24.2	16.1	18.5	41.2	0.0
Household Distribution by Income Level	265,733	26.9	14.7	15.9	42.4	0.0
Median Family Income MSA - 44140 Springfield, MA MSA		\$67,381	Median Housing Value			\$210,226
Median Family Income Non-MSAs – MA		\$73,868	Median Gross Rent			\$857
			Families Below Poverty Level			11.5%
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.						

Scope of Evaluation in Massachusetts

The Springfield CSA was selected for a full-scope review. This area accounts for a substantial majority of the deposits, lending, and branches within Massachusetts. The Pittsfield MSA received a limited-scope review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MASSACHUSETTS

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

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

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Springfield CSA	1,307	534	0	3	1,853	92.3	89.5
Pittsfield MSA	95	60	0	0	155	7.7	10.5

Dollar Volume of Loans (000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans*	% State Deposits
Springfield CSA	186,295	23,119	0	23,778	233,192	93.3	89.5
Pittsfield MSA	14,332	2,340	0	0	16,672	6.7	10.5

CBNA ranked 13th in deposits with 3.3 percent market share. In overall home mortgage lending, CBNA ranked first with 4.4 percent market share, followed by Quicken Loans with 4.2 percent and Peoples Bank with 4.1 percent. There are 335 mortgage lenders in the AA, many without a depository presence. There are 20 depository institutions in the AA. In small loans to businesses, CBNA ranked 13th with 1.6 percent market share. The top three lenders with a combined market share of 37.3 percent were American Express with 17.6 percent, Citigroup with 10.9 percent, and Capital One with 8.8 percent.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O in the state of Massachusetts 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 geographic distribution of home mortgage loans is excellent.

2017 to 2018

The proportion of loans in both low-and moderate-income geographies significantly exceeded both the proportion of owner-occupied homes in those geographies and the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018.

Small Loans to Businesses

Refer to Table Q in the state of Massachusetts 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 geographic distribution of small loans to businesses is adequate.

2017 to 2018

The proportion of loans in low-income geographies is well below both the proportion of businesses located in those geographies and the aggregate distribution of loans. The proportion of loans in moderate-income geographies exceeded both the proportion of businesses located in those geographies and the aggregate distribution of loans.

2016

The proportion of loans in low-income geographies approximated the proportion of businesses located in those geographies and exceeded the aggregate distribution of loans. The proportion of loans in moderate-income geographies was below both the proportion of businesses located in those geographies and the aggregate distribution of loans.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P in the state of Massachusetts section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases. The borrower distribution of home mortgage loans is excellent.

2017 to 2018

The proportion of loans to low-income borrowers is below the proportion of low-income families but significantly exceeded the aggregate distribution of loans. Considering the higher performance relative to all lenders, the distribution is good to low-income borrowers. The proportion of loans to moderate-income borrowers significantly exceeded both the proportion of moderate-income families and the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018.

Small Loans to Businesses

Refer to Table R in the state of Massachusetts section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses. The borrower distribution of small loans to businesses is excellent.

2017 to 2018

The proportion of loans to small businesses exceeded the percentage of small businesses in the CSA and significantly exceeded the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018.

Community Development Lending

The bank is a leader in making 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 multifamily loans that also qualify as CD loans.

CBNA demonstrated excellent responsiveness to CD lending needs and opportunities. CD loans include complex projects where the bank often acted in a leadership role. CBNA's originations of CD loans represents 32.3 percent of allocated Tier 1 Capital. Examples include:

- \$10 million and \$9.5 million loans for adaptive reuse of a former police academy in Agawam, MA into 51 units of affordable housing for formerly homeless veterans. The project also utilized various state funding sources and both federal and state LIHTC. One of the loans bridged the funding of the LIHTC equity investment.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

CBNA offers the MHP One program described earlier under the Boston CSA rating area. During the evaluation period, CBNA originated 73 MHP loans totaling \$10.7 million.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Pittsfield MSA is weaker than the bank's overall performance under the Lending Test in the full-scope area. Both geographic and borrower distribution were weaker than the overall performance, but still considered good. The weaker performance did not impact the overall Lending Test rating.

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

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

CBNA has an excellent level of qualified CD investment and grants, often in a leadership position.

CBNA exhibits excellent responsiveness to credit and community economic development needs. The bank makes extensive 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)
Springfield CSA	8	23,543	22	21,196	30	81.1	44,739	97.5	4	5,461
Pittsfield MSA	4	576	3	589	7	18.9	1,165	2.5	1	49

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

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

The combined prior and current period dollar volume represents 60.8 percent of allocated Tier 1 Capital. The CD investments helped finance the development or preservation of over 568 units of affordable housing. Examples include:

- \$7.3 million funded of a \$13.3 million commitment in a proprietary LIHTC fund to help finance the project described under Community Development Loans within Massachusetts.
- \$2.8 million funded of a \$3 million commitment in a multi-investor LIHTC fund to assist in the rehabilitation of affordable housing projects in Westfield, Chicopee, Holyoke, and Springfield with a total of 384 units of housing.

Conclusions for Area Receiving a Limited-Scope Review

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

SERVICE TEST

The institution's performance under the Service Test in the state of Massachusetts is rated Outstanding.

Based on a full-scope review, the institution's performance in the Springfield CSA is excellent.

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Springfield CSA	89.5	20	87.0	10.0	35.0	40.0	15.0	13.3	15.5	35.4	33.3
Pittsfield MSA	10.5	3	13.0	0.0	33.3	33.3	33.3	8.4	11.4	50.5	29.7

The distribution of branches was good in low-income geographies and excellent in moderate-income geographies. The distribution of branches in low-income geographies was below the percentage of the population in low-income geographies, while the distribution in moderate-income geographies exceeded the percentage of the population in moderate-income geographies. Within the Springfield CSA, CBNA had one branch located in a middle-income geography that was within one quarter of a mile of a low-income geography. This branch helped to provide LMI individuals and individuals in the moderate-income geography additional access to the bank's retail banking services. Considering the additional accessibility provided by adjacent branches, the bank's service delivery systems are readily accessible.

Access to retail banking services was further expanded through alternative delivery systems, including ATMs and digital banking platforms (online banking/mobile banking). Over the three-year evaluation period, an average of 54 percent of customer households in low-income geographies utilized the bank's digital banking platforms to access banking services. In moderate-income geographies, utilization of the bank's digital platforms increased to an average of 56 percent of customer households. The bank operated 21 deposit-taking ATMs in the Springfield CSA. ATM availability was poor in low-income geographies and excellent in moderate-income geographies. The percentage of the bank's ATMs in low-income geographies was well below the percentage of the population in those geographies. The percentage of ATMs in moderate-income geographies exceeded the percentage of the population in those geographies.

The bank did not open or close branches in the Springfield CSA during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. In-store branches located in Stop & Shop grocery stores were open 10:00 am to 7:00 pm Monday through Friday, 10:00 am to 5:00 pm Saturday, and 11:00 am to 3:00 pm Sunday.

Community Development Services

The bank provides a significant level of CD services.

CBNA employees provided 467 hours of services to nine organizations that meet the definition of CD. During the evaluation period, 30 CBNA employees in the CSA provided 142 CD services throughout the CSA. Services primarily involved providing financial literacy and education to LMI students and individuals in LMI geographies. Other services involved providing leadership on three boards of local non-profit organizations and offering technical support for local non-profit organizations. Examples include:

- Employees provided financial literacy education to over 5,000 LMI individuals.
- Employees provided homebuyer financial education classes that assisted 75 potential homebuyers.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Service Test in the Pittsfield MSA is weaker than the bank's overall performance under the Service Test in the state of Massachusetts. Performance is weaker in the Pittsfield MSA primarily due to the bank's limited presence. The bank has only three branches and three ATMs in the AA, which are located in moderate-, middle-, and upper-income geographies comprising nearly 92 percent of the AA's population.

State Rating

State of Michigan

CRA rating for the State of Michigan: Outstanding

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

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- Excellent geographic distribution of loans in its AA.
- Excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in making CD loans.
- Excellent level of qualified CD investment and grants and exhibits excellent responsiveness to credit and community economic development needs.
- Service delivery systems are accessible to geographies and individuals of different income levels.
- The bank is a leader in providing CD services.

Description of Institution's Operations in Michigan

CBNA has delineated three AAs within Michigan; Detroit CSA consisting of the Ann Arbor and Monroe MSAs in their entirety and a portion of the Detroit-Warren-Dearborn MSA consisting of Livingston, Macomb, Oakland, and Wayne Counties; Lansing CSA consisting of Lansing-East Lansing MSA and the non-metro Shiawassee County; and Saginaw MSA.

Within the state, CBNA held \$5.7 billion in deposits representing 6.3 percent of the bank's total deposits. CBNA ranked ninth with 2.6 percent market share. Major competitors include JP Morgan Chase Bank, N.A., Comerica, Bank of America, N.A., PNC Bank N.A., and Flagstar Bank, F.S.B. CBNA operated 87 branches and 103 ATMs representing 13 percent of total branches and 8.3 percent of total ATMs.

As part of the CRA evaluation, the OCC reviewed information from two community contacts made within the Detroit CSA to determine local economic conditions and community needs. Identified needs include safe, affordable housing, affordable childcare, financial education, and homeowner education. It was also identified that nearly 40 percent of Detroit residents do not have in-home internet service.

Detroit CSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Detroit CSA 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,366	13.6	23.8	32.1	28.3	2.2
Population by Geography	4,552,280	10.4	21.7	34.9	32.4	0.5
Housing Units by Geography	1,995,774	12.1	23.4	34.3	29.7	0.5
Owner-Occupied Units by Geography	1,201,916	5.9	17.9	38.1	37.9	0.1
Occupied Rental Units by Geography	560,840	19.4	30.5	30.9	18.3	0.9
Vacant Units by Geography	233,018	26.4	34.4	22.9	15.0	1.2
Businesses by Geography	265,993	7.5	19.2	32.6	39.5	1.2
Farms by Geography	6,796	4.5	13.9	46.5	34.9	0.3
Family Distribution by Income Level	1,134,134	22.6	16.5	18.9	42.1	0.0
Household Distribution by Income Level	1,762,756	25.0	15.4	16.8	42.8	0.0
Median Family Income MSA - 11460 Ann Arbor, MI MSA		\$87,331	Median Housing Value			\$135,470
Median Family Income MSA - 19804 Detroit-Dearborn-Livonia, MI MD		\$52,733	Median Gross Rent			\$880
Median Family Income MSA - 33780 Monroe, MI MSA		\$67,811	Families Below Poverty Level			12.4%
Median Family Income MSA - 47664 Warren-Troy-Farmington Hills, MI MD		\$76,739				
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.						

Scope of Evaluation in Michigan

The Detroit CSA received a full-scope review. This AA accounted for the substantial majority of the deposits, lending, and branches within the state. The Lansing CSA and Saginaw MSA received limited-scope reviews.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MICHIGAN

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

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

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Detroit CSA	6,317	3,566	0	7	9,890	96.0	97.8
Lansing CSA	176	75	0	0	251	2.4	1.4
Saginaw MSA	56	107	0	0	163	1.6	0.8

Dollar Volume of Loans* (000's)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Detroit CSA	849,754	210,807	0	43,962	1,104,523	97.2	97.8
Lansing CSA	21,232	3,504	0	0	24,736	2.2	1.4
Saginaw MSA	4,562	2,121	0	0	6,683	0.6	0.8

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

CBNA ranked eighth in deposits with a 4 percent market share. In overall home mortgage lending, CBNA ranked eighth with 2.9 percent market share. There are 635 mortgage lenders in the AA, many without a depository presence. There are 48 depository institutions in the AA. The leading lender was Quicken Loans with 9.4 percent market share, followed by JP Morgan Chase with 6.3 percent, and Wells Fargo with 4.9 percent. In small loans to businesses, CBNA ranked 12th with a market share of 1.6 percent. The top three lenders with a combined market share of 45.7 percent were American Express with 22.4 percent, Chase Bank USA with 12.9 percent, and Citigroup with 10.4 percent.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O in the state Michigan 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 geographic distribution of home mortgage loans is excellent.

2017 to 2018

The proportion of loans in low-income geographies was below the proportion of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans. The

proportion of loans in moderate-income geographies approximated the proportion of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans. Vacant and blighted homes within the CSA constrained lending opportunities to LMI borrowers. Performance is excellent when considering the depressed real estate value and disrepair of homes in these geographies.

2016

Performance was inconsistent with 2017 to 2018. The proportion of loans in low-income geographies was well below the proportion of owner-occupied homes in those geographies and significantly exceeded the aggregate distribution of loans. The proportion of loans in moderate-income geographies approximated the proportion of owner-occupied homes in those geographies and significantly exceeded the aggregate distribution of loans

Small Loans to Businesses

Refer to Table Q in the state of Michigan 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 geographic distribution of small loans to businesses is excellent.

2017 to 2018

The proportion of loans in low-income geographies substantially met the proportion of businesses located in those geographies and exceeded the aggregate distribution of loans. The proportion of loans in moderate-income geographies exceeded the proportion of businesses located in those geographies and exceeded the aggregate distribution of loans.

2016

Performance was inconsistent with 2017 to 2018. The proportion of loans in low-income geographies was significantly below the proportion of businesses located in those geographies and was well below the aggregate distribution of loans. The proportion of loans in moderate-income geographies was consistent with 2017 to 2018.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P in the state of Michigan section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases. The borrower distribution of home mortgage loans is excellent.

2017 to 2018

The proportion of loans to low-income borrowers was below the proportion of low-income

families within the AA but significantly exceeded the aggregate distribution of loans. Considering the higher performance relative to all lenders, the distribution is good to low-income borrowers. The proportion of loans to moderate-income borrowers exceeded both the proportion of moderate-income families and the aggregate distribution of loans. Homes with negative equity and poverty levels within the CSA constrained lending opportunities to low-income borrowers.

2016

Performance was consistent with 2017 to 2018.

Small Loans to Businesses

Refer to Table R in the state of Michigan section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses. The borrower distribution of small loans to businesses was excellent.

2017 to 2018

The proportion of loans to small businesses substantially met the percentage of small businesses in the CSA and significantly exceeded the aggregate distribution of loans. Performance is excellent when considering the competition from the larger financial institutions in the CSA that dominate the market and originate small business loans through credit cards.

2016

Performance was consistent with 2017 to 2018.

Community Development Lending

The bank is a leader in making 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 multifamily loans that also qualify as CD loans.

CBNA demonstrated excellent responsiveness to CD lending needs and opportunities. CD loans include complex projects where the bank often acted in a leadership role. The dollar volume represents 5.9 percent of allocated Tier 1 Capital. During the evaluation period, CBNA originated one letter of credit in the Detroit CSA for \$1.3 million which assisted in the creation of 80 units of affordable housing for LMI individuals. Examples include:

- \$21.9 million in construction and term financing for an 80-unit multifamily affordable housing development in Detroit, MI, with 61 units allocated to tenants earning less than 60 percent of the AMI. Thirty-nine units will be public housing units, 22 units are for HUD Section 8 housing, and 19 units are market rate.

- \$12.2 million loan to renovate an apartment complex in Detroit, MI and create 72 units of affordable housing. Project financing also utilized LIHTC.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Lansing CSA and Saginaw MSA is weaker than the bank's overall performance under the Lending Test in the full-scope area as a result of weaker geographic distribution of loans. The weaker performance did not impact the overall Lending Test rating.

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

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

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

CBNA exhibits excellent responsiveness to credit and community economic development needs. The bank makes extensive 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)
Detroit CSA	80	46,989	65	40,493	145	91.8	87,482	91.7	5	31,002
Lansing CSA	6	6,973	2	560	8	5.0	7,533	7.9	1	288
Saginaw MSA	2	76	3	356	5	3.2	432	0.4	0	0

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

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

The combined prior and current period dollar volume represents 11.8 percent of allocated Tier 1 Capital. The CD investments helped finance the development or preservation of over 850 units of affordable housing.

- \$13.3 million funded commitment to a proprietary LIHTC fund for development of an 80-unit senior housing complex in Detroit. Sixty-one units will be restricted to households with incomes of 60 percent of AMI or less and 19 units will be at market rate. Additionally, 39 of the units will be subject to a HUD rental assistance contract for an initial term of 40 years.
- \$13.2 million funded of a \$13.5 million commitment to a proprietary LIHTC fund. The investment preserves 157 units of affordable housing in Detroit.
- \$3 million equity equivalent investment in a \$42.9 million multi-bank/investor loan fund to help rehabilitate homes within the City of Detroit. Deeply distressed real estate values and lack of conventional financing has led to blight in much of the city.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Lansing CSA and Saginaw MSA is consistent with the bank's overall performance under the Investment Test in the full-scope area.

SERVICE TEST

The institution's performance under the Service Test in the state of Michigan is rated High Satisfactory.

Based on a full-scope review, the institution's performance in the Detroit CSA is good.

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Detroit CSA	97.8	84	86.6	4.7	22.6	32.1	40.5	10.4	21.7	34.9	32.4
Lansing CSA	1.4	2	2.3	0.0	0.0	50.0	50.0	9.0	21.1	35.1	29.4
Saginaw MSA	0.8	1	1.1	0.0	0.0	100.0	0.0	11.2	12.5	50.5	25.8

The distribution of branches was poor in low-income geographies and excellent in moderate-income geographies. The distribution of branches in low-income geographies was well below the percentage of the population in those geographies. The distribution in moderate-income geographies exceeded the percentage of the population in those geographies. CBNA had seven branches located in middle- and upper-income census tracts that were within one quarter of a mile of LMI census tracts. One of those branches was adjacent to a low-income geography. These branches provided LMI individuals and individuals in LMI geographies additional access to the bank's retail banking services. Considering the additional accessibility provided by adjacent branches, the bank's service delivery systems are accessible.

Access to retail banking services was further expanded through alternative delivery systems, including ATMs and digital banking platforms (online banking/mobile banking). Over the three-year evaluation period, an average of 51 percent of customer households in low-income geographies utilized the bank's digital banking platforms to access banking services. In moderate-income geographies, utilization of the bank's digital platforms increased to an average of 54 percent of customer households. The bank operated 98 deposit-taking ATMs in the Detroit CSA. ATM accessibility was adequate in low-income geographies and excellent in moderate-income geographies. The percentage of the bank's ATMs in low-income geographies was below the percentage of the population in those geographies and the percentage of ATMs in moderate-income geographies exceeded the percentage of the population in those geographies.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Detroit CSA	6	14	+1	-2	-3	-4
Lansing CSA	0	2	0	-1	-1	0
Saginaw MSA	0	0	0	0	0	0

The bank's opening and closing of branches has not adversely 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 the various portions of its AA, particularly LMI geographies and/or individuals. In-store branches located in Kroger grocery stores were open 10:30 am to 6:30 pm Monday through Thursday, 10:30 am to 7:00 pm Friday, 11:00 am to 4:00 pm Saturday, and 11:00 am to 3:00 pm Sunday.

Community Development Services

The bank is a leader in providing CD services.

CBNA employees provided 1,995 hours of CD services to 21 different organizations that meet the definition of CD. During the evaluation period, 68 CBNA employees in the CSA provided

over 300 services targeted to LMI individuals and small businesses. Services primarily involved providing VITA tax assistance, financial literacy and education to LMI students and individuals located in LMI geographies. Services also involved providing leadership on seven boards of local non-profit organizations, assisting with economic development of neighborhoods, and offering technical support for local non-profit organizations. Examples include:

- Employees provided financial literacy training to over 7,000 LMI individuals.
- Bank employees provided financial education to youth and adults through a workforce development program.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Lansing CSA and Saginaw MSA is weaker than the bank's overall performance under the Service Test in the state of Michigan. Performance is weaker primarily due to the bank's limited presence. The bank has only two branches and four ATMs in the Lansing CSA and one branch and one ATM in the Saginaw MSA. The branches and ATMs were located in middle- and upper-income geographies. The middle- and upper-income geographies comprised 64.5 percent of the Lansing CSA population and 76.3 percent of the Saginaw MSA population. The weaker performance did not impact the overall performance.

State Rating

State of New Hampshire

CRA rating for the State of New Hampshire⁶: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- Excellent geographic distribution of loans in its AA.
- Good distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in making CD loans.
- Excellent level of qualified CD investment and grants and exhibits excellent responsiveness to credit and community economic development needs.
- Service delivery systems are readily accessible to geographies and individuals of different income levels.
- The bank provides a low level of CD services.

Description of Institution's Operations in New Hampshire.

CBNA has delineated one AA in New Hampshire consisting of the non-MSA counties Carroll, Cheshire, Coos, Grafton, and Sullivan. Operations and performance in Belknap, Hillsborough, Merrimack, Rockingham, and Strafford Counties are included in the Boston CSA rating.

Within the state, CBNA held \$778 million in deposits representing approximately one percent of total deposits. Major competitors include TD Bank, Mascoma Bank, and Northway Bank. CBNA had 11 branches and 15 ATMs representing 1.4 percent of total branches and 1.2 percent of total ATMs.

As part of the CRA evaluation, the OCC reviewed information from two community contacts made within the state to determine local economic conditions and community needs. Identified needs include technical and financial education for small businesses and entrepreneurs, workforce development programs, and affordable childcare.

⁶ The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

NH Non-MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: NH Non-MSA 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	67	1.5	22.4	62.7	13.4	0.0
Population by Geography	288,289	1.4	19.7	64.3	14.5	0.0
Housing Units by Geography	170,248	1.1	20.6	65.7	12.6	0.0
Owner-Occupied Units by Geography	85,377	1.0	19.7	66.2	13.1	0.0
Occupied Rental Units by Geography	33,120	2.1	23.3	62.1	12.5	0.0
Vacant Units by Geography	51,751	0.7	20.3	67.2	11.8	0.0
Businesses by Geography	19,944	0.9	20.8	62.9	15.5	0.0
Farms by Geography	853	0.5	16.4	68.6	14.5	0.0
Family Distribution by Income Level	75,449	21.3	20.1	22.2	36.3	0.0
Household Distribution by Income Level	118,497	25.1	17.9	19.0	38.0	0.0
Median Family Income Non-MSAs – NH		\$71,699	Median Housing Value			\$203,917
			Median Gross Rent			\$891
			Families Below Poverty Level			6.5%
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.						

Scope of Evaluation in New Hampshire

The NH Non-MSA received a full-scope review. In evaluating geographic distribution of loans, more weight was placed on performance in the moderate-income geographies given there was one low-income geography as a result of the 2015 ACS. In 2016, there were no low-income geographies.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW HAMPSHIRE

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the NH Non-MSA is excellent.

Lending Activity

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

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
NH Non-MSA	878	479	0	1	1,358

Dollars of Loans (000's)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
NH Non-MSA	132,722	23,850	0	33,800	190,372

CBNA ranked third in deposits with 10.9 percent market share. In overall home mortgage lending, CBNA ranked first with 7.3 percent market share followed by Quicken Loans with 6.5 percent and Wells Fargo with 5.1 percent. This is a highly competitive market with 324 home lenders, many without a depository presence. There are 20 depository institutions in the AA. In small loans to businesses, CBNA ranked 12th with a market share of 2.6 percent. The top three lenders with a combined market share of 41.5 percent were American Express with 18.5 percent, Citigroup with 12.4 percent, and Capital One with 10.6 percent.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O in the state of New Hampshire 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 geographic distribution of home mortgage loans is excellent.

2017 to 2018

The proportion of loans in low-income geographies exceeded the proportion of owner-occupied homes in those geographies and significantly exceeded the aggregate distribution of loans. The proportion of loans in moderate-income geographies approximated the proportion of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans.

2016

Performance was inconsistent with 2017 to 2018 as the proportion of loans in moderate-income geographies exceeded the proportion of owner-occupied homes in those geographies. The aggregate distribution of loans was consistent.

Small Loans to Businesses

Refer to Table Q in the state of New Hampshire 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 geographic distribution of small loans to businesses is excellent.

2017 to 2018

The proportion of loans in low-income geographies was below the proportion of businesses located in those geographies and significantly exceeded the aggregate distribution of loans. The proportion of loans in moderate-income geographies exceeded both the proportion of businesses located in those geographies and the aggregate distribution of loans.

2016

Performance was inconsistent with 2017 to 2018. The proportion of loans in moderate-income geographies substantially met the proportion of businesses located in those geographies and approximated the aggregate distribution of loans.

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.

Home Mortgage Loans

Refer to Table P in the state of New Hampshire section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases. The borrower distribution of home mortgage loans is good.

2017 to 2018

The proportion of loans to low-income borrowers was below the proportion of low-income families but significantly exceeded the aggregate distribution of loans. Considering the higher performance relative to all lenders, the distribution is good to low-income borrowers. The proportion of loans to moderate-income borrowers exceeded both the proportion of moderate-income families and the aggregate distribution of loans.

2016

Performance was inconsistent with 2017 to 2018. The proportion of loans to low-income borrowers was well below the proportion of low-income families and significantly exceeded the aggregate distribution of loans. The proportion of loans to moderate-income borrowers was below the proportion of moderate-income families and substantially met the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table R in the state of New Hampshire section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses. The borrower distribution of small loans to businesses is excellent.

2017 to 2018

The proportion of loans to small businesses exceeded the percentage of small businesses in the CSA and significantly exceeded the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018.

Community Development Lending

The bank is a leader in making 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 multifamily loans that also qualify as CD loans.

CBNA demonstrated excellent responsiveness to CD lending needs and opportunities. The bank made one CD loan totaling \$33.8 million during the evaluation period. The loan was used to create a mall in a moderate-income geography that will provide LMI job creation. This was a complex project where the bank acted in a leadership role. The dollar volume of CD lending represents 32.7 percent of allocated Tier 1 Capital.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the NH Non-MSA is excellent.

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

CBNA exhibits excellent responsiveness to credit and community economic development needs. The bank makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments*	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
NH Non-MSA	1	2,031	6	9,359	7	100	11,390	100	3	8,134

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

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

The combined prior and current period dollar volume represents 11 percent of allocated Tier 1 Capital. The investments helped finance the development or preservation of 191 units of affordable housing in the New Hampshire Non-MSA market.

- \$5.3 million funded of a \$5.6 million commitment in a multi-investor LIHTC fund. The investment helped to rehabilitate a 42-unit low-income senior housing development in Berlin, NH. The development is subsidized by HUD Section 8 rental assistance payments.
- \$3 million funded commitment in a multi-investor LIHTC fund. The investment assisted in the development of a 29-unit affordable housing complex in Lebanon, NH.

SERVICE TEST

The institution's performance under the Service Test in the state of New Hampshire is rated Outstanding.

Based on a full-scope review, the institution's performance in the NH Non-MSA is excellent.

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
		# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
	% of Rated Area Deposits in AA			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
NH Non-MSA	100.0	11	100.0	0.0	27.3	54.6	18.2	1.4	19.7	64.3	14.5

No branches were located in low-income geographies; however, there is only one low-income geography, which contained 1.4 percent of the AA population. The distribution of branches was excellent in moderate-income geographies. The distribution of branches in moderate-income geographies exceeded the percentage of the population in moderate-income geographies. None of the branches in middle- and upper-income geographies were located close enough to LMI geographies to provide additional accessibility to LMI individuals or individuals residing in LMI geographies.

Access to retail banking services was further expanded through alternative delivery systems, including ATMs and digital banking platforms (online banking/mobile banking). Over the three-year evaluation period, an average of 58 percent of customer households in moderate-income geographies utilized the bank's digital banking platforms to access banking services. No usage data was available for households in low-income geographies. The bank operated 15 deposit-taking ATMs in the NH Non-MSA. The percentage of the bank's ATMs in moderate-income geographies exceeded the percentage of the population in those geographies. The bank had other ATMs in the NH Non-MSA that do not accept deposits, but were available for cash withdrawals, transfers, and balance inquiries during the operating hours of the business where the ATM was located.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
NH Non-MSA	0	2	0	-1	0	-1

The bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. Despite the branch closure in a moderate-income geography, the remaining branches remained readily accessible in moderate-income geographies and to LMI individuals.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals.

Community Development Services

The bank provides a low level of CD services.

CBNA employees provided 22 hours of services to two organizations that meet the definition of CD. During the evaluation period, two CBNA employees in the NH Non-MSA provided seven community service activities. Services primarily involved providing financial literacy, mentoring for LMI students and individuals located in LMI geographies, and providing VITA tax assistance. Other services involved providing homebuyer education classes.

State Rating

State of New York

CRA rating for the State of New York⁷: Outstanding

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

The major factors that support this rating include:

- Lending levels reflect good responsiveness to AA credit needs.
- Good geographic distribution of loans in its AA.
- Excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in making CD loans.
- Excellent level of qualified CD investment and grants and exhibits excellent responsiveness to credit and community economic development needs.
- Service delivery systems are accessible to geographies and individuals of different income levels.
- The bank provides a significant level of CD services.

Description of Institution's Operations in New York

CBNA has eight delineated AAs in the state; Albany CSA (Albany, Fulton, Montgomery, Rensselaer, Saratoga, Schenectady, and Warren counties), Binghamton MSA (Broome county), Buffalo MSA (Eire and Niagara counties), Ithaca CSA (Cortland and Tompkins counties), Rochester MSA (Livingston, Monroe, Ontario, and Wayne counties), Syracuse MSA (Madison and Onondaga counties), Utica-Rome MSA (Herkimer and Oneida counties), and NY Non-MSA (Chautauqua, Chenango, Otsego, and Sullivan counties).

The bank had \$9.4 billion in deposits representing approximately one percent of total deposits. Major competitors include Manufacturers and Traders Bank, Key Bank, and Bank of America, N.A. CBNA operated 108 branches and 131 ATMs representing 14.1 percent of total branches and 10.5 percent of total ATMs.

⁷ The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

As part of the CRA evaluation, the OCC reviewed information from four community contacts made within the Albany and Rochester AAs to determine local economic conditions and community needs. These contacts indicated the need for affordable housing, workforce development programs, literacy programs, small size business loans, and quality credit counseling.

Albany CSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Albany NY CSA 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	260	9.2	18.5	51.5	19.6	1.2
Population by Geography	1,015,498	7.0	16.5	53.1	22.6	0.8
Housing Units by Geography	469,676	7.9	17.4	54.1	20.5	0.1
Owner-Occupied Units by Geography	263,093	2.9	12.4	58.4	26.3	0.0
Occupied Rental Units by Geography	139,094	14.9	25.3	45.1	14.6	0.2
Vacant Units by Geography	67,489	13.4	20.6	55.8	9.8	0.4
Businesses by Geography	60,237	10.4	12.4	52.2	24.6	0.4
Farms by Geography	1,951	1.5	8.7	69.5	20.2	0.1
Family Distribution by Income Level	244,436	20.5	17.4	22.0	40.1	0.0
Household Distribution by Income Level	402,187	24.3	15.5	18.7	41.5	0.0
Median Family Income MSA - 10580 Albany-Schenectady-Troy, NY MSA		\$81,103	Median Housing Value			\$188,471
Median Family Income MSA - 24020 Glens Falls, NY MSA		\$64,495	Median Gross Rent			\$894
Median Family Income Non-MSAs – NY		\$59,570	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.						

Rochester MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Rochester MSA 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	256	17.2	16.4	39.5	23.8	3.1
Population by Geography	1,015,765	9.6	14.2	45.3	30.0	1.0
Housing Units by Geography	441,366	10.2	15.2	46.5	28.1	0.1
Owner-Occupied Units by Geography	270,466	3.6	11.3	50.6	34.5	0.0
Occupied Rental Units by Geography	134,252	20.7	21.6	38.4	19.2	0.1
Vacant Units by Geography	36,648	20.3	19.8	45.8	14.0	0.1
Businesses by Geography	54,656	9.5	13.5	43.6	33.2	0.3
Farms by Geography	2,052	1.7	8.4	63.4	26.4	0.0
Family Distribution by Income Level	251,478	21.6	16.9	19.8	41.6	0.0
Household Distribution by Income Level	404,718	24.2	16.0	17.3	42.5	0.0
Median Family Income MSA - 40380 Rochester, NY MSA		\$67,757	Median Housing Value			\$132,133
			Median Gross Rent			\$817
			Families Below Poverty Level			10.3%
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.						

Scope of Evaluation in New York

The Albany CSA and Rochester MSA received full-scope reviews based on the level of deposits held and volume of loans originated during the evaluation period. The Albany CSA received greater weight based on the level of deposits held. The remaining AAs received limited-scope reviews.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance is excellent in both the Albany CSA and the Rochester MSA.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Albany CSA	1,361	911	0	8	2,280	19.7	50.9
Rochester MSA	1,892	933	0	5	2,830	24.5	17.6
Binghamton MSA	179	169	0	0	348	3.0	3.0
Buffalo MSA	3,323	985	0	3	4,311	37.3	20.1
Ithaca MSA	71	73	0	0	144	1.3	0.6
Syracuse MSA	429	486	0	1	916	7.9	3.5
Utica-Rome	197	207	0	1	405	3.5	2.2
NY Non-MSA	207	114	0	1	322	2.8	2.1

Dollar Volume of Loans (000's)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Albany CSA	200,283	42,843	0	64,704	307,830	24.3	50.9
Rochester MSA	198,927	37,114	0	88,961	325,002	25.6	17.6
Binghamton MSA	15,841	6,800	0	0	22,641	1.8	3.0
Buffalo MSA	367,225	40,857	0	20,766	428,848	33.8	20.1
Ithaca MSA	8,776	4,552	0	0	13,328	1.1	0.6
Syracuse MSA	45,889	18,277	0	30,235	94,401	7.5	3.5
Utica-Rome	17,458	6,714	0	10,295	34,467	2.7	2.2
NY Non-MSA	25,312	5,317	0	10,000	40,629	3.2	2.1

Albany CSA

Lending levels reflect good responsiveness to AA credit needs. CBNA ranked second in deposits with 14.7 percent market share. In overall home mortgage lending, CBNA ranked 11th with a 3.1 percent market share. There are 298 mortgage lenders in the AA, many without a depository presence. There are 25 depository institutions in the AA. The leading lender in this market was Homestead Funding with 9 percent market share, followed by SEFCU Services, LLC with 7.5 percent, and Wells Fargo with 6.9 percent. In small loans to businesses, CBNA ranked ninth with 2 percent market share. The top three lenders with a combined market share of 41.5 percent were American Express with 21.8 percent, Chase Bank USA with 10.6 percent, and Capital One with 9.1 percent.

Rochester MSA

Lending levels reflect good responsiveness to AA credit needs. CBNA ranked fifth in deposits with 9.2 percent market share. In overall home mortgage lending, CBNA ranked fifth with 4.3 percent market share. There are 238 mortgage lenders in the AA, many without a depository presence. There are 19 depository institutions in the AA. The leading lender in this market was ESL Federal Credit Union with 17.4 percent market share, followed by Wells Fargo with 7.4 percent, and Premium Mortgage Corp. with 5.9 percent. In small loans to businesses, CBNA ranked 12th with a market share of 2 percent. The three leading lenders with a combined market share of 36.4 percent were American Express with 17.2 percent, Chase Bank USA with 11.3 percent, and Capital One with 7.9 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA. The geographic distribution of home mortgage loans is excellent and small loans to businesses is good.

Home Mortgage Loans

Refer to Table O in the state of New York section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases. The geographic distribution of home mortgage loans is excellent.

Albany CSA

2017 to 2018

The proportion of loans in both low-and moderate-income geographies exceeded both the proportion of owner-occupied homes in those geographies and the aggregate distribution of loans.

2016

The proportion of loans in low-income geographies was below the proportion of owner-occupied homes in those geographies but exceeded the aggregate distribution of loans. The proportion of loans in moderate-income geographies was below both the proportion of owner-occupied homes in those geographies and the aggregate distribution of loans.

Rochester MSA

2017 to 2018

The proportion of loans in both low-and moderate-income geographies exceeded both the proportion of owner-occupied homes in those geographies and the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018.

Small Loans to Businesses

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

Albany CSA2017 to 2018

The proportion of loans in low-income geographies was below the proportion of businesses located in those geographies and approximated the aggregate distribution of loans. The proportion of loans in moderate-income geographies approximated both the proportion of businesses located in those geographies and the aggregate distribution of loans.

2016

The proportion of loans in low-income geographies exceeded both the proportion of businesses located in those geographies and the aggregate distribution of loans. The proportion of loans in moderate-income geographies was well below the proportion of businesses located in those geographies and below the aggregate distribution of loans.

Rochester MSA2017 to 2018

The proportion of loans in low-income geographies exceeded both the proportion of businesses located in those geographies and the aggregate distribution of loans. The proportion of loans in moderate-income geographies was below the proportion of businesses located in those geographies but approximated the aggregate distribution of loans.

2016

The proportion of loans in low-income geographies approximated the proportion of businesses located in those geographies but exceeded the aggregate distribution of loans. The proportion of loans in moderate-income geographies was consistent with 2017 to 2018.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P in the state of New York section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases. The borrower distribution of home mortgage loans is excellent.

Albany CSA

2017 to 2018

The proportion of loans to low-income borrowers approximated the proportion of low-income families within the AA but significantly exceeded the aggregate distribution of loans. Considering the higher performance relative to all lenders, the distribution is excellent to low-income borrowers. The proportion of loans to moderate-income borrowers significantly exceeded both the proportion of moderate-income families and the aggregate distribution of loans.

2016

The proportion of loans to low-income borrowers was below the proportion of low-income families within the AA but exceeded the aggregate distribution of loans. Performance to moderate-income borrowers was consistent with 2017 to 2018.

Rochester MSA

2017 to 2018

The proportion of loans to low-income borrowers approximated the proportion of low-income families within the AA but significantly exceeded the aggregate distribution of loans. Considering the higher performance relative to all lenders, the distribution is excellent to low-income borrowers. The proportion of loans to moderate-income borrowers significantly exceeded both the proportion of moderate-income families and the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018.

Small Loans to Businesses

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

Albany CSA

2017 to 2018

The proportion of loans to small businesses exceeded the percentage of small businesses in the AA and significantly exceeded the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018.

Rochester MSA

2017 to 2018

The proportion of loans to small businesses exceeded the percentage of small businesses in the AA and significantly exceeded the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018.

Community Development Lending

The bank is a leader in making 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 multifamily loans that also qualify as CD loans.

Albany CSA

The bank is a leader in making CD loans. CBNA demonstrated excellent responsiveness to CD lending needs and opportunities. CD loans include many complex projects where the bank often acted in a leadership role. The dollar volume of CD lending represents 10.2 percent of allocated Tier 1 Capital. During the evaluation period, CBNA originated one letter of credit in the Albany CSA for \$16.2 million, which supported the creation of 158 units of affordable housing for LMI individuals. The letter of credit provided credit enhancement to the tax-exempt bonds issued by the NY State Housing Finance Agency. Examples of CD loans include:

- \$12 million loan for the purchase of a vacant school building in a Historically Underutilized Business Zone located in a low-income geography. This allowed a charter school to double its enrollment and provide educational services to LMI individuals free of charge.
- \$3 million loan for a school building expansion project in a low-income geography.
- \$9.1 million in construction and term financing for a 61-unit affordable housing development. All units are for tenants earning less than 50 percent of the AMI.

Rochester MSA

The bank is a leader in making CD loans.

CBNA demonstrated excellent responsiveness to CD lending needs and opportunities. CD loans include complex projects where the bank often acted in a leadership role. During the evaluation period, CBNA originated one letter of credit in the Rochester MSA for \$8 million, to back construction of 83 units of affordable housing for LMI individuals. Examples include:

- \$10.5 million construction financing to create a 54-unit affordable housing development targeted to low-income seniors in a low-income geography. LIHTC and HTC were also used in financing this project.
- \$8.6 million construction financing for a 60-unit affordable housing development, with over 50 percent of the units targeted to low-income seniors with special needs.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

CBNA participates in the SONYMA program described earlier under the NY CSA rating area. During the evaluation period, CBNA originated three SONYMA loans totaling \$312 thousand.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Binghamton MSA, Buffalo MSA, Ithaca CSA, Syracuse MSA, and Utica MSA is consistent with the bank's overall performance under the Lending Test in the full-scope areas. Based on a limited-scope review, the bank's performance under the Lending Test in the NY Non-MSA is weaker than the bank's overall performance under the Lending Test in the full-scope areas and considered good. This weaker performance did not impact the overall Lending Test rating.

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

INVESTMENT TEST

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

Conclusions for Areas Receiving Full Scope Reviews.

Based on full scope reviews, the bank's performance in the Albany CSA and Rochester MSAs is excellent.

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

The bank exhibits excellent responsiveness to credit and community economic development needs and makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments*	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Albany CSA	13	24,339	109	31,686	122	37.2	56,025	34.0	2	13,441
Binghamton MSA	11	994	14	1,296	25	7.6	2,290	1.4	0	0
Buffalo MSA	29	9,162	64	27,653	93	28.4	36,815	22.3	3	14,979
Ithaca CSA	2	176	1	133	3	0.9	309	0.2	0	0
NY Non-MSA	1	1,414	0	0	1	0.3	1,414	0.9	0	0
Rochester MSA	17	17,980	32	33,839	49	14.9	51,819	31.4	9	10,256
Syracuse MSA	8	8,372	22	2,885	30	9.1	11,257	6.8	0	0
Utica-Rome MSA	2	3,658	3	1,703	5	1.5	5,361	3.2	2	1,317

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

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

Albany CSA

In the Albany CSA, the combined prior and current period dollar volume represents 8.8 percent of allocated Tier 1 Capital. The bank's investments targeted affordable housing, a primary need in the AA. The investments focused on LIHTC, MBS, equity investments and grants. Examples include:

- Funded \$7.9 million commitment in a proprietary LIHTC fund to develop a 158-unit apartment complex in Saratoga Springs. The tax credit units are restricted to families earning 50 and 60 percent of the AMI. Ten units are also set aside through the Empire State Supportive Housing Initiative for persons age 18-24 who are aging out of foster care, chronically homeless, are disabled, or have been a victim of human trafficking.
- Funded \$7.7 million of \$8.5 million commitment in a multi-investor LIHTC fund to develop a 112-unit affordable housing development in Saratoga Springs.

Rochester MSA

In the Rochester MSA, the combined prior and current period dollar volume represents 23.5 percent of allocated Tier 1 Capital. The bank's investments targeted affordable housing, a primary need in the AA. The investments focused on LIHTCs, equity investments and grants.

Examples include:

- Funded \$5.8 million of \$6.2 million commitment in a multi-investor LIHTC fund. The investment was directed towards the development of a 104-unit affordable housing complex in Ontario, NY.
- Funded \$3.8 million of a \$5.6 million commitment in a multi-investor LIHTC fund. The investment was directed toward the development of an 88-unit affordable housing apartment building in Geneva, NY.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Binghamton, Buffalo, Syracuse and Utica MSAs is consistent with the bank's overall performance under the Investment Test in the full-scope areas. The bank's performance under the Investment Test in the Ithaca CSA and NY Non-Metro AA is weaker than the bank's overall performance under the Investment Test in the full-scope areas due to a lower level of investments.

SERVICE TEST

The institution's performance under the Service Test in the state of New York is rated High Satisfactory.

Based on full-scope reviews, the institution's performance in the Albany CSA is excellent and the performance in the Rochester MSA is good. Performance in limited-scope AAs adversely affected the overall rating.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the institution's AA(s).

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
Albany CSA	50.9	25	23.1	16.0	12.0	32.0	40.0	7.0	16.5	53.1	22.6
Rochester MSA	17.6	25	23.1	8.0	12.0	52.0	28.0	9.6	14.2	45.3	30.0
Binghamton MSA	3.0	4	3.7	25.0	25.0	25.0	25.0	8.1	16.0	51.5	24.4
Buffalo MSA	20.1	41*	38.0	4.9	4.9	53.7	34.1	12.7	13.5	40.0	32.5
Ithaca MSA	0.6	2	1.9	0.0	50.0	0.0	50.0	0.0	13.4	56.9	25.7
Syracuse MSA	3.5	6	5.6	0.0	0.0	50.0	50.0	11.4	13.1	40.6	33.4
Utica-Rome MSA	2.2	3*	2.8	0.0	0.0	66.6	0.0	11.7	10.2	53.0	23.3
NY Non-MSA	2.1	2	1.9	0.0	0.0	100.0	0.0	1.7	12.0	75.5	9.8

*One branch in each AA is located in a N/A designated geography.

Albany CSA

Service delivery systems are readily accessible to geographies and individuals of different income levels in the Albany CSA. The distribution of branches was excellent in low-income geographies and good in moderate-income geographies. The distribution of branches in low-income geographies exceeded the percentage of the population in those geographies and was below the percentage of the population in moderate-income geographies. Within the CSA, CBNA had three branches located in middle- and upper-income geographies that were within one quarter of a mile of LMI geographies. While these adjacent branches provided LMI individuals and individuals in LMI census tracts additional access to the bank's retail banking services, they had no impact on the overall conclusion.

Access to retail banking services was further expanded through alternative delivery systems, including ATMs and digital banking platforms (online banking/mobile banking). Over the three-year evaluation period, an average of 53 percent of customer households in low-income geographies utilized the bank's digital banking platforms to access banking services. In moderate-income geographies, utilization of the bank's digital platforms increased to an average of 58 percent of customer households. The bank operated 27 deposit-taking ATMs in the CSA. ATM availability was excellent in LMI geographies. The percentage of the bank's ATMs in low-income census tracts exceeded the percentage of the population in low-income census tracts while the percentage of ATMs in moderate-income census tracts was slightly below the percentage of the population in moderate-income census tracts.

Rochester MSA

Service delivery systems are accessible to geographies and individuals of different income levels in the Rochester MSA. The distribution of branches was good in LMI geographies. The distribution of branches in LMI geographies was below the percentage of the population in LMI

geographies. CBNA had no branches located in middle- and upper-income census tracts that were within one quarter of a mile of LMI census tracts that could have provided additional access to retail banking services.

Access to retail banking services was enhanced through alternative delivery systems, including ATMs and digital banking platforms (online banking/mobile banking). Over the three-year evaluation period, an average of 46 percent of customer households in low-income geographies utilized the bank's digital banking platforms to access banking services. In moderate-income geographies, utilization of the bank's digital platforms increased to an average of 51 percent of customer households. The bank also operated 24 deposit-taking ATMs in the Rochester MSA. ATM availability was adequate in low-income geographies and good in moderate-income geographies. The percentage of the bank's ATMs in low-income geographies was well-below the percentage of the population in those geographies and was below the percentage of the population in moderate-income geographies.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Albany CSA	1	5	-1	0	-3	0
Rochester MSA	1	10	-1	-3	-5	0
Binghamton MSA	0	2	-1	-1	0	0
Buffalo	1*	1*	0	0	0	0
Ithaca CSA	0	0	0	0	0	0
Syracuse MSA	0	3	0	-1	-1	-1
Utica-Rome MSA	0	0	0	0	0	0
NY Non-MSA	0	5	0	-1	-3	-1

*Branch opened or closed in a N/A designated geography.

Albany CSA

The bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. Despite the net closure of one branch in a low-income geography, the remaining branches remained readily accessible in LMI geographies and to LMI individuals.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. In-store branches located in Hannaford grocery stores were typically open 10:00 am to 7:00 pm Monday through Friday, 10:00 am to 4:00 pm Saturday, and 11:00 am to 3:00 pm Sunday. The branch located in the Starbucks downtown had expanded hours. The branch, located in a low-income census tract, opened 7:30 am to 5:00 pm Monday through Thursday and 7:30 am to 6:00 pm Friday.

Rochester MSA

The bank's opening and closing of branches has adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank opened one branch and closed ten branches that comprised a net closure of one branch in a low-income census tract, a net closure of three branches in moderate-income census tracts, and a net closure of five branches in middle-income census tracts. The net closures in LMI geographies reduced the accessibility of the bank's retail banking services in LMI geographies and to LMI individuals.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. In-store branches located in Tops super markets were typically open 10:00 am to 7:00 pm Monday through Friday, 10:00 am to 4:00 pm Saturday, and 11:00 am to 3:00 pm Sunday. The branch located in the Starbucks had expanded hours. The branch was open from 7:30 am to 7:00 pm Monday through Saturday and 8:00 am to 5:00 pm Sunday.

Community Development Services

Albany CSA

The bank provides a significant level of CD services.

CBNA employees provided 425 hours of CD services to 10 organizations that meet the definition of CD. During the evaluation period, 27 CBNA employees in the CSA provided 125 CD services throughout the CSA. Services primarily involved providing financial literacy and education to LMI students and individuals located in LMI geographies. Other services involved providing leadership on six boards of local non-profit organizations, helping with job placement assistance and offering technical support for local non-profit organizations.

Examples include:

- Bank employees provided financial literacy training to over 1,950 LMI individuals.
- Bank employees provided first time homebuyer education to over 200 LMI individuals.

Rochester MSA

The bank provides a significant level of CD services.

CBNA employees provided 471 hours of CD services to 15 different organizations that meet the definition of CD. During the evaluation period, 20 CBNA employees in the MSA provided 141 CD services throughout the MSA. Services primarily involved providing financial literacy and education to LMI students and individuals located in LMI geographies. Other services involved providing board leadership at nine local non-profit organizations, assisting with workforce development, and offering technical support for local non-profit organizations.

Examples include:

- Bank employees provided financial literacy training to over 1,600 LMI individuals.
- Providing lending and financial education for affordable housing to 30 individuals.

Based on limited-scope reviews, the bank's performance under the Service Test in the Binghamton MSA and Ithaca MSA is stronger than the bank's overall performance under the Service Test in the state of New York. Performance is stronger primarily due to the greater accessibility of retail banking services in LMI geographies relative to the distribution of the population in LMI geographies. Performance in the Buffalo MSA, Syracuse MSA, Utica-Rome MSA, and NY Non-MSA is weaker than the bank's overall High Satisfactory performance under the Service Test in the state of New York. Performance is weaker primarily due the lower accessibility of the bank's retail banking services in LMI geographies relative to the distribution of the population in LMI geographies. The weaker performance in the limited-scope AAs adversely affected the overall conclusion.

State Rating

State of Ohio

CRA rating for the State of Ohio: **Outstanding**

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

The major factors that support this rating include:

- Lending levels reflect good responsiveness to AA credit needs.
- Adequate geographic distribution of loans in its AA.
- Excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in making CD loans.
- Excellent level of qualified CD investment and grants and exhibits excellent responsiveness to credit and community economic development needs.
- Service delivery systems are accessible to geographies and individuals of different income levels.
- The bank is a leader in providing CD services.

Description of Institution's Operations in Ohio

CBNA has four delineated AAs in Ohio consisting of a portion of the Cleveland CSA, a portion of the Toledo MSA, the Youngstown CSA, and the Non-MSA area of Scioto County. The bank had \$10.4 billion in deposits representing 11.5 percent of the bank's total deposits. Major competitors include The Huntington National Bank, Key Bank, N.A, Fifth Third Bank, and PNC Bank, N.A. CBNA operated 100 branches and 138 ATMs representing 13.1 percent of the bank's total branches and 11.1 percent of ATMs.

As part of the CRA evaluation, the OCC reviewed information from two community contacts made within the Cleveland CSA to determine local economic conditions and community needs. These organizations indicated needs include home improvement loans, micro loans to small businesses, technical assistance to small businesses, and capacity building for non-profits.

Cleveland CSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Cleveland CSA 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	915	17.2	21.4	37.2	22.8	1.4
Population by Geography	3,235,903	11.0	18.8	40.4	29.5	0.3
Housing Units by Geography	1,474,728	12.5	20.9	39.7	26.5	0.5
Owner-Occupied Units by Geography	870,774	5.8	15.6	44.0	34.4	0.1
Occupied Rental Units by Geography	445,889	20.6	28.5	34.7	15.3	0.9
Vacant Units by Geography	158,065	26.4	28.2	29.8	14.6	1.0
Businesses by Geography	204,832	8.1	15.1	37.9	38.0	0.8
Farms by Geography	5,798	3.3	9.7	50.2	36.7	0.1
Family Distribution by Income Level	823,449	22.0	17.0	20.1	40.9	0.0
Household Distribution by Income Level	1,316,663	25.4	15.6	17.1	42.0	0.0
Median Family Income MSA - 10420 Akron, OH MSA		\$65,716	Median Housing Value			\$135,281
Median Family Income MSA - 15940 Canton-Massillon, OH MSA		\$59,302	Median Gross Rent			\$753
Median Family Income MSA - 17460 Cleveland-Elyria, OH MSA		\$65,821	Families Below Poverty Level			11.3%
Median Family Income Non-MSAs – OH		\$56,217				
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.						

Scope of Evaluation in Ohio

The Cleveland CSA received a full-scope review. This area represented 91.3 percent of deposits, 80.2 percent of lending and 80 percent of branches within the state. The Toledo, Youngstown, and Ohio Non-MSA AAs received limited-scope reviews.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO**LENDING TEST**

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

Conclusions for Areas Receiving Full-Scope Reviews

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

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Cleveland CSA	6,376	2,474	0	10	8,860	82.2	90.8
Toledo MSA	873	262	0	0	1,135	10.5	6.5
Youngstown CSA	477	196	0	0	673	6.2	1.8
OH Non-MSA	95	19	0	0	114	1.1	0.9

Dollar Volume of Loans (000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans*	%State Deposits
Cleveland CSA	757,663	119,849	0	94,105	971,617	87.1	90.8
Toledo MSA	76,910	11,534	0	0	88,444	7.9	6.5
Youngstown CSA	37,993	9,416	0	0	47,409	4.3	1.8
OH Non-MSA	6,376	1,707	0	0	8,083	0.7	0.9

CBNA ranked fourth in deposits with a 10.5 percent market share. In overall home mortgage lending, CBNA ranked sixth with a 3.6 percent market share. Competition is strong. There are 542 mortgage lenders in the AA, many without a depository presence. There are 50 depository institutions in the AA. The top lender in this market was The Huntington National Bank with a 14.0 percent market share, followed by Third Federal Savings and Loan with 8 percent, and Wells Fargo with 5 percent. In small loans to businesses, CBNA ranked 12th with 1.7 percent market share. The top three lenders with a combined market share of 44.2 percent were American Express with 17.9 percent, PNC Bank with 14.9 percent, and Chase Bank USA with 11.5 percent.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O in the state of Ohio 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 geographic distribution of home mortgage loans is good.

2017 to 2018

The proportion of loans in both low- and moderate-income geographies was below the proportion of owner-occupied homes in those geographies but significantly exceeded the aggregate distribution of loans in low-income geographies and exceeded the aggregate distribution of loans in moderate-income geographies.

2016

Performance in low-income geographies was consistent with 2017 to 2018. The proportion of loans in moderate-income geographies exceeded both the proportion of owner-occupied homes in those geographies and the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table Q in the state of Ohio 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 geographic distribution of small loans to businesses good.

2017 to 2018

The proportion of loans in low-income geographies approximated both the proportion of businesses located in those geographies and the aggregate distribution of loans. The proportion of loans in moderate-income geographies was below the proportion of businesses located in those geographies and approximated the aggregate distribution of loans.

2016

The proportion of loans in low-income geographies was below the proportion of businesses located in those geographies and approximated the aggregate distribution of loans. The proportion of loans in moderate-income geographies approximated the proportion of businesses located in those geographies and exceeded the aggregate distribution of loans.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases. The borrower distribution of home mortgage loans is excellent.

2017 to 2018

The proportion of loans to low-income borrowers approximated the proportion of low-income families within the AA but significantly exceeded the aggregate distribution of loans. The

proportion of loans to moderate-income borrowers significantly exceeded the proportion of moderate-income families and exceeded the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018.

Small Loans to Businesses

Refer to Table R in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses. The borrower distribution of small loans to businesses is excellent.

2017 to 2018

The proportion of loans to small businesses met the percentage of small businesses in the CSA and significantly exceeded the aggregate distribution of loans.

2016

The proportion of loans to small businesses substantially met the percentage of small businesses in the CSA and significantly exceeded the aggregate distribution of loans.

Community Development Lending

The bank is a leader in making 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 multifamily loans that also qualify as CD loans.

CBNA demonstrated excellent responsiveness to CD lending needs and opportunities. CD loans include many complex projects where the bank often acted in a leadership role. The dollar volume of CD lending represents 7.5 percent of allocated Tier 1 Capital. Examples include:

- \$21.5 million loan to rehab 143 units of senior affordable housing. All of the units are under HUD/HAP Section 8 contracts. Additionally, this transaction utilized other financing including LIHTCs from the Ohio Housing Finance Agency.
- \$10 million construction financing for 194 units of affordable housing. The property is located within Cleveland's designated "Community Reinvestment Area" where the city is targeting development to serve LMI individuals.
- \$2 million revolving line of credit to fund a non-profit loan fund that assists small businesses within the state of Ohio, including the Cleveland CSA.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Ohio Non-Metro, Toledo MSA, and the Youngstown CSA is weaker than the bank's overall performance under the Lending Test in the full-scope area. For the Youngstown CSA, the bank's geographic distribution was weaker, but still considered adequate. This weaker performance did not impact the overall Lending Test rating.

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

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Conclusions for the Area Receiving a Full-Scope Review.

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

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

The bank exhibits excellent responsiveness to credit and community economic development needs. CBNA makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Cleveland CSA	46	59,338	327	74,185	373	88.4	133,524	87.9	4	\$39,612
Toledo MSA	4	7,360	28	6,427	32	7.6	13,787	9.1	1	\$1,720
Youngstown CSA	5	1,945	12	2,661	17	4.0	4,605	2.8	1	\$559
Ohio Non-Metro	0	0	0	0	0	0	0	0	0	\$0

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

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

The combined prior and current period dollar volume represents 10.6 percent of allocated Tier 1 Capital. The bank's investments targeted affordable housing, a primary need in the AA. The investments focused on LIHTCs, MBS, equity investments, and grants. Examples include:

- \$22.1 funded commitment in a proprietary LIHTC fund consisting of a 143-unit senior housing complex in Cleveland. The project involved multiple layers of financing including private, state, and federal sources.
- Funded \$14.4 million of a \$15.2 million commitment in a proprietary LIHTC fund. The investment created 59 units of affordable housing serving seniors and persons with developmental disabilities with incomes of 30 percent, 50 percent, and 60 percent or less of AMI. The project involved multiple layers of financing through federal, state, and county funding as well as CBNA construction loan and equity bridge loan.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope reviews, the bank's performance under the Investment Test in the Toledo and Youngstown MSAs is consistent with the bank's overall performance under the Investment Test in the Cleveland CSA. The bank's performance in the Ohio Non-MSA is weaker than the bank's overall performance under the Investment Test in the full-scope area as a result of no investments. The weaker performance did not impact the overall rating.

SERVICE TEST

The institution's performance under the Service Test in the state of Ohio is rated High Satisfactory.

Based on a full-scope review, the institution's performance in the Cleveland CSA is good.

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Cleveland CSA	90.8	80*	80.0	8.8	13.8	46.3	30.0	11.0	18.8	40.4	29.5
Toledo MSA	6.5	13	13.0	7.7	15.4	53.8	23.1	14.2	15.7	38.7	30.4
Youngstown CSA	1.8	4	4.0	0.0	0.0	50.0	50.0	7.8	14.8	53.1	24.3
OH Non-MSA	0.9	3	3.0	67.7	0.0	0.0	33.3	3.0	33.5	49.3	14.1

*One branch in a N/A designated geography.

The distribution of branches was good in LMI geographies. The distribution of branches in low-income geographies was below the percentage of the population in low-income geographies and the distribution of branches in moderate-income geographies was below the percentage of the population in moderate-income geographies. Within the CSA, CBNA had eight branches located in middle- and upper-income census tracts that were within one quarter of a mile of LMI census tracts. While these adjacent branches provided LMI individuals and individuals in LMI census tracts additional access to the bank's retail banking services, they had no significant impact on the overall conclusion.

Access to retail banking services was further expanded through alternative delivery systems, including ATMs and digital banking platforms (online banking/mobile banking). Over the three-year evaluation period, an average of 48 percent of customer households in low-income geographies utilized the bank's digital banking platforms to access banking services. In moderate-income geographies, utilization of the bank's digital platforms increased to an average of 54 percent of customer households. The bank operated 113 deposit-taking ATMs in the Cleveland CSA. ATM availability was good in LMI geographies. The percentage of the bank's ATMs in LMI census tracts were below the percentages of the population in LMI census tracts.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Cleveland CSA	4*	11*	-1	-2	-5	+1
Toledo MSA	1	4	0	0	-3	0
Youngstown CSA	0	2	0	0	-2	0
OH Non-MSA	0	0	0	0	0	0

*Branch opened and closed in N/A designated geography.

The bank's opening and closing of branches has adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank opened four branches and closed eleven branches that comprised a net closure of one branch in a low-income census tract, two branches in moderate-income census tracts, five branches in middle-income census tracts, and one net opening in an upper-income census tract. The closures in LMI geographies reduced the accessibility of the bank's retail banking services in LMI geographies and to LMI individuals.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. In-store branches located in ACME grocery stores were typically open 10:30 am to 6:30 pm Monday through Thursday, 10:30 am to 7:00 pm Friday, 11:00 am to 4:00 pm Saturday, and 11:00 am to 3:00 pm Sunday.

Community Development Services

The bank is a leader in providing CD services.

CBNA employees provided 1,379 hours of CD services to 36 different organizations that meet the definition of CD. During the evaluation period, 75 CBNA employees provided 291 CD services throughout the CSA. Services primarily involved providing VITA tax assistance and financial literacy education to LMI students and individuals located in LMI geographies. Other services involved providing board leadership at 12 local non-profit organizations, assisting with economic development of neighborhoods, and offering technical support for local non-profit organizations. Examples include:

- Bank employees provided financial literacy training to over 4,200 LMI individuals.
- Job readiness education provided to over 300 youth in LMI communities.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Toledo MSA is consistent with the bank's overall High Satisfactory performance under the Service Test in the state of Ohio. Performance in the Ohio Non-MSA is stronger than the bank's overall High Satisfactory performance under the Service Test in the state of Ohio. Despite only having three branches in the Ohio Non-MSA, two of the branches were in low-income geographies where only approximately 3 percent of the population resides. Performance in the Youngstown CSA is weaker than the bank's overall High Satisfactory performance under the Service Test in the state of Ohio. Performance is weaker primarily due the lower accessibility of the bank's retail banking services in LMI geographies relative to the distribution of the population in LMI geographies. While the bank only had four branches in the Youngstown CSA, none of the branches were in LMI geographies where approximately 22.6 percent of the population resides. The weaker performance did not impact the overall rating.

State Rating

State of Vermont

CRA rating for the State of Vermont: Outstanding

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

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- Excellent geographic distribution of loans in its AA.
- Excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in making CD loans.
- Excellent level of qualified CD investment and grants and exhibits excellent responsiveness to credit and community economic development needs.
- Service delivery systems are readily accessible to geographies and individuals of different income levels.
- The bank provides a low level of CD services.

Description of Institution's Operations in Vermont

CBNA has delineated two AAs within the state of Vermont; Burlington-South Burlington, VT MSA, which includes Franklin and Chittenden counties and the VT Non-MSA, which includes Addison, Bennington, Rutland, Washington, Windham, and Windsor counties.

CBNA has \$879.5 million in deposits in the state, representing about one percent of the bank's deposits. Primary competitors include People's United Bank, N.A., TD Bank, N.A., and Community Bank, N.A. There are 21 FDIC-insured depository institutions within the bank's AAs. CBNA has 13 branches and 16 ATMs within the state representing 1.7 percent of total branches and 1.3 percent of total ATMs.

As part of the CRA evaluation, the OCC reviewed information from one community contact made within the state of Vermont to determine local economic conditions and community needs. The major identified need included affordable housing for seniors and low-income residents.

VT Non-MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: VT Non-MSA 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	97	0.0	6.2	78.4	15.5	0.0
Population by Geography	293,202	0.0	6.7	77.0	16.4	0.0
Housing Units by Geography	165,621	0.0	5.6	78.4	16.0	0.0
Owner-Occupied Units by Geography	88,107	0.0	4.6	78.0	17.5	0.0
Occupied Rental Units by Geography	35,400	0.0	12.6	74.3	13.2	0.0
Vacant Units by Geography	42,114	0.0	1.9	83.0	15.1	0.0
Businesses by Geography	25,467	0.0	8.0	75.3	16.7	0.0
Farms by Geography	1,533	0.0	2.0	78.4	19.6	0.0
Family Distribution by Income Level	76,796	18.6	17.3	22.4	41.7	0.0
Household Distribution by Income Level	123,507	23.1	15.6	18.3	43.0	0.0
Median Family Income Non-MSAs – VT		\$64,849	Median Housing Value			\$219,973
			Median Gross Rent			\$860
			Families Below Poverty Level			7.5%
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.						

Scope of Evaluation in Vermont

The VT Non-MSA received a full-scope review. This area accounted for nearly 60 percent of the deposits and lending in the state. In evaluating the geographic distribution of loans, more emphasis was placed on performance in moderate-income geographies given there were no low-income geographies in the 2015 ACS. The Burlington MSA received a limited-scope review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN VERMONT

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the VT Non-MSA is excellent.

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope review, the bank's performance in the VT Non-MSA is excellent.

Lending Activity

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

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Vermont Non-MSA	583	444	0	1	1,028	59.4	58.7
Burlington MSA	284	417	0	1	702	40.6	41.3

Dollar Volume of Loans (000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Vermont Non-MSA	86,346	18,225	0	4,700	109,271	57.2	58.7
Burlington MSA	56,388	19,452	0	6,000	81,840	42.8	41.3

CBNA ranked third in deposits with 8.4 percent market share. In overall home mortgage lending, CBNA ranked fourth with a 5.5 percent market share. There are 231 mortgage lenders in the AA, many without a depository presence. There are 18 depository institutions in the AA. The top lender in this market was Quicken Loans with 7.6 percent market share, followed by Vermont State Employees Credit Union with 7.3 percent, and People's United Bank, FSB, with 6.2 percent. In small loans to businesses, CBNA ranked 12th with a market share of 2.5 percent. The top three lenders held a combined market share of 38.6 percent. The top lender was American Express with 17.5 percent, followed by Capital One with 10.9 percent, and Citigroup with 10.2 percent.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O in the state of Vermont 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 geographic distribution of home mortgage loans is excellent.

2017 to 2018

This AA has no designated low-income geographies. The proportion of loans in moderate-income geographies exceeded the proportion of owner-occupied homes in those geographies and significantly exceeded the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018.

Small Loans to Businesses

Refer to Table Q in the state of Vermont 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 geographic distribution of small loans to businesses is good.

2017 to 2018

This AA has no designated low-income geographies. The proportion of loans in moderate-income geographies was below the proportion of businesses located in those geographies and exceeded the aggregate distribution of loans.

2016

Performance in 2016 was inconsistent with 2017 to 2018. Only 0.2 percent of businesses were located in low-income geographies. CBNA originated no loans in low-income geographies. The proportion of loans in moderate-income geographies exceeded both the proportion of businesses located in those geographies and the aggregate distribution of loans.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P in the state of Vermont section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases. The borrower distribution of home mortgage loans is excellent.

2017 to 2018

The proportion of loans to low-income borrowers was below the proportion of low-income families within the AA but significantly exceeded the aggregate distribution of loans. Considering the higher performance relative to all lenders, the distribution is good to low-income borrowers. The proportion of loans to moderate-income borrowers exceeded both the proportion of moderate-income families and the aggregate distribution of loans.

2016

Performance was inconsistent with 2017 to 2018. The proportion of loans to moderate-income borrowers was below the proportion of moderate-income families and approximated the aggregate distribution of loans. The proportion of loans to low-income borrowers was consistent.

Small Loans to Businesses

Refer to Table R in the state of Vermont section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses. The borrower distribution of small loans to businesses is excellent.

2017 to 2018

The proportion of loans to small businesses exceeded the percentage of small businesses in the CSA and significantly exceeded the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018.

Community Development Lending

The bank is a leader in making 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 multifamily loans that also qualify as CD loans.

CBNA demonstrated excellent responsiveness to the identified affordable housing needs by providing \$4.7 million in construction financing for the development of 25 units of affordable housing, with all units allocated to tenants earning less than 80 percent of the AMI. This represented 6.9 percent of allocated Tier 1 Capital.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

Conclusions for Area Receiving a Limited-Scope Review

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

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

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Vermont Non-MSA is excellent.

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

The bank has excellent responsiveness to credit and community economic development needs. CBNA makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total					Unfunded Commitments**
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Vermont Non-MSA	15	6,115	8	1,473	23	67.6	7,588	54.1	1	1,091
Burlington MSA	1	4,017	10	2,417	11	32.4	6,434	45.9	2	1,907

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

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

The combined prior and current period dollar volume represents 11.1 percent of allocated Tier 1 Capital. The CD investments helped finance the development or preservation of over 236 units of affordable housing in the Vermont Non-MSA.

- \$1.4 million in a multi-investor LIHTC fund. The investment helped to fund the construction of a 22-unit affordable apartment complex in Bennington, VT.

Conclusions for Area Receiving a Limited-Scope Review

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

SERVICE TEST

The institution's performance under the Service Test in the state of Vermont is rated Outstanding.

Based on a full-scope review, the institution's performance in the VT Non-MSA is excellent.

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Burlington MSA	58.7	6	22.2	0.0	33.3	33.3	33.3	1.5	18.5	60.6	19.5
VT Non-MSA	41.3	7	77.8	0.0	28.6	57.1	14.3	0.0	6.7	77.0	16.4

The distribution of branches was excellent in moderate-income geographies. The distribution of branches in moderate-income geographies significantly exceeded the percentage of the population in moderate-income geographies. None of the branches in middle- or upper-income census tracts were within one quarter of a mile of moderate-income census tracts to provide LMI individuals and moderate-income geographies additional access to retail banking services.

Access to retail banking services was further expanded through alternative delivery systems, including ATMs and digital banking platforms (online banking/mobile banking). Over the three-year evaluation period, an average of 47 percent of customer households in moderate-income geographies utilized the bank's digital banking platforms to access banking services. The bank also operated nine deposit-taking ATMs in the VT Non-MSA. ATM availability was excellent in moderate-income geographies. The percentage of the bank's ATMs in moderate-income census tracts exceeded the percentage of the population in moderate-income geographies.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Burlington MSA	0	0	0	0	0	0
VT Non-MSA	0	7	0	-1	-5	-1

The bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. Although the bank

closed seven branches, the remaining branches remained readily accessible in moderate-income geographies and to LMI individuals.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals.

Community Development Services

The institution provides a low level of CD services.

CBNA employees provided 132 hours of CD services to three organizations that meet the definition of CD. During the evaluation period, 10 CBNA employees in the AA provided 10 CD services targeted to LMI individuals and two affordable housing activities throughout the AA. Services primarily involved providing financial literacy and education to LMI students and individuals located in LMI geographies. Other services involved providing board leadership for local non-profit organizations, assisting with affordable housing, and offering technical support for local non-profit organizations.

Based on a limited-scope review, the bank's performance under the Service Test in the Burlington MSA is consistent with the bank's overall performance under the Service Test in the state of Vermont.

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:	01/01/2016 to 12/31/2018	
Bank Products Reviewed:	Home mortgage loans, small loans to businesses, community development loans, investments, and services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Citizens One CDC	Bank Subsidiary	Community development investments
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
Boston MMSA	Full-scope	CT: Windham MA: Barnstable, Bristol, Norfolk, Plymouth, Suffolk, Essex, Middlesex, Worcester NH: Belknap, Hillsborough, Merrimack, Rockingham, Strafford RI Bristol, Kent, Newport. Providence, Washington
New York CSA	Full-scope	CT: Fairfield, New Haven NY: Dutchess, Orange, Ulster, Westchester
Connecticut		
Hartford CSA	Full-scope	Hartford, Middlesex, New London
Delaware		
Philadelphia CSA	Full-scope	New Castle, Kent
Salisbury MSA	Limited-scope	Sussex
Massachusetts		
Springfield CSA	Full-scope	Hampden, Hampshire, Franklin
Pittsfield MSA	Limited-scope	Berkshire
Michigan		
Detroit CSA	Full-scope	Livingston, Macomb, Monroe, Oakland, Wayne, Washtenaw
Lansing CSA	Limited-scope	Ingham, Shiawassee
Saginaw MSA	Limited-scope	Saginaw
New Hampshire		
NH Non-MSA	Full-scope	Carroll, Cheshire, Coos, Grafton, Sullivan
New York		
Albany CSA	Full-scope	Albany, Fulton, Montgomery, Rensselaer, Saratoga, Schenectady, Warren
Binghamton MSA	Limited-scope	Broome
Buffalo MSA	Limited-scope	Erie, Niagara
Ithaca CSA	Limited-scope	Cortland, Tompkins
NY Non-MSA	Limited-scope	Chautauqua, Chenango, Otsego, Sullivan
Rochester MSA	Full-scope	Livingston, Monroe. Ontario, Wayne
Syracuse MSA	Limited-scope	Madison, Onondaga

Utica-Rome MSA	Limited-scope	Herkimer, Oneida
Ohio		
Cleveland CSA	Full-scope	Cuyahoga, Geauga, Lake, Lorain, Medina, Portage, Summit, Stark, Tuscarawas
Toledo MSA	Limited-scope	Lucas, Wood
Youngstown CSA	Limited-scope	Mahoning, Trumbull, Columbiana
OH Non-MSA	Limited-scope	Scioto
Vermont		
Burlington MSA	Limited-scope	Chittenden, Franklin
VT Non-MSA	Full-scope	Addison, Bennington, Rutland, Washington, Windham, Windsor

Appendix B: Summary of MMSA and State Ratings

RATINGS		CITIZENS BANK, N.A.		
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Citizens Bank, N.A.	Outstanding	Outstanding	Outstanding	Outstanding
MCSA/MMSA or State:				
Boston MCSA	Outstanding	Outstanding	Outstanding	Outstanding
New York MCSA	Outstanding	Outstanding	High Satisfactory	Outstanding
Connecticut	Outstanding	Outstanding	High Satisfactory	Outstanding
Delaware	Outstanding	Outstanding	Outstanding	Outstanding
Massachusetts	Outstanding	Outstanding	Outstanding	Outstanding
Michigan	Outstanding	Outstanding	High Satisfactory	Outstanding
New Hampshire	Outstanding	Outstanding	Outstanding	Outstanding
New York	Outstanding	Outstanding	High Satisfactory	Outstanding
Ohio	Outstanding	Outstanding	High Satisfactory	Outstanding
Vermont	Outstanding	Outstanding	Outstanding	Outstanding

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including 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 O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2016
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 Loan	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
Boston CSA	5,042	1,518,274	100	303,844	2.8	2.8	3.3	13.3	12.0	13.0	49.9	44.8	48.7	33.9	40.4	35.1	0.0	0.0	0.0
Total	5,042	1,518,274	100	303,844	2.8	2.8	3.3	13.3	12.0	13.0	49.9	44.8	48.7	33.9	40.4	35.1	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																			2016
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Boston CSA	5,042	1,518,274	100.0	303,844	21.6	4.9	4.2	16.9	17.6	15.2	21.1	23.8	22.7	40.4	51.7	43.1	0.0	2.0	14.9
Total	5,042	1,518,274	100.0	303,844	21.6	4.9	4.2	16.9	17.6	15.2	21.1	23.8	22.7	40.4	51.7	43.1	0.0	2.0	14.9
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 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
Boston CSA	4,034	265,180	100.0	183,024	7.0	5.5	6.1	14.4	15.5	13.9	43.1	44.4	43.9	35.4	34.6	35.9	0.2	0.1	0.2
Total	4,034	265,180	100.0	183,024	7.0	5.5	6.1	14.4	15.5	13.9	43.1	44.4	43.9	35.4	34.6	35.9	0.2	0.1	0.2

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											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
Boston CSA	4,034	265,180	100.0	183,024	83.2	78.5	44.3	6.9	18.9	9.9	2.6
Total	4,034	265,180	100.0	183,024	83.2	78.5	44.3	6.9	18.9	9.9	2.6
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 O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Boston CSA	23,048	5,141,569	100.0	271,321	3.2	2.9	4.4	13.7	11.9	14.9	46.4	42.8	45.2	36.5	42.2	35.2	0.1	0.1	0.1
Total	23,048	5,141,569	100.0	271,321	3.2	2.9	4.4	13.7	11.9	14.9	46.4	42.8	45.2	36.5	42.2	35.2	0.1	0.1	0.1
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Boston CSA	23,048	5,141,569	100.0	271,321	22.8	8.0	6.2	16.5	19.7	18.8	20.0	25.4	23.6	40.7	45.1	38.5	0.0	1.8	12.9
Total	23,048	5,141,569	100.0	271,321	22.8	8.0	6.2	16.5	19.7	18.8	20.0	25.4	23.6	40.7	45.1	38.5	0.0	1.8	12.9
Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **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
Boston CSA	9,709	541,932	100.0	181,773	7.3	7.2	6.8	15.3	17.7	15.1	39.8	40.4	40.6	36.9	34.3	37.1	0.6	0.4	0.5
Total	9,709	541,932	100.0	181,773	7.3	7.2	6.8	15.3	17.7	15.1	39.8	40.4	40.6	36.9	34.3	37.1	0.6	0.4	0.5

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											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
Boston CSA	9,709	541,932	100.0	181,773	83.5	80.2	46.5	6.7	17.4	9.8	2.4
Total	9,709	541,932	100.0	181,773	83.5	80.2	46.5	6.7	17.4	9.8	2.4
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 O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2016**

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
NY CSA	783	426,206	100.0	77,171	2.7	1.3	2.6	11.7	7.2	10.4	37.1	25.7	36.4	48.5	65.9	50.6	0.0	0.0	0.0
Total	783	426,206	100.0	77,171	2.7	1.3	2.6	11.7	7.2	10.4	37.1	25.7	36.4	48.5	65.9	50.6	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																			2016
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
NY CSA	783	426,206	100.0	77,171	19.7	2.4	4.5	15.3	8.9	13.7	18.8	11.9	19.8	46.3	71.4	48.6	0.0	5.4	13.4
Total	783	426,206	100.0	77,171	19.7	2.4	4.5	15.3	8.9	13.7	18.8	11.9	19.8	46.3	71.4	48.6	0.0	5.4	13.4
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 **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
NY CSA	706	54,114	100.0	102,632	6.7	6.7	6.4	14.6	13.6	12.9	32.7	39.0	31.9	45.9	40.8	48.9	0.0	0.0	0.0
Total	706	54,114	100.0	102,632	6.7	6.7	6.4	14.6	13.6	12.9	32.7	39.0	31.9	45.9	40.8	48.9	0.0	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											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
NY CSA	706	54,114	100.0	102,632	86.2	83.9	46.2	5.8	15.0	8.0	1.1
Total	706	54,114	100.0	102,632	86.2	83.9	46.2	5.8	15.0	8.0	1.1
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											

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
NY CSA	2,898	946,467	100.0	80,740	2.9	2.0	3.3	12.2	9.0	12.2	32.9	26.1	31.6	52.0	62.8	52.8	0.0	0.0	0.0
Total	2,898	946,467	100.0	80,740	2.9	2.0	3.3	12.2	9.0	12.2	32.9	26.1	31.6	52.0	62.8	52.8	0.0	0.0	0.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-18**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loan	Aggregate	% Families	% Bank Loan	Aggregate	% Families	% Bank Loan	Aggregate	% Families	% Bank Loan	Aggregate	% Families	% Bank Loan	Aggregate
NY CSA	2,898	946,467	100.0	80,740	21.1	5.4	5.5	14.8	14.4	15.1	17.4	17.1	19.9	46.7	62.2	47.0	0.0	0.9	12.3
Total	2,898	946,467	100.0	80,740	21.1	5.4	5.5	14.8	14.4	15.1	17.4	17.1	19.9	46.7	62.2	47.0	0.0	0.9	12.3

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 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
NY CSA	1,434	79,812	100.0	96,001	7.0	5.8	7.2	14.2	12.6	13.5	29.7	36.1	28.4	49.1	45.5	50.8	0.1	0.0	0.1
Total	1,434	79,812	100.0	96,001	7.0	5.8	7.2	14.2	12.6	13.5	29.7	36.1	28.4	49.1	45.5	50.8	0.1	0.0	0.1

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

Table 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
NY CSA	1,434	79,812	100.0	96,001	86.4	87.4	51.5	5.7	11.9	7.9	0.7
Total	1,434	79,812	100.0	96,001	86.4	87.4	51.5	5.7	11.9	7.9	0.7
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 O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2016
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
Hartford CSA	227	51,019	100.0	35,881	3.5	1.3	3.1	12.0	9.7	10.5	48.7	46.7	47.8	35.7	42.3	38.5	0.0	0.0	0.0
Total	227	51,019	100.0	35,881	3.5	1.3	3.1	12.0	9.7	10.5	48.7	46.7	47.8	35.7	42.3	38.5	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																			2016
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Hartford CSA	227	51,019	100.0	35,881	21.6	10.1	6.4	17.5	18.9	19.0	22.1	19.8	22.2	38.8	47.6	34.6	0.0	3.5	17.7
Total	227	51,019	100.0	35,881	21.6	10.1	6.4	17.5	18.9	19.0	22.1	19.8	22.2	38.8	47.6	34.6	0.0	3.5	17.7
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																			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
Hartford CSA	488	24,096	100.0	28,770	8.9	3.3	7.4	12.9	13.7	12.6	43.2	46.3	45.5	34.8	36.5	34.4	0.3	0.2	0.1
Total	488	24,096	100.0	28,770	8.9	3.3	7.4	12.9	13.7	12.6	43.2	46.3	45.5	34.8	36.5	34.4	0.3	0.2	0.1
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																			

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
Hartford CSA	488	24,096	100.0	28,770	84.1	84.2	48.1	6.0	14.5	9.9	1.2
Total	488	24,096	100.0	28,770	84.1	84.2	48.1	6.0	14.5	9.9	1.2
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 O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2017-18	
Assess ment 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 Loan	Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	% of Owner- Occu- pied Housing Units	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units	% Bank Loan	Aggregate	% of Owner- Occupied Housing Units	% Bank Loan	Aggregate
Hartford CSA	1,206	236,599	100.0	34,176	4.3	3.6	4.7	10.9	6.3	10.0	43.9	40.3	43.0	41.0	49.8	42.3	0.0	0.0	0.0
Total	1,206	236,599	100.0	34,176	4.3	3.6	4.7	10.9	6.3	10.0	43.9	40.3	43.0	41.0	49.8	42.3	0.0	0.0	0.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Hartford CSA	1,206	236,599	100.0	34,176	22.8	11.8	10.6	16.9	23.7	23.8	20.4	26.1	22.3	39.9	36.5	29.4	0.0	1.9	13.9
Total	1,206	236,599	100.0	34,176	22.8	11.8	10.6	16.9	23.7	23.8	20.4	26.1	22.3	39.9	36.5	29.4	0.0	1.9	13.9
Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **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
Hartford CSA	977	56,903	100.0	27,762	10.3	7.3	9.5	12.0	9.4	12.2	40.7	42.7	41.1	36.7	40.6	37.1	0.3	0.0	0.2
Total	977	56,903	100.0	27,762	10.3	7.3	9.5	12.0	9.4	12.2	40.7	42.7	41.1	36.7	40.6	37.1	0.3	0.0	0.2

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 **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
Hartford CSA	977	56,903	100.0	27,762	84.3	85.2	50.4	5.9	13.8	9.8	1.0
Total	977	56,903	100.0	27,762	84.3	85.2	50.4	5.9	13.8	9.8	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 O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2016**

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
Philadelphia CSA	265	65,649	71.2	25,806	2.1	0.8	1.2	19.5	17.0	16.2	45.2	31.7	46.2	33.2	50.6	36.4	0.0	0.0	0.0
Salisbury MSA	107	39,167	28.8	10,602	0.0	0.0	0.0	11.8	2.8	9.3	73.5	68.2	69.1	14.7	29.0	21.5	0.0	0.0	0.0
Total	372	104,816	100.0	36,408	1.6	0.5	0.9	17.6	12.9	14.2	52.2	42.2	52.8	28.6	44.4	32.1	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																				2016
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Philadelphia CSA	265	65,649	71.2	25,806	20.3	7.9	6.6	18.0	21.9	17.5	21.5	15.5	20.3	40.2	52.1	29.3	0.0	2.6	26.3	
Salisbury MSA	107	39,167	28.8	10,602	20.4	2.8	3.4	19.3	12.2	10.6	21.9	3.7	16.6	38.5	80.4	54.5	0.0	0.9	15.0	
Total	372	104,816	100.0	36,408	20.3	6.5	5.6	18.3	19.1	15.5	21.6	12.1	19.2	39.8	60.2	36.7	0.0	2.2	23.0	
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 **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
Philadelphia CSA	246	10,260	71.1	14,969	3.4	1.2	2.7	20.7	22.8	21.0	39.9	48.0	38.6	36.0	28.0	37.7	0.0	0.0	0.0
Salisbury MSA	100	3,437	28.9	4,551	0.0	0.0	0.0	12.6	8.0	10.8	67.6	81.0	64.8	19.7	11.0	24.3	0.0	0.0	0.0
Total	346	13,697	100.0	19,520	2.6	0.9	2.1	18.9	18.5	18.7	46.3	57.5	44.7	32.2	23.1	34.5	0.0	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											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
Philadelphia CSA	246	10,260	71.1	14,969	82.0	88.2	45.9	6.6	8.9	11.4	2.8
Salisbury MSA	100	3,437	28.9	4,551	85.2	92.0	47.6	4.4	2.0	10.4	6.0
Total	346	13,697	100.0	19,520	82.7	89.3	46.3	6.1	6.9	11.2	3.8
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 O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-18

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Philadelphia CSA	949	155,172	71.8	24,549	1.7	0.7	1.1	19.2	17.0	18.5	48.8	43.2	47.3	30.3	39.1	33.1	0.0	0.0	0.0
Salisbury MSA	373	97,905	28.2	10,945	0.0	0.0	0.0	6.5	2.9	4.0	77.0	67.0	70.0	16.4	30.0	26.0	0.0	0.0	0.0
Total	1,322	253,077	100.0	35,494	1.3	0.5	0.8	15.9	13.0	14.0	56.1	49.9	54.3	26.7	36.5	30.9	0.0	0.0	0.0

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Philadelphia CSA	949	155,172	71.8	24,549	20.9	14.0	9.9	17.6	22.9	20.4	21.0	23.8	20.5	40.4	38.1	24.7	0.0	1.2	24.5
Salisbury MSA	373	97,905	38.9	10,945	20.1	8.3	4.8	18.2	16.1	13.2	21.2	15.0	18.0	40.4	59.5	50.1	0.0	1.1	13.9
Total	1,322	253,077	100.0	35,494	20.7	12.4	8.3	17.8	21.0	18.1	21.1	21.3	19.7	40.4	44.2	32.5	0.0	1.1	21.3
Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **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
Philadelphia CSA	477	25,575	70.7	14,898	4.3	3.1	4.2	25.6	20.5	24.1	45.0	53.0	43.9	25.0	23.3	27.9	0.0	0.0	0.0
Salisbury MSA	198	7,940	29.3	4,624	0.0	0.0	0.0	9.1	5.6	6.9	70.1	73.2	71.5	20.8	21.2	21.6	0.0	0.0	0.0
Total	675	33,515	100.0	19,522	3.3	2.2	3.2	21.9	16.1	20.0	50.8	59.0	50.4	24.1	22.7	26.4	0.0	0.0	0.0

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

Table 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
Philadelphia CSA	477	25,575	70.7	14,898	82.4	83.9	49.9	6.4	14.7	11.1	1.5
Salisbury MSA	198	7,940	32.1	4,624	85.5	91.4	49.3	4.4	8.6	10.1	0.0
Total	675	33,515	100.0	19,522	83.1	86.1	49.7	6.0	12.9	10.9	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 O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2016
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
Pittsfield MSA	10	1,189	3.4	3,168	0.6	0.0	0.5	6.9	0.0	6.7	69.5	80.0	69.3	22.9	20.0	23.5	0.0	0.0	0.0
Springfield CSA	287	41,277	96.6	17,375	2.9	7.3	2.9	16.0	22.3	15.9	44.2	38.7	43.2	36.9	31.7	38.0	0.0	0.0	0.0
Total	297	42,466	100.0	20,543	2.4	7.1	2.6	14.4	21.5	14.4	48.8	40.1	47.3	34.4	31.3	35.7	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																				2016
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Pittsfield MSA	10	1,189	3.4	3,168	21.8	30.0	8.0	17.0	30.0	16.7	22.6	20.0	18.8	38.6	10.0	42.2	0.0	10.0	14.3	
Springfield CSA	287	41,277	96.6	17,375	23.4	10.1	6.0	16.4	25.8	19.8	19.6	28.6	23.4	40.6	24.7	36.0	0.0	10.8	14.8	
Total	297	42,466	100.0	20,543	23.2	10.8	6.3	16.5	25.9	19.3	20.1	28.3	22.7	40.3	24.2	37.0	0.0	10.8	14.7	
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 **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
Pittsfield MSA	19	940	9.4	2,372	8.1	0.0	7.5	7.7	5.3	6.5	62.9	73.7	62.1	21.3	21.1	23.9	0.0	0.0	0.0
Springfield CSA	183	9,072	90.6	13,935	12.3	10.9	10.5	19.0	13.7	15.8	36.7	29.5	37.4	31.8	45.9	36.1	0.2	0.0	0.1
Total	202	10,012	100.0	16,307	11.5	9.9	10.1	16.8	12.9	14.5	41.7	33.7	41.0	29.8	43.6	34.3	0.2	0.0	0.1

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

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
Pittsfield MSA	19	940	9.4	2,372	81.7	89.5	49.4	6.2	10.5	12.1	0.0
Springfield CSA	183	9,072	90.6	13,935	81.9	85.8	41.5	6.2	13.1	11.8	1.1
Total	202	10,012	100.0	16,307	81.9	86.1	42.6	6.2	12.9	11.9	1.0

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 O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Pittsfield MSA	85	13,143	7.7	3,292	3.1	3.5	4.0	10.2	9.4	9.1	55.5	45.9	54.5	31.2	41.2	32.4	0.0	0.0	0.0
Springfield CSA	1,020	145,018	92.3	16,517	4.3	9.6	5.7	12.7	22.7	15.3	40.3	33.2	39.0	42.7	34.4	40.0	0.0	0.0	0.0
Total	1,105	158,161	100.0	19,809	4.1	9.1	5.4	12.2	21.7	14.3	43.1	34.2	41.6	40.6	34.9	38.7	0.0	0.0	0.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-18**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Pittsfield MSA	85	13,143	10.8	3,292	21.3	5.9	7.7	17.6	17.6	18.3	20.5	25.9	20.0	40.6	50.6	42.2	0.0	0.0	11.8
Springfield CSA	1,020	145,018	92.3	16,517	24.2	11.3	7.9	16.1	32.0	22.9	18.5	23.3	23.3	41.2	28.9	30.8	0.0	4.5	15.1
Total	1,105	158,161	100.0	19,809	23.7	10.9	7.9	16.4	30.9	22.2	18.8	23.5	22.7	41.1	30.6	32.7	0.0	4.2	14.5

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **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
Pittsfield MSA	41	1,400	10.2	2,265	12.9	7.3	11.2	6.6	4.9	6.9	43.1	61.0	44.4	37.4	26.8	37.5	0.0	0.0	0.0
Springfield CSA	360	14,047	159.3	12,056	12.9	8.1	12.3	15.2	18.1	14.7	34.7	33.9	34.0	36.5	39.7	38.7	0.8	0.3	0.3
Total	401	15,447	177.4	14,321	12.9	8.0	12.1	13.6	16.7	13.5	36.2	36.7	35.7	36.7	38.4	38.5	0.6	0.2	0.2

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 **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
Pittsfield MSA	41	1,400	11.1	2,265	81.1	80.5	51.1	6.3	14.6	12.6	12.5
Springfield CSA	360	14,047	89.8	12,056	81.8	87.8	46.0	6.1	10.6	12.0	1.7
Total	401	15,447	100.0	14,321	81.7	87.0	46.8	6.2	11.0	12.1	2.0

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 O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2016**

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
Detroit CSA	1,395	197,296	96.5	158,537	4.3	2.5	1.2	18.5	18.2	10.1	41.2	38.0	42.3	36.0	41.3	46.4	0.0	0.0	0.0
Lansing CSA	38	3,348	2.6	10,128	5.3	0.0	3.3	17.6	18.4	13.4	49.1	57.9	50.9	28.0	23.7	32.4	0.0	0.0	0.1
Saginaw MSA	12	717	0.8	4,226	5.6	0.0	1.1	15.5	0.0	7.4	43.7	91.7	44.4	35.2	8.3	47.2	0.0	0.0	0.0
Total	1,445	201,361	100.0	172,891	4.4	2.4	1.3	18.3	18.1	10.2	41.8	39.0	42.8	35.5	40.6	45.6	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																			2016
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Detroit CSA	1,395	197,296	96.5	158,537	21.6	11.7	7.6	17.0	18.3	17.1	19.9	19.5	22.0	41.5	36.2	40.1	0.0	14.3	13.2
Lansing CSA	38	3,348	2.6	10,128	22.8	21.1	8.4	17.3	23.7	19.9	20.8	13.2	22.4	39.1	26.3	35.1	0.0	15.8	14.2
Saginaw MSA	12	717	0.8	4,226	21.9	16.7	9.0	16.9	50.0	20.2	20.7	16.7	22.1	40.6	8.3	35.4	0.0	8.3	13.3
Total	1,445	201,361	100.0	172,891	21.7	12.0	7.7	17.0	18.7	17.3	20.0	19.3	22.0	41.3	35.7	39.7	0.0	14.3	13.3
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 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
Detroit CSA	1,028	60,433	94.5	105,739	6.2	2.9	4.4	17.7	19.5	15.5	37.6	35.3	35.5	37.8	41.8	44.1	0.6	0.5	0.4
Lansing CSA	32	1,766	2.9	4,479	6.8	15.6	8.9	27.3	9.4	24.0	35.5	34.4	34.5	27.6	40.6	31.4	2.9	0.0	1.1
Saginaw MSA	28	613	2.6	2,206	6.0	0.0	4.5	14.7	3.6	12.0	42.3	78.6	40.4	37.0	17.9	43.1	0.0	0.0	0.0
Total	1,088	62,812	100.0	112,424	6.2	3.2	4.6	18.2	18.8	15.7	37.6	36.4	35.6	37.1	41.2	43.6	0.8	0.5	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 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
Detroit CSA	1,028	60,433	94.5	105,739	82.5	73.0	42.0	7.4	22.4	10.1	4.7
Lansing CSA	32	1,766	2.9	4,479	78.0	81.3	44.4	6.9	12.5	15.1	6.3
Saginaw MSA	28	613	2.6	2,206	76.6	100.0	43.2	7.7	0.0	15.7	0.0
Total	1,088	62,812	100.0	112,424	82.0	73.9	42.1	7.4	21.5	10.6	4.6

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 O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-18**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Detroit CSA	4,922	652,458	96.4	141,992	6.0	3.9	2.7	17.9	15.3	13.5	38.1	35.2	40.5	37.9	45.6	43.2	0.1	0.0	0.1
Lansing CSA	138	17,884	2.7	9,502	4.7	3.6	4.2	19.2	13.8	18.3	42.3	47.8	42.3	33.6	34.8	34.9	0.2	0.0	0.3
Saginaw MSA	44	3,845	0.9	3,768	7.8	0.0	1.7	9.6	2.3	4.0	54.8	95.5	59.4	27.8	2.3	34.9	0.0	0.0	0.0
Total	5,104	674,187	100.0	155,262	5.9	3.8	2.8	17.6	15.2	13.6	39.1	36.0	41.1	37.2	44.9	42.5	0.1	0.0	0.1

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Detroit CSA	4,922	652,458	96.4	141,992	22.6	12.2	9.0	16.5	21.5	19.3	18.9	23.7	22.7	42.1	41.2	37.6	0.0	1.4	11.4
Lansing CSA	138	17,884	2.7	9,502	23.4	18.1	11.3	17.1	17.4	23.3	19.7	25.4	22.6	39.8	37.7	31.2	0.0	1.4	11.7
Saginaw MSA	44	3,845	1.2	3,768	21.2	4.5	7.5	17.1	43.2	20.7	20.7	15.9	24.2	41.0	36.4	36.6	0.0	0.0	11.0
Total	5,104	674,187	100.0	155,262	22.6	12.3	9.1	16.5	21.5	19.6	19.0	23.7	22.7	41.9	41.1	37.2	0.0	1.4	11.4
Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			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
Detroit CSA	2,538	150,374	95.4	88,592	7.5	7.1	6.5	19.2	21.6	18.1	32.6	31.5	32.4	39.5	39.2	41.9	1.2	0.7	1.0
Lansing CSA	43	1,738	2.9	4,504	11.1	4.7	13.5	22.2	16.3	20.1	29.0	53.5	26.2	34.0	25.6	38.4	3.8	0.0	1.8
Saginaw MSA	79	1,508	3.0	2,210	6.7	2.5	5.4	12.2	2.5	9.9	53.3	82.3	53.5	27.9	12.7	31.2	0.0	0.0	0.0
Total	2,660	153,620	100.0	95,306	7.7	6.9	6.8	19.2	20.9	18.0	33.0	33.4	32.6	38.7	38.2	41.5	1.4	0.6	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 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
Detroit CSA	2,538	150,374	95.4	88,592	82.4	76.5	51.5	7.4	20.6	10.2	2.8
Lansing CSA	43	1,738	1.8	4,504	78.2	86.0	47.8	7.0	11.6	14.8	4.5
Saginaw MSA	79	1,508	3.0	2,210	75.2	92.4	45.7	8.0	7.6	16.9	0.0
Total	2,660	153,620	100.0	95,306	81.9	77.1	51.2	7.4	20.1	10.7	2.7
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 O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2016
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
NH Non-Metro	179	30,315	100.0	6,733	0.0	0.0	0.0	19.8	22.9	21.0	66.0	62.6	64.3	14.2	14.5	14.7	0.0	0.0	0.0
Total	179	30,315	100.0	6,733	0.0	0.0	0.0	19.8	22.9	21.0	66.0	62.6	64.3	14.2	14.5	14.7	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 **2016**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
NH Non-Metro	179	30,315	100.0	6,733	19.8	7.8	4.9	20.6	15.6	17.5	23.5	21.8	18.8	36.1	52.5	43.3	0.0	2.2	15.6
Total	179	30,315	100.0	6,733	19.8	7.8	4.9	20.6	15.6	17.5	23.5	21.8	18.8	36.1	52.5	43.3	0.0	2.2	15.6

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																			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
NH Non-Metro	181	10,749	100.0	5,117	0.0	0.0	0.0	20.2	18.2	20.3	66.3	70.7	66.4	13.4	11.1	13.3	0.0	0.0	0.0
Total	181	10,749	100.0	5,117	0.0	0.0	0.0	20.2	18.2	20.3	66.3	70.7	66.4	13.4	11.1	13.3	0.0	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**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
NH Non-Metro	181	10,749	100.0	5,117	80.8	86.7	46.6	6.0	11.1	13.2	2.2
Total	181	10,749	100.0	5,117	80.8	86.7	46.6	6.0	11.1	13.2	2.2

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 O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
NH Non-Metro	699	102,407	100.0	7,524	1.0	1.3	0.6	19.7	18.9	16.2	66.2	65.2	69.6	13.1	14.6	13.7	0.0	0.0	0.0
Total	699	102,407	100.0	7,524	1.0	1.3	0.6	19.7	18.9	16.2	66.2	65.2	69.6	13.1	14.6	13.7	0.0	0.0	0.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-18**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
NH Non-Metro	699	102,407	100.0	7,524	21.3	14.3	8.5	20.1	22.2	20.2	22.2	19.7	21.8	36.3	42.8	37.5	0.0	1.0	12.0
Total	699	102,407	100.0	7,524	21.3	14.3	8.5	20.1	22.2	20.2	22.2	19.7	21.8	36.3	42.8	37.5	0.0	1.0	12.0

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **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
NH Non-Metro	298	13,101	202.7	5,447	0.9	0.7	0.3	20.8	20.1	19.9	62.9	62.4	65.3	15.5	16.8	14.5	0.0	0.0	0.0
Total	298	13,101	202.7	5,447	0.9	0.7	0.3	20.8	20.1	19.9	62.9	62.4	65.3	15.5	16.8	14.5	0.0	0.0	0.0

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

Table 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
NH Non-Metro	298	13,101	100.0	5,447	80.2	88.9	50.0	6.4	8.1	13.4	3.0
Total	298	13,101	100.0	5,447	80.2	88.9	50.0	6.4	8.1	13.4	3.0
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 O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2016
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
Albany CSA	273	36,553	18.2	24,574	4.0	2.9	2.9	10.4	6.6	8.9	59.1	59.3	58.7	26.5	31.1	29.5	0.0	0.0	0.0
Binghamton MSA 2016	43	3,991	2.9	3,222	2.9	7.0	2.6	13.1	9.3	11.0	51.4	53.5	50.0	32.5	30.2	36.5	0.0	0.0	0.0
Buffalo MSA	667	67,699	44.4	23,954	5.0	2.1	2.5	14.3	16.9	11.0	43.1	41.4	43.8	37.7	39.6	42.7	0.0	0.0	0.0
Ithaca CSA	8	456	0.5	2,431	0.2	0.0	0.2	10.1	25.0	8.8	64.3	50.0	64.9	25.4	0.0	25.8	0.0	25.0	0.3
NY Non-Metro	41	4,157	2.7	4,572	0.2	0.0	0.1	10.2	2.4	8.4	75.3	87.8	76.8	14.3	9.8	14.8	0.0	0.0	0.0
Rochester CSA	347	24,653	23.1	26,633	3.3	5.2	2.2	10.6	16.7	9.0	54.9	46.7	55.7	31.3	31.4	33.2	0.0	0.0	0.0
Syracuse MSA	84	6,845	5.6	11,868	4.1	3.6	2.6	12.9	17.9	12.3	37.7	35.7	36.4	45.3	42.9	48.6	0.0	0.0	0.0
Utica MSA	40	2,801	2.7	6,220	3.1	15.0	2.5	9.4	10.0	8.7	58.9	45.0	57.1	28.6	30.0	31.6	0.0	0.0	0.0
Total	1,503	147,155	100.0	103,474	3.6	3.5	2.4	11.7	14.3	9.8	52.9	47.3	52.5	31.8	34.8	35.3	0.0	0.1	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																			2016
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Albany CSA	273	36,553	18.2	24,574	20.4	8.8	7.0	17.9	22.3	20.4	21.7	16.5	23.7	40.0	28.2	33.5	0.0	24.2	15.4
Binghamton MSA	43	3,991	2.9	3,222	21.7	11.6	8.1	17.6	16.3	22.3	20.9	20.9	23.4	39.8	27.9	29.5	0.0	23.3	16.6
Buffalo MSA	667	67,699	44.4	23,954	21.6	7.2	7.5	17.4	23.2	20.4	20.9	19.2	23.1	40.1	28.5	31.9	0.0	21.9	17.1
Ithaca CSA	8	456	0.5	2,431	17.8	12.5	5.1	18.8	50.0	17.6	21.5	12.5	23.9	42.0	25.0	42.8	0.0	0.0	10.6
NY Non-Metro	41	4,157	2.7	4,572	21.1	7.3	7.7	17.8	24.4	17.7	21.9	12.2	21.8	39.2	36.6	40.5	0.0	19.5	12.2
Rochester CSA	347	24,653	23.1	26,633	20.2	13.3	8.0	17.2	23.3	20.4	22.0	13.8	23.2	40.6	19.0	35.0	0.0	30.5	13.4
Syracuse MSA	84	6,845	5.6	11,868	20.9	7.1	8.3	16.0	20.2	20.5	20.6	15.5	22.6	42.5	21.4	33.8	0.0	35.7	14.7
Utica MSA	40	2,801	2.7	6,220	21.3	5.0	7.6	17.2	27.5	20.3	21.5	27.5	25.3	40.1	15.0	37.8	0.0	25.0	9.0
Total	1,503	147,155	100.0	103,474	20.8	9.0	7.6	17.4	23.0	20.3	21.4	17.3	23.3	40.4	25.7	34.2	0.0	25.0	14.6
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																			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
Albany CSA	280	14,934	24.0	14,981	6.8	7.1	6.1	15.2	9.6	12.5	53.0	61.8	54.0	25.0	21.4	27.4	0.0	0.0	0.0
Binghamton MSA	46	2,642	3.9	2,388	10.9	2.2	10.4	18.1	21.7	17.0	42.4	43.5	41.1	28.5	32.6	31.4	0.0	0.0	0.0
Buffalo MSA	278	10,200	23.9	14,981	8.0	1.8	7.0	14.5	16.2	13.8	41.0	40.6	38.6	36.0	41.4	40.5	0.4	0.0	0.1
Ithaca CSA	19	3,286	1.6	2,194	0.2	0.0	0.5	17.7	15.8	16.9	52.3	73.7	53.0	29.5	10.5	29.5	0.3	0.0	0.1
NY Non-Metro	37	2,674	3.2	4,084	3.0	0.0	1.9	15.6	10.8	15.3	68.1	75.7	67.4	13.2	13.5	15.4	0.0	0.0	0.0
Rochester CSA	300	12,635	25.8	15,693	9.9	9.0	8.0	11.0	8.3	8.7	48.5	52.7	49.2	30.4	30.0	33.9	0.2	0.0	0.1
Syracuse MSA	142	5,615	12.2	7,849	16.3	7.0	13.9	12.2	12.0	10.9	35.9	48.6	38.9	35.6	32.4	36.3	0.0	0.0	0.0
Utica MSA	63	2,551	5.4	3,584	4.8	3.2	4.8	14.4	11.1	14.8	53.5	54.0	49.0	25.6	28.6	30.2	1.7	3.2	1.2
Total	1,165	54,537	100.0	65,754	8.5	5.6	7.3	13.9	11.8	12.3	47.6	52.3	47.6	29.7	30.1	32.6	0.3	0.2	0.1
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																			

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
Albany CSA	280	14,934	24.0	14,981	79.5	82.1	46.4	6.7	14.3	13.8	3.6
Binghamton MSA	46	2,642	3.9	2,388	78.9	80.4	44.5	6.8	17.4	14.3	2.2
Buffalo MSA	278	10,200	23.9	14,981	80.2	80.9	46.4	7.4	13.7	12.4	5.4
Ithaca CSA	19	3,286	1.6	2,194	78.0	78.9	50.5	6.4	15.8	15.6	5.3
NY Non-Metro	37	2,674	3.2	4,084	79.7	89.2	48.3	6.0	10.8	14.3	0.0
Rochester CSA	300	12,635	25.8	15,693	80.5	82.0	44.7	7.3	13.3	12.2	4.7
Syracuse MSA	142	5,615	12.2	7,849	78.7	85.9	42.9	7.6	10.6	13.6	3.5
Utica MSA	63	2,551	5.4	3,584	78.9	92.1	50.8	6.6	6.3	14.6	1.6
Total	1,165	54,537	100.0	65,754	79.7	82.9	46.0	7.0	13.0	13.2	4.0

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 O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Albany CSA	1,088	163,730	17.7	27,352	2.9	3.0	2.7	12.4	11.9	11.9	58.4	53.1	57.9	26.3	31.9	27.5	0.0	0.0	0.0
Binghamton MSA	136	11,850	2.2	3,646	3.4	4.4	3.2	12.1	14.7	12.0	58.1	54.4	55.3	26.3	26.5	29.5	0.0	0.0	0.0
Buffalo MSA	2,656	299,526	43.1	28,852	6.9	4.6	4.4	11.4	9.6	9.5	43.8	43.4	44.4	37.9	42.4	41.6	0.0	0.0	0.0
Ithaca CSA	63	8,320	1.0	2,251	0.0	0.0	0.0	10.1	15.9	10.0	68.6	68.3	67.0	21.2	15.9	22.4	0.1	0.0	0.6
NY Non-Metro	166	21,155	2.7	5,082	0.6	0.0	0.4	7.8	5.4	7.0	83.1	77.1	81.9	8.4	17.5	10.7	0.0	0.0	0.0
Rochester MSA	1,545	174,274	25.1	28,488	3.6	4.1	2.8	11.3	13.0	10.5	50.6	43.2	49.5	34.5	39.7	37.2	0.0	0.0	0.0
Syracuse MSA	345	39,044	5.6	12,845	3.2	2.3	2.4	10.3	12.5	9.4	47.3	46.1	46.7	39.0	39.1	41.4	0.1	0.0	0.1
Utica MSA	157	14,657	2.6	5,984	5.0	8.9	4.3	7.2	12.7	7.3	60.0	58.0	56.0	27.8	20.4	32.3	0.0	0.0	0.0
Total	6,156	732,557	100.0	114,500	4.0	4.0	3.1	10.9	11.2	10.2	53.9	47.0	52.2	31.1	37.8	34.5	0.0	0.0	0.1
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Albany CSA	1,088	163,730	17.7	27,352	20.5	13.1	8.9	17.4	24.9	22.4	22.0	24.2	25.4	40.1	36.7	34.6	0.0	1.1	8.6
Binghamton MSA	136	11,850	2.2	3,646	22.6	18.4	9.5	17.6	24.3	23.7	21.0	21.3	23.9	38.8	32.4	33.5	0.0	3.7	9.4
Buffalo MSA	2,656	299,526	43.1	28,852	22.2	12.4	9.7	16.6	26.1	22.7	20.3	27.2	23.5	40.9	32.4	32.3	0.0	1.8	11.8
Ithaca CSA	63	8,320	4.8	2,251	20.0	19.0	8.0	16.2	23.8	21.5	21.7	30.2	24.4	42.1	25.4	36.1	0.0	1.6	10.0
NY Non-Metro	166	21,155	2.7	5,082	22.4	6.0	8.3	18.0	16.9	19.3	21.8	30.1	22.9	37.9	45.2	40.5	0.0	1.8	9.0
Rochester MSA	1,545	174,274	25.1	28,488	21.6	15.9	8.5	16.9	24.5	21.5	19.8	23.9	22.2	41.6	33.3	34.4	0.0	2.5	13.5
Syracuse MSA	345	39,044	5.6	12,845	20.7	15.1	9.7	16.6	20.6	21.5	20.2	27.2	22.8	42.5	33.6	36.4	0.0	3.5	9.6
Utica MSA	157	14,657	2.6	5,984	22.0	20.4	8.2	16.9	23.6	21.0	21.5	23.6	24.0	39.6	29.3	37.9	0.0	3.2	8.9
Total	6,156	732,557	100.0	114,500	21.5	13.8	9.0	17.0	24.8	21.9	20.8	25.7	23.6	40.7	33.7	34.6	0.0	2.0	10.8
Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			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
Albany CSA	631	27,909	23.3	15,334	10.4	7.8	8.0	12.4	10.6	11.8	52.2	53.4	52.2	24.6	28.2	27.7	0.4	0.0	0.3
Binghamton MSA	123	4,158	4.5	2,400	12.2	13.0	9.8	14.0	17.1	16.0	56.1	47.2	55.9	17.7	22.8	18.3	0.0	0.0	0.0
Buffalo MSA	707	30,657	26.1	15,301	9.1	8.9	8.8	12.2	11.3	11.4	37.9	40.2	36.3	37.2	38.8	41.1	3.6	0.8	2.4
Ithaca CSA	54	1,266	2.0	2,090	0.0	0.0	0.0	13.4	13.0	13.8	52.5	61.1	53.5	32.3	25.9	30.2	1.8	0.0	2.5
NY Non-Metro	77	2,643	2.8	4,137	4.5	2.6	3.1	13.8	3.9	12.4	70.6	80.5	71.9	11.0	13.0	12.6	0.1	0.0	0.0
Rochester MSA	633	24,479	23.3	15,963	9.5	10.6	8.2	13.5	10.3	11.4	43.6	41.4	44.1	33.2	37.8	36.2	0.3	0.0	0.1
Syracuse MSA	344	12,662	12.7	8,119	9.3	6.7	6.9	10.8	11.3	10.3	40.9	45.3	40.8	36.2	35.8	40.1	2.8	0.9	2.0
Utica MSA	144	4,163	5.3	3,860	11.9	13.9	12.2	13.7	7.6	11.1	47.7	59.7	45.6	25.3	16.7	30.0	1.5	2.1	1.2
Total	2,713	107,937	100.0	67,204	9.2	8.8	7.8	12.6	10.8	11.7	46.5	47.1	46.3	30.1	32.8	33.2	1.5	0.4	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 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
Albany CSA	631	27,909	23.3	15,334	80.0	87.3	49.2	6.5	11.1	13.5	1.6
Binghamton MSA	123	4,158	4.7	2,400	77.7	87.8	46.5	7.2	10.6	15.2	1.6
Buffalo MSA	707	30,657	26.1	15,301	80.1	84.4	49.5	7.4	11.9	12.5	3.7
Ithaca CSA	54	1,266	2.0	2,090	78.1	88.9	53.4	6.3	11.1	15.6	0.0
NY Non-Metro	77	2,643	2.8	4,137	78.8	96.1	52.9	6.3	3.9	15.0	0.0
Rochester MSA	633	24,479	23.3	15,963	80.6	85.8	49.1	7.3	10.6	12.2	3.6
Syracuse MSA	344	12,662	12.7	8,119	78.5	88.4	45.7	7.6	9.6	14.0	2.0
Utica MSA	144	4,163	5.4	3,860	78.6	91.7	48.1	6.8	7.6	14.6	1.4
Total	2,713	107,937	100.0	67,204	79.7	86.9	49.0	7.0	10.6	13.3	2.5

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 O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2016**

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
Cleveland CSA	1,422	144,097	80.7	89,652	5.0	3.2	1.8	14.5	13.9	10.0	45.1	46.6	44.1	35.5	36.2	44.1	0.0	0.0	0.0
OH Non-Metro	28	1,277	1.6	1,383	8.5	17.9	5.1	12.1	3.6	10.4	75.7	78.6	79.3	3.7	0.0	5.2	0.0	0.0	0.0
Toledo MSA	192	10,978	10.9	13,731	6.3	8.9	1.4	14.0	16.7	7.7	44.5	47.9	43.6	35.3	26.6	47.4	0.0	0.0	0.0
Youngstown CSA	120	7,344	6.8	11,649	4.3	1.7	0.7	14.7	6.7	8.1	58.9	72.5	62.2	22.0	19.2	29.0	0.0	0.0	0.0
Total	1,762	163,696	100.0	116,415	5.1	4.0	1.7	14.4	13.6	9.6	47.4	49.0	46.3	33.1	33.4	42.5	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																			2016
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Cleveland CSA	1,422	144,097	80.7	89,652	21.1	11.8	7.9	17.6	23.0	18.2	21.1	18.2	20.5	40.1	28.6	37.1	0.0	18.4	16.3
OH Non-Metro	28	1,277	1.6	1,383	30.6	14.3	7.2	17.2	21.4	18.1	19.2	17.9	21.4	32.9	32.1	35.8	0.0	14.3	17.5
Toledo MSA	192	10,978	10.9	13,731	22.3	13.0	7.1	16.8	22.9	17.2	20.1	19.3	22.9	40.7	20.3	38.8	0.0	24.5	14.0
Youngstown CSA	120	7,344	6.8	11,649	20.9	11.7	7.1	18.4	15.8	19.8	21.8	20.0	22.6	38.9	27.5	32.7	0.0	25.0	17.8
Total	1,762	163,696	100.0	116,415	21.4	12.0	7.7	17.6	22.5	18.2	21.1	18.4	21.0	39.9	27.6	36.9	0.0	19.5	16.2
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 **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
Cleveland CSA	686	37,041	82.4	55,148	7.4	5.8	5.9	13.3	11.7	11.5	40.1	40.4	38.1	38.9	42.1	44.4	0.3	0.0	0.1
OH Non-Metro	5	644	0.6	633	25.2	40.0	21.5	6.8	0.0	8.2	64.6	60.0	67.1	3.4	0.0	3.2	0.0	0.0	0.0
Toledo MSA	89	3,496	10.7	7,970	7.0	3.4	4.9	15.1	20.2	11.6	41.0	44.9	38.4	36.7	31.5	45.0	0.3	0.0	0.0
Youngstown CSA	53	1,097	6.4	7,139	6.7	1.9	5.9	13.1	9.4	11.2	52.5	64.2	50.4	27.7	24.5	32.5	0.0	0.0	0.0
Total	833	42,278	100.0	70,890	7.5	5.5	6.0	13.4	12.4	11.4	41.9	42.5	39.6	36.9	39.6	42.9	0.2	0.0	0.1

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

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
Cleveland CSA	686	37,041	82.4	55,148	81.3	78.9	44.5	7.4	16.9	11.3	4.2
OH Non-Metro	5	644	0.6	633	79.0	60.0	49.4	5.9	40.0	15.0	0.0
Toledo MSA	89	3,496	10.7	7,970	78.5	85.4	43.9	7.7	14.6	13.9	0.0
Youngstown CSA	53	1,097	6.4	7,139	80.3	94.3	44.7	6.8	3.8	12.9	1.9
Total	833	42,278	100.0	70,890	80.9	80.4	44.5	7.4	16.0	11.8	3.6

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 O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-18**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Cleveland CSA	4,954	613,566	81.8	101,757	5.8	4.3	2.8	15.6	12.9	12.1	44.0	41.2	44.6	34.4	41.5	40.5	0.1	0.1	0.0
OH Non-Metro	67	5,099	1.1	1,329	0.6	0.0	0.4	28.6	26.9	23.7	54.5	35.8	52.6	16.4	37.3	23.3	0.0	0.0	0.0
Toledo MSA	681	65,932	11.2	14,196	7.4	4.1	2.5	13.1	12.6	9.2	42.9	46.4	42.5	36.6	36.9	45.8	0.0	0.0	0.0
Youngstown CSA	357	30,649	5.9	13,826	4.6	1.7	1.1	12.1	8.4	7.7	55.7	55.7	58.9	27.6	34.2	32.3	0.0	0.0	0.0
Total	6,059	715,247	100.0	131,108	5.8	4.1	2.5	15.1	12.8	11.5	45.6	42.6	45.9	33.5	40.5	40.0	0.1	0.1	0.0

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Cleveland CSA	4,954	613,566	81.8	101,757	22.0	13.6	9.5	17.0	24.7	19.9	20.1	24.4	21.7	40.9	35.2	35.9	0.0	2.0	13.0
OH Non-Metro	67	5,099	1.5	1,329	29.3	20.9	10.5	15.4	26.9	23.4	18.3	17.9	24.4	37.0	32.8	32.4	0.0	1.5	9.3
Toledo MSA	681	65,932	11.2	14,196	23.8	13.7	9.4	16.4	23.9	20.2	19.3	28.0	22.9	40.5	33.6	35.9	0.0	0.7	11.5
Youngstown CSA	357	30,649	5.9	13,826	21.1	12.3	10.0	18.2	29.7	22.4	20.7	26.9	24.3	40.0	29.1	31.3	0.0	2.0	12.1
Total	6,059	715,247	100.0	131,108	22.2	13.6	9.6	17.1	24.9	20.3	20.0	24.9	22.1	40.7	34.7	35.4	0.0	1.8	12.7
Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

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

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
Cleveland CSA	1,788	82,808	84.4	53,743	8.1	7.0	7.2	15.1	12.3	13.8	37.9	36.4	37.0	38.0	43.8	41.3	0.8	0.6	0.7
OH Non-Metro	14	1,063	1.4	652	14.4	0.0	16.0	29.1	50.0	30.8	40.5	28.6	38.7	16.0	21.4	14.6	0.0	0.0	0.0
Toledo MSA	173	8,038	8.2	6,628	13.4	10.4	11.4	11.0	13.9	10.6	35.9	40.5	33.2	39.6	35.3	44.7	0.1	0.0	0.0
Youngstown CSA	143	8,319	6.8	7,551	7.1	7.7	6.3	11.7	10.5	10.6	47.0	51.0	45.9	34.2	30.8	37.1	0.0	0.0	0.0
Total	2,118	100,228	100.0	68,574	8.7	7.3	7.6	14.5	12.6	13.3	38.7	37.6	37.6	37.5	42.1	40.9	0.6	0.5	0.5

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

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

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
Cleveland CSA	1,788	82,808	84.4	53,743	81.3	81.4	49.9	7.3	16.8	11.4	1.8
OH Non-Metro	14	1,063	1.1	652	79.0	64.3	50.0	5.9	35.7	15.1	0.0
Toledo MSA	173	8,038	8.2	6,628	78.1	83.8	47.3	7.8	14.5	14.1	1.7
Youngstown CSA	143	8,319	6.8	7,551	79.5	81.1	47.7	7.0	16.8	13.5	4.5
Total	2,118	100,228	100.0	68,574	80.7	81.4	49.4	7.3	16.7	12.0	1.8

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

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2016
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
Burlington MSA	66	14,405	33.0	7,529	0.4	0.0	0.7	16.3	22.7	14.9	56.5	36.4	57.9	26.7	40.9	26.4	0.1	0.0	0.0
VT Non-Metro	134	19,012	67.0	6,676	0.1	0.0	0.0	7.1	7.5	6.1	72.9	85.8	69.8	19.9	6.7	24.1	0.0	0.0	0.0
Total	200	33,417	100.0	14,205	0.2	0.0	0.4	10.6	12.5	10.8	66.7	69.5	63.5	22.5	18.0	25.3	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																				2016
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Burlington MSA	66	14,405	33.0	7,529	18.1	7.6	6.4	18.9	15.2	20.9	23.5	15.2	25.4	39.5	47.0	35.4	0.0	15.2	11.9	
VT Non-Metro	134	19,012	67.0	6,676	17.8	7.5	4.3	18.3	13.4	13.6	22.4	18.7	20.7	41.5	35.1	47.5	0.0	25.4	13.9	
Total	200	33,417	100.0	14,205	17.9	7.5	5.4	18.5	14.0	17.4	22.8	17.5	23.2	40.7	39.0	41.1	0.0	22.0	12.9	
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 **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
Burlington MSA	127	5,297	43.6	6,131	1.1	0.0	0.5	20.9	9.4	18.1	51.0	62.2	53.1	26.8	28.3	28.1	0.2	0.0	0.1
VT Non-Metro	164	7,249	56.4	6,240	0.2	0.0	0.1	11.3	11.6	8.8	67.1	67.7	67.3	21.4	20.7	23.8	0.0	0.0	0.0
Total	291	12,546	100.0	12,371	0.6	0.0	0.3	15.1	10.7	13.4	60.7	65.3	60.3	23.6	24.1	25.9	0.1	0.0	0.1

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

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
Burlington MSA	127	5,297	43.6	6,131	82.9	86.6	37.1	6.6	13.4	10.5	0.0
VT Non-Metro	164	7,249	56.4	6,240	82.4	89.6	44.7	6.1	8.5	11.5	1.8
Total	291	12,546	100.0	12,371	82.6	88.3	40.9	6.3	10.7	11.1	1.0

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 O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Burlington MSA	218	41,983	32.7	6,337	1.0	1.4	1.2	11.7	10.1	13.3	66.2	61.9	66.1	21.1	26.6	19.3	0.0	0.0	0.0
VT Non-Metro	449	67,334	67.3	6,481	0.0	0.0	0.0	4.6	4.7	3.2	78.0	74.2	76.9	17.5	21.2	19.9	0.0	0.0	0.0
Total	667	109,317	100.0	12,818	0.4	0.5	0.6	7.3	6.4	8.2	73.4	70.2	71.6	18.9	22.9	19.6	0.0	0.0	0.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-18**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Burlington MSA	218	41,983	41.9	6,337	20.6	13.3	9.9	17.6	25.2	23.2	23.0	24.3	25.4	38.8	36.2	30.8	0.0	0.9	10.7
VT Non-Metro	449	67,334	67.3	6,481	18.6	10.7	6.4	17.3	18.9	17.8	22.4	19.6	21.5	41.7	48.8	42.8	0.0	2.0	11.5
Total	667	109,317	100.0	12,818	19.4	11.5	8.1	17.4	21.0	20.4	22.6	21.1	23.4	40.6	44.7	36.9	0.0	1.6	11.1

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **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
Burlington MSA	290	14,155	50.9	4,348	0.9	0.7	1.2	22.8	15.5	20.1	53.7	58.6	54.4	22.3	25.2	23.9	0.2	0.0	0.3
VT Non-Metro	280	10,976	49.1	5,731	0.0	0.0	0.0	8.0	6.4	6.0	75.3	73.6	74.2	16.7	20.0	19.9	0.0	0.0	0.0
Total	570	25,131	100.0	10,079	0.4	0.4	0.5	14.0	11.1	12.1	66.5	66.0	65.7	19.0	22.6	21.6	0.1	0.0	0.1

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

Table 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
Burlington MSA	290	14,155	58.2	4,348	83.2	88.6	42.9	6.4	10.3	10.4	2.0
VT Non-Metro	224	9,108	43.6	4,479	82.9	89.7	50.1	5.8	8.5	11.3	1.8
Total	514	23,263	100.0	8,827	83.0	89.1	46.5	6.1	9.5	10.9	1.4

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

Appendix B.2

HSBC Community Reinvestment Act Performance Evaluation (Oct. 1, 2018)



PUBLIC DISCLOSURE

October 1, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

HSBC Bank USA, N.A.
Charter Number: 24522

1800 Tysons Boulevard
Tysons, VA 22102

Office of the Comptroller of the Currency
Large Bank Supervision
Constitution Center
400 7th Street, S.W.
Washington, DC 20219

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

Table of Contents

Overall CRA Rating.....	3
Description of Institution.....	4
Scope of the Evaluation.....	6
Discriminatory or Other Illegal Credit Practices Review.....	9
Multistate Metropolitan Statistical Area Rating.....	10
NY CSA.....	10
Philadelphia MMSA.....	19
DC MMSA.....	26
State Rating.....	33
State of California.....	33
State of Florida.....	45
State of Washington.....	53
Appendix A: Scope of Examination.....	A-1
Appendix B: Summary of MMSA and State Ratings.....	B-1
Appendix C: Definitions and Common Abbreviations.....	C-1
Appendix D: Tables of Performance Data.....	D-1

Overall CRA Rating

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

The following table indicates the performance level of HSBC Bank USA N.A. ("HBUS", or "the bank") with respect to the Lending, Investment, and Service Tests:

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

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

The major factors that support this rating include:

- The Lending Test rating is based on an Outstanding rating in all the bank's rating areas.
- The Investment Test rating is based on an Outstanding rating in all the bank's rating areas.
- The Service Test rating is based on a majority of rating areas receiving a High Satisfactory rating.

Lending in Assessment Area

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

The bank originated and purchased 80.2 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. This factored favorably into the geographic distribution of lending by income level of geography.

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	26,533	86.6	4,114	13.4	30,647	12,262,253	87.7	1,713,999	12.3	13,976,252
Small Business	23,654	74.1	8,280	25.9	31,934	1,685,307	76.2	525,439	23.8	2,210,746
Small Farm	3	37.5	5	62.5	8	728	23.3	2,400	76.7	3,128
Total	50,190	80.2	12,399	19.8	62,589	13,948,288	86.2	2,241,838	13.8	16,190,126

Description of Institution

HSBC Bank USA, National Association is an interstate bank headquartered in Tysons, Virginia, with principal executive offices in New York City (NYC). As of December 31, 2017, HBUS had total assets of \$180.4 billion and total deposits of \$133.1 billion. HBUS is a subsidiary of HSBC USA Inc., which is a subsidiary of HSBC North America Holdings Inc. (HNAH). HSBC Holdings plc (HSBC), based in London, UK is the parent of HNAH and is ranked as one of the world's largest banking and financial service organizations, with assets of \$2.5 trillion as of December 31, 2017. HBUS offers a full range of commercial and consumer banking products and had approximately 1.4 million customers. HBUS offers products and services to individuals, corporations, institutions, and governments, through its Retail Banking and Wealth Management (RBWM), Commercial Banking, Global Banking and Markets, and Private Banking businesses.

For this evaluation, there are six rating areas. This includes one Combined Statistical Area (CSA) and two Multistate Metropolitan Statistical Area (MMSA)s where the bank operated in at least two states.

At year-end 2017, HBUS operated 229 retail branches with 49 or 21.4 percent of these branches located in low- and moderate- income (LMI) geographies and 399 ATMs with 92 or 23.1 percent of these ATMs in LMI geographies.

The table below provides basic bank financial information as of the beginning of the first year (with the exception of Net Income) and end of the third year of the evaluation period:

Loan Mix	01/01/2015		12/31/2017		% Growth / (Decline) in Period
	Balance Sheet \$ Amount (000)	% of Total Loans	Balance Sheet \$ Amount (000)	% of Total Loans	
Real Estate Loans	28,817,866	39.2	29,120,093	43.8	1.0
Commercial Loans	36,436,646	49.5	26,981,795	40.6	(25.9)
Individual Loans	1,237,707	1.7	1,125,590	1.7	(9.1)
Agricultural Loans	280,010	0.4	249,869	0.4	(10.8)
All Other Loans/Leases	6,831,235	9.2	8,989,295	13.5	31.6
Total Loans/Leases	73,603,454		66,466,642		(9.7)
Total Assets	178,676,927		180,371,724		0.9
Total Deposits*	117,316,713		137,711,320		17.4
Net Income	410,806		(232,763)		(156.7)
Tier 1 Capital	17,214,516		19,294,161		12.1

Source: FFIEC Call Reports, FDIC Summary of Deposits

*Represents international and domestic deposits. For CRA performance and capital allocated to AAs, total deposits were adjusted to \$128.2 billion for 2017.

The bank was not constrained by any financial impediments that would hinder its ability to meet the credit, investment, and service needs of its communities. During the evaluation period, the bank operated under multiple consent orders, which limited the bank's ability to open new branches.

HBUS was rated "Satisfactory" at its previous CRA evaluation dated December 31, 2014.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses the bank's CRA performance under the large institution Lending, Investment, and Service Tests. The evaluation period is January 1, 2015 to December 31, 2017.

In evaluating the bank's lending performance, the OCC reviewed home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) and small loans to businesses reported under the CRA. All home mortgage products were reviewed, and conclusions reached in the aggregate. Loans to farms were not considered because the bank made very few reportable farm loans during the evaluation period.

Under the Lending Test, we performed separate analysis of 2015-2016 data and 2017 data. This is due to changes instituted by the 2015 American Community Survey (ACS), which updated income, population, and housing information. The ACS also resulted in changes to the income designations of some geographies. The changes became effective on January 1, 2017.

Selection of Areas for Full-Scope Review

In each state where HBUS has an office, one AA within that state was selected for a full-scope review. With the exception of the state of California, all rating areas contained one AA and received a full-scope review. Both AAs in the state of California also received 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 combined statistical area (CSA) are combined and evaluated as a single AA.

Ratings

The bank's overall rating is a blend of the CSA, MMSAs, and state ratings. Bank performance in each of the evaluation years were weighted equally. The New York CSA rating area carried the greatest emphasis in the OCC's conclusions as this area represented HBUS' most significant market with 86 percent of HBUS' adjusted deposits, 58 percent of loans originated and purchased, and 69 percent of the branch network.

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

Other Information

AAs – The OCC determined that all AAs consisted of whole geographies and met the requirements of the regulation. The areas reasonably reflected the different trade areas that HBUS's branches service and did not arbitrarily exclude any LMI areas.

Lending Gap Analysis – The OCC reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic

distribution of loans in all full-scope AAs. The OCC did not identify any unexplained conspicuous gaps in any of the areas they reviewed.

Deposit Market Share - The OCC used summary deposit data reported to the Federal Deposit Insurance Corporation as of June 30, 2017, unless otherwise noted. This was the most recent public data available during the evaluation period.

Business Banking - In January 2016, HBUS' Retail Business Banking (RBB) segment, defined as commercial clients with annual turnover of less than \$5 million, was transferred from Commercial Banking to RBWM. RBB has developed a small business product and has streamlined the application approval process to better serve its local business communities.

Flexible and Innovative Lending Products - The bank offered CRA affordable mortgage products during the evaluation period. Flexible products offered in all AAs include Community Works and FHA. Community Works offers affordable low down payment mortgage options to first-time homebuyers that meet LMI income requirements and/or purchase property in an LMI designed census tract. During the evaluation period, the bank originated 183 Community Works mortgages totaling \$30.4 million and 21 FHA mortgages totaling \$6.7 million.

Junior Achievement – HBUS' s officers and employees provided over 5,200 hours to Junior Achievement, a program primarily focused on teaching young people about the importance of money management, workforce readiness, and entrepreneurial thinking. The majority of students in this program are low-income. This program was provided in all AAs.

Lending Test

The OCC evaluated home mortgage and small loans to business in each AA. The OCC did not analyze or draw conclusions on a particular loan product if HBUS made less than 20 loans during the evaluation period because this analysis would not provide substantive conclusions. The OCC did not analyze HBUS' small farm or consumer loans, as none of the full-scope AAs had a sufficient number of small farm or consumer loans.

The OCC generally gave equal weighting to geographic and borrower distribution components of the Lending Test. When evaluating the geographic distribution of loans, the OCC gave greater consideration to HBUS' performance in moderate-income tracts in instances where there were a limited number of owner-occupied housing units or businesses in the low-income tracts. When evaluating the distribution of home mortgage loans based on the income level of the borrower, the OCC considered the poverty level of the AA as well as the significant affordability barriers that exist in certain markets.

The OCC also considered the volume of community development (CD) loans and the degree of responsiveness of those loans to the needs in the community.

Investment Test

The OCC gave equal consideration to the volume of investments and grants made during the current evaluation period and those made in prior evaluation periods that remain outstanding. The OCC also considered how responsive the investments were to the needs of the communities. In most AAs, the investments were considered non-complex. The bank has used low-income housing tax credits (LIHTCs) in larger AAs.

Service Test

The OCC gave primary consideration to HBUS' performance in delivering retail products and services to geographies and individuals of different income levels through HBUS' distribution of branches. The OCC focused on branches in LMI geographies. The 2015 ACS census tract update impacted HBUS' branch locations. Prior to the ACS update, HBUS had a total of 59 LMI branches out of 229 total branches; however, the 2015 ACS update resulted in a reduction to 49 LMI branches.

The OCC evaluated the range of products and services offered by HBUS through its branch network with emphasis on accessibility to LMI borrowers. Products and services offered are consistent throughout the branch network. The OCC specifically focused on any differences in branch hours and services in LMI geographies compared to those in middle- and upper- income geographies. HBUS offers a wide range of traditional deposit and banking products and services. They also offer multiple alternative delivery systems commensurate with standard industry offerings including ATMs, telephone and online banking, electronic bill-pay, remote deposit capture, and mobile banking options. We evaluated the level of retail services provided to LMI borrowers through bank-provided analysis. ATMs are available at all branches.

The OCC evaluated HBUS' record of providing CD services. Our primary consideration was responsiveness of the services to the needs of the community. The OCC gave the most consideration to CD services that addressed critical needs or were most impactful to the AAs.

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 Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this bank 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 bank 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.

Combined Statistical Area Rating

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

CRA rating for the NY CSA¹: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to credit needs in its AA.
- An excellent geographic distribution of both home mortgage loans and small loans to businesses.
- A good distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank has made a relatively high level of CD loans.
- An excellent level of CD investments that were responsive to community needs.
- Branch distribution was accessible to individuals of different income levels and essentially all portions of geographies in the AA.
- The institution provides a significant level of CD services.

Description of Institution's Operations in NY CSA

HBUS's AA is comprised of geographies in New York, New Jersey, and Connecticut. The bank conducts operations within three MDs in the New York-Newark-Jersey City MSA: New York-Jersey City-White Plains, NY-NJ MD consisting of Bergen, Hudson, and Middlesex counties in NJ and Bronx, Kings, New York, Orange, Queens, Richmond, Rockland, and Westchester counties in NY; Nassau County-Suffolk County, NY MD in its entirety; and the Newark, NJ MD consisting of Morris and Union counties in NJ. The AA also includes the Bridgeport, CT MSA consisting of Fairfield County in its entirety.

This AA represents the largest retail market for the bank in terms of loans, deposits, and branches.

HBUS had \$109.9 billion in deposits in the CSA representing 85.7 percent of adjusted deposits. The local banking environment is highly competitive with 204 FDIC-insured institutions

¹ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

operating 4,844 branches. HBUS ranked fourth in deposit market share with 6.3 percent. The top three banks by deposit market share are JPM Chase with 33.8 percent, Citibank with 6.9 percent, and Bank of America with 6.9 percent. In addition to FDIC-insured institutions, this area is served by a number of credit unions. HBUS operated 158 branches and 1,240 ATMs in the CSA, representing 69 percent of total branches and 51.9 percent of total ATMs.

The area poses a number of challenges to home mortgage lenders in the AA, including HBUS. The CSA is a high-cost housing area, limiting access to affordable home ownership among LMI borrowers. The median housing value in the CSA is \$484,802 while the National Association of Realtors (NAR) 4Q2017 median sales price of a single-family home ranged from \$404,300 to \$455,900. One simplistic method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Assuming a 30-year mortgage with a 4 percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$41,169 (or less than 50 percent of the FFIEC adjusted median family income in the AA) could afford a \$198,278 mortgage with a payment of \$947 per month; a moderate-income borrower earning \$65,863 (or less than 80 percent of the FFIEC adjusted median family income in the AA) could afford a \$317,209 mortgage with a payment of \$1,514 per month. Another simplistic method is that the median housing value is 11.8 times greater than the maximum income of a low-income borrower and 7.4 times greater than the maximum income of a moderate-income borrower.

The poverty level across the AA was considered in our evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial wherewithal to qualify for a home loan than those with income above poverty. In the NY CSA, the overall poverty level was 14 percent. However, in low-income tracts, the household poverty rate increases to 37 percent and in moderate-income tracts it increases to 21 percent. In middle- and upper-income tracts, the combined poverty level is 9 percent.

As part of the CRA evaluation, the OCC reviewed information from 11 community contacts made within the NY CSA to determine local economic conditions and community needs. These contacts included representatives from affordable housing organizations, community and economic development organizations, and social service groups. Needs identified include more affordable rental and owner-occupied housing, small business loans, workforce development, high quality and affordable day care and afterschool programs, and financial literacy and education.

NY CSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: NY CMMSA 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	4,080	11.1	22.8	32.0	32.1	2.1
Population by Geography	17,352,283	12.5	23.3	30.7	33.2	0.3
Housing Units by Geography	6,754,622	11.6	22.3	30.3	35.7	0.2
Owner-Occupied Units by Geography	3,052,723	2.7	13.9	36.7	46.5	0.1
Occupied Rental Units by Geography	3,129,023	20.3	30.2	24.4	24.9	0.2
Vacant Units by Geography	572,876	10.7	23.8	28.7	36.6	0.3
Businesses by Geography	1,203,102	7.0	16.4	29.5	45.8	1.3
Farms by Geography	17,487	3.7	14.7	34.9	46.4	0.3
Family Distribution by Income Level	4,068,355	25.6	15.6	17.2	41.6	0.0
Household Distribution by Income Level	6,181,746	27.4	14.3	15.9	42.5	0.0
Median Family Income MSA - 14860 Bridgeport-Stamford- Norwalk, CT MSA		\$105,628	Median Housing Value			\$484,802
Median Family Income MSA - 35004 Nassau County-Suffolk County, NY MD		\$108,193	Median Gross Rent			\$1,357
Median Family Income MSA - 35084 Newark, NJ-PA MD		\$95,579	Families Below Poverty Level			11.6%
Median Family Income MSA - 35614 New York-Jersey City- White Plains, NY-NJ MD		\$72,047				
Source: 2015 ACS Census and 2017 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.						

Scope of Evaluation in NY CSA

The NY CSA received a full-scope review. The Bridgeport-Stamford-Norwalk, CT MSA and all MDs within the New York-Newark-Jersey City, NY-NJ-PA MSA were combined in evaluating performance under each test.

Small loans to businesses received greater weight based on the volume of loan originations in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NY CSA

LENDING TEST

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

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

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
NY CSA	11,347	17,798	2	144	29,329

Dollar Volume of Loans (000)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
NY CSA	\$4,664,038	\$1,407,794	\$323	\$1,354,386	\$7,426,521

HBUS ranked fourth in deposits with 6.3 percent market share. In small loans to businesses, HBUS ranked 11th with a market share of 1.4 percent. The top three lenders with a combined market share of 58.4 were American Express with 34 percent, Chase Bank USA with 17.1 percent, and Capital One with 7.3 percent. In overall HMDA lending, HBUS ranked 12th with 1.3 percent market share. While the HMDA lending market share is lower than the bank's deposit market share, this is a highly competitive market with 924 home mortgage lenders. The top lender in this market was Wells Fargo Bank with 8.7 percent market share followed by JPMorgan Chase with 6.8 percent and Quicken Loans with 5.2 percent.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

2017

The proportion of loans in low- and moderate-income geographies exceeded or significantly exceeded both the proportion of owner-occupied homes in those geographies and the aggregate distribution of loans.

2015 to 2016

Performance was consistent with 2017.

Small Loans to Businesses

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

2017

The proportion of loans in both low- and moderate-income geographies exceeded both the proportion of businesses located in those geographies and the aggregate distribution of loans.

2015 to 2016

Performance was consistent with 2017.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business and farms of different sizes.

Home Mortgage Loans

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

2017

The proportion of loans to low-income borrowers is significantly weaker than the proportion of low-income families within the AA, but stronger than the aggregate distribution of loans. The proportion of loans to moderate-income borrowers exceeded both the proportion of moderate-income families and the aggregate distribution of loans. The high housing cost and poverty levels within the CSA constrain lending opportunities to LMI borrowers.

2015 to 2016

Performance to low-income borrowers was consistent with 2017. The proportion of loans to moderate-income borrowers substantially met the proportion of moderate-income families and exceeded the aggregate distribution of loans.

Small Loans to Businesses

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

2017

The proportion of loans to small businesses is below the percentage of small businesses in the CSA and exceeded the aggregate distribution of loans.

2015 to 2016

The proportion of loans to small businesses is well below the percentage of small businesses in the CSA and exceeded the aggregate distribution of loans.

Community Development Lending

HBUS 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 multifamily loans that also qualify as CD loans.

HBUS originations of CD loans represents 8.8 percent of allocated tier 1 capital. The loans supported a variety of CD purposes identified as community needs, including affordable housing, economic development, and community services.

Examples include:

- HBUS provided a \$25 million commitment to recapitalize a revolving loan fund. The fund provides financing for acquisition, predevelopment, and moderate rehabilitation costs associated with the development and preservation of multifamily affordable, supportive, and mixed income rental housing throughout NYC.
- HBUS provided a \$15 million loan to capitalize a community revolving loan fund. The fund's mission is to provide development capital to create affordable homes and to rebuild communities.
- HBUS financed an \$11.6 million mortgage on a property that provides 36 units of affordable housing on Long Island. Residents must earn less than 80 percent of AMI.

Product Innovation and Flexibility

The bank uses flexible lending practices in order to serve AA's credit needs. In the NY CSA, the bank offers State of NY Mortgage Agency (SONYMA) loans. This program is a competitive, fixed interest rate program which provides affordable mortgage financing and down payment assistance. During the evaluation period, the bank originated 85 loans totaling \$18.6 million.

INVESTMENT TEST

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

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

HBUS has an excellent level of qualified CD investment and grants. The bank exhibits excellent responsiveness to credit and community economic development needs. The bank makes use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
NY CMMSA	45	243,565	257	1,015,797	302	100	1,259,362	100	2	6,834

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

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

The combined prior and current period dollar volume represents 8.2 percent of allocated tier 1 capital. Examples include:

- HBUS purchased a \$45.2 million mortgage backed security (MBS) with the underlying property consisting of a 139-unit building. The building is 100 percent LIHTC and Project Based Section 8. The LIHTC expiration period is 30 years. Set asides are 28 units at 50 percent of AMI and 111 units at 60 percent of AMI.
- HBUS was the sole investor in a \$27.4 million LIHTC new construction mixed use project with 167 apartments located in the Bronx. The project is being developed pursuant to the Extremely Low- & Low-Income Affordability program of the NYC Department of Housing Preservation and Development. The units may be leased to households earning between 30 and 60 percent of AMI.
- HBUS was the sole investor in an \$11.4 million LIHTC new construction project with 66 housing units in the East Flatbush section of Brooklyn. Fifty of the units will be covered by a rental and service subsidy from the NYS Office of Mental Health. All of the units are set aside for households earning 60 percent or less of the AMI.

SERVICE TEST

The institution's performance under the Service Test in NY CSA is rated High Satisfactory.

Based on a full-scope review, the institution's performance in the NY CSA is good.

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%) *				% of Population within Each Geography**			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
NY CSA	100	158	100	10.1	12.7	31.6	44.3	12.5	23.3	30.7	33.2

* Two branches are located in geographies that do not have income designations.

** 0.3% of the population in the NY CSA live in CTs with no income designation.

Distribution of Branch Openings/Closings					
Branch Openings/Closings***					
# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
		Low	Moderate	Middle	Upper
0	4	0	0	-2	-2

The proportion of branches in low-income geographies is near to the proportion of the low-income population in those geographies. The proportion of branches in moderate-income geographies is below the proportion of the moderate-income population in those geographies. However, as a result of the 2015 ACS, a net loss of seven branches in moderate-income geographies occurred with the income reclassification of geographies.

The institution's opening and closing of branches has not affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. Two branches in middle-income geographies and two branches in upper-income geographies were closed due to high cost and poor financial performance.

Services, including where appropriate business hours, do not vary in a way that inconveniences the various portions of the AA, particularly LMI geographies and/or individuals. Branch hours are consistent with extended hours on Thursdays. Additionally, 116 branches offer Saturday hours with 11 percent of these branches in low- and 14 percent in moderate-income tracts.

Community Development Services

The institution provides a significant level of CD services.

HBUS employees provided 8,723 hours of services to 67 organizations that meet the definition of CD. Services consist of board and committee memberships and providing financial literacy, mentoring, and technical assistance.

Examples include:

- HBUS' participation in the Federal Home Loan Bank of New York programs consisting of the First Home Club (FHC) and Affordable Housing Program (AHP) is responsive to the affordable housing need in the NY CSA. AHP funds are awarded to members who submit applications on behalf of project sponsors who are planning to purchase, rehabilitate, or construct affordable homes or apartments. The FHC Program assists first-time homebuyers with incomes at or below 80 percent of AMI. Assistance is provided in the form of matching funds based on the household's systematic savings within a dedicated savings account. During the evaluation period the bank sponsored four community partners for the AHP. The bank enrolled 933 LMI households in the FHC. By the end of the evaluation period, 127 achieved their savings goal and purchased a home with the savings.
- Members of HBUS legal staff provided 189 hours of pro bono legal assistance to the Neighborhood Entrepreneur Legal Project (NELP). NELP provides low- to moderate-income micro-entrepreneurs with the legal services necessary to start their businesses.

Multistate Metropolitan Statistical Area Rating

Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MMSA (Philadelphia MMSA)

CRA rating for the Philadelphia MMSA²: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in its AA, given the bank's very limited presence.
- A good geographic distribution of home mortgage loans and excellent distribution of small loans to businesses.
- A good distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in making CD loans.
- An excellent level of CD investments that were responsive to community needs.
- Branch distribution was accessible to individuals of different income levels and essentially all portions of geographies in the AA.
- The institution provides a significant level of CD services.

Description of Institution's Operations in Philadelphia MMSA

HBUS operates within a portion of the Philadelphia MMSA and has a very limited presence. The bank's AA includes Philadelphia County in Pennsylvania and New Castle County in Delaware. The bank operates three branches and had \$525.6 million in deposits, or less than one percent of adjusted bank deposits and ranked 21st with a 0.2 percent market share. Major competitors include TD Bank, Wells Fargo Bank, and PNC Bank, each with a substantially larger branch network.

The poverty level across the Philadelphia MMSA was considered in our evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial wherewithal to

² This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

qualify for a home loan than those with income above poverty. In the Philadelphia MMSA, the overall poverty level was 16.9 percent. However, in low-income geographies, the household poverty rate increases to 45 percent and in moderate-income geographies it increases to 28 percent. In middle- and upper-income geographies, the combined poverty level is just 12 percent.

To understand the credit and community development needs in the area, OCC representatives met with six community-based organizations. Participants noted a need for affordable housing, and small business loans, homeownership counseling, workforce development, financial literacy, and commercial real estate loans.

Philadelphia MMSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Philadelphia MMSA 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	515	11.3	32.6	26.8	26.4	2.9
Population by Geography	2,104,715	11.4	33.4	29.4	25.3	0.5
Housing Units by Geography	889,650	11.0	33.5	28.5	26.8	0.3
Owner-Occupied Units by Geography	445,559	7.5	28.7	32.5	31.2	0.0
Occupied Rental Units by Geography	337,759	13.9	36.6	25.3	23.6	0.7
Vacant Units by Geography	106,332	16.4	43.6	21.6	18.1	0.2
Businesses by Geography	127,712	7.0	26.8	27.1	37.5	1.6
Farms by Geography	1,370	3.6	19.6	36.2	39.8	0.7
Family Distribution by Income Level	442,546	27.6	17.8	17.8	36.7	0.0
Household Distribution by Income Level	783,318	29.4	15.7	16.2	38.8	0.0
Median Family Income MSA - 37964 Philadelphia, PA MD		\$56,411	Median Housing Value			\$188,943
Median Family Income MSA - 48864 Wilmington, DE-MD-NJ MD		\$80,707	Median Gross Rent			\$971
			Families Below Poverty Level			16.9%
Source: 2015 ACS Census and 2017 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.						

Scope of Evaluation in Philadelphia MMSA

The Philadelphia MMSA received a full-scope review. Home mortgage lending received significantly greater weight based on the volume of loan originations.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PHILADELPHIA MMSA

LENDING TEST

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

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

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs, given the bank's very limited presence and significant competition.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Philadelphia MMSA	1,455	212	0	13	1,680

Dollar Volume of Loans (000)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Philadelphia MMSA	\$260,226	\$11,574	0	\$19,900	\$291,700

Lending activity is excellent when considering the bank's very limited presence and competition in the AA. As noted earlier, the bank had 0.2 percent deposit market share and ranked 21st of 61 banks operating in the AA. In overall HMDA lending, the bank ranked 51st with 0.5 percent market share. There are 643 home mortgage lenders in the MMSA. Wells Fargo led the market with 9.4 percent market share. In small loans to businesses, the bank ranked 25th with 0.4 percent market share. The top three lenders and their market share were American Express with 23.7 percent, PNC Bank with 9.8 percent, and Capital One Bank with 7.6 percent for a combined market share of 41.1 percent. There are 150 small business lenders in the AA.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

2017

The proportion of loans in low-income geographies was below the proportion of owner-occupied units in those geographies and exceeded the aggregate distribution of loans. In moderate-income

geographies, the proportion of loans exceeded both the proportion of owner-occupied units and the aggregate distribution of loans.

2015 to 2016

Performance in moderate-income geographies was consistent with 2017 performance. In low-income geographies, the proportion of loans was well below the proportion of owner-occupied housing and exceeded the aggregate distribution of loans.

Small Loans to Businesses

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

2017

The proportion of small loans to businesses exceeded in low- and significantly exceeded in moderate-income geographies the proportion of businesses located in those geographies and the aggregate distribution of loans.

2015 to 2016

Performance was consistent with 2017.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business and farms of different sizes.

Home Mortgage Loans

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

2017

The proportion of loans to low-income borrowers was weaker than the proportion of low-income families and stronger than the aggregate distribution of loans. The proportion of loans to moderate-income borrowers was significantly stronger than both the proportion of moderate-income families and the aggregate distribution of loans.

2015 to 2016

Performance was consistent with 2017.

Small Loans to Businesses

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

2017

The proportion of loans to small businesses approximates the proportion of small businesses and significantly exceeded the aggregate distribution of loans.

2015 to 2016

Performance was inconsistent with 2017. The proportion of loans to small businesses was well below the proportion of small businesses and exceeded the aggregate distribution of loans.

Community Development Lending

The institution is a leader in making 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 multifamily loans that also qualify as CD loans.

HBUS originations of CD loans represents 27 percent of allocated tier 1 capital. One example includes:

- HBUS renewed revolving lines of credit totaling \$4.5 million to three CDFIs in support of their loan funds. The funds provide loans to support affordable housing, small businesses, economic development, and community services targeting low- and moderate-income persons.

Product Innovation and Flexibility

The institution uses innovative and/or flexible lending practices in order to serve AA credit needs.

INVESTMENT TEST

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

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

HBUS has an excellent level of qualified CD investment and grants. The bank exhibits excellent responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Philadelphia MMA	5	56,994	52	25,886	57	100	\$82,880	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.

The combined prior and current period dollar volume exceeds allocated tier 1 capital. HBUS's investments targeted affordable housing, a primary need in the Philadelphia MMSA. The investments consisted of LIHTCs, MBSs backed by mortgage loans to LMI borrowers, and equity investments.

A major investment included:

- HBUS invested \$5 million in a qualified LIHTC fund that will benefit two affordable senior housing projects in Philadelphia. The projects contain a total of 590 units. Both of these properties were built or renovated using funding from HUD's Section 202 Supportive Housing for the Elderly program and residency is restricted to households earning 50 percent or less of the AMI.

SERVICE TEST

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

Based on a full-scope review, the institution's performance in the Philadelphia MMSA is good.

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Philadelphia MMA	100	3	100	0	33.3	33.3	33.3	11.4	33.4	29.4	25.3

The bank operates two branches in Philadelphia, Pennsylvania and one branch in Wilmington, Delaware. The Delaware branch is located in a moderate-income geography.

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, do not vary in any way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. The two branches in Philadelphia have extended hours on Friday. The Arch Street branch in Philadelphia also has Saturday hours.

Community Development Services

The bank provides a significant level of CD services. One employee served on the board of four different organizations that provide community services to low- and moderate-income persons. Additionally, 37 employees provided 613 hours to 15 organizations serving low- and moderate-income persons. The majority of service provided included financial literacy and education sessions.

Multistate Metropolitan Statistical Area Rating

Washington-Arlington-Alexandria, DC-VA-MD-WV MSA (DC MMSA)

CRA rating for the DC MMSA³: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to credit needs in its AA.
- An excellent geographic distribution of home mortgage loans and good distribution of small loans to businesses.
- A good distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in making CD loans.
- An excellent level of CD investments that were responsive to community needs.
- Branch distribution was reasonably accessible to individuals of different income levels and essentially all portions of geographies in the AA.
- The institution provides a significant level of CD services.

Description of Institution's Operations in DC MMSA

The AA in the DC MMSA is comprised of the District of Columbia; Montgomery County in Maryland, and the following counties and independent cities in Virginia: Alexandria City, Arlington County, Fairfax City, Fairfax County, and Falls Church City. HSBC operates 12 branches within the MMSA with total deposits of \$2.3 billion or 1.8 percent of the bank's adjusted deposits and a market share of 1.2 percent. Eighty-eight percent of the deposits of the DC branches are derived from serving the embassies and are centered on deposit products that cater to this market. Major competitors and their deposit market share include E*TRADE Bank with 20 percent, Wells Fargo Bank with 13.8 percent, Bank of America with 12.9 percent, and Capital One with 12.1 percent. With the exception of E*TRADE, all have a substantially larger branch network compared to HBUS.

The DC MMSA is a high-cost housing area, limiting access to affordable home ownership among LMI borrowers. The median housing value of a single family home in the DC MMSA is

³ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

\$494,471. The NAR 4Q2017 median sales price is \$406,700. The median housing value exceeds the maximum income of a low-income individual by nine times.

The poverty level across the AA was considered in our evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial wherewithal to qualify for a home loan than those with income above poverty. In the DC MMSA, the overall poverty level was 8 percent. However, in low-income tracts, the household poverty rate increases to 23 percent and in moderate-income tracts it increases to 11 percent. In middle- and upper-income tracts, the combined poverty level is 5 percent.

To understand the credit and community development needs in the area, OCC representatives met with five community-based organizations. Participants noted a need for affordable housing, small business financing, and financial education and counseling.

DC MMSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: DC MMSA 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	757	11.6	14.7	29.5	42.5	1.7
Population by Geography	3,204,035	11.2	14.6	30.9	42.4	0.9
Housing Units by Geography	1,294,329	11.2	14.5	31.2	42.3	0.7
Owner-Occupied Units by Geography	701,160	4.6	11.3	31.3	52.5	0.3
Occupied Rental Units by Geography	508,773	19.0	18.7	31.7	29.3	1.3
Vacant Units by Geography	84,396	18.2	15.7	28.3	37.0	0.8
Businesses by Geography	278,234	4.6	13.3	30.6	50.6	1.0
Farms by Geography	3,303	4.1	10.8	33.7	51.0	0.3
Family Distribution by Income Level	739,509	21.4	14.6	18.3	45.7	0.0
Household Distribution by Income Level	1,209,933	22.9	15.2	17.7	44.2	0.0
Median Family Income MSA - 43524 Silver Spring-Frederick- Rockville, MD		\$112,655	Median Housing Value			\$494,471
Median Family Income MSA - 47894 Washington-Arlington- Alexandria, DC-VA-MD-WV MD		\$106,762	Median Gross Rent			\$1,618
			Families Below Poverty Level			6.0%
Source: 2015 ACS Census and 2017 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.						

Scope of Evaluation in DC MMSA

The DC MMSA received a full-scope review. Home mortgage lending received substantially greater weight based on the volume of loan originations. The high cost of housing and poverty levels within the MMSA was considered in the bank's performance under the Lending Test.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN DC MMSA

LENDING TEST

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

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

Lending Activity

Lending levels reflect good responsiveness to AA credit needs, given competition and the bank's limited presence.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
DC MMSA	1,799	516	0	14	2,327

Dollar Volume of Loans (000)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
DC MMSA	\$717,486	\$27,491	\$0	\$101,500	\$846,477

Lending activity is good when considering the significant competition in the AA relative to the bank's presence. HBUS had \$2.3 billion in deposits and ranked 14th with 1.2 percent market share. In HMDA lending, HBUS ranked 42nd with 0.6 percent market share. There are 713 home mortgage lenders in the AA. Wells Fargo Bank led the market with 9.1 percent market share followed by SunTrust Bank with 5.9 percent and Quicken Loans with 3.4 percent. In small loans to businesses, HBUS ranked 22nd with 0.3 percent market share. American Express led the market with 27.4 percent market share followed by Bank of America with 11.5 percent and Chase Bank USA with 11 percent.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

2017

The proportion of loans in both low- and moderate-income geographies significantly exceeded both the proportion of owner-occupied housing in those geographies and the aggregate distribution of loans.

2015 to 2016

Performance in both low- and moderate income geographies was consistent with 2017.

Small Loans to Businesses

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

2017

The proportion of loans in low-income geographies significantly exceeded and in moderate-income geographies exceeded both the proportion of businesses located in those geographies and the aggregate distribution of loans.

2015 to 2016

Performance in both low- and moderate-income geographies was inconsistent with 2017. The proportion of loans in low-income geographies was below both the proportion of businesses located in those geographies and the aggregate distribution of loans. The proportion of loans in moderate-income geographies was well below both the proportion of businesses and aggregate distribution of loans.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

2017

The proportion of loans to low-income borrowers was somewhat below the proportion of low-income families and significantly exceeded the aggregate distribution of loans. The proportion of loans to moderate-income borrowers significantly exceeded both the proportion of moderate-income families and the aggregate distribution of loans.

2015 to 2016

Performance is consistent with 2017.

Small Loans to Businesses

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

2017

The proportion of loans to small businesses was well below the proportion of small businesses and below the aggregate distribution of loans.

2015 to 2016

Performance is consistent with 2017.

Community Development Lending

The institution is a leader in making 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 multifamily loans that also qualify as CD loans.

HBUS originations of CD loans represent 31.2 percent of allocated tier 1 capital. Examples include:

- HBUS twice renewed a \$9 million revolving credit facility that capitalizes a community loan fund (CLF). The CLF provides loans for affordable housing, community facilities, and small businesses in low- and moderate-income communities in the Washington, DC and surrounding area.
- HBUS participated in a \$100 million syndicated revolving facility to a CDFI by providing \$5 million in financing. The CDFI provides acquisition, construction and permanent multifamily loans to nonprofit affordable housing developers that are members of the NeighborWorks America network.

Product Innovation and Flexibility

The institution makes little use of innovative and/or flexible lending practices in order to serve AA credit needs.

INVESTMENT TEST

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

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

HBUS has an excellent level of qualified CD investment and grants. The bank exhibits excellent responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
DC MMSA	5	\$6,772	76	\$59,740	81	100	\$66,512	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.

The combined prior and current period dollar volume represents 20.3 percent of allocated tier 1 capital. HBUS's investments targeted affordable housing, a primary need in the DC MMSA.

A major investment included:

- HBUS invested \$15.1 million in a LIHTC project that will create 150 units of affordable housing in the AA. All units are restricted to households earning between 30 and 60 percent of AMI.

SERVICE TEST

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

Based on a full-scope review, the bank's performance in the DC MMSA is adequate.

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)*				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
DC MMSA	100	12	100	0	0	25	75	11.2	14.6	29.5	42.5

There are no branches in low- or moderate-income geographies; however, this is a direct result of the 2015 ACS Census update. The moderate-income geographies where three branches were located were reclassified as middle-income geographies.

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences, the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. Eight branches have Saturday hours and 11 branches have extended hours at least one day during the week.

Community Development Services

The bank provides a significant level of CD services.

HSBC employees provided 754 hours of service to 13 organizations within the AA that meet the definition of CD. Services primarily involve providing financial literacy and education to students and individuals in LMI persons located in LMI geographies. Other services involve providing board leadership for local non-profit organizations, participating in homebuyer's workshops, and offering technical support for local non-profit organizations.

State Rating

State of California

CRA rating for the State of California⁴: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in its AA.
- An excellent geographic distribution of both home mortgage loans and small loans to businesses.
- An excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in making CD loans.
- An excellent level of CD investments that were responsive to community needs.
- Branch distribution was accessible to individuals of different income levels and essentially all portions of geographies in the AAs.
- The institution provides a relatively high level of CD services.

Description of Institution's Operations in California

HBUS has two AAs within California consisting of the Los Angeles-Long Beach-Anaheim MSA (LA MSA) in its entirety and a portion of the San Jose-San Francisco-Oakland, CA CSA (San Jose CSA) consisting of Alameda, San Francisco, San Mateo, and Santa Clara counties. HBUS operates 35 branches within the state with total deposits of \$10 billion, which represent 7.8 percent of the bank's adjusted deposits and a market share of 0.7 percent. Major competitors include Bank of America, Wells Fargo, and JP Morgan Chase Bank, each with substantially larger branch networks. These three banks combined have a 50.1 percent deposit market share.

Both the LA MSA and San Jose CSA are high-cost housing areas, limiting access to affordable home ownership among LMI borrowers. The median housing value of a single family home in the LA MSA and San Jose CSA is \$515,607 and \$707,125, respectively. The NAR 4Q2017 median sales price in the LA MSA ranged from \$550,800 (Los Angeles County) to \$780,000

⁴ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

(Orange County). In the San Jose CSA, the median sales price ranged from \$900,000 (San Francisco MSA) to \$1.2 million (San Jose MSA).

The poverty level across the AAs was considered in our evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial wherewithal to qualify for a home loan than those with income above poverty. In the LA MSA, the overall poverty level was 13 percent. However, in low-income geographies, the household poverty rate increases to 36 percent and in moderate-income geographies it increases to 23 percent. In middle- and upper-income geographies, the combined poverty level is 10 percent. In the San Jose CSA, the overall poverty level was 10 percent. In low-income geographies, the household poverty rate increases to 27 percent and in moderate-income geographies it increases to 14 percent. In middle- and upper-income geographies, the combined poverty level is 7 percent.

To understand the credit and community development needs in the area, OCC representatives primarily met with 14 community-based organizations for a listening session and also contacted three community organizations in the San Jose CSA and three organizations in the LA MSA. Participants noted a need for affordable housing, small business loans, financial literacy, and CDFI investments.

LA MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: LA MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2,929	9.1	28.0	25.9	35.1	1.8
Population by Geography	13,154,457	8.6	28.9	26.9	35.0	0.6
Housing Units by Geography	4,541,360	7.5	25.8	26.2	40.1	0.4
Owner-Occupied Units by Geography	2,082,030	2.7	17.6	27.5	52.2	0.1
Occupied Rental Units by Geography	2,190,392	12.0	33.7	25.1	28.4	0.7
Vacant Units by Geography	268,938	8.0	24.6	24.4	42.2	0.8
Businesses by Geography	978,267	5.0	19.4	25.4	48.2	1.9
Farms by Geography	10,497	3.6	18.6	28.1	48.9	0.8
Family Distribution by Income Level	2,913,538	24.4	16.3	17.0	42.3	0.0
Household Distribution by Income Level	4,272,422	25.6	15.5	16.1	42.8	0.0
Median Family Income MSA - 11244 Anaheim-Santa Ana-Irvine, CA MD		\$86,003	Median Housing Value			\$515,607
Median Family Income MSA - 31084 Los Angeles-Long Beach- Glendale, CA MD		\$62,703	Median Gross Rent			\$1,353
			Families Below Poverty Level			13.0%
Source: 2015 ACS Census and 2017 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.						

San Jose CSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: San Jose CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,088	11.4	20.7	32.5	34.0	1.4
Population by Geography	5,042,626	10.7	21.6	34.3	32.9	0.4
Housing Units by Geography	1,892,562	10.5	20.0	34.1	34.8	0.6
Owner-Occupied Units by Geography	929,600	4.6	15.7	35.7	43.8	0.1
Occupied Rental Units by Geography	863,768	16.4	24.7	32.6	25.3	0.9
Vacant Units by Geography	99,194	15.2	18.8	31.7	33.1	1.2
Businesses by Geography	399,207	10.7	17.3	30.7	40.6	0.7
Farms by Geography	5,050	7.5	18.4	34.6	39.3	0.2
Family Distribution by Income Level	1,155,897	24.6	15.7	18.2	41.6	0.0
Household Distribution by Income Level	1,793,368	26.6	14.7	16.3	42.4	0.0
Median Family Income MSA - 36084 Oakland-Hayward-Berkeley, CA MD		\$93,822	Median Housing Value			\$707,125
Median Family Income MSA - 41884 San Francisco-Redwood City-South San Francisco, CA		\$103,742	Median Gross Rent			\$1,588
Median Family Income MSA - 41940 San Jose-Sunnyvale-Santa Clara, CA MSA		\$107,126	Families Below Poverty Level			7.0%
Source: 2015 ACS Census and 2017 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.						

Scope of Evaluation in California

The LA MSA and the San Jose CSA each received a full-scope review. Each area represents a significant portion of the bank's operations in California. The LA MSA received slightly greater weight based on the proportion of the bank's lending and deposit concentration. Home mortgage lending received greater weight based on the volume of loan originations. The very high cost of housing and poverty levels in each of the AAs was considered in our evaluation under the Lending Test.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CALIFORNIA

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

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

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
LA MSA	5,136	2,291	0	22	7,449	63.6	60.9
San Jose CSA	3,102	1,138	0	26	4,266	36.4	39.1

Dollar Volume of Loans (000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State* Loans	% State Deposits
LA MSA	\$2,945,947	\$81,280	0	\$117,039	\$3,144,266	55.4	60.9
San Jose CSA	\$2,381,240	\$44,383	0	\$108,640	\$2,534,263	44.6	39.1

LA MSA

Lending activity is excellent when considering the significant competition in the AA relative to the bank's presence. HBUS had \$6.1 billion in deposits and ranked 16th with 1.2 percent market share. In HMDA lending, HBUS ranked 72nd with 0.3 percent market share. There are 936 home mortgage lenders in the AA. The top three lenders, Wells Fargo Bank with 8.6 percent, JPMorgan Chase Bank with 5.3 percent, and Bank of America with 4.1 percent have a combined market share of 18 percent. In small loans to businesses, HBUS ranked 21st with 0.3 percent market share. American Express led the market with 23.6 percent market share, followed by Chase Bank USA with 14.3 percent and Bank of America with 13.1 percent market share.

San Jose CSA

Lending activity is excellent when considering the significant competition in the AA relative to the bank's presence. HBUS had \$3.9 billion in deposits and ranked 13th with a 0.8 percent market share. In HMDA lending, HBUS ranked 33rd with 0.6 percent market share. There are 751 home mortgage lenders in the AA. The top three lenders, Wells Fargo Bank with 12.5

percent, JPMorgan Chase Bank with 6.6 percent, and Bank of America with 6.5 percent have a combined market share of 25.6 percent. In small loans to businesses, HBUS ranked 15th with 0.5 percent market share. Chase Bank USA led the market with 20 percent market share, followed by American Express with 19.4 percent and Bank of America with 13.4 percent market share.

Distribution of Loans by Income Level of the Geography

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

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.

LA MSA

2017

The proportion of loans in both LMI geographies exceeds the proportion of owner-occupied housing units in those geographies and the aggregate distribution of loans.

2015 to 2016

Performance was consistent with 2017.

San Jose CSA

2017

The proportion of loans in both LMI geographies exceeds the proportion of owner-occupied housing units in those geographies and the aggregate distribution of loans.

2015 to 2016

In low-income geographies, performance was consistent with 2017. In moderate-income geographies, the proportion of loans was lower than the proportion of owner-occupied housing units in those geographies and consistent with the aggregate distribution of loans. This performance did not impact our overall conclusion.

Small Loans to Businesses

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

LA MSA

2017

The proportion of loans in low-income geographies exceeded and in moderate-income geographies significantly exceeded the proportion of businesses in those geographies. The bank exceeded in low- and significantly exceeded in moderate-income the aggregate distribution of loans.

2015 to 2016

The proportion of loans in both low- and moderate-income geographies was slightly below both the proportion of businesses in those geographies and the aggregate distribution of loans was equaled in low-income geographies and below the aggregate in middle-income geographies.

San Jose CSA

2017

The proportion of loans in low-income geographies exceeded and in moderate-income geographies significantly exceeded the proportion of businesses in those geographies. The bank exceeded in low- and significantly exceeded in moderate-income the aggregate distribution of loans.

2015 to 2016

Performance in low-income geographies was consistent with 2017. In moderate-income geographies, the proportion of loans was near to the proportion of businesses and the aggregate distribution of loans in those geographies.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business of different sizes.

Home Mortgage Loans

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

LA MSA

2017

The overall borrower distribution of home mortgage loans reported in the AA is good, given the high cost of housing. The proportion of the bank's distribution of loans to low-income borrowers

was significantly below the proportion of low-income families, but significantly exceeded the aggregate distribution of loans. The proportion of the bank's distribution of loans to moderate-income borrowers was somewhat below with the percentage of moderate-income families and significantly exceeded the aggregate distribution of loans.

2015 to 2016

Performance was consistent with 2017

San Jose CSA

2017

The overall borrower distribution of home mortgage loans reported in the AA is good, given the high cost of housing. The proportion of the bank's loans to low-income borrowers was significantly below the proportion of low-income families and significantly exceeded the aggregate distribution of loans. The bank's distribution of loans to moderate-income borrowers is consistent with the proportion of moderate-income families and significantly exceeded the aggregate distribution of loans.

2015 to 2016

Performance to low-income borrowers was consistent with 2017. The proportion of loans to moderate-income borrowers was slightly below the proportion of moderate-income families and significantly exceeded the aggregate distribution of loans.

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.

LA MSA

2017

The distribution of loans to small businesses was below the proportion of small businesses but exceeded the aggregate distribution of loans.

2015 to 2016

The distribution of loans to small businesses was well below the proportion of small businesses and below the aggregate distribution of loans.

San Jose CSA

2017

The distribution of loans to small businesses was well below the proportion of small businesses and below the aggregate distribution of loans.

2015 to 2016

Performance was generally consistent with 2017. The proportion of loans substantially met the aggregate distribution of loans.

Community Development Lending

The bank is a leader in making 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 multifamily loans that also qualify as CD loans.

LA MSA

HBUS originations of CD loans represents 13.8 percent of allocated tier 1 capital. The loans supported a variety of community development purposes identified as community needs, including affordable housing, community services and economic development. One example includes:

- HBUS provided a \$22.5 million revolving credit facility to a nonprofit financial intermediary that lends to affordable housing developers in Los Angeles County.

San Jose CSA

HBUS originations of CD loans represents 19.9 percent of allocated tier 1 capital. The loans supported a variety of community development purposes identified as community needs, including affordable housing, community services and economic development.

Examples include:

- HBUS provided a \$4.8 million loan to fund the acquisition of a mixed use property in a low-income geography designated as a Community Benefit District. There are 16 housing units with rents affordable to LMI families and individuals.
- HBUS refinanced a \$3.1 million loan on three mixed use properties containing 56 residential units in San Francisco. All but three units are considered affordable.
- HBUS provided a \$3 million revolving loan to a nonprofit community loan fund. The fund provides capital to community development organizations. The fund also has a

wholly-owned subsidiary whose sole purpose is to conduct U.S. Small Business Administration SBA 7(a) lending activity.

Product Innovation and Flexibility

The institution makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs.

INVESTMENT TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance in the LA MSA and San Jose CSA is excellent.

HBUS has an excellent level of qualified CD investment and grants. The bank exhibits excellent responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
LA MSA	8	15,626	70	85,990	78	52.3	101,616	63.5	0	0
San Jose CSA	5	1,310	66	57,109	71	47.7	58,419	36.5	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.

LA MSA

The combined prior and current period dollar volume represents 12 percent of allocated tier 1 capital. HBUS's investments targeted affordable housing, a primary need in the LA MSA. The current period investments consisted of MBSs backed by mortgage loans to LMI borrowers.

San Jose CSA

The combined prior and current period dollar volume represents 10.7 percent of allocated tier 1 capital. HBUS's investments targeted affordable housing, a primary need in the San Jose CSA. The current period investments consisted of MBSs backed by mortgage loans to LMI borrowers.

SERVICE TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
LA MSA	60.9	21	60	4.8	23.8	9.5	57.1	8.6	28.9	26.9	35.0
San Jose CSA	39.1	14	40	21.4	7.1	28.6	42.9	10.7	21.6	34.3	32.9

In the LA MSA, the proportion of branches in low-income geographies is below the proportion of the population and in moderate-income geographies is near to the proportion of the population. In the San Jose CSA, the proportion of branches in low-income geographies significantly exceeds the proportion of the population. In moderate-income geographies, the proportion of branches is well below the proportion of the population.

Distribution of Branch Openings/Closings						
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
LA MSA	2	2	0	0	0	0
San Jose CSA	NA	NA	NA	NA	NA	NA

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. In the LA MSA, the bank relocated both branches (one low- and one middle-income) within the same income designated geography early in the evaluation period. The branches were relocated to reduce occupancy expense. No branches were opened or closed in the San Jose CSA.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly low- and moderate-income geographies and/or individuals. Branch hours are extended on Thursdays. Additionally, in the LA MSA, seven branches have Saturday hours, with two branches located in moderate-income geographies. In the San Jose CSA six branches have Saturday hours, one of which is located in a low-income geography.

Community Development Services

The bank provides a relatively high level of CD services.

LA MSA

Four employees served as board or committee members for six different organizations. These organizations focused on affordable housing, economic development, and community services. Additionally, 62 HBUS employees provided 588 hours of service to 18 different organizations. Services primarily involve providing financial literacy and education to students and individuals in low- and moderate-income geographies.

San Jose CSA

One employee served on the board of an organization that provides community services to LMI individuals. Additionally, 44 HBUS employees provided 434 hours of service to seven different organizations. Services primarily involve providing financial literacy and education to students and individuals in low- and moderate-income geographies.

State of Florida

CRA rating for the State of Florida⁵: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to credit needs in its AA.
- An excellent geographic distribution of both home mortgage loans and small loans to businesses.
- An excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in making CD loans.
- An excellent level of CD investments that were responsive to community needs.
- Branch distribution was reasonably accessible to individuals of different income levels and essentially all portions of geographies in the AA.
- The institution provides a significant level of CD services.

Description of Institution's Operations in Florida

HSBC operates in each of the three MDs that comprise the Miami-Fort Lauderdale-West Palm Beach, FL MSA (Miami MSA). The AA consists of Miami-Dade, Broward, and Palm Beach counties in their entirety. This is the most populous MSA in Florida.

The bank had deposits of \$4.6 billion and ranked 19th in the state with 0.8 percent market share. The deposits represent 3.6 percent of the bank's adjusted deposits. Major competitors include Wells Fargo Bank, Bank of America, and JPMorgan Chase. Together these three banks have a combined market share of nearly 41 percent and each have significantly larger branch networks within the MSA.

The Miami MSA is a high-cost housing area, limiting access to affordable home ownership among LMI borrowers. The median housing value is \$227,861 and the NAR 4Q2017 median sales price of a single family home is \$330,000.

⁵ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

The poverty level across the AA was considered in our evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial wherewithal to qualify for a home loan than those with income above poverty. In the Miami MSA, the overall poverty level was 14 percent. However, in low-income geographies, the household poverty rate increases to 40 percent and in moderate-income geographies it increases to 24 percent. In middle- and upper-income geographies, the combined poverty level is just 11 percent.

To understand the credit and community development needs in the area, OCC representatives met with two community-based organizations during two in-person interviews. Participants noted a need for affordable owner-occupied and rental housing, preservation of affordable housing, and small business products.

Miami MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Miami MSA 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,219	6.2	28.2	29.5	33.6	2.5
Population by Geography	5,861,000	5.8	28.9	31.5	33.4	0.4
Housing Units by Geography	2,484,604	5.5	27.9	30.9	35.3	0.3
Owner-Occupied Units by Geography	1,248,038	2.6	23.2	32.9	41.2	0.2
Occupied Rental Units by Geography	799,004	10.1	36.4	30.1	22.9	0.5
Vacant Units by Geography	437,562	5.6	25.9	26.7	41.2	0.6
Businesses by Geography	797,472	4.2	21.8	28.2	44.6	1.2
Farms by Geography	12,328	4.6	24.0	29.5	41.5	0.4
Family Distribution by Income Level	1,330,793	23.1	17.0	17.7	42.2	0.0
Household Distribution by Income Level	2,047,042	25.1	15.7	16.6	42.6	0.0
Median Family Income MSA - 22744 Fort Lauderdale-Pompano Beach-Deerfield Beach, FL		\$61,809	Median Housing Value			\$227,861
Median Family Income MSA - 33124 Miami-Miami Beach-Kendall, FL MD		\$49,264	Median Gross Rent			\$1,194
Median Family Income MSA - 48424 West Palm Beach-Boca Raton-Delray Beach, FL MD		\$65,914	Families Below Poverty Level			13.5%
Source: 2015 ACS Census and 2017 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.						

Scope of Evaluation in Florida

The Miami MSA received a full-scope review. Home mortgage loans received greater weight based on loan originations.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Miami-Fort Lauderdale-West Palm Beach MSA is excellent.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs, given competition and the bank's market presence.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Miami MSA	2,317	1,511	1	17	3,846	100	100

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Miami MSA	682,858	100,149	400	313,600	1,097,007	100	100

HBUS ranked 11th in deposits with 2 percent market share. In overall HMDA lending, HBUS ranked 76th with 0.3 percent market share. While the bank's mortgage lending market share is much lower than the bank's deposit market share, this is a highly competitive market with 1,081 home lenders, including those without a depository presence. Wells Fargo Bank led the market with 8.7 percent market share and Quicken Loans ranked 2nd with 5.1 percent market share. In small loans to businesses, HBUS ranked 21st with 0.4 percent market share. There are 228 business lenders in the AA. American Express ranked 1st with 28.4 percent market share. Bank of America with 14.3 percent and Chase Bank USA with 9.9 percent rank 2nd and 3rd, respectively. Together, these three financial entities account for 52.6 percent market share.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

2017

The proportion of loans in low-income geographies was below the proportion of owner-occupied housing in those geographies and was near to the aggregate distribution of loans. The proportion of loans in moderate-income geographies exceeded both the proportion of owner-occupied housing and the aggregate distribution of loans.

2015 to 2016

Performance in low-income geographies was inconsistent with 2017. The proportion of loans equaled the proportion of owner-occupied housing and exceeded the aggregate distribution of loans. Performance in moderate-income geographies was consistent with 2017.

Small Loans to Businesses

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

2017

The proportion of loans in both low- and moderate-income geographies significantly exceeded both the proportion of businesses located in those geographies and the aggregate distribution of loans.

2015 to 2016

Performance in moderate-income geographies was inconsistent with 2017. The proportion of loans approximated the proportion of businesses and substantially met the aggregate distribution of loans. Performance in low-income geographies was consistent with 2017.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and business and farms of different sizes. We considered the high cost of housing and the poverty level of the AA in reaching our conclusions.

Home Mortgage Loans

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

2017

The proportion of loans to low-income borrowers was well below the proportion of families in the AA, but significantly exceeded the aggregate distribution of loans. The proportion of loans to moderate-income borrowers exceeded both the proportion of families and aggregate distribution of loans.

2015 to 2016

Performance to both low- and moderate-income borrowers was consistent with 2017.

Small Loans to Businesses

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

2017

The proportion of loans to small businesses is below the proportion of small businesses in the AA and substantially exceeded the aggregate distribution of loans.

2015 to 2016

The proportion of loans to small businesses was well below the proportion of small businesses in the AA and substantially met the aggregate distribution of those loans.

Community Development Lending

The bank is a leader in making CD loans.

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

HBUS originations of CD loans represents 48.3 percent of allocated tier 1 capital. One example includes:

- HBUS provided a \$17.5 million loan to construct a building with eight retail units. The property is located in a moderate-income geography and will assist in creating permanent jobs for low- and moderate-income individuals.

Product Innovation and Flexibility

The bank uses innovative and/or flexible lending practices in order to serve AA credit needs.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Miami-Fort Lauderdale-West Palm Beach MSA is excellent.

HSBC has a significant level of qualified CD investments and grants and exhibits excellent responsiveness to credit and community economic development needs. The bank occasionally uses 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)
Miami MSA	10	12,791	74	58,935	84	100	71,726	100	1	1,641

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

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

The combined prior and current period dollar volume represents 11 percent of allocated tier 1 capital. HBUS's investments targeted affordable housing, a primary need in the AA. The investments consisted of LIHTCs, MBSs backed by mortgage loans to LMI borrowers, and equity investments. Examples include:

- HBUS invested \$15 million in LIHTCs for the construction of an affordable senior housing complex consisting of 160 units in the Liberty City section of Miami.
- HBUS invested \$6 million in LIHTCs in an affordable housing complex consisting of 120 units in the Liberty City section of Miami. The units are available to families earning between 50 and 60 percent of the AMI.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Miami MSA	100	17	100	0	11.8	23.5	64.7	5.8	28.9	31.5	33.4

There are no branches in low-income geographies. In moderate-income geographies, the proportion of branches is well below the proportion of the moderate-income population.

Distribution of Branch Openings/Closings					
Branch Openings/Closings					
# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
		Low	Mod	Mid	Upp
2	2	0	0	0	0

To the extent changes have been made, the bank opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. Two branches located in upper-income geographies were closed due to expiring leases and reopened within the upper-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals. Branches have extended hours Friday evenings. Additionally, seven branches, including the two moderate-income branches, have Saturday hours.

Community Development Services

The institution provides a relatively high level of CD services.

HSBC employees provided approximately 763 hours of service to 14 organizations within the AA that meet the definition of CD. Services primarily involve providing financial literacy and education to students and individuals in LMI persons located in LMI geographies. Other

services involve providing board leadership for local non-profit organizations, participating in homebuyer's workshops, and offering technical support for local non-profit organizations.

State Rating

State of Washington

CRA rating for the State of Washington⁶: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in its AA.
- An excellent geographic distribution of both home mortgage loans and small loans to businesses.
- An excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank has made a relatively high level of CD loans.
- An excellent level of CD investments that were responsive to community needs.
- Branch distribution was reasonably accessible to individuals of different income levels and essentially all portions of geographies in the AA.
- The institution provides a significant level of CD services.

Description of Institution's Operations in Washington

The bank has delineated King County within the Seattle-Tacoma-Bellevue MSA (Seattle AA) as its AA. HSBC operated four branches within the AA. The bank's primary focus is commercial middle market businesses, given the port and trade opportunities in Seattle. The bank's deposits totaled \$767 million, or less than one percent of adjusted deposits and 0.9 percent deposit market share. Major competitors include Bank of America, Wells Fargo Bank, and JPMorgan Chase Bank, each with substantially larger branch networks. As noted in the demographic table that follows, the high housing value is a significant barrier in mortgage lending to low- and moderate-income persons. One community contact was made during the evaluation period with a CDFI. The representative indicated that opportunities include grants and lines of credit for CDFIs and nonprofits, debt financing for affordable housing developers, small business loans, and financial education.

⁶ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Seattle AA 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	398	5.0	20.1	38.7	35.4	0.8
Population by Geography	2,045,756	5.1	20.5	38.0	35.9	0.4
Housing Units by Geography	871,836	4.7	19.8	38.3	36.9	0.2
Owner-Occupied Units by Geography	470,632	2.7	15.2	40.4	41.7	0.0
Occupied Rental Units by Geography	349,019	7.4	25.6	35.8	30.7	0.5
Vacant Units by Geography	52,185	5.5	22.3	36.2	35.7	0.3
Businesses by Geography	168,467	5.3	16.3	34.7	43.1	0.6
Farms by Geography	3,101	3.4	14.4	41.2	40.9	0.2
Family Distribution by Income Level	488,006	21.0	16.4	19.5	43.1	0.0
Household Distribution by Income Level	819,651	24.2	15.6	17.0	43.2	0.0
Median Family Income MSA - 42644 Seattle-Bellevue-Everett, WA MD		\$92,317	Median Housing Value			\$410,534
			Median Gross Rent			\$1,241
			Families Below Poverty Level			7.0%
Source: 2015 ACS Census and 2017 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.						

Scope of Evaluation in Washington

The Seattle AA received a full-scope review. Mortgage lending received significantly greater weight based on the volume loan originations. The high housing cost was considered in our evaluation of performance under the Lending Test.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WASHINGTON

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Seattle AA	1,378	188	0	5	1,571	100	100
Dollar Volume of Loans (000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Seattle AA	\$610,630	\$12,636	0	\$11,050	\$634,316	100	100

HSBC has a limited presence in the AA. The bank ranked 15 of 46 banks operating in the AA with a 0.9 percent deposit market share. In overall home mortgage lending, the bank ranked 37 with a 0.6 percent market share. There are 587 mortgage lenders including many non-depository institutions in the AA, providing significant competition. The top three mortgage lenders and their individual market shares were Wells Fargo with 8.4 percent, Caliber Home Loans with 5.8 percent, and Homestreet Bank with 5.2 percent. In small business lending, the bank ranked with 0.21 Market share. The top three lenders have a combined market share of 50.4 percent. Bank of America led with 20.9 percent followed by American Express with 16.4 percent and Chase USA Bank with 13.1 percent.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

2017

The proportion of loans in low-income geographies exceeded and in moderate-income geographies significantly exceeded the proportion of owner-occupied housing units in those geographies. The bank exceeded in low-income and significantly exceeded in moderate-income the aggregate distribution of loans.

2015 to 2016

The proportion of loans in low-income geographies was slightly below than both the proportion of owner-occupied housing units in those geographies and the aggregate distribution of loans. The proportion of loans and aggregate distribution of loans in moderate-income geographies was consistent with 2017 performance.

Small Loans to Businesses

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

2017

The proportion of loans in both low- and moderate-income geographies significantly exceeded both the proportion of businesses located in those geographies and the aggregate distribution of loans.

2015 to 2016

Performance was inconsistent with 2017. The proportion of loans in both low- and moderate-income geographies was significantly below both the proportion of businesses located in those geographies and the aggregate distribution of loans.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

2017

The proportion of loans to low-income borrowers is less than the proportion of low-income families within the AA, but significantly stronger than the aggregate distribution of loans. The bank was able to achieve 51 percent of the demographic comparator. The proportion of loans to moderate-income borrowers significantly exceeded both the proportion of low-income families within the AA and the aggregate distribution of loans.

2015 to 2016

Performance for lending to low-income borrowers was inconsistent with 2017. The proportion of loans to low-income borrowers was significantly less than the proportion of low-income families within the AA, but significantly exceeded the aggregate distribution of loans. Performance for lending to moderate-income borrowers was consistent with 2017 performance.

Small Loans to Businesses

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

2017

The proportion of loans to small businesses is comparable to the percentage of small businesses in the AA and stronger than the aggregate distribution of loans.

2015 to 2016

Performance was inconsistent with 2017. The proportion of loans to small businesses was substantially below than both the percentage of small businesses in the AA and the aggregate distribution of loans.

Community Development Lending

The institution 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 bank level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

HBUS originated five loans totaling \$11.1 million or 10.3 percent of allocated tier 1 capital. One example is a \$5 million loan to a CDFI to capitalize a revolving loan fund for the purposes of economic development, community services and small business development in low- and/or moderate-income communities, including its AA. The loan was renewed once during the evaluation period.

Product Innovation and Flexibility

HSBC makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

HBUS has an excellent level of qualified CD investment and grants. The bank exhibits excellent responsiveness to credit and community economic development needs. The bank does not use 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)
Seattle AA	0	0	18	22,275	18	100	\$22,275	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.

The combined current period dollar volume represents 20.8 percent of allocated tier 1 capital. HBUS's investments targeted affordable housing, a primary need in the Seattle AA. The investments consisted of MBSs backed by mortgage loans to LMI borrowers.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

HBUS has a very limited presence in the Seattle AA. Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Seattle AA	100	4	100	0	0	3	1	5.1	20.5	38.0	35.9

Although there are no branches in low- or moderate-income geographies, this was a direct result of the 2015 ACS census. Previously, one branch that was located in a moderate-income geography is now located in a middle-income geography.

The bank did not open or close any branches during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals. During 2017, branch hours were expanded to better meet customer needs.

Community Development Services

The bank provides a relatively high level of CD services, given the bank's very limited presence and available employees. During the evaluation period, HSBC employees provided 221 hours of CD service to three organizations that focus on financial literacy and affordable housing.

- One employee served on the loan committee of an organization that provides LMI borrowers with down payment assistance for home ownership and rescue loans to save homes from foreclosure.

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:	01/01/2015 to 12/31/2016 (2010 Census), 12/31/2017 (2015 ACS Survey)	
Bank Products Reviewed:	Home mortgage, small business, community development loans, investments, and services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA or State		
NY CSA	Full-scope	CT: Fairfield County NY: Bronx, Kings, Nassau, New York, Orange, Queens, Richmond, Rockland, Suffolk, Westchester Counties NJ: Bergen, Hudson, Middlesex, Morris, Union Counties
Philadelphia MMSA	Full-scope	PA: Philadelphia County DE: New Castle County
DC MMSA	Full-scope	DC: District of Columbia MD: Montgomery County VA: Alexandria, Arlington, Fairfax (City), Fairfax County, Falls Church City
California		
Los Angeles MSA	Full-scope	Los Angeles and Orange Counties
San Jose CSA	Full-scope	Alameda, San Francisco, San Mateo, Santa Clara
Florida		
Miami MSA	Full-Scope	Miami-Dade, Broward, and Palm Beach Counties
Washington		
Seattle AA	Full-scope	King County

Appendix B: Summary of MMSA and State Ratings

RATINGS		HSBC Bank USA, N.A.		
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
HSBC Bank USA, N.A.	Outstanding	Outstanding	High Satisfactory	Outstanding
MMSA or State:				
NY CSA	Outstanding	Outstanding	High Satisfactory	Outstanding
Philadelphia MMSA	Outstanding	Outstanding	High Satisfactory	Outstanding
DC MMSA	Outstanding	Outstanding	Low Satisfactory	Outstanding
California	Outstanding	Outstanding	High Satisfactory	Outstanding
Florida	Outstanding	Outstanding	Low Satisfactory	Outstanding
Washington	Outstanding	Outstanding	Low Satisfactory	Outstanding

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including 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 bank 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 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
NY CSA	3,655	1,514,619	100.0	257,182	2.7	4.8	3.6	13.9	21.2	14.9	36.7	30.2	35.4	46.5	43.8	46.1	0.1	0.0	0.1
Total	3,655	1,514,619	100.0	257,182	2.7	4.8	3.6	13.9	21.2	14.9	36.7	30.2	35.4	46.5	43.8	46.1	0.1	0.0	0.1
Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 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**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
NY CSA	3,655	1,514,619	100.0	257,182	25.6	3.3	3.0	15.6	16.5	11.5	17.2	22.9	20.0	41.6	55.7	51.6	0.0	1.6	13.9
Total	3,655	1,514,619	100.0	257,182	25.6	3.3	3.0	15.6	16.5	11.5	17.2	22.9	20.0	41.6	55.7	51.6	0.0	1.6	13.9

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 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**

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
NY CSA	7,128	415,690	100.0	524,236	7.0	8.7	7.7	16.5	19.3	16.5	29.5	20.7	28.3	45.8	48.6	46.4	1.3	2.7	1.1
Total	7,128	415,690	100.0	524,236	7.0	8.7	7.7	16.5	19.3	16.5	29.5	20.7	28.3	45.8	48.6	46.4	1.3	2.7	1.1

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 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
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
NY CSA	7,128	415,690	100.0	524,236	85.8	61.0	49.1	7.0	39.0	7.2	0.0
Total	7,128	415,690	100.0	524,236	85.8	61.0	49.1	7.0	39.0	7.2	0.0
<i>Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

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
NY CSA	7,692	3,149,419	100.0	283,944	2.4	2.9	2.6	13.7	13.0	13.1	37.7	34.2	35.2	46.2	49.8	49.1	0.0	0.1	0.0
Total	7,692	3,149,419	100.0	283,944	2.4	2.9	2.6	13.7	13.0	13.1	37.7	34.2	35.2	46.2	49.8	49.1	0.0	0.1	0.0

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

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

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
NY CSA	7,692	3,149,419	100.0	283,944	24.3	3.6	2.6	16.3	14.8	10.4	18.2	23.9	19.3	41.2	54.9	52.9	0.0	2.8	14.8
Total	7,692	3,149,419	100.0	283,944	24.3	3.6	2.6	16.3	14.8	10.4	18.2	23.9	19.3	41.2	54.9	52.9	0.0	2.8	14.8

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table 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
NY CSA	10,670	992,104	100.0	546,282	6.5	6.5	6.6	17.4	16.3	16.8	30.7	26.4	30.6	44.0	46.2	44.7	1.4	4.6	1.3
Total	10,670	992,104	100.0	546,282	6.5	6.5	6.6	17.4	16.3	16.8	30.7	26.4	30.6	44.0	46.2	44.7	1.4	4.6	1.3

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2015-16
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
NY CSA	10,670	992,104	100.0	546,282	85.6	55.6	42.3	7.1	40.5	7.4	3.9
Total	10,670	992,104	100.0	546,282	85.6	55.6	42.3	7.1	40.5	7.4	3.9
<i>Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

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
PA-DE MMSA	365	62,288	100.0	50,574	7.5	5.5	4.0	28.7	33.2	25.9	32.5	34.0	33.3	31.2	27.4	36.7	0.0	0.0	0.0
Total	365	62,288	100.0	50,574	7.5	5.5	4.0	28.7	33.2	25.9	32.5	34.0	33.3	31.2	27.4	36.7	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 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**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
PA-DE MMSA	365	62,288	100.0	50,574	27.6	8.2	7.4	17.8	29.0	15.7	17.8	25.5	18.8	36.7	37.3	38.9	0.0	0.0	19.1
Total	365	62,288	100.0	50,574	27.6	8.2	7.4	17.8	29.0	15.7	17.8	25.5	18.8	36.7	37.3	38.9	0.0	0.0	19.1

Source: 2015 ACS Census 01/01/2017 - 12/31/2017 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**

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
PA-DE MMSA	137	4,240	100.0	34,163	7.0	8.0	6.3	26.8	64.2	24.4	27.1	10.9	27.5	37.5	16.8	40.4	1.6	0.0	1.3
Total	137	4,240	100.0	34,163	7.0	8.0	6.3	26.8	64.2	24.4	27.1	10.9	27.5	37.5	16.8	40.4	1.6	0.0	1.3

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 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**

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
PA-DE MMSA	137	4,240	100.0	34,163	85.1	83.9	49.5	5.7	16.1	9.2	0.0
Total	137	4,240	100.0	34,163	85.1	83.9	49.5	5.7	16.1	9.2	0.0

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA 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 **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
PA-DE MMSA	1,090	197,938	100.0	53,439	8.4	4.8	4.6	27.1	24.6	21.9	34.4	39.0	35.2	30.1	31.4	38.2	0.0	0.3	0.1
Total	1,090	197,938	100.0	53,439	8.4	4.8	4.6	27.1	24.6	21.9	34.4	39.0	35.2	30.1	31.4	38.2	0.0	0.3	0.1

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

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

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
PA-DE MMSA	1,090	197,938	100.0	53,439	27.4	9.0	6.2	17.7	26.5	14.7	18.6	22.6	18.4	36.3	40.2	38.3	0.0	1.7	22.4
Total	1,090	197,938	100.0	53,439	27.4	9.0	6.2	17.7	26.5	14.7	18.6	22.6	18.4	36.3	40.2	38.3	0.0	1.7	22.4

Source: 2010 U.S Census 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table 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
PA-DE MMSA	75	7,334	100.0	34,047	9.0	9.3	8.2	21.6	36.0	20.2	28.0	13.3	27.1	39.9	37.3	43.2	1.4	4.0	1.3
Total	75	7,334	100.0	34,047	9.0	9.3	8.2	21.6	36.0	20.2	28.0	13.3	27.1	39.9	37.3	43.2	1.4	4.0	1.3

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

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

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
PA-DE MMSA	75	7,334	100.0	34,047	85.0	53.3	46.5	5.7	44.0	9.3	5.6
Total	75	7,334	100.0	34,047	85.0	53.3	46.5	5.7	44.0	9.3	5.6

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

Table 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
DC-VA-MD MMSA	780	211,518	100.0	100,737	4.6	11.8	6.5	11.3	24.2	12.7	31.3	34.1	32.7	52.5	29.2	47.7	0.3	0.6	0.5
Total	780	211,518	100.0	100,737	4.6	11.8	6.5	11.3	24.2	12.7	31.3	34.1	32.7	52.5	29.2	47.7	0.3	0.6	0.5

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 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**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
DC-VA-MD MMSA	780	211,518	100.0	100,737	21.4	14.9	6.0	14.6	36.2	15.8	18.3	25.5	21.2	45.7	23.5	43.9	0.0	0.0	13.1
Total	780	211,518	100.0	100,737	21.4	14.9	6.0	14.6	36.2	15.8	18.3	25.5	21.2	45.7	23.5	43.9	0.0	0.0	13.1

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 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**

Assessm ent 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
DC- VA- MD MMSA	287	9,100	100.0	82,749	4.6	10.1	4.0	13.3	19.9	13.8	30.6	27.9	31.2	50.6	41.8	50.4	1.0	0.3	0.5
Total	287	9,100	100.0	82,749	4.6	10.1	4.0	13.3	19.9	13.8	30.6	27.9	31.2	50.6	41.8	50.4	1.0	0.3	0.5

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 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**

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
DC-VA-MD MMSA	287	9,100	100.0	82,749	83.3	41.5	54.8	6.9	58.5	9.8	0.0
Total	287	9,100	100.0	82,749	83.3	41.5	54.8	6.9	58.5	9.8	0.0

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA 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 **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
DC-VA-MD MMSA	1,019	505,968	100.0	133,690	4.6	9.9	5.7	15.8	24.0	16.5	32.0	33.2	31.4	47.6	32.9	46.4	0.0	0.0	0.0
Total	1,019	505,968	100.0	133,690	4.6	9.9	5.7	15.8	24.0	16.5	32.0	33.2	31.4	47.6	32.9	46.4	0.0	0.0	0.0

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

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

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
DC-VA-MD MMSA	1,019	505,968	100.0	133,690	20.9	9.5	4.9	15.3	30.8	13.2	18.8	26.2	20.0	45.0	32.0	43.5	0.0	1.5	18.4
Total	1,019	505,968	100.0	133,690	20.9	9.5	4.9	15.3	30.8	13.2	18.8	26.2	20.0	45.0	32.0	43.5	0.0	1.5	18.4

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table 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
DC-VA-MD MMSA	229	18,391	100.0	94,004	4.9	3.1	4.0	16.6	10.0	16.7	28.2	24.9	29.0	49.9	62.0	50.2	0.4	0.0	0.1
Total	229	18,391	100.0	94,004	4.9	3.1	4.0	16.6	10.0	16.7	28.2	24.9	29.0	49.9	62.0	50.2	0.4	0.0	0.1
Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

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

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
DC-VA-MD MMSA 2016	229	18,391	100.0	94,004	82.8	28.4	49.3	7.1	31.9	10.1	39.7
Total	229	18,391	100.0	94,004	82.8	28.4	49.3	7.1	31.9	10.1	39.7

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

Table 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
LA CALIFORNIA	1,006	674,077	100.0	309,844	2.7	3.9	3.3	17.6	23.1	19.1	27.5	17.6	27.7	52.2	53.1	49.4	0.1	2.4	0.4
Total	1,006	674,077	100.0	309,844	2.7	3.9	3.3	17.6	23.1	19.1	27.5	17.6	27.7	52.2	53.1	49.4	0.1	2.4	0.4

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 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
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
LA CALIFORNIA	1,006	674,077	100.0	309,844	24.4	4.3	2.2	16.3	13.9	6.7	17.0	10.9	15.7	42.3	70.6	61.0	0.0	0.3	14.4
Total	1,006	674,077	100.0	309,844	24.4	4.3	2.2	16.3	13.9	6.7	17.0	10.9	15.7	42.3	70.6	61.0	0.0	0.3	14.4
Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 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
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	
LA CALIFORNIA	1,406	26,896	100.0	424,096	5.0	6.5	4.7	19.4	57.8	19.4	25.4	10.5	25.6	48.2	22.1	48.8	1.9	3.1	1.5	
Total	1,406	26,896	100.0	424,096	5.0	6.5	4.7	19.4	57.8	19.4	25.4	10.5	25.6	48.2	22.1	48.8	1.9	3.1	1.5	
Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 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
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
LA CALIFORNIA	1,406	26,896	100.0	424,096	86.9	68.3	53.0	6.2	31.7	6.9	0.0
Total	1,406	26,896	100.0	424,096	86.9	68.3	53.0	6.2	31.7	6.9	0.0
<i>Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

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
LA CALIFORNIA	4,129	2,271,698	100.0	418,164	2.4	2.4	2.3	17.4	16.5	16.9	29.9	27.5	29.5	50.2	53.0	51.3	0.0	0.5	0.1
Total	4,129	2,271,698	100.0	418,164	2.4	2.4	2.3	17.4	16.5	16.9	29.9	27.5	29.5	50.2	53.0	51.3	0.0	0.5	0.1

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2015-16

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
LA CALIFORNIA	4,129	2,271,698	100.0	418,164	23.6	4.9	1.7	16.6	15.6	6.0	18.1	16.3	15.2	41.7	62.2	62.6	0.0	0.9	14.7
Total	4,129	2,271,698	100.0	418,164	23.6	4.9	1.7	16.6	15.6	6.0	18.1	16.3	15.2	41.7	62.2	62.6	0.0	0.9	14.7

Source: 2010 U.S Census 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table 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
LA CALI FORNIA	885	54,384	100.0	523,168	6.0	5.1	5.1	20.1	17.4	18.7	27.3	26.9	27.0	45.5	49.7	48.3	1.2	0.9	0.9
Total	885	54,384	100.0	523,168	6.0	5.1	5.1	20.1	17.4	18.7	27.3	26.9	27.0	45.5	49.7	48.3	1.2	0.9	0.9

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

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

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
LA CALIFORNIA	885	54,384	100.0	523,168	86.8	33.0	44.3	6.2	40.3	7.1	26.7
Total	885	54,384	100.0	523,168	86.8	33.0	44.3	6.2	40.3	7.1	26.7

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

Table 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
San Jose-San Francisco CSA	918	699,297	100.0	127,939	4.6	9.4	6.2	15.7	23.1	18.4	35.7	24.5	36.2	43.8	42.5	38.9	0.1	0.5	0.3
Total	918	699,297	100.0	127,939	4.6	9.4	6.2	15.7	23.1	18.4	35.7	24.5	36.2	43.8	42.5	38.9	0.1	0.5	0.3

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 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**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
San Jose-San Francisco CSA	918	699,297	100.0	127,939	24.6	4.0	3.1	15.7	12.9	8.7	18.2	17.9	17.6	41.6	64.9	60.5	0.0	0.3	10.1
Total	918	699,297	100.0	127,939	24.6	4.0	3.1	15.7	12.9	8.7	18.2	17.9	17.6	41.6	64.9	60.5	0.0	0.3	10.1

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 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**

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
San Jose - San Francisco CSA	802	21,222	100.0	154,483	10.7	15.3	9.9	17.3	42.3	17.9	30.7	6.0	32.5	40.6	36.2	39.2	0.7	0.2	0.6
Total	802	21,222	100.0	154,483	10.7	15.3	9.9	17.3	42.3	17.9	30.7	6.0	32.5	40.6	36.2	39.2	0.7	0.2	0.6

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 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**

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
San Jose-San Francisco CSA	802	21,222	100.0	154,483	85.4	39.8	54.0	6.6	60.2	8.0	0.0
Total	802	21,222	100.0	154,483	85.4	39.8	54.0	6.6	60.2	8.0	0.0

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA 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																			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
San Jose-San Francisco CSA	2,184	1,681,943	100.0	196,968	4.9	5.2	5.6	15.5	13.7	16.6	39.6	32.1	39.7	40.0	48.9	38.1	0.0	0.0	0.0
Total	2,184	1,681,943	100.0	196,968	4.9	5.2	5.6	15.5	13.7	16.6	39.6	32.1	39.7	40.0	48.9	38.1	0.0	0.0	0.0

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2015-16
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
San Jose-San Francisco CSA	2,184	1,681,943	100.0	196,968	24.0	6.5	2.2	16.3	13.6	8.2	18.8	10.5	17.9	40.9	68.2	61.7	0.0	1.2	10.0
Total	2,184	1,681,943	100.0	196,968	24.0	6.5	2.2	16.3	13.6	8.2	18.8	10.5	17.9	40.9	68.2	61.7	0.0	1.2	10.0

Source: 2010 U.S Census 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table 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
San Jose -San Francisco CSA	336	23,161	27.5	211,941	12.4	15.2	9.5	17.0	15.8	17.4	32.8	22.9	35.5	37.8	46.1	37.5	0.1	0.0	0.0
Total	336	23,161	27.5	211,941	12.4	15.2	9.5	17.0	15.8	17.4	32.8	22.9	35.5	37.8	46.1	37.5	0.1	0.0	0.0

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

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

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
San Jose-San Francisco CSA	336	23,161	100.0	211,941	85.4	35.4	39.0	6.6	34.8	8.1	46.9
Total	336	23,161	100.0	211,941	85.4	35.4	39.0	6.6	34.8	8.1	46.9

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

Table 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
Miami MSA	399	142,221	100.0	140,541	2.6	2.0	2.3	23.2	24.6	20.5	32.9	24.6	34.1	41.2	47.9	42.8	0.2	1.0	0.4
Total	399	142,221	100.0	140,541	2.6	2.0	2.3	23.2	24.6	20.5	32.9	24.6	34.1	41.2	47.9	42.8	0.2	1.0	0.4

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 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**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Miami MSA	399	142,221	100.0	140,541	23.1	6.8	2.6	17.0	18.3	10.6	17.7	16.8	18.9	42.2	55.4	50.9	0.0	2.8	17.0
Total	399	142,221	100.0	140,541	23.1	6.8	2.6	17.0	18.3	10.6	17.7	16.8	18.9	42.2	55.4	50.9	0.0	2.8	17.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 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**

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
Miami MSA	881	33,321	100.0	226,331	4.2	11.5	4.6	21.8	39.2	21.4	28.2	14.5	27.3	44.6	33.6	45.5	1.2	1.2	1.2
Total	881	33,321	100.0	226,331	4.2	11.5	4.6	21.8	39.2	21.4	28.2	14.5	27.3	44.6	33.6	45.5	1.2	1.2	1.2

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 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**

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
Miami MSA	881	33,321	100.0	226,331	91.0	75.3	52.9	3.9	24.7	5.1	0.0
Total	881	33,321	100.0	226,331	91.0	75.3	52.9	3.9	24.7	5.1	0.0

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA 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 **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
Miami MSA	1,918	540,637	100.0	145,423	2.1	2.1	1.2	23.1	25.4	16.8	36.3	34.8	36.9	38.6	37.4	45.0	0.0	0.3	0.1
Total	1,918	540,637	100.0	145,423	2.1	2.1	1.2	23.1	25.4	16.8	36.3	34.8	36.9	38.6	37.4	45.0	0.0	0.3	0.1

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

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

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Miami MSA	1,918	540,637	100.0	145,423	22.4	6.4	2.2	17.3	27.9	9.6	18.9	17.5	17.6	41.3	46.5	53.7	0.0	1.7	16.8
Total	1,918	540,637	100.0	145,423	22.4	6.4	2.2	17.3	27.9	9.6	18.9	17.5	17.6	41.3	46.5	53.7	0.0	1.7	16.8

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table 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
Miami MSA	630	66,828	100.0	242,848	3.4	3.2	3.2	21.8	18.7	20.5	30.3	20.3	28.5	43.7	55.9	46.8	0.9	1.9	0.9
Total	630	66,828	100.0	242,848	3.4	3.2	3.2	21.8	18.7	20.5	30.3	20.3	28.5	43.7	55.9	46.8	0.9	1.9	0.9

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

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

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Miami MSA	630	66,828	100.0	242,848	90.7	41.1	48.5	3.8	52.2	5.5	13.2
Total	630	66,828	100.0	242,848	90.7	41.1	48.5	3.8	52.2	5.5	13.2

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

Table 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
Seattle AA	544	183,789	100.0	76,323	2.7	3.5	2.8	15.2	26.8	16.8	40.4	38.8	41.9	41.7	30.5	38.4	0.0	0.4	0.0
Total	544	183,789	100.0	76,323	2.7	3.5	2.8	15.2	26.8	16.8	40.4	38.8	41.9	41.7	30.5	38.4	0.0	0.4	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 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
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Seattle AA	544	183,789	100.0	76,323	21.0	10.7	3.8	16.4	28.7	14.1	19.5	20.2	21.6	43.1	40.1	51.6	0.0	0.4	8.9
Total	544	183,789	100.0	76,323	21.0	10.7	3.8	16.4	28.7	14.1	19.5	20.2	21.6	43.1	40.1	51.6	0.0	0.4	8.9

*Source: 2015 ACS Census 01/01/2017 - 12/31/2017 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**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Seattle AA	113	5,476	100.0	52,505	5.3	20.4	5.4	16.3	47.8	16.0	34.7	15.9	35.4	43.1	14.2	42.6	0.6	1.8	0.6
Total	113	5,476	100.0	52,505	5.3	20.4	5.4	16.3	47.8	16.0	34.7	15.9	35.4	43.1	14.2	42.6	0.6	1.8	0.6

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 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**

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
Seattle AA	113	5,476	100.0	52,505	85.4	77.0	50.4	5.9	23.0	8.8	0.0
Total	113	5,476	100.0	52,505	85.4	77.0	50.4	5.9	23.0	8.8	0.0

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA 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 **2015-16**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Seattle AA	834	426,841	100.0	95,112	1.7	1.6	1.8	13.2	14.5	12.7	47.3	41.0	47.9	37.7	42.9	37.6	0.0	0.0	0.0
Total	834	426,841	100.0	95,112	1.7	1.6	1.8	13.2	14.5	12.7	47.3	41.0	47.9	37.7	42.9	37.6	0.0	0.0	0.0

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

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

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Seattle AA	834	426,841	100.0	95,112	20.0	6.6	3.4	16.9	19.3	12.5	21.1	20.6	20.4	42.0	52.3	53.0	0.0	1.2	10.7
Total	834	426,841	100.0	95,112	20.0	6.6	3.4	16.9	19.3	12.5	21.1	20.6	20.4	42.0	52.3	53.0	0.0	1.2	10.7

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

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

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Seattle AA	75	7,160	131.6	73,282	5.2	2.7	4.5	14.8	5.3	13.8	42.9	64.0	43.9	36.9	28.0	37.7	0.2	0.0	0.0
Total	75	7,160	131.6	73,282	5.2	2.7	4.5	14.8	5.3	13.8	42.9	64.0	43.9	36.9	28.0	37.7	0.2	0.0	0.0

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

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

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Seattle AA	75	7,160	100.0	73,282	86.1	13.3	39.5	5.6	77.3	8.3	12.3
Total	75	7,160	100.0	73,282	86.1	13.3	39.5	5.6	77.3	8.3	12.3

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

Appendix C

Riegle-Neal Permissibility Analysis

Riegle-Neal Permissibility Analysis

According to the Riegle-Neal Interstate Banking and Branching Efficiency Act of 1994 (“Riegle-Neal”), “[a]n interstate merger transaction may involve the acquisition of a branch of an insured bank without the acquisition of the bank only if the law of the State in which the branch is located permits out-of-state banks to acquire a branch of a bank in such State without acquiring the bank.” 12 U.S.C. § 1831u(a)(4)(A). Of the 80 Branches to be acquired by CBNA as part of the Transaction, 10 are located across Florida, Maryland and the District of Columbia, where CBNA does not currently maintain any branches. The permissibility of the acquisition pursuant to Riegle-Neal and applicable state law, including a discussion of authority, compliance with state age limits and host state filing requirements, and any other applicable state-level restrictions, is discussed in turn below.

District of Columbia

Authority. D.C. law expressly permits out-of-state banks to acquire branches of banks located in D.C. D.C. CODE ANN. § 26-734.

State Age Limits. D.C. law does not impose any state age limits for an out-of-state bank’s acquisition of a branch located in D.C.

Filing Requirements. CBNA is required to provide a copy of this Application to the D.C. Superintendent of Banking and Financial Institutions. *Id.* § 26-734(a)(1). CBNA will also be required to obtain approval from the D.C. Mayor to transact business as a foreign entity. *Id.* § 26-734(a)(2).

Florida

Authority. Florida law permits out-of-state banks to “establish and maintain a de novo branch or acquire a branch in this state upon compliance with chapter 605 or part I of chapter 607 relating to doing business in this state as a foreign business entity, including maintaining a registered agent for service of process and other legal notice pursuant to s. 655.0201.” FLA. STAT. ANN. § 658.2953(11)(c).

State Age Limits. Florida law does not impose any state age limits for an out-of-state bank’s acquisition of a branch located in Florida.

Filing Requirements. Florida law does not require out-of-state banks to make any specific bank regulatory filings in order to acquire a branch located in Florida. However, as noted above, CBNA will be required to comply with laws generally applicable to foreign entities transacting business in Florida. *See id.*

Additional Restrictions. We are not aware of any further restrictions on CBNA's ability to acquire the Florida Branches.

Maryland

Authority. Maryland law expressly permits out-of-state banks to acquire a branch of a bank located in Maryland, as long as the branch is not located on the premises or property of an affiliate if the affiliate engages in commercial activities. Md. CODE FIN. INST. § 5-1003(a)(2), (c).

State Age Limits. Maryland law does not impose any state age limits for an out-of-state bank's acquisition of a branch located in Maryland.

Filing Requirements. Within 15 days of providing this Application to the OCC, CBNA shall provide a copy to the Maryland Commissioner. MD. CODE FIN. INST. § 5-1014(a)(2). CBNA must also qualify under § 7-203 of the Corporations and Associations Article of the Maryland Code to do business in Maryland as a foreign corporation. *Id.* § 5-1014(a)(1).

Additional Restrictions. Maryland law imposes its own statewide deposit concentration limits, providing that "the Commissioner may not approve a transaction resulting in the establishment of a branch or branches by a bank, other than a de novo branch, if on consummation of the transaction the applicant, including any insured depository institution affiliate of the applicant, would control 30 percent or more of the total amount of deposits of insured depository institutions in" Maryland. *Id.* § 5-1013(a). Because CBNA does not currently maintain any branches in Maryland, the volume of Maryland deposits that would be maintained by CBNA upon consummation of the Transaction would be the same amount of Maryland deposits as currently maintained by the Maryland Branches. According to the FDIC's most recently published deposit market share report, dated June 30, 2020, the Maryland Branches had deposits of approximately \$534.3 million, or 0.29% of the \$182.176 billion of deposits in Maryland. Thus, upon consummation of the Transaction, the volume of deposits maintained by CBNA in Maryland would be far less than the 30% threshold established under Maryland law.

Appendix D

Riegle-Neal Concentration Limits

Riegle-Neal Concentration Limits

Pursuant to Riegle-Neal, the OCC is prohibited from approving an application for an interstate merger transaction if the resulting bank, including all insured depository institutions (“IDIs”) which are affiliates of the resulting bank, would control more than (1) 10% of the total amount of deposits of insured depository institutions in the United States (the “Nationwide Concentration Limit”); or (2) 30% or more of the total amount of deposits of insured depository institutions in any state where the acquiring bank, or any of its IDI affiliates, maintained a branch prior to the transaction (the “Statewide Concentration Limit”).¹

Using data from the FDIC’s most recent deposit market share reports as of June 30, 2020 (the “FDIC Market Data”), this Appendix shows that the OCC is not prohibited from approving the Transaction due to either the Nationwide Concentration Limit or the Statewide Concentration Limit.² Note that the volume of deposits listed in the FDIC Market Data as being located in the Branches as of June 30, 2020 (approximately \$25.12 billion) is materially higher than the current estimated volume of deposits being assumed pursuant to the Transaction (approximately \$9 billion). In addition to standard deposit fluctuations, this discrepancy is primarily attributable to the fact that the Transaction involves the assumption of only retail deposits rather than commercial and high net worth deposits. Additionally, the Branch-level data does not encompass the scope of the deposits being assumed from HSBC’s online deposit business. We nonetheless use the FDIC Market Data in this analysis for consistency.

That being said, even if CBNA were to acquire the full scope of deposits located at the Branches as of June 30, 2020—which is approximately 2.79 times greater than the current estimated volume of deposits actually encompassed by the Transaction, as shown below, it is clear that CBNA would not come remotely close to either the Nationwide or Statewide Concentration Limits.

Nationwide Concentration Limits

The consummation of the Transaction would not result in CBNA controlling more than 10 percent of the total amount of deposits of insured depository institutions in the United States. See 12 U.S.C. § 1831u(b)(2) (prohibiting the OCC from approving applications for interstate merger transactions if the resulting bank (including all insured depository institutions which are affiliates of the resulting bank) would control more than 10 percent of the total amount of deposits of insured depository institutions in the United

¹ CBNA does not have any affiliated IDIs.

² This Appendix does not include discussion of the Statewide Concentration Limits for the states in which CBNA does not currently maintain branches, as such analysis is not required by Riegle-Neal.

States). According to the FDIC's June 30, 2020 deposit market share report, CBNA maintained a total of approximately \$145.79 billion deposits nationwide, or 1.14% of the approximately \$12.75 trillion of deposits held in insured depository institutions nationwide.³ According to the same deposit market share report, the Branches maintained a total of approximately \$25.12 billion, or 0.197%, of deposits nationwide. Thus, upon consummation of the Transaction, CBNA would maintain a nationwide deposit market share of 1.34%, which is significantly less than the 10% threshold established under federal law.

	(\$000s)	% total
Total domestic deposits nationwide, as of June 30, 2020 (\$000s)	\$12,748,000,000	n/a
CBNA pre-Transaction nationwide deposits (\$000s)	\$145,790,405	1.14363%
Total deposits acquired (\$000s)	\$25,124,653	0.1971%
CBNA post-Transaction nationwide deposits (\$000s)	\$170,915,058	1.34072%

Statewide Concentration Limits

New Jersey. According to the FDIC's June 30, 2020 deposit market share report, CBNA maintained \$926.23 million, or 0.23%, of the \$403.731 billion of deposits in New Jersey. According to the same deposit market share report, the New Jersey Branches had deposits of approximately \$1.02 billion, or 0.25% of deposits in New Jersey. Thus, upon consummation of the Transaction, CBNA would maintain a deposit market share in New Jersey of approximately 0.48%, which is significantly less than Riegle-Neal's 30% limit. See 12 U.S.C. § 1831u(b)(2)(B).

New York. According to the FDIC's June 30, 2020 deposit market share report, CBNA maintained \$12.38 billion, or 0.57%, of the \$2.183 trillion of deposits in New York. According to the same deposit market share report, the New York Branches had deposits of approximately \$14.29 billion, or 0.65% of deposits in New York. Thus, upon consummation of the Transaction, CBNA would maintain a deposit market share in New York of approximately 1.22%, which is significantly less than Riegle-Neal's 30% limit. See 12 U.S.C. § 1831u(b)(2)(B).

Pennsylvania. According to the FDIC's June 30, 2020 deposit market share report, CBNA maintained \$32.65 billion, or 6.51%, of the \$501.24 billion of deposits in Pennsylvania. According to the same deposit market share report, the Pennsylvania Branches had deposits of approximately \$401.7 million, or 0.08% of deposits in Pennsylvania. Thus, upon consummation of the Transaction, CBNA would maintain a deposit market share in Pennsylvania of approximately 6.59%, which is significantly less than Riegle-Neal's 30% limit. See 12 U.S.C. § 1831u(b)(2)(B).

³ See FDIC, Statistics at a Glance (June 30, 2020), <https://www.fdic.gov/analysis/quarterly-banking-profile/statistics-at-a-glance/2020jun/industry.pdf>.

Virginia. According to the FDIC's June 30, 2020 deposit market share report, CBNA maintained \$405,000, or less than .01%, of the \$380.38 billion of deposits in Virginia. According to the same deposit market share report, the Virginia Branches had deposits of approximately \$218.12 million, or 0.06%, of deposits in Virginia. Thus, upon consummation of the Transaction, CBNA would maintain a deposit market share in Virginia of approximately 0.06%, which is significantly less than Riegle-Neal's 30% limit. See 12 U.S.C. § 1831u(b)(2)(B).

State	As of June 30, 2020			Pro Forma	
	Statewide Deposits (\$000s)	HSBC Branch Deposits (\$000s)	CBNA Deposits (\$000s)	CBNA Deposits (\$000s)	CBNA Deposits (% Statewide Deposits)
DC	\$65,826,668	\$2,958,299	\$0	\$2,958,299	4.49%
FL	\$708,384,984	\$5,701,458	\$0	\$5,701,458	0.80%
MD	\$182,176,005	\$534,304	\$0	\$534,304	0.29%
NJ	\$403,731,148	\$1,017,237	\$926,230	\$1,943,467	0.48%
NY	\$2,183,058,996	\$14,293,513	\$12,378,000	\$26,671,513	1.22%
PA	\$501,241,403	\$401,718	\$32,652,710	\$33,054,428	6.59%
VA	\$380,379,749	\$218,124	\$405	\$218,529	0.06%
TOTAL	\$4,424,798,953	\$25,124,653	\$45,957,345	\$71,081,998	

Appendix E

Branch Locations

Branch Locations

BRANCHES							
#	Region 2	Branch Name	Address	City	State	Zip	COUNTY
1	Greater NYC	STATEN ISLAND	280 MARSH AVENUE	STATEN ISLAND	NY	10314	RICHMOND
2	Greater NYC	MONTAGUE ST	174 MONTAGUE ST	BROOKLYN	NY	11201	KINGS
3	Greater NYC	3RD AVE & 92ND	9201 THIRD AVENUE	BROOKLYN	NY	11209	KINGS
4	Greater NYC	WILLIAMSBURG OFFICE	252 BEDFORD AVENUE	BROOKLYN	NY	11211	KINGS
5	Greater NYC	86TH ST & 23RD AVE	2301 86TH STREET	BROOKLYN	NY	11214	KINGS
6	Greater NYC	9TH ST	325 NINTH STREET	BROOKLYN	NY	11215	KINGS
7	Greater NYC	AVE U	1702 AVE U	BROOKLYN	NY	11229	KINGS
8	Greater NYC	GEORGETOWNE	2145 RALPH AVENUE	BROOKLYN	NY	11234	KINGS
9	Greater NYC	FLATBUSH & NOSTRAND	1545 FLATBUSH AVENUE	BROOKLYN	NY	11210	KINGS
10	Greater NYC	STARRET CITY	1330 PENNSYLVANIA AVENUE	BROOKLYN	NY	11239	KINGS
11	Florida	MIAMI BEACH	301 ARTHUR GODFREY RD	MIAMI BEACH	FL	33140	MIAMI-DADE
12	Florida	CORAL GABLES	2222 PONCE DE LEON	CORAL GABLES	FL	33134	MIAMI-DADE
13	Florida	DORAL	4090 NW 97TH AVE	MIAMI	FL	33178	MIAMI-DADE
14	Florida	LAS OLAS BRANCH	350 EAST LAS OLAS BLVD	FORT LAUDERDALE	FL	33301	BROWARD
15	Greater NYC	FRANKLIN SQ	682-684 DOGWOOD AVENUE	FRANKLIN SQUARE	NY	11010	NASSAU
16	Greater NYC	LEVITTOWN	3130 HEMPSTEAD TPKE	LEVITTOWN	NY	11756	NASSAU
17	Greater NYC	ROCKVILLE CENTRE	330 SUNRISE HIGHWAY	ROCKVILLE CENTRE	NY	11570	NASSAU
18	Greater NYC	VALLEY STREAM	750 West Sunrise Highway, Suite 4110	VALLEY STREAM	NY	11581	NASSAU
19	Greater NYC	HUNTINGTON VLG	355 WEST MAIN Street	HUNTINGTON	NY	11743	SUFFOLK
20	Greater NYC	GREAT NECK	57 MIDDLE NECK RD	GREAT NECK	NY	11021	NASSAU
21	Greater NYC	E. SETAUKET	300 MAIN STREET SUITE 1	EAST SETAUKET	NY	11733	SUFFOLK
22	Greater NYC	LK RONKONKOMA	395 PORTION Road	RONKONKOMA	NY	11779	SUFFOLK
23	Greater NYC	MELVILLE	534 BROAD HOLLOW RD	MELVILLE	NY	11747	SUFFOLK
24	Greater NYC	BOHEMIA	4040 VETERANS MEMORIAL HWY	BOHEMIA	NY	11716	SUFFOLK
25	Greater NYC	HAMPTON BAYS	248 MONTAUK HWY WEST	HAMPTON BAYS	NY	11946	SUFFOLK
26	Greater NYC	SYOSSET	603 JERICHO TPKE	SYOSSET	NY	11791	NASSAU
27	Greater NYC	LENOX HILL	1340 THIRD AVE	NEW YORK	NY	10075	New York
28	Greater NYC	UNION SQ	15 UNION SQUARE WEST	NEW YORK	NY	10003	New York
29	Greater NYC	CANAL ST	235 CANAL STREET	NEW YORK	NY	10013	New York
30	Greater NYC	3RD AVE & 40TH ST	617 THIRD AVENUE	NEW YORK	NY	10158	New York
31	Greater NYC	57TH AND LEXINGTON	131 EAST 57TH STREET	NEW YORK	NY	10022	New York
32	Greater NYC	86TH ST & 3RD AVE	186 EAST 86TH STREET	NEW YORK	NY	10028	New York
33	Greater NYC	GRAMERCY	302 3RD AVENUE	NEW YORK	NY	10010	New York
34	Greater NYC	Delancey	101 DELANCEY ST	NEW YORK	NY	10002	New York
35	Greater NYC	EAST VILLAGE	143 SECOND AVENUE	NEW YORK	NY	10003	New York
36	Greater NYC	TRIBECA	110 WEST BROADWAY	NEW YORK	NY	10013	New York

BRANCHES							
#	Region 2	Branch Name	Address	City	State	Zip	COUNTY
37	Greater NYC	7TH AVE.	518 FASHION AVENUE	NEW YORK	NY	10018	New York
38	Greater NYC	CHELSEA	800 6TH AVENUE	NEW YORK	NY	10001	New York
39	Greater NYC	95TH STREET & AMSTERDAM	721 AMSTERDAM AVE	NEW YORK	NY	10025	New York
40	Greater NYC	8TH AVE & 14TH ST	80 EIGHTH AVENUE	NEW YORK	NY	10011	New York
41	Greater NYC	57TH STREET OFFICE	252 WEST 57TH STREET	NEW YORK	NY	10107	New York
42	Greater NYC	1133 AVE OF AMERICAS	1133 AVENUE OF THE AMERICAS	NEW YORK	NY	10036	New York
43	Greater NYC	BOWLING GREEN	26 BROADWAY	NEW YORK	NY	10004	New York
44	Greater NYC	FREDERICK DOUGLASS BOULEV	2063 FREDERICK DOUGLASS BLVD	NEW YORK	NY	10026	New York
45	Mid-Atlantic	ARCH ST	1027 ARCH STREET	PHILADELPHIA	PA	19107	PHILADELPHIA
46	Mid-Atlantic	ARLINGTON	4075 WILSON BOULEVARD	ARLINGTON	VA	22203	ARLINGTON
47	Mid-Atlantic	WASHINGTON DC	1401 I STREET N.W., SUITE 110	WASHINGTON	DC	20005	District of Columbia
48	Mid-Atlantic	RESTON OFFICE	11842 SPECTRUM CENTER	RESTON	VA	20190	FAIRFAX
49	Mid-Atlantic	ROCKVILLE BRANCH	200C E MIDDLE LANE	ROCKVILLE	MD	20850	MONTGOMERY
50	Mid-Atlantic	POTOMAC OFFICE	10113 RIVER ROAD	POTOMAC	MD	20854	MONTGOMERY
51	Mid-Atlantic	SILVER SPRING	8252 GEORGIA AVENUE	SILVER SPRING	MD	20910	MONTGOMERY
52	Mid-Atlantic	BETHESDA OFFICE	7637 OLD GEORGETOWN ROAD	BETHESDA	MD	20814	MONTGOMERY
53	Mid-Atlantic	ALEXANDRIA	1700 DIAGONAL RD	ALEXANDRIA	VA	22314	ALEXANDRIA
54	Greater NYC	NEWPORT-PAVONIA BRANCH	89 RIVER DRIVE	JERSEY CITY	NJ	07310	HUDSON
55	Greater NYC	RYE CITY	67 PURCHASE STREET	RYE	NY	10580	WESTCHESTER
56	Greater NYC	BRONXVILLE	74 PONDFIELD RD	BRONXVILLE	NY	10708	WESTCHESTER
57	Greater NYC	NEW ROCHELLE	260 NORTH AVE	NEW ROCHELLE	NY	10801	WESTCHESTER
58	Greater NYC	E. YONKERS	778 YONKERS AVE	YONKERS	NY	10704	WESTCHESTER
59	Greater NYC	S. YONKERS	449 S BROADWAY	YONKERS	NY	10705	WESTCHESTER
60	Greater NYC	NORTH AVE	1300 NORTH AVE	NEW ROCHELLE	NY	10804	WESTCHESTER
61	Greater NYC	CITY CENTER	1 CITY PLACE	WHITE PLAINS	NY	10601	WESTCHESTER
62	Greater NYC	EDISON	1819 STATE ROUTE 27	EDISON	NJ	08817	MIDDLESEX
63	Greater NYC	HILLSIDE	14702 HILLSIDE AVENUE	JAMAICA	NY	11435	QUEENS
64	Greater NYC	POMONOK	15602 AGUILAR AVE	FLUSHING	NY	11367	QUEENS
65	Greater NYC	WOODSIDE	5120 NORTHERN BOULEVARD	WOODSIDE	NY	11377	QUEENS
66	Greater NYC	BOSTON RD	3478 BOSTON RD	BRONX	NY	10469	BRONX
67	Greater NYC	FORDHAM	ONE EAST FORDHAM RD	BRONX	NY	10468	BRONX
68	Greater NYC	CROSBY	1756 CROSBY AVE	BRONX	NY	10461	BRONX
69	Greater NYC	RIVERDALE	569 WEST 235TH ST	BRONX	NY	10463	BRONX
70	Greater NYC	GLEN OAKS	25715 UNION TPKE	GLEN OAKS	NY	11004	QUEENS
71	Greater NYC	NORTHERN BLVD	144-01 Northern Blvd	FLUSHING	NY	11361	QUEENS
72	Greater NYC	BAYSIDE	3415 FRANCIS LEWIS BLVD	FLUSHING	NY	11358	QUEENS

BRANCHES							
#	Region 2	Branch Name	Address	City	State	Zip	COUNTY
73	Greater NYC	FOREST HILLS	107-19 CONTINENTAL AVE	FOREST HILLS	NY	11375	QUEENS
74	Greater NYC	Long Island City	24-15 QUEENS PLAZA NORTH	LONG ISLAND CITY	NY	11101	QUEENS
75	Greater NYC	PARKCHESTER	1499 WEST AVE	BRONX	NY	10462	BRONX
76	Florida	BRICKELL	1441 BRICKELL AVE.STE 100	MIAMI	FL	33131	MIAMI-DADE
77	Greater NYC	CARLE PLACE	East Gate Blvd	Garden City	NY	11530	NASSAU
78	Greater NYC	COMMACK	5880 JERICHO TPKE	COMMACK	NY	11725	SUFFOLK
79	Greater NYC	ELMHURST	8703 QUEENS BOULEVARD	ELMHURST	NY	11373	QUEENS
80	Greater NYC	FORT LEE	2151 LEMOINE AVENUE	FORT LEE	NJ	07024	BERGEN

Appendix F

CASSIDI Pro Forma Merger Screens



Metro New York City, NY-NJ-CT-PA Banking Market HHI Deposit Analysis* (For Commercial Bank and Thrift Organizations)

Report Date: Friday, May 28, 2021 at 16:32:24 EST.

	Pre Merger	Post Merger
Total Organizations	212	211
Total Banking Organizations:	169	168
Total Thrift Organizations:	43	43

Herfindahl-Hirschman Index	Pre Merger	Post Merger	Change in HHI
HHI Unweighted Deposits	1254	1255	1
HHI Weighted Deposits	1409	1411	2

						Pre Merger						Post Merger					
						Unweighted			Weighted ***			Unweighted			Weighted ***		
RSSDID	Type	Branches	Name	City	State	Deposits**	Rank	%	Deposits	Rank	%	Deposits**	Rank	%	Deposits	Rank	%
Target Organization																	
1857108	BHC	79	HSBC HOLDINGS PLC	LONDON		126,674.910	6	5.17	126,674.910	5	5.57	0.000	0	0.00	0.000	0	0.00
413208	Bank	79	HSBC BANK USA, NATIONAL ASSOCIATION	MCLEAN	VA	126,674.910			126,674.910								
Buyer Organization																	
1132449	BHC	20	CITIZENS FINANCIAL GROUP, INC.	PROVIDENCE	RI	4,109.120	45	0.17	4,109.120	41	0.18						
3303298	Bank	20	CITIZENS BANK, NATIONAL ASSOCIATION	PROVIDENCE	RI	4,109.120			4,109.120								
Resulting Organization																	
1132449	BHC	99	CITIZENS FINANCIAL GROUP, INC.	PROVIDENCE	RI							130,784.030	5	5.34	130,784.030	4	5.75
3303298	Bank	99	CITIZENS BANK, NATIONAL ASSOCIATION	PROVIDENCE	RI							130,784.030			130,784.030		

Other Organizations

RSSDID	Type	Branches	Name	City	State	Pre Merger						Post Merger					
						Unweighted			Weighted ***			Unweighted			Weighted ***		
						Deposits**	Rank	%	Deposits	Rank	%	Deposits**	Rank	%	Deposits	Rank	%
1039502	BHC	848	JPMORGAN CHASE & CO.	NEW YORK	NY	771,216.479	1	31.47	771,216.479	1	33.92	771,216.479	1	31.47	771,216.479	1	33.92

RSSDID	Type	Branches	Name	City	State	Pre Merger						Post Merger					
						Unweighted			Weighted ***			Unweighted			Weighted ***		
						Deposits**	Rank	%	Deposits	Rank	%	Deposits**	Rank	%	Deposits	Rank	%
852218	Bank	848	JPMORGAN CHASE BANK, NATIONAL ASSOCIATION	COLUMBUS	OH	771,216.479			771,216.479			771,216.479			771,216.479		
1073757	BHC	453	BANK OF AMERICA CORPORATION	CHARLOTTE	NC	191,639.657	2	7.82	191,639.657	2	8.43	191,639.657	2	7.82	191,639.657	2	8.43
480228	Bank	453	BANK OF AMERICA, NATIONAL ASSOCIATION	CHARLOTTE	NC	191,639.657			191,639.657			191,639.657			191,639.657		
3587146	BHC	8	BANK OF NEW YORK MELLON CORPORATION, THE	NEW YORK	NY	171,159.000	3	6.99	171,159.000	3	7.53	171,159.000	3	6.99	171,159.000	3	7.53
541101	Bank	8	BANK OF NEW YORK MELLON, THE	NEW YORK	NY	171,159.000			171,159.000			171,159.000			171,159.000		
1951350	BHC	254	CITIGROUP INC.	NEW YORK	NY	127,199.000	5	5.19	127,199.000	4	5.59	127,199.000	6	5.19	127,199.000	5	5.59
476810	Bank	254	CITIBANK, NATIONAL ASSOCIATION	SIOUX FALLS	SD	127,199.000			127,199.000			127,199.000			127,199.000		
2162966	BHC	1	MORGAN STANLEY	NEW YORK	NY	93,901.000	7	3.83	93,901.000	6	4.13	93,901.000	7	3.83	93,901.000	6	4.13
2489805	Bank	1	MORGAN STANLEY PRIVATE BANK, NATIONAL ASSOCIATION	PURCHASE	NY	93,901.000			93,901.000			93,901.000			93,901.000		
1238565	BHC	447	TORONTO-DOMINION BANK, THE	TORONTO		90,888.557	8	3.71	90,888.557	7	4.00	90,888.557	8	3.71	90,888.557	7	4.00
497404	Bank	447	TD BANK, NATIONAL ASSOCIATION	WILMINGTON	DE	90,888.557			90,888.557			90,888.557			90,888.557		
1120754	BHC	355	WELLS FARGO & COMPANY	SAN FRANCISCO	CA	72,483.709	9	2.96	72,483.709	8	3.19	72,483.709	9	2.96	72,483.709	8	3.19
451965	Bank	355	WELLS FARGO BANK, NATIONAL ASSOCIATION	SIOUX FALLS	SD	72,483.709			72,483.709			72,483.709			72,483.709		
2277860	BHC	140	CAPITAL ONE FINANCIAL CORPORATION	MCLEAN	VA	51,365.231	10	2.10	51,365.231	9	2.26	51,365.231	10	2.10	51,365.231	9	2.26
112837	Bank	140	CAPITAL ONE, NATIONAL ASSOCIATION	MCLEAN	VA	51,365.231			51,365.231			51,365.231			51,365.231		
2942690	Bank	30	SIGNATURE BANK	NEW YORK	NY	48,477.099	11	1.98	48,477.099	10	2.13	48,477.099	11	1.98	48,477.099	10	2.13
1069778	BHC	210	PNC FINANCIAL SERVICES GROUP, INC., THE	PITTSBURGH	PA	33,839.442	12	1.38	33,839.442	11	1.49	33,839.442	12	1.38	33,839.442	11	1.49
817824	Bank	210	PNC BANK, NATIONAL ASSOCIATION	WILMINGTON	DE	33,839.442			33,839.442			33,839.442			33,839.442		
1242423	BHC	1	DEUTSCHE BANK AKTIENGESELLSCHAFT	FRANKFURT		32,975.000	13	1.35	32,975.000	12	1.45	32,975.000	13	1.35	32,975.000	12	1.45
214807	Bank	1	DEUTSCHE BANK TRUST COMPANY AMERICAS	NEW YORK	NY	32,975.000			32,975.000			32,975.000			32,975.000		
2132932	BHC	172	NEW YORK COMMUNITY BANCORP, INC.	WESTBURY	NY	24,649.059	14	1.01	24,649.059	13	1.08	24,649.059	14	1.01	24,649.059	13	1.08
694904	Thrift	172	NEW YORK COMMUNITY BANK	HICKSVILLE	NY	24,649.059			24,649.059			24,649.059			24,649.059		
1048773	BHC	176	VALLEY NATIONAL BANCORP	NEW YORK	NY	24,059.882	15	0.98	24,059.882	14	1.06	24,059.882	15	0.98	24,059.882	14	1.06
229801	Bank	176	VALLEY NATIONAL BANK	WAYNE	NJ	24,059.882			24,059.882			24,059.882			24,059.882		
3083291	BHC	77	STERLING BANCORP	PEARL RIVER	NY	23,755.113	16	0.97	23,755.113	15	1.04	23,755.113	16	0.97	23,755.113	15	1.04
125471	Bank	77	STERLING NATIONAL BANK	PEARL RIVER	NY	23,755.113			23,755.113			23,755.113			23,755.113		

RSSDID	Type	Branches	Name	City	State	Pre Merger						Post Merger					
						Unweighted			Weighted ***			Unweighted			Weighted ***		
						Deposits**	Rank	%	Deposits	Rank	%	Deposits**	Rank	%	Deposits	Rank	%
3650152	BHC	183	PEOPLE'S UNITED FINANCIAL, INC.	BRIDGEPORT	CT	23,695.127	17	0.97	23,695.127	16	1.04	23,695.127	17	0.97	23,695.127	16	1.04
613307	Bank	183	PEOPLE'S UNITED BANK, NATIONAL ASSOCIATION	BRIDGEPORT	CT	23,695.127			23,695.127			23,695.127			23,695.127		
1239254	BHC	190	BANCO SANTANDER, S.A.	BOADILLA DEL MONTE MADRID		22,796.369	18	0.93	22,796.369	17	1.00	22,796.369	18	0.93	22,796.369	17	1.00
722777	Bank	190	SANTANDER BANK, N.A.	WILMINGTON	DE	22,796.369			22,796.369			22,796.369			22,796.369		
4114567	Bank	12	FIRST REPUBLIC BANK	SAN FRANCISCO	CA	20,147.519	19	0.82	20,147.519	18	0.89	20,147.519	19	0.82	20,147.519	18	0.89
908508	Bank	1	BANK OF CHINA	NEW YORK	NY	18,807.941	20	0.77	18,807.941	19	0.83	18,807.941	20	0.77	18,807.941	19	0.83
2477754	BHC	140	INVESTORS BANCORP, INC.	SHORT HILLS	NJ	17,716.806	21	0.72	17,716.806	20	0.78	17,716.806	21	0.72	17,716.806	20	0.78
35570	Bank	140	INVESTORS BANK	SHORT HILLS	NJ	17,716.806			17,716.806			17,716.806			17,716.806		
1145476	BHC	62	WEBSTER FINANCIAL CORPORATION	WATERBURY	CT	17,386.285	22	0.71	17,386.285	21	0.76	17,386.285	22	0.71	17,386.285	21	0.76
761806	Bank	62	WEBSTER BANK, NATIONAL ASSOCIATION	WATERBURY	CT	17,386.285			17,386.285			17,386.285			17,386.285		
1037003	BHC	173	M&T BANK CORPORATION	BUFFALO	NY	16,625.970	23	0.68	16,625.970	22	0.73	16,625.970	23	0.68	16,625.970	22	0.73
2265456	Bank	7	WILMINGTON TRUST, NATIONAL ASSOCIATION	WILMINGTON	DE	0.000			0.000			0.000			0.000		
501105	Bank	166	MANUFACTURERS AND TRADERS TRUST COMPANY	BUFFALO	NY	16,625.970			16,625.970			16,625.970			16,625.970		
1232497	BHC	6	ROYAL BANK OF CANADA	MONTREAL		13,686.107	24	0.56	13,686.107	23	0.60	13,686.107	24	0.56	13,686.107	23	0.60
63069	Bank	6	CITY NATIONAL BANK	LOS ANGELES	CA	13,686.107			13,686.107			13,686.107			13,686.107		
3446412	BHC	80	APPLE FINANCIAL HOLDINGS, INC.	NEW YORK	NY	13,494.506	25	0.55	13,494.506	24	0.59	13,494.506	25	0.55	13,494.506	24	0.59
249612	Thrift	80	APPLE BANK FOR SAVINGS	NEW YORK	NY	13,494.506			13,494.506			13,494.506			13,494.506		
1416523	BHC	67	DIME COMMUNITY BANCSHARES, INC.	HAUPPAUGE	NY	9,721.017	26	0.40	9,721.017	25	0.43	9,721.017	26	0.40	9,721.017	25	0.43
23504	Bank	67	DIME COMMUNITY BANK	BRIDGEHAMPTON	NY	9,721.017			9,721.017			9,721.017			9,721.017		
4028712	BHC	5	BANKUNITED, INC.	MIAMI LAKES	FL	9,574.855	27	0.39	9,574.855	26	0.42	9,574.855	27	0.39	9,574.855	26	0.42
3938186	Bank	5	BANKUNITED, NATIONAL ASSOCIATION	MIAMI LAKES	FL	9,574.855			9,574.855			9,574.855			9,574.855		
3133637	BHC	99	PROVIDENT FINANCIAL SERVICES, INC.	JERSEY CITY	NJ	9,067.380	28	0.37	9,067.380	27	0.40	9,067.380	28	0.37	9,067.380	27	0.40
204004	Thrift	99	PROVIDENT BANK	JERSEY CITY	NJ	9,067.380			9,067.380			9,067.380			9,067.380		
1240737	BHC	4	ISRAEL DISCOUNT BANK LIMITED	TEL AVIV		7,939.647	29	0.32	7,939.647	28	0.35	7,939.647	29	0.32	7,939.647	28	0.35
320119	Bank	4	ISRAEL DISCOUNT BANK OF NEW YORK	NEW YORK	NY	7,939.647			7,939.647			7,939.647			7,939.647		
95716	Bank	1	STATE BANK OF INDIA	NEW YORK	NY	7,781.170	30	0.32	7,781.170	29	0.34	7,781.170	30	0.32	7,781.170	29	0.34
1068025	BHC	68	KEYCORP	CLEVELAND	OH	7,150.857	31	0.29	7,150.857	30	0.31	7,150.857	31	0.29	7,150.857	30	0.31
280110	Bank	68	KEYBANK NATIONAL ASSOCIATION	CLEVELAND	OH	7,150.857			7,150.857			7,150.857			7,150.857		
1404799	BHC	52	LAKELAND BANCORP, INC.	OAK RIDGE	NJ	6,152.827	32	0.25	6,152.827	31	0.27	6,152.827	32	0.25	6,152.827	31	0.27
687009	Bank	52	LAKELAND BANK	NEWFOUNDLAND	NJ	6,152.827			6,152.827			6,152.827			6,152.827		

RSSDID	Type	Branches	Name	City	State	Pre Merger						Post Merger					
						Unweighted			Weighted ***			Unweighted			Weighted ***		
						Deposits**	Rank	%	Deposits	Rank	%	Deposits**	Rank	%	Deposits	Rank	%
2393274	BHC	26	FLUSHING FINANCIAL CORPORATION	UNIONDALE	NY	6,051.159	33	0.25	6,051.159	32	0.27	6,051.159	33	0.25	6,051.159	32	0.27
959304	Bank	26	FLUSHING BANK	UNIONDALE	NY	6,051.159			6,051.159			6,051.159			6,051.159		
1048764	BHC	28	CONNECTONE BANCORP, INC.	ENGLEWOOD CLIFFS	NJ	5,912.818	35	0.24	5,912.818	33	0.26	5,912.818	35	0.24	5,912.818	33	0.26
3317932	Bank	28	CONNECTONE BANK	ENGLEWOOD CLIFFS	NJ	5,912.818			5,912.818			5,912.818			5,912.818		
909000	Bank	1	BANK OF BARODA	NEW YORK	NY	5,878.183	36	0.24	5,878.183	34	0.26	5,878.183	36	0.24	5,878.183	34	0.26
1129382	BHC	39	POPULAR, INC.	SAN JUAN	PR	5,762.727	37	0.24	5,762.727	35	0.25	5,762.727	37	0.24	5,762.727	35	0.25
2736291	Bank	39	POPULAR BANK	NEW YORK	NY	5,762.727			5,762.727			5,762.727			5,762.727		
2609975	BHC	40	OCEANFIRST FINANCIAL CORP.	TOMS RIVER	NJ	5,387.011	38	0.22	5,387.011	36	0.24	5,387.011	38	0.22	5,387.011	36	0.24
85472	Bank	40	OCEANFIRST BANK, NATIONAL ASSOCIATION	TOMS RIVER	NJ	5,387.011			5,387.011			5,387.011			5,387.011		
3212091	BHC	6	NEW YORK PRIVATE BANK & TRUST CORPORATION	NEW YORK	NY	4,889.244	40	0.20	4,889.244	37	0.22	4,889.244	40	0.20	4,889.244	37	0.22
137915	Thrift	5	EMIGRANT BANK	NEW YORK	NY	4,888.744			4,888.744			4,888.744			4,888.744		
3268173	Bank	1	EMIGRANT MERCANTILE BANK	NEW YORK	NY	0.500			0.500			0.500			0.500		
2651590	BHC	20	PEAPACK-GLADSTONE FINANCIAL CORPORATION	BEDMINSTER	NJ	4,864.088	41	0.20	4,864.088	38	0.21	4,864.088	41	0.20	4,864.088	38	0.21
236706	Bank	20	PEAPACK-GLADSTONE BANK	GLADSTONE	NJ	4,864.088			4,864.088			4,864.088			4,864.088		
2368106	BHC	1	SNBNY HOLDINGS LIMITED	GIBRALTAR		4,710.757	43	0.19	4,710.757	39	0.21	4,710.757	43	0.19	4,710.757	39	0.21
918918	Bank	1	SAFRA NATIONAL BANK OF NEW YORK	NEW YORK	NY	4,710.757			4,710.757			4,710.757			4,710.757		
3185355	BHC	3	MIZUHO FINANCIAL GROUP, INC.	TOKYO		4,224.276	44	0.17	4,224.276	40	0.19	4,224.276	44	0.17	4,224.276	40	0.19
229913	Bank	3	MIZUHO BANK (USA)	NEW YORK	NY	4,224.276			4,224.276			4,224.276			4,224.276		
4400336	BHC	4	WORKERS UNITED	PHILADELPHIA	PA	3,809.790	47	0.16	3,809.790	42	0.17	3,809.790	46	0.16	3,809.790	41	0.17
661308	Bank	4	AMALGAMATED BANK	NEW YORK	NY	3,809.790			3,809.790			3,809.790			3,809.790		
790105	Bank	1	BANK HAPOALIM B.M.	NEW YORK	NY	3,670.443	48	0.15	3,670.443	43	0.16	3,670.443	47	0.15	3,670.443	42	0.16
2820211	BHC	8	METROPOLITAN BANK HOLDING CORP	NEW YORK	NY	3,417.073	49	0.14	3,417.073	44	0.15	3,417.073	48	0.14	3,417.073	43	0.15
2705895	Bank	8	METROPOLITAN COMMERCIAL BANK	NEW YORK	NY	3,417.073			3,417.073			3,417.073			3,417.073		
1048894	BHC	46	FIRST OF LONG ISLAND CORPORATION, THE	GLEN HEAD	NY	3,324.853	50	0.14	3,324.853	45	0.15	3,324.853	49	0.14	3,324.853	44	0.15
837000	Bank	46	FIRST NATIONAL BANK OF LONG ISLAND, THE	GLEN HEAD	NY	3,324.853			3,324.853			3,324.853			3,324.853		
1232536	BHC	1	BANK LEUMI LE-ISRAEL B.M.	TEL AVIV		3,193.382	51	0.13	3,193.382	46	0.14	3,193.382	50	0.13	3,193.382	45	0.14
101019	Bank	1	BANK LEUMI USA	NEW YORK	NY	3,193.382			3,193.382			3,193.382			3,193.382		
4389329	BHC	1	CRB GROUP, INC.	FORT LEE	NJ	3,039.281	52	0.12	3,039.281	47	0.13	3,039.281	51	0.12	3,039.281	46	0.13
3783313	Bank	1	CROSS RIVER BANK	TEANECK	NJ	3,039.281			3,039.281			3,039.281			3,039.281		
2571120	SLHC	54	COLUMBIA BANK MHC	FAIR LAWN	NJ	5,987.736	34	0.24	2,993.868	48	0.13	5,987.736	34	0.24	2,993.868	47	0.13

RSSDID	Type	Branches	Name	City	State	Pre Merger						Post Merger					
						Unweighted			Weighted ***			Unweighted			Weighted ***		
						Deposits**	Rank	%	Deposits	Rank	%	Deposits**	Rank	%	Deposits	Rank	%
174572	Thrift	54	COLUMBIA BANK	FAIR LAWN	NJ	5,987.736			2,993.868			5,987.736			2,993.868		
1246159	BHC	2	BESSEMER GROUP, INCORPORATED, THE	WOODBIDGE	NJ	2,694.447	53	0.11	2,694.447	49	0.12	2,694.447	52	0.11	2,694.447	48	0.12
7009	Bank	1	BESSEMER TRUST COMPANY	WOODBIDGE	NJ	866.628			866.628			866.628			866.628		
976703	Bank	1	BESSEMER TRUST COMPANY, NATIONAL ASSOCIATION	NEW YORK	NY	1,827.819			1,827.819			1,827.819			1,827.819		
1751420	Bank	1	BANK OF EAST ASIA LTD., THE	NEW YORK	NY	2,661.473	54	0.11	2,661.473	50	0.12	2,661.473	53	0.11	2,661.473	49	0.12
3099443	SLHC	52	KEARNY FINANCIAL CORP.	FAIRFIELD	NJ	4,935.063	39	0.20	2,467.532	51	0.11	4,935.063	39	0.20	2,467.532	50	0.11
633378	Thrift	52	KEARNY BANK	FAIRFIELD	NJ	4,935.063			2,467.532			4,935.063			2,467.532		
3170539	BHC	30	BCB BANCORP, INC.	BAYONNE	NJ	2,445.364	55	0.10	2,445.364	52	0.11	2,445.364	54	0.10	2,445.364	51	0.11
2954059	Bank	30	BCB COMMUNITY BANK	BAYONNE	NJ	2,445.364			2,445.364			2,445.364			2,445.364		
859712	Thrift	40	RIDGEWOOD SAVINGS BANK	RIDGEWOOD	NY	4,828.643	42	0.20	2,414.322	53	0.11	4,828.643	42	0.20	2,414.322	52	0.11
4284536	BHC	2	CUSTOMERS BANCORP, INC	WYOMISSING	PA	2,307.006	57	0.09	2,307.006	54	0.10	2,307.006	56	0.09	2,307.006	53	0.10
2354985	Bank	2	CUSTOMERS BANK	PHOENIXVILLE	PA	2,307.006			2,307.006			2,307.006			2,307.006		
727709	Bank	1	BANK OF INDIA	NEW YORK	NY	2,175.753	58	0.09	2,175.753	55	0.10	2,175.753	57	0.09	2,175.753	54	0.10
2611718	BHC	24	AMBOY BANCORPORATION	OLD BRIDGE	NJ	2,079.600	59	0.08	2,079.600	56	0.09	2,079.600	58	0.08	2,079.600	55	0.09
9807	Bank	24	AMBOY BANK	OLD BRIDGE	NJ	2,079.600			2,079.600			2,079.600			2,079.600		
3132863	SLHC	37	NORTHFIELD BANCORP, INC.	WOODBIDGE	NJ	3,931.339	46	0.16	1,965.670	57	0.09	3,931.339	45	0.16	1,965.670	56	0.09
28013	Thrift	37	NORTHFIELD BANK	STATEN ISLAND	NY	3,931.339			1,965.670			3,931.339			1,965.670		
1117129	BHC	25	FULTON FINANCIAL CORPORATION	LANCASTER	PA	1,948.452	60	0.08	1,948.452	58	0.09	1,948.452	59	0.08	1,948.452	57	0.09
474919	Bank	25	FULTON BANK, NATIONAL ASSOCIATION	LANCASTER	PA	1,948.452			1,948.452			1,948.452			1,948.452		
5301421	BHC	23	USB BANCORP, INC.	DANBURY	CT	1,926.278	61	0.08	1,926.278	59	0.08	1,926.278	60	0.08	1,926.278	58	0.08
443205	Thrift	23	UNION SAVINGS BANK	DANBURY	CT	1,926.278			1,926.278			1,926.278			1,926.278		
1843080	BHC	11	CATHAY GENERAL BANCORP	LOS ANGELES	CA	1,807.167	62	0.07	1,807.167	60	0.08	1,807.167	61	0.07	1,807.167	59	0.08
595869	Bank	11	CATHAY BANK	LOS ANGELES	CA	1,807.167			1,807.167			1,807.167			1,807.167		
2961879	BHC	10	HOPE BANCORP, INC.	LOS ANGELES	CA	1,797.574	63	0.07	1,797.574	61	0.08	1,797.574	62	0.07	1,797.574	60	0.08
671464	Bank	10	BANK OF HOPE	LOS ANGELES	CA	1,797.574			1,797.574			1,797.574			1,797.574		
2589714	BHC	16	MB MUTUAL HOLDING COMPANY	WALL TOWNSHIP	NJ	1,726.000	64	0.07	1,726.000	62	0.08	1,726.000	63	0.07	1,726.000	61	0.08
459671	Thrift	16	MANASQUAN BANK	MANASQUAN	NJ	1,726.000			1,726.000			1,726.000			1,726.000		
3553815	BHC	13	BANKWELL FINANCIAL GROUP, INC.	NEW CANAAN	CT	1,626.994	65	0.07	1,626.994	63	0.07	1,626.994	64	0.07	1,626.994	62	0.07
3109043	Bank	13	BANKWELL BANK	NEW CANAAN	CT	1,626.994			1,626.994			1,626.994			1,626.994		
3596009	BHC	13	ORANGE COUNTY BANCORP, INC.	MIDDLETOWN	NY	1,438.199	67	0.06	1,438.199	64	0.06	1,438.199	66	0.06	1,438.199	63	0.06
176101	Bank	13	ORANGE BANK & TRUST COMPANY	MIDDLETOWN	NY	1,438.199			1,438.199			1,438.199			1,438.199		

RSSDID	Type	Branches	Name	City	State	Pre Merger						Post Merger					
						Unweighted			Weighted ***			Unweighted			Weighted ***		
						Deposits**	Rank	%	Deposits	Rank	%	Deposits**	Rank	%	Deposits	Rank	%
5079476	BHC	16	PCSB FINANCIAL CORPORATION	YORKTOWN HEIGHTS	NY	1,425.939	68	0.06	1,425.939	65	0.06	1,425.939	67	0.06	1,425.939	64	0.06
24006	Thrift	16	PCSB BANK	BREWSTER	NY	1,425.939			1,425.939			1,425.939			1,425.939		
2784920	BHC	25	1ST CONSTITUTION BANCORP	CRANBURY	NJ	1,384.275	71	0.06	1,384.275	66	0.06	1,384.275	70	0.06	1,384.275	65	0.06
1412619	Bank	25	1ST CONSTITUTION BANK	CRANBURY	NJ	1,384.275			1,384.275			1,384.275			1,384.275		
2181426	BHC	16	UNITY BANCORP, INC.	CLINTON	NJ	1,383.432	72	0.06	1,383.432	67	0.06	1,383.432	71	0.06	1,383.432	66	0.06
1890525	Bank	16	UNITY BANK	CLINTON	NJ	1,383.432			1,383.432			1,383.432			1,383.432		
2835514	BHC	16	BLUE FOUNDRY, MHC	RUTHERFORD	NJ	1,355.887	73	0.06	1,355.887	68	0.06	1,355.887	72	0.06	1,355.887	67	0.06
797775	Thrift	16	BLUE FOUNDRY BANK	RUTHERFORD	NJ	1,355.887			1,355.887			1,355.887			1,355.887		
2367921	BHC	14	TOMPKINS FINANCIAL CORPORATION	ITHACA	NY	1,305.545	76	0.05	1,305.545	69	0.06	1,305.545	75	0.05	1,305.545	68	0.06
521804	Bank	14	MAHOPAC BANK	BREWSTER	NY	1,305.545			1,305.545			1,305.545			1,305.545		
5045444	BHC	18	NSB MUTUAL HOLDING COMPANY	NEWTOWN	CT	1,185.355	77	0.05	1,185.355	70	0.05	1,185.355	76	0.05	1,185.355	69	0.05
507509	Thrift	18	NEWTOWN SAVINGS BANK	NEWTOWN	CT	1,185.355			1,185.355			1,185.355			1,185.355		
845573	Thrift	21	SPENCER SAVINGS BANK, SLA	ELMWOOD PARK	NJ	2,341.581	56	0.10	1,170.790	71	0.05	2,341.581	55	0.10	1,170.790	70	0.05
2734233	BHC	7	EAST WEST BANCORP, INC.	PASADENA	CA	1,161.395	78	0.05	1,161.395	72	0.05	1,161.395	77	0.05	1,161.395	71	0.05
197478	Bank	7	EAST WEST BANK	PASADENA	CA	1,161.395			1,161.395			1,161.395			1,161.395		
4224297	BHC	1	SUMITOMO MITSUI TRUST HOLDINGS, INC.	TOKYO		1,154.968	79	0.05	1,154.968	73	0.05	1,154.968	78	0.05	1,154.968	72	0.05
925411	Bank	1	SUMITOMO MITSUI TRUST BANK (U.S.A.) LIMITED	HOBOKEN	NJ	1,154.968			1,154.968			1,154.968			1,154.968		
5309306	BHC	9	WOORI FINANCIAL GROUP, INC.	SEOUL		1,100.519	80	0.04	1,100.519	74	0.05	1,100.519	79	0.04	1,100.519	73	0.05
384018	Bank	9	WOORI AMERICA BANK	NEW YORK	NY	1,100.519			1,100.519			1,100.519			1,100.519		
3633173	Bank	12	ALMA BANK	ASTORIA	NY	1,097.411	81	0.04	1,097.411	75	0.05	1,097.411	80	0.04	1,097.411	74	0.05
538802	Bank	1	INTERAUDI BANK	NEW YORK	NY	1,065.406	82	0.04	1,065.406	76	0.05	1,065.406	81	0.04	1,065.406	75	0.05
2693273	BHC	11	SALISBURY BANCORP, INC.	LAKEVILLE	CT	997.507	85	0.04	997.507	77	0.04	997.507	84	0.04	997.507	76	0.04
821906	Bank	11	SALISBURY BANK AND TRUST COMPANY	LAKEVILLE	CT	997.507			997.507			997.507			997.507		
3401970	Bank	8	FIRST BANK	HAMILTON	NJ	976.805	87	0.04	976.805	78	0.04	976.805	86	0.04	976.805	77	0.04
3716339	BHC	8	WESTCHESTER BANK HOLDING CORPORATION, THE	WHITE PLAINS	NY	960.355	88	0.04	960.355	79	0.04	960.355	87	0.04	960.355	78	0.04
3716320	Bank	8	WESTCHESTER BANK, THE	WHITE PLAINS	NY	960.355			960.355			960.355			960.355		
1231968	BHC	1	BNP PARIBAS	PARIS		960.354	89	0.04	960.354	80	0.04	960.354	88	0.04	960.354	79	0.04
804963	Bank	1	BANK OF THE WEST	SAN FRANCISCO	CA	960.354			960.354			960.354			960.354		
3271230	BHC	14	RHINEBECK BANCORP, MHC	POUGHKEEPSIE	NY	933.337	91	0.04	933.337	81	0.04	933.337	90	0.04	933.337	80	0.04
195111	Thrift	14	RHINEBECK BANK	RHINEBECK	NY	933.337			933.337			933.337			933.337		

RSSDID	Type	Branches	Name	City	State	Pre Merger						Post Merger					
						Unweighted			Weighted ***			Unweighted			Weighted ***		
						Deposits**	Rank	%	Deposits	Rank	%	Deposits**	Rank	%	Deposits	Rank	%
2961897	BHC	1	MITSUBISHI UFJ FINANCIAL GROUP, INC.	TOKYO		890.222	92	0.04	890.222	82	0.04	890.222	91	0.04	890.222	81	0.04
212465	Bank	1	MUFG UNION BANK, NATIONAL ASSOCIATION	SAN FRANCISCO	CA	890.222			890.222			890.222			890.222		
4097978	BHC	4	CHINA INVESTMENT CORPORATION	BEIJING		880.037	93	0.04	880.037	83	0.04	880.037	92	0.04	880.037	82	0.04
1015560	Bank	4	INDUSTRIAL AND COMMERCIAL BANK OF CHINA (USA), NATIONAL ASSOCIATION	NEW YORK	NY	880.037			880.037			880.037			880.037		
3404373	Bank	9	FIRST COMMERCE BANK	LAKEWOOD	NJ	870.988	94	0.04	870.988	84	0.04	870.988	93	0.04	870.988	83	0.04
3595271	Bank	12	BANK OF PRINCETON, THE	PRINCETON	NJ	809.043	97	0.03	809.043	85	0.04	809.043	96	0.03	809.043	84	0.04
5097340	BHC	2	FIELDPOINT PRIVATE HOLDINGS, INC.	GREENWICH	CT	805.425	98	0.03	805.425	86	0.04	805.425	97	0.03	805.425	85	0.04
3664588	Thrift	2	FIELDPOINT PRIVATE BANK & TRUST	GREENWICH	CT	805.425			805.425			805.425			805.425		
3948439	BHC	9	HAVEN BANCORP, MHC	HOBOKEN	NJ	802.019	99	0.03	802.019	87	0.04	802.019	98	0.03	802.019	86	0.04
918477	Thrift	9	HAVEN SAVINGS BANK	HOBOKEN	NJ	802.019			802.019			802.019			802.019		
3854268	BHC	8	ESSA BANCORP, INC.	STROUDSBURG	PA	800.989	100	0.03	800.989	88	0.04	800.989	99	0.03	800.989	87	0.04
952677	Thrift	8	ESSA BANK & TRUST	STROUDSBURG	PA	800.989			800.989			800.989			800.989		
4132084	BHC	9	PNBK HOLDINGS LLC	STAMFORD	CT	787.407	101	0.03	787.407	89	0.03	787.407	100	0.03	787.407	88	0.03
2236821	Bank	9	PATRIOT BANK, NATIONAL ASSOCIATION	STAMFORD	CT	787.407			787.407			787.407			787.407		
373601	Thrift	4	UNION COUNTY SAVINGS BANK	ELIZABETH	NJ	1,528.137	66	0.06	764.068	90	0.03	1,528.137	65	0.06	764.068	89	0.03
2817930	BHC	5	MAHAM BETEILIGUNGSGESELLSCHAFT AG	ZURICH		733.073	102	0.03	733.073	91	0.03	733.073	101	0.03	733.073	90	0.03
245016	Bank	5	HABIB AMERICAN BANK	NEW YORK	NY	733.073			733.073			733.073			733.073		
4267427	BHC	2	ESQUIRE FINANCIAL HOLDINGS, INC.	JERICHO	NY	727.489	103	0.03	727.489	92	0.03	727.489	102	0.03	727.489	91	0.03
3447820	Bank	2	ESQUIRE BANK, NATIONAL ASSOCIATION	JERICHO	NY	727.489			727.489			727.489			727.489		
958204	Thrift	17	FIRST COUNTY BANK	STAMFORD	CT	1,418.057	69	0.06	709.028	93	0.03	1,418.057	68	0.06	709.028	92	0.03
3824373	SLHC	16	FAIRFIELD COUNTY BANK, MHC	RIDGEFIELD	CT	1,394.673	70	0.06	697.336	94	0.03	1,394.673	69	0.06	697.336	93	0.03
882701	Thrift	16	FAIRFIELD COUNTY BANK	RIDGEFIELD	CT	1,394.673			697.336			1,394.673			697.336		
29878	Thrift	6	MASPETH FEDERAL SAVINGS AND LOAN ASSOCIATION	MASPETH	NY	1,327.117	74	0.05	663.558	95	0.03	1,327.117	73	0.05	663.558	94	0.03
3912766	SLHC	19	ION FINANCIAL, MHC	NAUGATUCK	CT	1,321.095	75	0.05	660.548	96	0.03	1,321.095	74	0.05	660.548	95	0.03
407506	Thrift	19	ION BANK	NAUGATUCK	CT	1,321.095			660.548			1,321.095			660.548		
5010134	BHC	7	HANOVER BANCORP, INC.	MINEOLA	NY	659.975	104	0.03	659.975	97	0.03	659.975	103	0.03	659.975	96	0.03
3793714	Bank	7	HANOVER COMMUNITY BANK	GARDEN CITY PARK	NY	659.975			659.975			659.975			659.975		
3382855	BHC	7	MAGYAR BANCORP, MHC	NEW BRUNSWICK	NJ	627.767	105	0.03	627.767	98	0.03	627.767	104	0.03	627.767	97	0.03
548771	Thrift	7	MAGYAR BANK	NEW BRUNSWICK	NJ	627.767			627.767			627.767			627.767		

RSSDID	Type	Branches	Name	City	State	Pre Merger						Post Merger					
						Unweighted			Weighted ***			Unweighted			Weighted ***		
						Deposits**	Rank	%	Deposits	Rank	%	Deposits**	Rank	%	Deposits	Rank	%
4176855	BHC	7	RBB BANCORP	LOS ANGELES	CA	612.179	108	0.02	612.179	99	0.03	612.179	107	0.02	612.179	98	0.03
3835454	Bank	7	ROYAL BUSINESS BANK	LOS ANGELES	CA	612.179			612.179			612.179			612.179		
2728157	BHC	12	BERKSHIRE BANCORP INC.	NEW YORK	NY	606.475	109	0.02	606.475	100	0.03	606.475	108	0.02	606.475	99	0.03
1396764	Bank	12	BERKSHIRE BANK, THE	NEW YORK	NY	606.475			606.475			606.475			606.475		
5423547	BHC	7	BOGOTA FINANCIAL, MHC	TEANECK	NJ	598.864	110	0.02	598.864	101	0.03	598.864	109	0.02	598.864	100	0.03
927479	Thrift	4	BOGOTA SAVINGS BANK	TEANECK	NJ	516.514			516.514			516.514			516.514		
670775	Thrift	3	GIBRALTAR BANK	PARSIPPANY	NJ	82.350			82.350			82.350			82.350		
3720000	BHC	1	MODERN BANK MANAGEMENT LLC	NEW YORK	NY	584.711	111	0.02	584.711	102	0.03	584.711	110	0.02	584.711	101	0.03
2398701	Bank	1	MODERN BANK, NATIONAL ASSOCIATION	NEW YORK	NY	584.711			584.711			584.711			584.711		
3268249	Bank	1	GREENE COUNTY COMMERCIAL BANK	CATSKILL	NY	579.269	112	0.02	579.269	103	0.03	579.269	111	0.02	579.269	102	0.03
2333663	BHC	7	BERKSHIRE HILLS BANCORP, INC	BOSTON	MA	556.452	115	0.02	556.452	104	0.02	556.452	114	0.02	556.452	103	0.02
473501	Bank	7	BERKSHIRE BANK	PITTSFIELD	MA	556.452			556.452			556.452			556.452		
3609132	BHC	6	FIRST HOPE BANCORP	HOPE	NJ	538.165	117	0.02	538.165	105	0.02	538.165	116	0.02	538.165	104	0.02
434203	Bank	6	FIRST HOPE BANK, A NATIONAL BANKING ASSOCIATION	HOPE	NJ	538.165			538.165			538.165			538.165		
3080209	BHC	3	CTBC FINANCIAL HOLDING CO., LTD.	TAIPEI		534.187	118	0.02	534.187	106	0.02	534.187	117	0.02	534.187	105	0.02
996260	Bank	3	CTBC BANK CORP. (USA)	LOS ANGELES	CA	534.187			534.187			534.187			534.187		
1199611	BHC	2	NORTHERN TRUST CORPORATION	CHICAGO	IL	533.655	119	0.02	533.655	107	0.02	533.655	118	0.02	533.655	106	0.02
210434	Bank	2	NORTHERN TRUST COMPANY, THE	CHICAGO	IL	533.655			533.655			533.655			533.655		
125707	Bank	1	BANK OF CHINA	FLUSHING	NY	524.094	120	0.02	524.094	108	0.02	524.094	119	0.02	524.094	107	0.02
3107964	BHC	8	SHINHAN FINANCIAL GROUP CO., LTD.	SEOUL		520.977	121	0.02	520.977	109	0.02	520.977	120	0.02	520.977	108	0.02
1494914	Bank	8	SHINHAN BANK AMERICA	NEW YORK	NY	520.977			520.977			520.977			520.977		
2728595	SLHC	9	GREENE COUNTY BANCORP, MHC	CATSKILL	NY	1,037.473	83	0.04	518.736	110	0.02	1,037.473	82	0.04	518.736	109	0.02
214106	Thrift	9	BANK OF GREENE COUNTY, THE	CATSKILL	NY	1,037.473			518.736			1,037.473			518.736		
1048504	BHC	12	JEFFERSONVILLE BANCORP	JEFFERSONVILLE	NY	511.112	122	0.02	511.112	111	0.02	511.112	121	0.02	511.112	110	0.02
306908	Bank	12	JEFF BANK	JEFFERSONVILLE	NY	511.112			511.112			511.112			511.112		
626101	Thrift	15	SAVINGS BANK OF DANBURY	DANBURY	CT	1,009.136	84	0.04	504.568	112	0.02	1,009.136	83	0.04	504.568	111	0.02
2460569	BHC	11	NVE BANCORP, MHC	ENGLEWOOD	NJ	503.685	123	0.02	503.685	113	0.02	503.685	122	0.02	503.685	112	0.02
1012671	Thrift	11	NVE BANK	ENGLEWOOD	NJ	503.685			503.685			503.685			503.685		
301800	Thrift	14	ULSTER SAVINGS BANK	KINGSTON	NY	978.527	86	0.04	489.264	114	0.02	978.527	85	0.04	489.264	113	0.02
5115468	SLHC	14	PONCE BANK MUTUAL HOLDING COMPANY	BRONX	NY	952.049	90	0.04	476.024	115	0.02	952.049	89	0.04	476.024	114	0.02
897170	Thrift	14	PONCE BANK	BRONX	NY	952.049			476.024			952.049			476.024		

RSSDID	Type	Branches	Name	City	State	Pre Merger						Post Merger					
						Unweighted			Weighted ***			Unweighted			Weighted ***		
						Deposits**	Rank	%	Deposits	Rank	%	Deposits**	Rank	%	Deposits	Rank	%
2702232	BHC	4	RSI BANCORP, MHC	RAHWAY	NJ	474.682	125	0.02	474.682	116	0.02	474.682	124	0.02	474.682	115	0.02
148809	Thrift	4	RSI BANK	RAHWAY	NJ	474.682			474.682			474.682			474.682		
5014794	BHC	11	REGAL BANCORP INC.	LIVINGSTON	NJ	462.790	126	0.02	462.790	117	0.02	462.790	125	0.02	462.790	116	0.02
3650563	Bank	11	REGAL BANK	LIVINGSTON	NJ	462.790			462.790			462.790			462.790		
3443998	BHC	10	CATSKILL HUDSON BANCORP, INC.	KINGSTON	NY	451.884	127	0.02	451.884	118	0.02	451.884	126	0.02	451.884	117	0.02
2132594	Bank	10	CATSKILL HUDSON BANK	MONTICELLO	NY	451.884			451.884			451.884			451.884		
1169650	Bank	2	AMERASIA BANK	FLUSHING	NY	449.370	128	0.02	449.370	119	0.02	449.370	127	0.02	449.370	118	0.02
587800	Thrift	13	LIBERTY BANK	MIDDLETOWN	CT	854.260	95	0.03	427.130	120	0.02	854.260	94	0.03	427.130	119	0.02
2365356	BHC	12	NORWOOD FINANCIAL CORP.	HONESDALE	PA	420.795	130	0.02	420.795	121	0.02	420.795	129	0.02	420.795	120	0.02
59316	Bank	12	WAYNE BANK	HONESDALE	PA	420.795			420.795			420.795			420.795		
3472859	Bank	6	NEWBANK	FLUSHING	NY	419.342	131	0.02	419.342	122	0.02	419.342	130	0.02	419.342	121	0.02
5010844	BHC	5	FREEDOM BANCORP, INC.	MAYWOOD	NJ	416.964	133	0.02	416.964	123	0.02	416.964	132	0.02	416.964	122	0.02
3729124	Bank	5	FREEDOM BANK	MAYWOOD	NJ	416.964			416.964			416.964			416.964		
120609	Thrift	10	THOMASTON SAVINGS BANK	THOMASTON	CT	810.296	96	0.03	405.148	124	0.02	810.296	95	0.03	405.148	123	0.02
3439610	BHC	5	ES BANCSHARES, INC	NEWBURGH	NY	374.498	136	0.02	374.498	125	0.02	374.498	135	0.02	374.498	124	0.02
3277241	Bank	5	EMPIRE STATE BANK	NEWBURGH	NY	374.498			374.498			374.498			374.498		
2686211	Bank	13	CROWN BANK	ELIZABETH	NJ	373.784	137	0.02	373.784	126	0.02	373.784	136	0.02	373.784	125	0.02
5011832	BHC	7	NMB FINANCIAL CORPORATION	FORT LEE	NJ	372.493	138	0.02	372.493	127	0.02	372.493	137	0.02	372.493	126	0.02
2833882	Bank	7	NEW MILLENNIUM BANK	FORT LEE	NJ	372.493			372.493			372.493			372.493		
3227947	BHC	6	MARINER'S BANCORP	EDGEWATER	NJ	367.006	139	0.01	367.006	128	0.02	367.006	138	0.01	367.006	127	0.02
3010000	Bank	6	MARINERS BANK	EDGEWATER	NJ	367.006			367.006			367.006			367.006		
4894588	BHC	3	FIRST GREENWICH FINANCIAL, INC.	COS COB	CT	357.344	140	0.01	357.344	129	0.02	357.344	139	0.01	357.344	128	0.02
3466988	Bank	3	FIRST BANK OF GREENWICH, THE	COS COB	CT	357.344			357.344			357.344			357.344		
2065432	BHC	5	DIMECO, INC	HONESDALE	PA	353.119	141	0.01	353.119	130	0.02	353.119	140	0.01	353.119	129	0.02
56717	Bank	5	DIME BANK, THE	HONESDALE	PA	353.119			353.119			353.119			353.119		
3685396	Bank	1	SAVOY BANK	NEW YORK	NY	347.988	142	0.01	347.988	131	0.02	347.988	141	0.01	347.988	130	0.02
1918344	Bank	1	PREFERRED BANK	LOS ANGELES	CA	347.428	143	0.01	347.428	132	0.02	347.428	142	0.01	347.428	131	0.02
2863946	BHC	8	ASSOCIATED COMMUNITY BANCORP, INC.	GREENWICH	CT	337.094	144	0.01	337.094	133	0.01	337.094	143	0.01	337.094	132	0.01
2756909	Bank	8	CONNECTICUT COMMUNITY BANK, NATIONAL ASSOCIATION	WESTPORT	CT	337.094			337.094			337.094			337.094		
1094640	BHC	1	FIRST HORIZON CORPORATION	MEMPHIS	TN	319.374	146	0.01	319.374	134	0.01	319.374	145	0.01	319.374	133	0.01
485559	Bank	1	FIRST HORIZON BANK	MEMPHIS	TN	319.374			319.374			319.374			319.374		
3958821	BHC	2	ALCAR INC.	NEW YORK	NY	317.076	147	0.01	317.076	135	0.01	317.076	146	0.01	317.076	134	0.01
3428258	Bank	2	DR BANK	DARIEN	CT	317.076			317.076			317.076			317.076		
341310	Thrift	11	WALDEN SAVINGS BANK	MONTGOMERY	NY	625.066	106	0.03	312.533	136	0.01	625.066	105	0.03	312.533	135	0.01

RSSDID	Type	Branches	Name	City	State	Pre Merger						Post Merger					
						Unweighted			Weighted ***			Unweighted			Weighted ***		
						Deposits**	Rank	%	Deposits	Rank	%	Deposits**	Rank	%	Deposits	Rank	%
3793143	SLHC	7	NORTHEAST COMMUNITY BANCORP, MHC	WHITE PLAINS	NY	613.641	107	0.03	306.820	137	0.01	613.641	106	0.03	306.820	136	0.01
823478	Thrift	7	NORTHEAST COMMUNITY BANK	WHITE PLAINS	NY	613.641			306.820			613.641			306.820		
2797359	Thrift	9	FIRST CENTRAL SAVINGS BANK	GLEN COVE	NY	577.195	113	0.02	288.598	138	0.01	577.195	112	0.02	288.598	137	0.01
1048513	SLHC	27	TRUSTCO BANK CORP NY	GLENVILLE	NY	563.571	114	0.02	281.786	139	0.01	563.571	113	0.02	281.786	138	0.01
677176	Thrift	27	TRUSTCO BANK	GLENVILLE	NY	563.571			281.786			563.571			281.786		
107244	Bank	2	BANK OZK	LITTLE ROCK	AR	280.403	151	0.01	280.403	140	0.01	280.403	150	0.01	280.403	139	0.01
1117213	BHC	5	PALM BANCORP	PALMERTON	PA	272.804	152	0.01	272.804	141	0.01	272.804	151	0.01	272.804	140	0.01
186717	Bank	5	FIRST NORTHERN BANK AND TRUST COMPANY	PALMERTON	PA	272.804			272.804			272.804			272.804		
2531245	SLHC	7	CARVER BANCORP, INC.	NEW YORK	NY	545.460	116	0.02	272.730	142	0.01	545.460	115	0.02	272.730	141	0.01
268677	Thrift	7	CARVER FEDERAL SAVINGS BANK	NEW YORK	NY	545.460			272.730			545.460			272.730		
3388165	Bank	5	NOAH BANK	ELKINS PARK	PA	244.701	153	0.01	244.701	143	0.01	244.701	152	0.01	244.701	142	0.01
159971	Thrift	7	SOMERSET SAVINGS BANK, SLA	BOUND BROOK	NJ	485.192	124	0.02	242.596	144	0.01	485.192	123	0.02	242.596	143	0.01
2937100	BHC	4	CONNECTICUT MUTUAL HOLDING COMPANY	WINSTED	CT	225.784	154	0.01	225.784	145	0.01	225.784	153	0.01	225.784	144	0.01
545604	Thrift	4	NORTHWEST COMMUNITY BANK	WINSTED	CT	225.784			225.784			225.784			225.784		
3368916	BHC	2	CHECKSPRING COMMUNITY CORPORATION	BRONX	NY	222.311	155	0.01	222.311	146	0.01	222.311	154	0.01	222.311	145	0.01
3368925	Bank	2	SPRING BANK	BRONX	NY	222.311			222.311			222.311			222.311		
1136344	BHC	6	BRUNSWICK BANCORP	NEW BRUNSWICK	NJ	218.949	156	0.01	218.949	147	0.01	218.949	155	0.01	218.949	146	0.01
463203	Bank	6	BRUNSWICK BANK AND TRUST COMPANY	NEW BRUNSWICK	NJ	218.949			218.949			218.949			218.949		
2646998	BHC	4	MILLBROOK BANK SYSTEM, INC.	MILLBROOK	NY	218.467	157	0.01	218.467	148	0.01	218.467	156	0.01	218.467	147	0.01
175609	Bank	4	BANK OF MILLBROOK	MILLBROOK	NY	218.467			218.467			218.467			218.467		
1139279	BHC	6	NBT BANCORP INC.	NORWICH	NY	214.250	158	0.01	214.250	149	0.01	214.250	157	0.01	214.250	148	0.01
702117	Bank	6	NBT BANK, NATIONAL ASSOCIATION	NORWICH	NY	214.250			214.250			214.250			214.250		
1007873	Thrift	6	CROSS COUNTY SAVINGS BANK	MIDDLE VILLAGE	NY	422.035	129	0.02	211.018	150	0.01	422.035	128	0.02	211.018	149	0.01
4098537	SLHC	3	QUONTIC BANK ACQUISITION CORP.	NEW YORK	NY	417.024	132	0.02	208.512	151	0.01	417.024	131	0.02	208.512	150	0.01
3340725	Thrift	3	QUONTIC BANK	NEW YORK	NY	417.024			208.512			417.024			208.512		
258306	Thrift	7	MILFORD BANK, THE	MILFORD	CT	412.886	134	0.02	206.443	152	0.01	412.886	133	0.02	206.443	151	0.01
4111584	BHC	5	AMERICAN COMMUNITY BANCORP, INC.	GLEN COVE	NY	204.140	162	0.01	204.140	153	0.01	204.140	161	0.01	204.140	152	0.01
2871558	Bank	5	AMERICAN COMMUNITY BANK	GLEN COVE	NY	204.140			204.140			204.140			204.140		
3805279	BHC	1	MALVERN BANCORP, INC.	PAOLI	PA	199.090	163	0.01	199.090	154	0.01	199.090	162	0.01	199.090	153	0.01

RSSDID	Type	Branches	Name	City	State	Pre Merger						Post Merger					
						Unweighted			Weighted ***			Unweighted			Weighted ***		
						Deposits**	Rank	%	Deposits	Rank	%	Deposits**	Rank	%	Deposits	Rank	%
676478	Bank	1	MALVERN BANK, NATIONAL ASSOCIATION	PAOLI	PA	199.090			199.090			199.090			199.090		
2889227	Bank	1	ALPINE CAPITAL BANK	NEW YORK	NY	199.009	164	0.01	199.009	155	0.01	199.009	163	0.01	199.009	154	0.01
425108	Thrift	5	RONDOUT SAVINGS BANK	KINGSTON	NY	377.099	135	0.02	188.550	156	0.01	377.099	134	0.02	188.550	155	0.01
3400937	BHC	3	HANA FINANCIAL GROUP INC.	SEOUL		188.020	166	0.01	188.020	157	0.01	188.020	165	0.01	188.020	156	0.01
609609	Bank	3	KEB HANA BANK USA, NATIONAL ASSOCIATION	FORT LEE	NJ	188.020			188.020			188.020			188.020		
3888414	BHC	2	FREEHOLD MHC	FREEHOLD	NJ	184.123	167	0.01	184.123	158	0.01	184.123	166	0.01	184.123	157	0.01
588478	Thrift	2	FREEHOLD BANK	FREEHOLD	NJ	184.123			184.123			184.123			184.123		
2916534	Thrift	1	M.Y. SAFRA BANK, FSB	NEW YORK	NY	334.320	145	0.01	167.160	159	0.01	334.320	144	0.01	167.160	158	0.01
1118265	BHC	3	FIRST KEYSTONE CORPORATION	BERWICK	PA	166.398	168	0.01	166.398	160	0.01	166.398	167	0.01	166.398	159	0.01
790918	Bank	3	FIRST KEYSTONE COMMUNITY BANK	BERWICK	PA	166.398			166.398			166.398			166.398		
502111	Bank	1	NATIONAL BANK OF NEW YORK CITY	FLUSHING	NY	158.165	169	0.01	158.165	161	0.01	158.165	168	0.01	158.165	160	0.01
3561771	Bank	1	GLOBAL BANK	NEW YORK	NY	154.279	170	0.01	154.279	162	0.01	154.279	169	0.01	154.279	161	0.01
1135468	BHC	1	DELTA INVESTMENT COMPANY (CAYMAN)	GEORGE TOWN		152.842	171	0.01	152.842	163	0.01	152.842	170	0.01	152.842	162	0.01
65513	Bank	1	DELTA NATIONAL BANK AND TRUST COMPANY	NEW YORK	NY	152.842			152.842			152.842			152.842		
5419205	BHC	1	IFB BANCORP, INC.	MIAMI	FL	149.764	172	0.01	149.764	164	0.01	149.764	171	0.01	149.764	163	0.01
867632	Bank	1	INTERNATIONAL FINANCE BANK	MIAMI	FL	149.764			149.764			149.764			149.764		
762773	Thrift	5	ABACUS FEDERAL SAVINGS BANK	NEW YORK	NY	295.125	148	0.01	147.562	165	0.01	295.125	147	0.01	147.562	164	0.01
5117592	SLHC	8	WALLKILL VALLEY BANCORP MHC	WALLKILL	NY	294.554	149	0.01	147.277	166	0.01	294.554	148	0.01	147.277	165	0.01
7072	Thrift	8	WALLKILL VALLEY FEDERAL SAVINGS AND LOAN ASSOCIATION	WALLKILL	NY	294.554			147.277			294.554			147.277		
3789986	SLHC	4	LUSITANIA FINANCIAL, MHC	NEWARK	NJ	293.683	150	0.01	146.842	167	0.01	293.683	149	0.01	146.842	166	0.01
385686	Thrift	4	LUSITANIA SAVINGS BANK	NEWARK	NJ	293.683			146.842			293.683			146.842		
1398807	BHC	2	REPUBLIC FIRST BANCORP, INC.	PHILADELPHIA	PA	144.003	173	0.01	144.003	168	0.01	144.003	172	0.01	144.003	167	0.01
1216321	Bank	2	REPUBLIC BANK	PHILADELPHIA	PA	144.003			144.003			144.003			144.003		
2698906	BHC	2	EVERGREEN HOLDINGS, LLC	NEW YORK	NY	135.919	174	0.01	135.919	169	0.01	135.919	173	0.01	135.919	168	0.01
98717	Bank	2	EASTBANK, NATIONAL ASSOCIATION	NEW YORK	NY	135.919			135.919			135.919			135.919		
2589666	BHC	1	UNITED ROOSEVELT MHC	CARTERET	NJ	132.152	175	0.01	132.152	170	0.01	132.152	174	0.01	132.152	169	0.01
644776	Thrift	1	UNITED ROOSEVELT SAVINGS BANK	CARTERET	NJ	132.152			132.152			132.152			132.152		
287007	Bank	6	PUTNAM COUNTY NATIONAL BANK OF CARMEL, THE	CARMEL	NY	127.502	176	0.01	127.502	171	0.01	127.502	175	0.01	127.502	170	0.01

RSSDID	Type	Branches	Name	City	State	Pre Merger						Post Merger					
						Unweighted			Weighted ***			Unweighted			Weighted ***		
						Deposits**	Rank	%	Deposits	Rank	%	Deposits**	Rank	%	Deposits	Rank	%
2606693	BHC	3	IRON BANCSHARES, INC.	SALISBURY	CT	125.510	177	0.01	125.510	172	0.01	125.510	176	0.01	125.510	171	0.01
1008209	Bank	3	NATIONAL IRON BANK, THE	SALISBURY	CT	125.510			125.510			125.510			125.510		
2326179	BHC	3	IBW FINANCIAL CORPORATION	WASHINGTON D.C.	DC	111.562	178	0.00	111.562	173	0.00	111.562	177	0.00	111.562	172	0.00
536527	Bank	3	INDUSTRIAL BANK	WASHINGTON D.C.	DC	111.562			111.562			111.562			111.562		
4750086	BHC	3	METROCITY BANKSHARES, INC.	DORAVILLE	GA	106.728	179	0.00	106.728	174	0.00	106.728	178	0.00	106.728	173	0.00
3437456	Bank	3	METRO CITY BANK	DORAVILLE	GA	106.728			106.728			106.728			106.728		
147679	Thrift	4	GLEN ROCK SAVINGS BANK	GLEN ROCK	NJ	208.857	159	0.01	104.428	175	0.00	208.857	158	0.01	104.428	174	0.00
605610	Thrift	3	SAWYER SAVINGS BANK	SAUGERTIES	NY	207.272	160	0.01	103.636	176	0.00	207.272	159	0.01	103.636	175	0.00
3790487	SLHC	2	LINCOLN PARK BANCORP, MHC	LINCOLN PARK	NJ	206.362	161	0.01	103.181	177	0.00	206.362	160	0.01	103.181	176	0.00
930871	Thrift	2	LINCOLN 1ST BANK	LINCOLN PARK	NJ	206.362			103.181			206.362			103.181		
3793125	SLHC	1	COMMUNITY FSB HOLDING COMPANY	WOODHAVEN	NY	192.693	165	0.01	96.346	178	0.00	192.693	164	0.01	96.346	177	0.00
3040418	Thrift	1	COMMUNITY FEDERAL SAVINGS BANK	WOODHAVEN	NY	192.693			96.346			192.693			96.346		
1048867	BHC	2	COMMUNITY BANK SYSTEM, INC.	DE WITT	NY	92.801	182	0.00	92.801	179	0.00	92.801	181	0.00	92.801	178	0.00
202907	Bank	2	COMMUNITY BANK, NATIONAL ASSOCIATION	CANTON	NY	92.801			92.801			92.801			92.801		
1074156	BHC	2	TRUIST FINANCIAL CORPORATION	CHARLOTTE	NC	88.730	185	0.00	88.730	180	0.00	88.730	184	0.00	88.730	179	0.00
852320	Bank	2	TRUIST BANK	CHARLOTTE	NC	88.730			88.730			88.730			88.730		
5342974	Bank	1	PIERMONT BANK	NEW YORK	NY	84.567	187	0.00	84.567	181	0.00	84.567	186	0.00	84.567	180	0.00
1491409	BHC	1	HOME BANCSHARES, INC.	CONWAY	AR	82.964	188	0.00	82.964	182	0.00	82.964	187	0.00	82.964	181	0.00
456045	Bank	1	CENTENNIAL BANK	CONWAY	AR	82.964			82.964			82.964			82.964		
3595084	BHC	2	PCB BANCORP	LOS ANGELES	CA	81.694	189	0.00	81.694	183	0.00	81.694	188	0.00	81.694	182	0.00
3212402	Bank	2	PACIFIC CITY BANK	LOS ANGELES	CA	81.694			81.694			81.694			81.694		
1139541	BHC	1	PEOPLES FINANCIAL SERVICES CORPORATION	SCRANTON	PA	68.403	191	0.00	68.403	184	0.00	68.403	190	0.00	68.403	183	0.00
278818	Bank	1	PEOPLES SECURITY BANK AND TRUST COMPANY	SCRANTON	PA	68.403			68.403			68.403			68.403		
70218	Bank	2	UNITED ORIENT BANK	NEW YORK	NY	68.375	192	0.00	68.375	185	0.00	68.375	191	0.00	68.375	184	0.00
2900261	BHC	2	HANMI FINANCIAL CORPORATION	LOS ANGELES	CA	67.086	193	0.00	67.086	186	0.00	67.086	192	0.00	67.086	185	0.00
657365	Bank	2	HANMI BANK	LOS ANGELES	CA	67.086			67.086			67.086			67.086		
3005332	BHC	1	F.N.B. CORPORATION	PITTSBURGH	PA	51.806	194	0.00	51.806	187	0.00	51.806	193	0.00	51.806	186	0.00
379920	Bank	1	FIRST NATIONAL BANK OF PENNSYLVANIA	GREENVILLE	PA	51.806			51.806			51.806			51.806		
3844269	SLHC	1	WSFS FINANCIAL CORPORATION	WILMINGTON	DE	103.466	180	0.00	51.733	188	0.00	103.466	179	0.00	51.733	187	0.00
437914	Thrift	1	WILMINGTON SAVINGS FUND SOCIETY, FSB	WILMINGTON	DE	103.466			51.733			103.466			51.733		

RSSDID	Type	Branches	Name	City	State	Pre Merger						Post Merger					
						Unweighted			Weighted ***			Unweighted			Weighted ***		
						Deposits**	Rank	%	Deposits	Rank	%	Deposits**	Rank	%	Deposits	Rank	%
1144107	BHC	2	HONAT BANCORP, INC.	HONESDALE	PA	48.269	195	0.00	48.269	189	0.00	48.269	194	0.00	48.269	188	0.00
465618	Bank	2	HONESDALE NATIONAL BANK, THE	HONESDALE	PA	48.269			48.269			48.269			48.269		
5215715	BHC	1	GRASSHOPPER BANCORP, INC.	NEW YORK	NY	47.415	196	0.00	47.415	190	0.00	47.415	195	0.00	47.415	189	0.00
5210989	Bank	1	GRASSHOPPER BANK, N.A.	NEW YORK	NY	47.415			47.415			47.415			47.415		
3589980	BHC	2	FIRST IC CORPORATION	DORAVILLE	GA	47.000	197	0.00	47.000	191	0.00	47.000	196	0.00	47.000	190	0.00
2877840	Bank	2	FIRST IC BANK	DORAVILLE	GA	47.000			47.000			47.000			47.000		
657178	Thrift	2	SCHUYLER SAVINGS BANK	KEARNY	NJ	93.856	181	0.00	46.928	192	0.00	93.856	180	0.00	46.928	191	0.00
564678	Thrift	2	GSL SAVINGS BANK	GUTTENBERG	NJ	91.937	183	0.00	45.968	193	0.00	91.937	182	0.00	45.968	192	0.00
565170	Thrift	1	FIRST FEDERAL SAVINGS OF MIDDLETOWN	MIDDLETOWN	NY	89.718	184	0.00	44.859	194	0.00	89.718	183	0.00	44.859	193	0.00
65205	Thrift	2	TORRINGTON SAVINGS BANK, THE	TORRINGTON	CT	87.310	186	0.00	43.655	195	0.00	87.310	185	0.00	43.655	194	0.00
4495220	SLHC	1	SUNNYSIDE BANCORP, INC.	IRVINGTON	NY	78.944	190	0.00	39.472	196	0.00	78.944	189	0.00	39.472	195	0.00
516873	Thrift	1	SUNNYSIDE FEDERAL SAVINGS AND LOAN ASSOCIATION OF IRVINGTON	IRVINGTON	NY	78.944			39.472			78.944			39.472		
3852031	SLHC	2	STERLING BANCORP, INC.	SOUTHFIELD	MI	46.124	198	0.00	23.062	197	0.00	46.124	197	0.00	23.062	196	0.00
979375	Thrift	2	STERLING BANK AND TRUST, FSB	SOUTHFIELD	MI	46.124			23.062			46.124			23.062		
2339759	BHC	1	IBC BANCORP, INC.	CHICAGO	IL	17.502	200	0.00	17.502	198	0.00	17.502	199	0.00	17.502	197	0.00
2006024	Bank	1	INTERNATIONAL BANK OF CHICAGO	CHICAGO	IL	17.502			17.502			17.502			17.502		
828473	Thrift	1	CITIZENS SAVINGS BANK	CLARKS SUMMIT	PA	32.647	199	0.00	16.324	199	0.00	32.647	198	0.00	16.324	198	0.00
4199229	BHC	3	WOODFOREST FINANCIAL GROUP EMPLOYEE STOCK OWNERSHIP PLAN (WITH 401(K) PROVISIONS) (AMENDED AND RESTATED EFF. 03/01/06)	THE WOODLANDS	TX	14.638	201	0.00	14.638	200	0.00	14.638	200	0.00	14.638	199	0.00
412751	Bank	3	WOODFOREST NATIONAL BANK	THE WOODLANDS	TX	14.638			14.638			14.638			14.638		
449515	Bank	1	METROPOLITAN BANK AND TRUST COMPANY	NEW YORK	NY	9.945	202	0.00	9.945	201	0.00	9.945	201	0.00	9.945	200	0.00
2107707	BHC	1	DICKINSON FINANCIAL CORPORATION II	KANSAS CITY	MO	6.654	203	0.00	6.654	202	0.00	6.654	202	0.00	6.654	201	0.00
983457	Bank	1	ARMED FORCES BANK, NATIONAL ASSOCIATION	FORT LEAVENWORTH	KS	6.654			6.654			6.654			6.654		
3818804	BHC	1	BEAL FINANCIAL CORPORATION	PLANO	TX	0.113	205	0.00	0.113	203	0.00	0.113	204	0.00	0.113	202	0.00
1176881	Bank	1	BEAL BANK	PLANO	TX	0.113			0.113			0.113			0.113		
2380443	BHC	2	GOLDMAN SACHS GROUP, INC., THE	NEW YORK	NY	155,577.000	4	6.35	0.000	204	0.00	155,577.000	4	6.35	0.000	203	0.00

RSSDID	Type	Branches	Name	City	State	Pre Merger						Post Merger					
						Unweighted			Weighted ***			Unweighted			Weighted ***		
						Deposits**	Rank	%	Deposits	Rank	%	Deposits**	Rank	%	Deposits	Rank	%
2182786	Bank	2	GOLDMAN SACHS BANK USA	NEW YORK	NY	155,577.000			0.000			155,577.000			0.000		
3284397	Bank	2	BEAL BANK USA	LAS VEGAS	NV	2.959	204	0.00	0.000	205	0.00	2.959	203	0.00	0.000	204	0.00
3583700	BHC	1	AMG NATIONAL CORP.	GREENWOOD VILLAGE	CO	0.000	206	0.00	0.000	206	0.00	0.000	205	0.00	0.000	205	0.00
3015939	Bank	1	AMG NATIONAL TRUST BANK	BOULDER	CO	0.000			0.000			0.000			0.000		
4923497	BHC	1	ATLANTIC COMMUNITY BANCSHARES INC	CAMP HILL	PA	0.000	207	0.00	0.000	207	0.00	0.000	206	0.00	0.000	206	0.00
959715	Bank	1	ATLANTIC COMMUNITY BANKERS BANK	CAMP HILL	PA	0.000			0.000			0.000			0.000		
975751	Bank	1	CIBC NATIONAL TRUST COMPANY	ATLANTA	GA	0.000	208	0.00	0.000	208	0.00	0.000	207	0.00	0.000	207	0.00
1199844	BHC	1	COMERICA INCORPORATED	DALLAS	TX	0.000	209	0.00	0.000	209	0.00	0.000	208	0.00	0.000	208	0.00
60143	Bank	1	COMERICA BANK	DALLAS	TX	0.000			0.000			0.000			0.000		
2795083	BHC	4	MHBC INVESTMENTS LIMITED PARTNERSHIP I LLLP	ENGLAND	AR	0.000	210	0.00	0.000	210	0.00	0.000	209	0.00	0.000	209	0.00
244149	Bank	4	BANK OF ENGLAND	ENGLAND	AR	0.000			0.000			0.000			0.000		
1111435	BHC	1	STATE STREET CORPORATION	BOSTON	MA	0.000	211	0.00	0.000	211	0.00	0.000	210	0.00	0.000	210	0.00
35301	Bank	1	STATE STREET BANK AND TRUST COMPANY	BOSTON	MA	0.000			0.000			0.000			0.000		
3792687	SLHC	1	TIAA BOARD OF GOVERNORS	NEW YORK	NY	0.000	212	0.00	0.000	212	0.00	0.000	211	0.00	0.000	211	0.00
2735146	Thrift	1	TIAA FSB	JACKSONVILLE	FL	0.000			0.000			0.000			0.000		
Totals:						2,450,261.828		100.00	2,273,506.260		100.00	2,450,261.828		100.00	2,273,506.260		100.00

Notes:

* The geographic market is defined as: Fairfield County, CT;

Bethlehem, Bridgewater, Canaan, Cornwall, Goshen, Kent, Litchfield, Morris, New Milford, North Canaan, Plymouth, Roxbury, Salisbury, Sharon, Thomaston, Warren, Washington, Watertown, and Woodbury towns in Litchfield County, CT;

Ansonia, Beacon Falls, Bethany, Cheshire, Derby, Hamden, Meriden, Middlebury, Milford, Naugatuck, North Haven, Orange, Oxford, Prospect, Seymour, Southbury, Wallingford, Waterbury, Wolcott, and Woodbridge in New Haven County, CT;

Bronx, Dutchess, Kings, Nassau, New York, Orange, Putnam, Queens, Richmond, Rockland, Suffolk, Sullivan, Ulster and Westchester Counties, NY;

Hudson city, Ancram, Clermont, Copake, Gallatin, Germantown, Greenport, Livingston, and Taghkanic towns in Columbia County, NY;

Catskill, Halcott, Hunter, and Lexington towns in Greene County, NY;

Bergen, Essex, Hudson, Hunterdon, Middlesex, Monmouth, Morris, Ocean, Passaic, Somerset, Sussex, and Union Counties, NJ;

Pemberton and Wrightstown boroughs, Bass River, New Hanover, North Hanover, Pemberton, Shamong, Southampton, Tabernacle, Washington, and Woodland townships in Burlington County, NJ;

Hightstown, Hopewell, Pennington, Princeton boroughs, East Windsor, Ewing, Hopewell, Lawrence, Princeton, Robbinsville, and West Windsor townships in

Mercer County, NJ;

Washington borough, Belvidere and Hackettstown towns, Allamuchy, Blairstown, Franklin, Frelinghuysen, Greenwich, Hardwick, Harmony, Hope, Independence, Knowlton,

Liberty, Lopatcong, Mansfield, Oxford, Washington, and White townships in Warren County, NJ;

Pike County, PA;

Delaware Water Gap, East Stroudsburg, Mount Pocono, and Stroudsburg boroughs, Barrett, Coolbaugh, Middle Smithfield, Paradise, Pocono, Price, Smithfield, and Stroud townships in Monroe County, PA; and

Hawley borough, Berlin, Damascus, Dreher, Lebanon, Manchester, Oregon, Palmyra, Paupack, Salem, and Sterling townships in Wayne County, PA.

**** Financial data (in millions of dollars) is as of Jun. 30, 2020, and reflects currently known ownership structure.**

***** Deposits of thrift institutions are weighted at 50 percent, unless otherwise noted. Deposits of thrift subsidiaries of commercial banking organizations, however, are weighted at 100 percent.**



Philadelphia, PA Banking Market HHI Deposit Analysis* (For Commercial Bank and Thrift Organizations)

Report Date: Friday, May 28, 2021 at 16:32:29 EST.

	Pre Merger	Post Merger
Total Organizations	88	87
Total Banking Organizations:	66	65
Total Thrift Organizations:	22	22

Herfindahl-Hirschman Index	Pre Merger	Post Merger	Change in HHI
HHI Unweighted Deposits	923	926	3
HHI Weighted Deposits	994	998	4

						Pre Merger						Post Merger					
						Unweighted			Weighted ***			Unweighted			Weighted ***		
RSSDID	Type	Branches	Name	City	State	Deposits**	Rank	%	Deposits	Rank	%	Deposits**	Rank	%	Deposits	Rank	%
Target Organization																	
1857108	BHC	1	HSBC HOLDINGS PLC	LONDON		401.718	40	0.20	401.718	36	0.21	0.000	0	0.00	0.000	0	0.00
413208	Bank	1	HSBC BANK USA, NATIONAL ASSOCIATION	MCLEAN	VA	401.718			401.718								
Buyer Organization																	
1132449	BHC	148	CITIZENS FINANCIAL GROUP, INC.	PROVIDENCE	RI	18,471.331	5	9.11	18,471.331	5	9.50						
3303298	Bank	148	CITIZENS BANK, NATIONAL ASSOCIATION	PROVIDENCE	RI	18,471.331			18,471.331								
Resulting Organization																	
1132449	BHC	149	CITIZENS FINANCIAL GROUP, INC.	PROVIDENCE	RI							18,873.049	5	9.31	18,873.049	5	9.70
3303298	Bank	149	CITIZENS BANK, NATIONAL ASSOCIATION	PROVIDENCE	RI							18,873.049			18,873.049		

Other Organizations

RSSDID	Type	Branches	Name	City	State	Pre Merger						Post Merger					
						Unweighted			Weighted ***			Unweighted			Weighted ***		
						Deposits**	Rank	%	Deposits	Rank	%	Deposits**	Rank	%	Deposits	Rank	%
1120754	BHC	167	WELLS FARGO & COMPANY	SAN FRANCISCO	CA	34,515.092	1	17.02	34,515.092	1	17.74	34,515.092	1	17.02	34,515.092	1	17.74

RSSDID	Type	Branches	Name	City	State	Pre Merger						Post Merger					
						Unweighted			Weighted ***			Unweighted			Weighted ***		
						Deposits**	Rank	%	Deposits	Rank	%	Deposits**	Rank	%	Deposits	Rank	%
451965	Bank	167	WELLS FARGO BANK, NATIONAL ASSOCIATION	SIOUX FALLS	SD	34,515.092			34,515.092			34,515.092			34,515.092		
1238565	BHC	134	TORONTO-DOMINION BANK, THE	TORONTO		28,437.555	2	14.02	28,437.555	2	14.62	28,437.555	2	14.02	28,437.555	2	14.62
497404	Bank	134	TD BANK, NATIONAL ASSOCIATION	WILMINGTON	DE	28,437.555			28,437.555			28,437.555			28,437.555		
1069778	BHC	130	PNC FINANCIAL SERVICES GROUP, INC., THE	PITTSBURGH	PA	26,765.540	3	13.20	26,765.540	3	13.76	26,765.540	3	13.20	26,765.540	3	13.76
817824	Bank	130	PNC BANK, NATIONAL ASSOCIATION	WILMINGTON	DE	26,765.540			26,765.540			26,765.540			26,765.540		
1073757	BHC	82	BANK OF AMERICA CORPORATION	CHARLOTTE	NC	22,325.521	4	11.01	22,325.521	4	11.48	22,325.521	4	11.01	22,325.521	4	11.48
480228	Bank	82	BANK OF AMERICA, NATIONAL ASSOCIATION	CHARLOTTE	NC	22,325.521			22,325.521			22,325.521			22,325.521		
1239254	BHC	76	BANCO SANTANDER, S.A.	BOADILLA DEL MONTE MADRID		7,160.243	6	3.53	7,160.243	6	3.68	7,160.243	6	3.53	7,160.243	6	3.68
722777	Bank	76	SANTANDER BANK, N.A.	WILMINGTON	DE	7,160.243			7,160.243			7,160.243			7,160.243		
1074156	BHC	79	TRUIST FINANCIAL CORPORATION	CHARLOTTE	NC	6,875.028	7	3.39	6,875.028	7	3.53	6,875.028	7	3.39	6,875.028	7	3.53
852320	Bank	79	TRUIST BANK	CHARLOTTE	NC	6,875.028			6,875.028			6,875.028			6,875.028		
1116609	BHC	40	UNIVEST FINANCIAL CORPORATION	SOUDERTON	PA	4,485.219	9	2.21	4,485.219	8	2.31	4,485.219	9	2.21	4,485.219	8	2.31
354310	Bank	40	UNIVEST BANK AND TRUST CO.	SOUDERTON	PA	4,485.219			4,485.219			4,485.219			4,485.219		
1140994	BHC	40	BRYN MAWR BANK CORPORATION	BRYN MAWR	PA	4,156.160	10	2.05	4,156.160	9	2.14	4,156.160	10	2.05	4,156.160	9	2.14
765019	Bank	40	BRYN MAWR TRUST COMPANY, THE	BRYN MAWR	PA	4,156.160			4,156.160			4,156.160			4,156.160		
1117129	BHC	48	FULTON FINANCIAL CORPORATION	LANCASTER	PA	3,593.796	11	1.77	3,593.796	10	1.85	3,593.796	11	1.77	3,593.796	10	1.85
474919	Bank	48	FULTON BANK, NATIONAL ASSOCIATION	LANCASTER	PA	3,593.796			3,593.796			3,593.796			3,593.796		
1398807	BHC	29	REPUBLIC FIRST BANCORP, INC.	PHILADELPHIA	PA	3,426.276	12	1.69	3,426.276	11	1.76	3,426.276	12	1.69	3,426.276	11	1.76
1216321	Bank	29	REPUBLIC BANK	PHILADELPHIA	PA	3,426.276			3,426.276			3,426.276			3,426.276		
3844269	SLHC	56	WSFS FINANCIAL CORPORATION	WILMINGTON	DE	5,241.830	8	2.58	2,620.915	12	1.35	5,241.830	8	2.58	2,620.915	12	1.35
437914	Thrift	56	WILMINGTON SAVINGS FUND SOCIETY, FSB	WILMINGTON	DE	5,241.830			2,620.915			5,241.830			2,620.915		
4284536	BHC	9	CUSTOMERS BANCORP, INC	WYOMISSING	PA	2,568.547	14	1.27	2,568.547	13	1.32	2,568.547	14	1.27	2,568.547	13	1.32
2354985	Bank	9	CUSTOMERS BANK	PHOENIXVILLE	PA	2,568.547			2,568.547			2,568.547			2,568.547		
1068025	BHC	36	KEYCORP	CLEVELAND	OH	2,230.433	15	1.10	2,230.433	14	1.15	2,230.433	15	1.10	2,230.433	14	1.15
280110	Bank	36	KEYBANK NATIONAL ASSOCIATION	CLEVELAND	OH	2,230.433			2,230.433			2,230.433			2,230.433		
1037003	BHC	23	M&T BANK CORPORATION	BUFFALO	NY	2,174.050	16	1.07	2,174.050	15	1.12	2,174.050	16	1.07	2,174.050	15	1.12
2265456	Bank	4	WILMINGTON TRUST, NATIONAL ASSOCIATION	WILMINGTON	DE	0.000			0.000			0.000			0.000		

RSSDID	Type	Branches	Name	City	State	Pre Merger						Post Merger					
						Unweighted			Weighted ***			Unweighted			Weighted ***		
						Deposits**	Rank	%	Deposits	Rank	%	Deposits**	Rank	%	Deposits	Rank	%
501105	Bank	19	MANUFACTURERS AND TRADERS TRUST COMPANY	BUFFALO	NY	2,174.050			2,174.050			2,174.050			2,174.050		
2477754	BHC	17	INVESTORS BANCORP, INC.	SHORT HILLS	NJ	2,028.407	17	1.00	2,028.407	16	1.04	2,028.407	17	1.00	2,028.407	16	1.04
35570	Bank	17	INVESTORS BANK	SHORT HILLS	NJ	2,028.407			2,028.407			2,028.407			2,028.407		
3200463	BHC	25	PENN COMMUNITY MUTUAL HOLDINGS INC	DOYLESTOWN	PA	1,884.976	18	0.93	1,884.976	17	0.97	1,884.976	18	0.93	1,884.976	17	0.97
328777	Thrift	25	PENN COMMUNITY BANK	DOYLESTOWN	PA	1,884.976			1,884.976			1,884.976			1,884.976		
2609975	BHC	11	OCEANFIRST FINANCIAL CORP.	TOMS RIVER	NJ	1,648.280	19	0.81	1,648.280	18	0.85	1,648.280	19	0.81	1,648.280	18	0.85
85472	Bank	11	OCEANFIRST BANK, NATIONAL ASSOCIATION	TOMS RIVER	NJ	1,648.280			1,648.280			1,648.280			1,648.280		
5033580	BHC	7	MERIDIAN CORPORATION	MALVERN	PA	1,166.698	20	0.58	1,166.698	19	0.60	1,166.698	20	0.58	1,166.698	19	0.60
3271799	Bank	7	MERIDIAN BANK	MALVERN	PA	1,166.698			1,166.698			1,166.698			1,166.698		
3347292	BHC	5	PARKE BANCORP, INC	SEWELL	NJ	1,152.028	21	0.57	1,152.028	20	0.59	1,152.028	21	0.57	1,152.028	20	0.59
2764212	Bank	5	PARKE BANK	SEWELL	NJ	1,152.028			1,152.028			1,152.028			1,152.028		
1071397	BHC	14	S & T BANCORP, INC.	INDIANA	PA	1,034.428	22	0.51	1,034.428	21	0.53	1,034.428	22	0.51	1,034.428	21	0.53
936426	Bank	14	S&T BANK	INDIANA	PA	1,034.428			1,034.428			1,034.428			1,034.428		
1118434	BHC	10	QNB CORP.	QUAKERTOWN	PA	983.523	23	0.49	983.523	22	0.51	983.523	23	0.49	983.523	22	0.51
852713	Bank	10	QNB BANK	QUAKERTOWN	PA	983.523			983.523			983.523			983.523		
1117491	BHC	16	FNB BANCORP, INC.	NEWTOWN	PA	968.084	24	0.48	968.084	23	0.50	968.084	24	0.48	968.084	23	0.50
1007417	Bank	16	FIRST NATIONAL BANK AND TRUST COMPANY OF NEWTOWN	NEWTOWN	PA	968.084			968.084			968.084			968.084		
3401970	Bank	10	FIRST BANK	HAMILTON	NJ	946.461	25	0.47	946.461	24	0.49	946.461	25	0.47	946.461	24	0.49
3314584	BHC	10	PRUDENTIAL BANCORP, INC.	PHILADELPHIA	PA	731.261	28	0.36	731.261	25	0.38	731.261	28	0.36	731.261	25	0.38
641775	Thrift	10	PRUDENTIAL BANK	PHILADELPHIA	PA	731.261			731.261			731.261			731.261		
1830361	BHC	11	NEWFIELD BANCORP, INC.	NEWFIELD	NJ	701.669	29	0.35	701.669	26	0.36	701.669	29	0.35	701.669	26	0.36
632410	Bank	11	NEWFIELD NATIONAL BANK	NEWFIELD	NJ	701.669			701.669			701.669			701.669		
3805279	BHC	7	MALVERN BANCORP, INC.	PAOLI	PA	692.230	30	0.34	692.230	27	0.36	692.230	30	0.34	692.230	27	0.36
676478	Bank	7	MALVERN BANK, NATIONAL ASSOCIATION	PAOLI	PA	692.230			692.230			692.230			692.230		
1143623	BHC	4	CITIZENS AND NORTHERN CORPORATION	WELLSBORO	PA	665.934	31	0.33	665.934	28	0.34	665.934	31	0.33	665.934	28	0.34
895710	Bank	4	CITIZENS & NORTHERN BANK	WELLSBORO	PA	665.934			665.934			665.934			665.934		
2861492	BHC	7	HARLEYSVILLE SAVINGS FINANCIAL CORPORATION	HARLEYSVILLE	PA	659.496	32	0.33	659.496	29	0.34	659.496	32	0.33	659.496	29	0.34
139478	Thrift	7	HARLEYSVILLE BANK	HARLEYSVILLE	PA	659.496			659.496			659.496			659.496		
1039502	BHC	31	JPMORGAN CHASE & CO.	NEW YORK	NY	645.802	33	0.32	645.802	30	0.33	645.802	33	0.32	645.802	30	0.33

RSSDID	Type	Branches	Name	City	State	Pre Merger						Post Merger					
						Unweighted			Weighted ***			Unweighted			Weighted ***		
						Deposits**	Rank	%	Deposits	Rank	%	Deposits**	Rank	%	Deposits	Rank	%
852218	Bank	31	JPMORGAN CHASE BANK, NATIONAL ASSOCIATION	COLUMBUS	OH	645.802			645.802			645.802			645.802		
3846713	BHC	13	WILLIAM PENN BANCORPORATION	BRISTOL	PA	567.509	34	0.28	567.509	31	0.29	567.509	34	0.28	567.509	31	0.29
664176	Bank	13	WILLIAM PENN BANK	BRISTOL	PA	567.509			567.509			567.509			567.509		
3595271	Bank	10	BANK OF PRINCETON, THE	PRINCETON	NJ	552.659	35	0.27	552.659	32	0.28	552.659	35	0.27	552.659	32	0.28
3118513	BHC	2	1ST COLONIAL BANCORP, INC.	COLLINGSWOOD	NJ	539.790	36	0.27	539.790	33	0.28	539.790	36	0.27	539.790	33	0.28
2920773	Bank	2	1ST COLONIAL COMMUNITY BANK	COLLINGSWOOD	NJ	539.790			539.790			539.790			539.790		
4439354	SLHC	1	EMPLOYEE'S STOCK OWNERSHIP PLAN OF CENLAR CAPITAL CORPORATION	EWING	NJ	893.461	26	0.44	446.730	34	0.23	893.461	26	0.44	446.730	34	0.23
934271	Thrift	1	CENLAR FSB	TRENTON	NJ	893.461			446.730			893.461			446.730		
2560508	BHC	6	CENTURY BANCORP MHC	VINELAND	NJ	440.123	38	0.22	440.123	35	0.23	440.123	38	0.22	440.123	35	0.23
392778	Thrift	6	CENTURY SAVINGS BANK	VINELAND	NJ	440.123			440.123			440.123			440.123		
2367921	BHC	8	TOMPKINS FINANCIAL CORPORATION	ITHACA	NY	373.556	41	0.18	373.556	37	0.19	373.556	40	0.18	373.556	36	0.19
678717	Bank	8	VIST BANK	WYOMISSING	PA	373.556			373.556			373.556			373.556		
2571120	SLHC	7	COLUMBIA BANK MHC	FAIR LAWN	NJ	745.014	27	0.37	372.507	38	0.19	745.014	27	0.37	372.507	37	0.19
174572	Thrift	7	COLUMBIA BANK	FAIR LAWN	NJ	745.014			372.507			745.014			372.507		
3349241	Bank	3	FIRST RESOURCE BANK	EXTON	PA	324.136	42	0.16	324.136	39	0.17	324.136	41	0.16	324.136	38	0.17
3939286	BHC	1	VICTORY BANCORP, INC, THE	LIMERICK	PA	316.372	43	0.16	316.372	40	0.16	316.372	42	0.16	316.372	39	0.16
3603961	Bank	1	VICTORY BANK, THE	LIMERICK	PA	316.372			316.372			316.372			316.372		
5042966	BHC	5	HV BANCORP, INC.	DOYLESTOWN	PA	304.688	44	0.15	304.688	41	0.16	304.688	43	0.15	304.688	40	0.16
582177	Thrift	5	HUNTINGDON VALLEY BANK	DOYLESTOWN	PA	304.688			304.688			304.688			304.688		
2947985	BHC	6	ELMER BANCORP, INC.	ELMER	NJ	296.795	46	0.15	296.795	42	0.15	296.795	45	0.15	296.795	41	0.15
609010	Bank	6	FIRST NATIONAL BANK OF ELMER, THE	ELMER	NJ	296.795			296.795			296.795			296.795		
1944204	BHC	4	MID PENN BANCORP, INC.	MILLERSBURG	PA	270.820	48	0.13	270.820	43	0.14	270.820	47	0.13	270.820	42	0.14
786612	Bank	4	MID PENN BANK	MILLERSBURG	PA	270.820			270.820			270.820			270.820		
3831513	BHC	7	CORNERSTONE FINANCIAL CORPORATION	MOUNT LAUREL	NJ	251.199	50	0.12	251.199	44	0.13	251.199	49	0.12	251.199	43	0.13
2850768	Bank	7	CORNERSTONE BANK	MOORESTOWN	NJ	251.199			251.199			251.199			251.199		
824671	Thrift	7	PHOENIXVILLE FEDERAL BANK AND TRUST	PHOENIXVILLE	PA	457.606	37	0.23	228.803	45	0.12	457.606	37	0.23	228.803	44	0.12
995272	Thrift	4	HATBORO FEDERAL SAVINGS, FA	HATBORO	PA	409.512	39	0.20	204.756	46	0.11	409.512	39	0.20	204.756	45	0.11
1132757	BHC	5	PENN BANCSHARES, INC.	PENNSVILLE	NJ	198.382	53	0.10	198.382	47	0.10	198.382	52	0.10	198.382	46	0.10

						Pre Merger						Post Merger					
						Unweighted			Weighted ***			Unweighted			Weighted ***		
RSSDID	Type	Branches	Name	City	State	Deposits**	Rank	%	Deposits	Rank	%	Deposits**	Rank	%	Deposits	Rank	%
828110	Bank	5	PENNSVILLE NATIONAL BANK, THE	PENNSVILLE	NJ	198.382			198.382			198.382			198.382		
2785459	BHC	3	ASIAN FINANCIAL CORPORATION	PHILADELPHIA	PA	192.046	54	0.09	192.046	48	0.10	192.046	53	0.09	192.046	47	0.10
2785477	Bank	3	ASIAN BANK	PHILADELPHIA	PA	192.046			192.046			192.046			192.046		
2333663	BHC	3	BERKSHIRE HILLS BANCORP, INC	BOSTON	MA	158.244	56	0.08	158.244	49	0.08	158.244	55	0.08	158.244	48	0.08
473501	Bank	3	BERKSHIRE BANK	PITTSFIELD	MA	158.244			158.244			158.244			158.244		
3845668	BHC	6	SHARON MUTUAL HOLDING COMPANY	DARBY	PA	157.560	57	0.08	157.560	50	0.08	157.560	56	0.08	157.560	49	0.08
164377	Thrift	6	SHARON BANK	SPRINGFIELD	PA	157.560			157.560			157.560			157.560		
1249918	BHC	3	PARTNERS BANCORP	SALISBURY	MD	154.640	58	0.08	154.640	51	0.08	154.640	57	0.08	154.640	50	0.08
885225	Bank	3	BANK OF DELMARVA, THE	SEAFORD	DE	154.640			154.640			154.640			154.640		
206174	Thrift	8	AMBLER SAVINGS BANK	AMBLER	PA	301.817	45	0.15	150.908	52	0.08	301.817	44	0.15	150.908	51	0.08
2409755	BHC	2	MALVERN BANK CORPORATION	MALVERN	PA	147.369	59	0.07	147.369	53	0.08	147.369	58	0.07	147.369	52	0.08
977616	Bank	2	NATIONAL BANK OF MALVERN, THE	MALVERN	PA	147.369			147.369			147.369			147.369		
459372	Thrift	6	UNITED SAVINGS BANK	PHILADELPHIA	PA	292.210	47	0.14	146.105	54	0.08	292.210	46	0.14	146.105	53	0.08
5535637	BHC	1	HYPERION BANCSHARES, INC.	PHILADELPHIA	PA	142.402	60	0.07	142.402	55	0.07	142.402	59	0.07	142.402	54	0.07
3517590	Bank	1	HYPERION BANK	PHILADELPHIA	PA	142.402			142.402			142.402			142.402		
1008076	Thrift	2	HADDON SAVINGS BANK	HADDON HEIGHTS	NJ	266.120	49	0.13	133.060	56	0.07	266.120	48	0.13	133.060	55	0.07
3854268	BHC	4	ESSA BANCORP, INC.	STROUDSBURG	PA	121.782	62	0.06	121.782	57	0.06	121.782	61	0.06	121.782	56	0.06
952677	Thrift	4	ESSA BANK & TRUST	STROUDSBURG	PA	121.782			121.782			121.782			121.782		
574079	Thrift	6	FRANKLIN BANK	PILESGROVE	NJ	234.945	51	0.12	117.472	58	0.06	234.945	50	0.12	117.472	57	0.06
3681316	SLHC	2	QUAINT OAK BANCORP	SOUTHAMPTON	PA	203.885	52	0.10	101.942	59	0.05	203.885	51	0.10	101.942	58	0.05
815277	Thrift	2	QUAINT OAK BANK	SOUTHAMPTON	PA	203.885			101.942			203.885			101.942		
3133637	BHC	2	PROVIDENT FINANCIAL SERVICES, INC.	JERSEY CITY	NJ	98.996	66	0.05	98.996	60	0.05	98.996	65	0.05	98.996	59	0.05
204004	Thrift	2	PROVIDENT BANK	JERSEY CITY	NJ	98.996			98.996			98.996			98.996		
1144086	BHC	3	CENTRIC FINANCIAL CORPORATION	HARRISBURG	PA	90.460	67	0.04	90.460	61	0.05	90.460	66	0.04	90.460	60	0.05
411512	Bank	3	CENTRIC BANK	HARRISBURG	PA	90.460			90.460			90.460			90.460		
5309306	BHC	1	WOORI FINANCIAL GROUP, INC.	SEOUL		85.404	68	0.04	85.404	62	0.04	85.404	67	0.04	85.404	61	0.04
384018	Bank	1	WOORI AMERICA BANK	NEW YORK	NY	85.404			85.404			85.404			85.404		
3388165	Bank	1	NOAH BANK	ELKINS PARK	PA	85.091	69	0.04	85.091	63	0.04	85.091	68	0.04	85.091	62	0.04
45775	Thrift	3	IRON WORKERS SAVINGS BANK	ASTON	PA	160.654	55	0.08	80.327	64	0.04	160.654	54	0.08	80.327	63	0.04
1139541	BHC	2	PEOPLES FINANCIAL SERVICES CORPORATION	SCRANTON	PA	62.127	72	0.03	62.127	65	0.03	62.127	71	0.03	62.127	64	0.03
278818	Bank	2	PEOPLES SECURITY BANK AND TRUST COMPANY	SCRANTON	PA	62.127			62.127			62.127			62.127		
814476	Thrift	2	MILLVILLE SAVINGS BANK	MILLVILLE	NJ	121.361	63	0.06	60.680	66	0.03	121.361	62	0.06	60.680	65	0.03

RSSDID	Type	Branches	Name	City	State	Pre Merger						Post Merger					
						Unweighted			Weighted ***			Unweighted			Weighted ***		
						Deposits**	Rank	%	Deposits	Rank	%	Deposits**	Rank	%	Deposits	Rank	%
660570	Thrift	2	PROSPER BANK	COATESVILLE	PA	115.149	64	0.06	57.574	67	0.03	115.149	63	0.06	57.574	66	0.03
3132863	SLHC	1	NORTHFIELD BANCORP, INC.	WOODBIDGE	NJ	110.390	65	0.05	55.195	68	0.03	110.390	64	0.05	55.195	67	0.03
28013	Thrift	1	NORTHFIELD BANK	STATEN ISLAND	NY	110.390			55.195			110.390			55.195		
5272361	BHC	1	LINKBANCORP, INC.	CAMP HILL	PA	53.714	73	0.03	53.714	69	0.03	53.714	72	0.03	53.714	68	0.03
2754389	Bank	1	LINKBANK	CAMP HILL	PA	53.714			53.714			53.714			53.714		
2259268	BHC	3	UNITED BANCSHARES, INC.	PHILADELPHIA	PA	47.356	75	0.02	47.356	70	0.02	47.356	74	0.02	47.356	69	0.02
1945247	Bank	3	UNITED BANK OF PHILADELPHIA	PHILADELPHIA	PA	47.356			47.356			47.356			47.356		
658072	Thrift	3	COUNTY SAVINGS BANK	ESSINGTON	PA	81.447	70	0.04	40.724	71	0.02	81.447	69	0.04	40.724	70	0.02
3404373	Bank	1	FIRST COMMERCE BANK	LAKEWOOD	NJ	39.632	77	0.02	39.632	72	0.02	39.632	76	0.02	39.632	71	0.02
927077	Thrift	2	MONROE SAVINGS BANK	WILLIAMSTOWN	NJ	70.334	71	0.03	35.167	73	0.02	70.334	70	0.03	35.167	72	0.02
1225798	Thrift	1	PORT RICHMOND SAVINGS	PHILADELPHIA	PA	51.266	74	0.03	25.633	74	0.01	51.266	73	0.03	25.633	73	0.01
2784920	BHC	1	1ST CONSTITUTION BANCORP	CRANBURY	NJ	25.585	78	0.01	25.585	75	0.01	25.585	77	0.01	25.585	74	0.01
1412619	Bank	1	1ST CONSTITUTION BANK	CRANBURY	NJ	25.585			25.585			25.585			25.585		
885579	Thrift	1	TIOGA-FRANKLIN SAVINGS BANK	PHILADELPHIA	PA	47.017	76	0.02	23.508	76	0.01	47.017	75	0.02	23.508	75	0.01
762773	Thrift	1	ABACUS FEDERAL SAVINGS BANK	NEW YORK	NY	20.921	79	0.01	10.460	77	0.01	20.921	78	0.01	10.460	76	0.01
2796277	Bank	1	PHILADELPHIA TRUST COMPANY, THE	PHILADELPHIA	PA	5.558	82	0.00	5.558	78	0.00	5.558	81	0.00	5.558	77	0.00
4199229	BHC	3	WOODFOREST FINANCIAL GROUP EMPLOYEE STOCK OWNERSHIP PLAN (WITH 401(K) PROVISIONS) (AMENDED AND RESTATED EFF. 03/01/06)	THE WOODLANDS	TX	4.927	83	0.00	4.927	79	0.00	4.927	82	0.00	4.927	78	0.00
412751	Bank	3	WOODFOREST NATIONAL BANK	THE WOODLANDS	TX	4.927			4.927			4.927			4.927		
460275	Thrift	1	SECOND FEDERAL SAVINGS AND LOAN ASSOCIATION OF PHILADELPHIA	PHILADELPHIA	PA	8.706	81	0.00	4.353	80	0.00	8.706	80	0.00	4.353	79	0.00
2973386	Thrift	1	SEI PRIVATE TRUST COMPANY	OAKS	PA	0.500	84	0.00	0.250	81	0.00	0.500	83	0.00	0.250	80	0.00
932978	Thrift	17	FIRSTTRUST SAVINGS BANK	CONSHOHOCKEN	PA	3,204.441	13	1.58	0.000	82	0.00	3,204.441	13	1.58	0.000	81	0.00
4046640	BHC	1	DREXEL MORGAN & CO.	RADNOR	PA	130.600	61	0.06	0.000	83	0.00	130.600	60	0.06	0.000	82	0.00
17110	Bank	1	HAVERFORD TRUST COMPANY, THE	RADNOR	PA	130.600			0.000			130.600			0.000		
3284397	Bank	1	BEAL BANK USA	LAS VEGAS	NV	12.261	80	0.01	0.000	84	0.00	12.261	79	0.01	0.000	83	0.00
3587146	BHC	2	BANK OF NEW YORK MELLON CORPORATION, THE	NEW YORK	NY	0.000	85	0.00	0.000	85	0.00	0.000	84	0.00	0.000	84	0.00

RSSDID	Type	Branches	Name	City	State	Pre Merger						Post Merger					
						Unweighted			Weighted ***			Unweighted			Weighted ***		
						Deposits**	Rank	%	Deposits	Rank	%	Deposits**	Rank	%	Deposits	Rank	%
398668	Bank	1	BANK OF NEW YORK MELLON TRUST COMPANY, NATIONAL ASSOCIATION, THE	LOS ANGELES	CA	0.000			0.000			0.000			0.000		
541101	Bank	1	BANK OF NEW YORK MELLON, THE	NEW YORK	NY	0.000			0.000			0.000			0.000		
1118368	BHC	1	CITIZENS FINANCIAL SERVICES, INC.	MANSFIELD	PA	0.000	86	0.00	0.000	86	0.00	0.000	85	0.00	0.000	85	0.00
978118	Bank	1	FIRST CITIZENS COMMUNITY BANK	MANSFIELD	PA	0.000			0.000			0.000			0.000		
2795083	BHC	2	MHBC INVESTMENTS LIMITED PARTNERSHIP I LLLP	ENGLAND	AR	0.000	87	0.00	0.000	87	0.00	0.000	86	0.00	0.000	86	0.00
244149	Bank	2	BANK OF ENGLAND	ENGLAND	AR	0.000			0.000			0.000			0.000		
1199611	BHC	1	NORTHERN TRUST CORPORATION	CHICAGO	IL	0.000	88	0.00	0.000	88	0.00	0.000	87	0.00	0.000	87	0.00
210434	Bank	1	NORTHERN TRUST COMPANY, THE	CHICAGO	IL	0.000			0.000			0.000			0.000		
Totals:		1480				202,786.155		100.00	194,521.780		100.00	202,786.155		100.00	194,521.780		100.00

Notes:

* The geographic market is defined as: Camden, Cumberland, Gloucester and Salem Counties, NJ;

Beverly, Bordentown, and Burlington cities, Fieldsboro, Palmyra, and Riverton boroughs, and Bordentown, Burlington, Chesterfield, Cinnaminson, Delanco, Delran, Eastampton, Edgewater Park, Evesham, Florence, Hainesport, Lumberton, Mansfield, Maple Shade, Medford, Moorestown, Mount Holly, Mount Laurel, Riverside, Springfield, and Willingboro townships in Burlington County, NJ;

Trenton city and Hamilton township in Mercer County, NJ; and

Bucks, Chester, Delaware, Montgomery and Philadelphia Counties, PA.

** Financial data (in millions of dollars) is as of Jun. 30, 2020, and reflects currently known ownership structure.

*** Deposits of thrift institutions are weighted at 50 percent, unless otherwise noted. Deposits of thrift subsidiaries of commercial banking organizations, however, are weighted at 100 percent.

Appendix G

Form of Public Notice

Form of Public Notice

NOTICE OF APPLICATION BY CITIZENS BANK, NATIONAL ASSOCIATION, FOR APPROVAL TO ACQUIRE CERTAIN ASSETS AND ASSUME CERTAIN DEPOSITS FROM HSBC BANK USA, NATIONAL ASSOCIATION

Notice is hereby given that an application has been made to the Office of the Comptroller of the Currency, District Licensing Office, Northeastern District Office, 340 Madison Avenue, New York, New York, 10173 ("OCC") on or about June 21, 2021, for approval of the assumption of certain deposit liabilities and purchase of certain assets, including the branches identified below, from HSBC Bank USA, National Association, with its main office located at 1800 Tysons Boulevard, Tysons, Virginia, 22102 ("HSBC"), by Citizens Bank, National Association, with its main office located at One Citizens Plaza, Providence, Rhode Island, 02903 ("CBNA"). It is contemplated that none of the branches acquired by CBNA will cease to operate as a result of the transaction.

This notice is published pursuant to 12 USC 1828(c) of the Federal Deposit Insurance Act and 12 CFR part 5 of the regulations of the OCC.

Anyone may submit written comments in connection with this application by July 22, 2021 to: Director of District Licensing, Northeastern District Office, 340 Madison Avenue, New York, New York, 10173. Information about the filing, including the closing date of the comment period, is available on the OCC Weekly Bulletin at www.occ.gov.

Requests for a copy of the public file on the application should be made to the Director of District Licensing.

The HSBC branches subject to acquisition by CBNA are as follows:

DISTRICT OF COLUMBIA: 1401 I St. N.W., Ste. 110, Washington, DC, 20005. FLORIDA: 301 Arthur Godfrey Rd., Miami Beach, FL, 33140; 2222 Ponce de Leon, Coral Gables, FL, 33134; 4090 NW 97th Ave., Miami, FL, 33178; 350 E. Las Olas Blvd., Fort Lauderdale, FL, 33301; 1441 Brickell Ave. Ste. 100, Miami, FL, 33131. MARYLAND: 200C E. Middle Ln., Rockville, MD, 20850; 10113 River Rd., Potomac, MD, 20854; 8252 Georgia Ave., Silver Spring, MD, 20910; 7637 Old Georgetown Rd., Bethesda, MD, 20814. NEW JERSEY: 89 River Dr., Jersey City, NJ, 07310; 1819 State Route 27, Edison, NJ, 08817; 2151 Lemoine Ave., Fort Lee, NJ, 07024. NEW YORK: 280 Marsh Ave., Staten Island, NY, 10314; 174 Montague St., Brooklyn, NY, 11201; 9201 3rd Ave., Brooklyn, NY, 11209; 252 Bedford Ave., Brooklyn, NY, 11211; 2301 86th St., Brooklyn, NY, 11214; 325 9th St., Brooklyn, NY, 11215; 1702 Avenue U, Brooklyn, NY, 11229; 2145 Ralph Ave., Brooklyn, NY, 11234; 1545 Flatbush Ave., Brooklyn, NY, 11210; 1330 Pennsylvania Ave., Brooklyn, NY, 11239; 682-684 Dogwood Ave., Franklin Square, NY, 11010; 3130 Hempstead Tpke., Levittown, NY, 11756; 330 Sunrise Hwy., Rockville Centre, NY, 11570; 750 W. Sunrise Hwy. Ste. 4110, Valley Stream, NY, 11581; 355 W. Main St., Huntington, NY, 11743; 57 Middle Neck Rd., Great Neck, NY, 11021; 300 Main St. Ste. 1, East Setauket, NY, 11733; 395 Portion Rd., Ronkonkoma, NY, 11779; 534 Broad Hollow Rd., Melville, NY, 11747; 4040 Veterans Memorial Hwy., Bohemia, NY, 11716; 248 Montauk Hwy. W., Hampton Bays, NY, 11946; 603 Jericho Tpke., Syosset, NY, 11791; 1340 3rd Ave., New York, NY, 10075; 15 Union Square W., New York, NY, 10003; 235 Canal St., New York, NY, 10013; 617 3rd Ave., New York, NY, 10158; 131 E. 57th St., New York, NY, 10022; 186 E. 86th St., New York, NY, 10028; 302 Third Ave., New York, NY, 10010; 101 Delancey St., New York, NY, 10002; 143 Second Ave., New York, NY, 10003; 110 W. Broadway, New York, NY, 10013; 518 5th Ave., New York, NY, 10018; 800 6th Ave., New York, NY, 10001; 721 Amsterdam Ave., New York, NY, 10025; 80 8th Ave., New York, NY, 10011; 252 W. 57th St., New York, NY, 10107; 1133 6th Ave., New York, NY, 10036; 26 Broadway, New York, NY, 10004; 2063 Frederick Douglass Blvd., New York, NY, 10026; 67 Purchase St., Rye, NY, 10580; 74 Pondfield Rd., Bronxville, NY, 10708; 260 North Ave., New Rochelle, NY, 10801; 778 Yonkers Ave., Yonkers, NY, 10704; 449 S. Broadway, Yonkers, NY, 10705; 1300 North Ave., New Rochelle, NY, 10804; 1 City Pl., White Plains, NY, 10601; 14702 Hillside Ave., Jamaica, NY, 11435; 15602 Aguilar Ave., Flushing, NY, 11367; 5120 Northern Blvd., Woodside, NY, 11377; 3478 Boston Rd., Bronx, NY, 10469; 1 E. Fordham Rd., Bronx, NY, 10468; 1756 Crosby Ave., Bronx, NY, 10461; 569 W. 235th St., Bronx, NY, 10463; 25715 Union Tpke., Glen Oaks, NY, 11004; 144-01 Northern Blvd, Flushing, NY, 11361; 3415 Francis Lewis Blvd., Flushing, NY, 11358; 107-19 Continental Ave., Forest Hills, NY, 11375; 24-15 Queens Plaza N., Long Island City, NY, 11101; 1499 West Ave., Bronx, NY, 10462; East Gate Blvd., Garden City, NY, 11530; 5880 Jericho Tpke., Commack, NY, 11725; 8703 Queens Blvd., Elmhurst, NY, 11373. PENNSYLVANIA: 1027 Arch St., Philadelphia, PA, 19107. VIRGINIA: 4075 Wilson Blvd., Arlington, VA, 22203; 11842 Spectrum Ctr., Reston, VA, 20190; 1700 Diagonal Rd., Alexandria, VA, 22314.

Appendix H.1

CBNA Call Report (Mar. 31, 2021)

Federal Financial Institutions Examination Council



Consolidated Reports of Condition and Income for A Bank With Domestic and Foreign Offices - FFIEC 031

Institution Name	CITIZENS BANK, NATIONAL ASSOCIATION
City	PROVIDENCE
State	RI
Zip Code	02903
Call Report Report Date	3/31/2021
Report Type	031
RSSD-ID	3303298
FDIC Certificate Number	57957
OCC Charter Number	24571
ABA Routing Number	11500120
Last updated on	4/30/2021



Consolidated Reports of Condition and Income for A Bank With Domestic and Foreign Offices - FFIEC 031

Report at the close of business March 31, 2021

This report is required by law: 12 U.S.C. §324 (State member banks); 12 U.S.C. §1817 (State non member banks); 12 U.S.C. §161 (National banks); and 12 U.S.C. §1464 (Savings associations).

Unless the context indicates otherwise, the term "bank" in this report form refers to both banks and savings associations.

NOTE: Each bank's board of directors and senior management are responsible for establishing and maintaining an effective system of internal control, including controls over the Reports of Condition and Income. The Reports of Condition and Income are to be prepared in accordance with federal regulatory authority instructions. The Reports of Condition and Income must be signed by the Chief Financial Officer (CFO) of the reporting bank (or by the individual performing an equivalent function) and attested to by not less than two directors (trustees) for state non member banks and three directors for state member banks, national banks, and savings associations.

I, the undersigned CFO (or equivalent) of the named bank, attest that the Reports of Condition and Income (including the supporting

Signature of Chief Financial Officer (or Equivalent)

Date of Signature

(20210331)

(RCON 9999)

This report form is to be filed by (1) banks with branches and consolidated subsidiaries in U.S. territories and possessions, Edge or Agreement subsidiaries, foreign branches, consolidated foreign subsidiaries, or International Banking Facilities, (2) banks with domestic offices only and total consolidated assets of \$100 billion or more, and (3) banks that are advanced approaches institutions for regulatory capital purposes.

schedules) for this report date have been prepared in conformance with the instructions issued by the appropriate Federal regulatory authority and are true and correct to the best of my knowledge and belief.

We, the undersigned directors (trustees), attest to the correctness of the Reports of Condition and Income (including the supporting schedules) for this report date and declare that the Reports of Condition and Income have been examined by us and to the best of our knowledge and belief have been prepared in conformance with the instructions issued by the appropriate Federal regulatory authority and are true and correct.

Director (Trustee)

Director (Trustee)

Director (Trustee)

Submission of Reports

Each bank must file its Reports of Condition and Income (Call Report) data by either:

- Using computer software to prepare its Call Report and then submitting the report data directly to the FFIEC's Central Data Repository (CDR), an Internet-based system for datacollection (<https://cdr.ffiec.gov/cdr/>), or
- Completing its Call Report in paper form and arranging with a software vendor or another party to convert the data in to the electronic format that can be processed by the CDR. The software vendor or other party then must electronically submit the bank's data file to the CDR.

For technical assistance with submissions to the CDR, please contact the CDR Help Desk by telephone at (888) CDR-3111, by fax at (703) 774-3946, or by e-mail at CDR.Help@cdr.ffiec.gov.

FDIC Certificate Number **57957** (RSSD 9050)

To fulfill the signature and attestation requirement for the Reports of Condition and Income for this report date, attach your bank's completed signature page (or a photocopy or a computer generated version of this page) to the hard-copy record of the data file submitted to the CDR that your bank must place in its files.

The appearance of your bank's hard-copy record of the submitted data file need not match exactly the appearance of the FFIEC's sample report forms, but should show at least the caption of each Call Report item and the reported amount.

CITIZENS BANK, NATIONAL ASSOCIATION

Legal Title of Bank (RSSD 9017)

PROVIDENCE

City (RSSD 9130)

RI

State Abbreviation (RSSD 9200)

02903

Zip Code (RSSD 9220)

Legal Entity Identifier (LEI)

DRMSV1Q0EKMEXLAU1P80 (RCON 9224)

The estimated average burden associated with this information collection is 50.4 hours per respondent and is estimated to vary from 20 to 775 hours per response, depending on individual circumstances. Burden estimates include the time for reviewing instructions, gathering and maintaining data in the required form, and completing the information collection, but exclude the time for compiling and maintaining business records in the normal course of a respondent's activities. A Federal agency may not conduct or sponsor, and an organization (or a person) is not required to respond to a collection of information, unless it displays a currently valid OMB control number. Comments concerning the accuracy of this burden estimate and suggestions for reducing this burden should be directed to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503, and to one of the following: Secretary, Board of Governors of the Federal Reserve System, 20th and C Streets, NW, Washington, DC 20551; Legislative and Regulatory Analysis Division, Office of the Comptroller of the Currency, Washington, DC 20219; Assistant Executive Secretary, Federal Deposit Insurance Corporation, Washington, DC 20429.

Consolidated Reports of Condition and Income for A Bank With Domestic and Foreign Offices - FFIEC 031

Table of Contents

Signature Page.....	1	Schedule RC-C Part I - Loans and Leases(Form Type - 031).....	23
Table of Contents.....	2	Schedule RC-C Part II - Loans to Small Businesses and Small Farms(Form Type - 031).....	28
Emergency Contact Information.....	4	Schedule RC-D - Trading Assets and Liabilities(Form Type - 031).....	29
Contact Information for the Reports of Condition and Income.....	4	Schedule RC-E Part I - Deposits in Domestic Offices(Form Type - 031).....	31
USA PATRIOT Act Section 314(a) Anti-Money Laundering Contact Information.....	5	Schedule RC-E Part II - Deposits in Foreign Offices including Edge and Agreement subsidiaries and IBFs(Form Type - 031).....	33
Bank Demographic Information(Form Type - 031).....	6	Schedule RC-F - Other Assets(Form Type - 031).....	34
Contact Information(Form Type - 031).....	6	Schedule RC-G - Other Liabilities(Form Type - 031).....	35
Schedule RI - Income Statement(Form Type - 031).....	8	Schedule RC-H - Selected Balance Sheet Items for Domestic Offices(Form Type - 031).....	36
Schedule RI-A - Changes in Bank Equity Capital(Form Type - 031).....	11	Schedule RC-I - Assets and Liabilities of IBFs(Form Type - 031).....	37
Schedule RI-B Part I - Charge-offs and Recoveries on Loans and Leases(Form Type - 031).....	12	Schedule RC-K - Quarterly Averages(Form Type - 031).....	37
Schedule RI-B Part II - Changes in Allowances for Credit Losses(Form Type - 031).....	13	Schedule RC-L - Derivatives and Off-Balance Sheet Items(Form Type - 031).....	38
Schedule RI-C Part I - Disaggregated Data on the Allowance for Loan and Lease Losses(Form Type - 031).....	14	Schedule RC-M - Memoranda(Form Type - 031).....	42
Schedule RI-C Part II - Disaggregated Data on the Allowances for Credit Losses(Form Type - 031).....	15	Schedule RC-N - Past Due and Nonaccrual Loans Leases and Other Assets(Form Type - 031).....	46
Schedule RI-D - Income from Foreign Offices(Form Type - 031).....	15	Schedule RC-O - Other Data for Deposit Insurance and FICO Assessments(Form Type - 031).....	49
Schedule RI-E - Explanations (Form Type - 031).....	16	Schedule RC-P - 1-4 Family Residential Mortgage Banking Activities in Domestic Offices(Form Type - 031).....	53
Schedule RC - Balance Sheet(Form Type - 031).....	18		
Schedule RC-A - Cash and Balances Due From Depository Institutions(Form Type - 031).....	19		
Schedule RC-B - Securities(Form Type - 031).....	20		

For information or assistance, national banks, state nonmember banks, and savings associations should contact the FDIC's Data Collection and Analysis Section, 550 17th Street, NW, Washington, DC 20429, toll free on (800) 688-FDIC(3342), Monday through Friday between 8:00 a.m. and 5:00 p.m., Eastern Time. State member banks should contact their Federal Reserve District Bank.

Board of Governors of the Federal Reserve System, Federal Deposit Insurance Corporation, Office of the Comptroller of the Currency

Legend: NR - Not Reported, CONF - Confidential

Schedule RC-Q - Assets and Liabilities Measured at Fair Value on a Recurring Basis(Form Type - 031).....	53
Schedule RC-R Part I - Regulatory Capital Components and Ratios(Form Type - 031).....	58
Schedule RC-R Part II - Risk-Weighted Assets(Form Type - 031).....	62
Schedule RC-S - Servicing Securitization and Asset Sale Activities(Form Type - 031).....	72
Schedule RC-T - Fiduciary and Related Services(Form Type - 031).....	73
Schedule RC-V - Variable Interest Entities(Form Type - 031).....	75
Optional Narrative Statement Concerning the Amounts Reported in the Consolidated Reports of Condition and Income(Form Type - 031).....	76

For information or assistance, national banks, state nonmember banks, and savings associations should contact the FDIC's Data Collection and Analysis Section, 550 17th Street, NW, Washington, DC 20429, toll free on (800) 688-FDIC(3342), Monday through Friday between 8:00 a.m. and 5:00 p.m., Eastern Time. State member banks should contact their Federal Reserve District Bank.

Board of Governors of the Federal Reserve System, Federal Deposit Insurance Corporation, Office of the Comptroller of the Currency
Legend: NR - Not Reported, CONF - Confidential

Contact Information for the Reports of Condition and Income

To facilitate communication between the Agencies and the bank concerning the Reports of Condition and Income, please provide contact information for (1) the Chief Financial Officer (or equivalent) of the bank signing the reports for this quarter, and (2) the person at the bank—other than the Chief Financial Officer (or equivalent)—to whom questions about the reports should be directed. If the Chief Financial Officer (or equivalent) is the primary contact for questions about the reports, please provide contact information for another person at the bank who will serve as a secondary contact for communications between the Agencies and the bank concerning the Reports of Condition and Income. Enter “none” for the contact’s e-mail address or fax number if not available. Contact information for the Reports of Condition and Income is for the confidential use of the Agencies and will not be released to the public.

Chief Financial Officer (or Equivalent) Signing the Reports

CONF

Name (TEXT C490)

CONF

Title (TEXT C491)

CONF

E-mail Address (TEXT C492)

CONF

Area Code / Phone Number / Extension (TEXT C493)

CONF

Area Code / FAX Number (TEXT C494)

Other Person to Whom Questions about the Reports Should be Directed

CONF

Name (TEXT C495)

CONF

Title (TEXT C496)

CONF

E-mail Address (TEXT 4086)

CONF

Area Code / Phone Number / Extension (TEXT 8902)

CONF

Area Code / FAX Number (TEXT 9116)

Emergency Contact Information

This information is being requested so the Agencies can distribute critical, time-sensitive information to emergency contacts at banks. Please provide primary contact information for a senior official of the bank who has decision-making authority. Also provide information for a secondary contact if available. Enter “none” for the contact’s e-mail address or fax number if not available. Emergency contact information is for the confidential use of the Agencies and will not be released to the public.

Primary Contact

CONF

Name (TEXT C366)

CONF

Title (TEXT C367)

CONF

E-mail Address (TEXT C368)

CONF

Area Code / Phone Number / Extension (TEXT C369)

CONF

Area Code / FAX Number (TEXT C370)

Secondary Contact

CONF

Name (TEXT C371)

CONF

Title (TEXT C372)

CONF

E-mail Address (TEXT C373)

CONF

Area Code / Phone Number / Extension (TEXT C374)

CONF

Area Code / FAX Number (TEXT C375)

USA PATRIOT Act Section 314(a) Anti-Money Laundering

Contact Information

This information is being requested to identify points-of-contact who are in charge of your bank's USA PATRIOT Act Section 314(a) information requests. Bank personnel listed could be contacted by law enforcement officers or the Financial Crimes Enforcement Network (FinCEN) for additional information related to specific Section 314(a) search requests or other anti-terrorist financing and anti- money laundering matters. Communications sent by FinCEN to the bank for purposes other than Section 314(a) notifications will state the intended purpose and should be directed to the appropriate bank personnel for review. Any disclosure of customer records to law enforcement officers or FinCEN must be done in compliance with applicable law, including the Right to Financial Privacy Act (12 U.S.C. 3401 et seq.).

Please provide information for a primary and secondary contact. Information for a third and fourth contact may be provided at the bank's option. Enter "none" for the contact's e-mail address if not available. This contact information is for the confidential use of the Agencies, FinCEN, and law enforcement officers and will not be released to the public.

Primary Contact

CONF
Name (TEXT C437)

CONF
Title (TEXT C438)

CONF
E-mail Address (TEXT C439)

CONF
Area Code / Phone Number / Extension (TEXT C440)

Secondary Contact

CONF
Name (TEXT C442)

CONF
Title (TEXT C443)

CONF
E-mail Address (TEXT C444)

CONF
Area Code / Phone Number / Extension (TEXT 8902)

Third Contact

CONF
Name (TEXT C870)

CONF
Title (TEXT C871)

CONF
E-mail Address (TEXT C368)

CONF
Area Code / Phone Number / Extension (TEXT C873)

Fourth Contact

CONF
Name (TEXT C875)

CONF
Title (TEXT C876)

CONF
E-mail Address (TEXT C877)

CONF
Area Code / Phone Number / Extension (TEXT C878)

Bank Demographic Information(Form Type - 031)

Dollar amounts in thousands

1. Reporting date.....	RCON9999	20210331	1.
2. FDIC certificate number.....	RSSD9050	57957	2.
3. Legal title of bank.....	RSSD9017	Click here for value	3.
4. City.....	RSSD9130	Providence	4.
5. State abbreviation.....	RSSD9200	RI	5.
6. Zip code.....	RSSD9220	02903	6.
7. Legal Entity Identifier (LEI) (Report only if your institution already has an LEI.).....	RCON9224	Click here for value	7.

(RCON9224) DRMSV1Q0EKMEXLAU1P80

(RSSD9017) Citizens Bank, National Association

Contact Information(Form Type - 031)

Dollar amounts in thousands

1. Contact Information for the Reports of Condition and Income			1.
a. Chief Financial Officer (or Equivalent) Signing the Reports			1.a.
1. Name.....	TEXTC490	CONF	1.a.1.
2. Title.....	TEXTC491	CONF	1.a.2.
3. E-mail Address.....	TEXTC492	CONF	1.a.3.
4. Telephone.....	TEXTC493	CONF	1.a.4.
5. FAX.....	TEXTC494	CONF	1.a.5.
b. Other Person to Whom Questions about the Reports Should be Directed			1.b.
1. Name.....	TEXTC495	CONF	1.b.1.
2. Title.....	TEXTC496	CONF	1.b.2.
3. E-mail Address.....	TEXT4086	CONF	1.b.3.
4. Telephone.....	TEXT8902	CONF	1.b.4.
5. FAX.....	TEXT9116	CONF	1.b.5.
2. Person to whom questions about Schedule RC-T - Fiduciary and Related Services should be directed			2.
a. Name and Title.....	TEXTB962	CONF	2.a.
b. E-mail Address.....	TEXTB926	CONF	2.b.
c. Telephone.....	TEXTB963	CONF	2.c.
d. FAX.....	TEXTB964	CONF	2.d.
3. Emergency Contact Information			3.
a. Primary Contact			3.a.
1. Name.....	TEXTC366	CONF	3.a.1.
2. Title.....	TEXTC367	CONF	3.a.2.
3. E-mail Address.....	TEXTC368	CONF	3.a.3.
4. Telephone.....	TEXTC369	CONF	3.a.4.
5. FAX.....	TEXTC370	CONF	3.a.5.
b. Secondary Contact			3.b.
1. Name.....	TEXTC371	CONF	3.b.1.
2. Title.....	TEXTC372	CONF	3.b.2.
3. E-mail Address.....	TEXTC373	CONF	3.b.3.
4. Telephone.....	TEXTC374	CONF	3.b.4.
5. FAX.....	TEXTC375	CONF	3.b.5.
4. USA PATRIOT Act Section 314(a) Anti-Money Laundering Contact Information			4.
a. Primary Contact			4.a.

Dollar amounts in thousands

1. Name.....	TEXTC437	CONF	4.a.1.
2. Title.....	TEXTC438	CONF	4.a.2.
3. E-mail Address.....	TEXTC439	CONF	4.a.3.
4. Telephone.....	TEXTC440	CONF	4.a.4.
b. Secondary Contact			4.b.
1. Name.....	TEXTC442	CONF	4.b.1.
2. Title.....	TEXTC443	CONF	4.b.2.
3. E-mail Address.....	TEXTC444	CONF	4.b.3.
4. Telephone.....	TEXTC445	CONF	4.b.4.
c. Third Contact			4.c.
1. Name.....	TEXTC870	CONF	4.c.1.
2. Title.....	TEXTC871	CONF	4.c.2.
3. E-mail Address.....	TEXTC872	CONF	4.c.3.
4. Telephone.....	TEXTC873	CONF	4.c.4.
d. Fourth Contact			4.d.
1. Name.....	TEXTC875	CONF	4.d.1.
2. Title.....	TEXTC876	CONF	4.d.2.
3. E-mail Address.....	TEXTC877	CONF	4.d.3.
4. Telephone.....	TEXTC878	CONF	4.d.4.
5. Chief Executive Officer Contact Information			5.
a. Chief Executive Officer			5.a.
1. Name.....	TEXTFT42	CONF	5.a.1.
2. E-mail Address.....	TEXTFT44	CONF	5.a.2.
3. Telephone.....	TEXTFT43	CONF	5.a.3.
4. FAX.....	TEXTFT45	CONF	5.a.4.

Schedule RI - Income Statement(Form Type - 031)

All Report of Income schedules are to be reported on a calendar year-to-date basis in thousands of dollars.

Dollar amounts in thousands

1. Interest income:			1.
a. Interest and fee income on loans:			1.a.
1. In domestic offices:			1.a.1.
a. Loans secured by real estate:			1.a.1.a.
1. Loans secured by 1-4 family residential properties.....	RIAD4435	260,809	1.a.1.a.1.
2. All other loans secured by real estate.....	RIAD4436	103,796	1.a.1.a.2.
b. Loans to finance agricultural production and other loans to farmers.....	RIAD4024	0	1.a.1.b.
c. Commercial and industrial loans.....	RIAD4012	327,127	1.a.1.c.
d. Loans to individuals for household, family, and other personal expenditures:			1.a.1.d.
1. Credit cards.....	RIADB485	40,667	1.a.1.d.1.
2. Other (includes revolving credit plans other than credit cards, automobile loans, and other consumer loans).....	RIADB486	325,570	1.a.1.d.2.
e. Loans to foreign governments and official institutions.....	RIAD4056	0	1.a.1.e.
f. All other loans in domestic offices.....	RIADB487	14,916	1.a.1.f.
2. In foreign offices, Edge and Agreement subsidiaries, and IBFs.....	RIAD4059	0	1.a.2.
3. Total interest and fee income on loans (sum of items 1.a.(1)(a) through 1.a.(2)).....	RIAD4010	1,072,885	1.a.3.
b. Income from lease financing receivables.....	RIAD4065	12,892	1.b.
c. Interest income on balances due from depository institutions ¹	RIAD4115	2,495	1.c.
d. Interest and dividend income on securities:			1.d.
1. U.S. Treasury securities and U.S. Government agency obligations (excluding mortgage-backed securities).....	RIADB488	3	1.d.1.
2. Mortgage-backed securities.....	RIADB489	118,561	1.d.2.
3. All other securities (includes securities issued by states and political subdivisions in the U.S.).....	RIAD4060	6,500	1.d.3.
e. Interest income from trading assets.....	RIAD4069	1,707	1.e.
f. Interest income on federal funds sold and securities purchased under agreements to resell.....	RIAD4020	0	1.f.
g. Other interest income.....	RIAD4518	2,629	1.g.
h. Total interest income (sum of items 1.a.(3) through 1.g.).....	RIAD4107	1,217,672	1.h.
2. Interest expense:			2.
a. Interest on deposits:			2.a.
1. Interest on deposits in domestic offices:			2.a.1.
a. Transaction accounts (interest-bearing demand deposits, NOW accounts, ATS accounts, and telephone and preauthorized transfer accounts).....	RIAD4508	3,900	2.a.1.a.
b. Nontransaction accounts:			2.a.1.b.
1. Savings deposits (includes MMDAs).....	RIAD0093	29,395	2.a.1.b.1.
2. Time deposits of \$250,000 or less.....	RIADHK03	13,024	2.a.1.b.2.
3. Time deposits of more than \$250,000.....	RIADHK04	3,678	2.a.1.b.3.
2. Interest on deposits in foreign offices, Edge and Agreement subsidiaries, and IBFs.....	RIAD4172	722	2.a.2.
b. Expense of federal funds purchased and securities sold under agreements to repurchase.....	RIAD4180	28	2.b.
c. Interest on trading liabilities and other borrowed money.....	RIAD4185	17,680	2.c.
d. Interest on subordinated notes and debentures.....	RIAD4200	8,095	2.d.
e. Total interest expense (sum of items 2.a through 2.d.).....	RIAD4073	76,522	2.e.
3. Net interest income (item 1.h minus 2.e.).....	RIAD4074	1,141,150	3.
4. Provision for loan and lease losses ¹	RIADJJ33	-140,300	4.
5. Noninterest income:			5.
a. Income from fiduciary activities ²	RIAD4070	12,048	5.a.
b. Service charges on deposit accounts in domestic offices.....	RIAD4080	94,646	5.b.

1. Includes interest income on time certificates of deposit not held for trading.
1. Institutions that have adopted ASU 2016-13 should report in item 4, the provisions for credit losses for all financial assets and off-balance-sheet credit exposures that fall within the scope of the standard.
2. For banks required to complete Schedule RC-T, items 14 through 22, income from fiduciary activities reported in Schedule RI, item 5.a, must equal the amount reported in Schedule RC-T, item 22.

Dollar amounts in thousands

c. Trading revenue ³	RIADA220	12,636	5.c.
d. Income from securities-related and insurance activities:			5.d.
1. Fees and commissions from securities brokerage.....	RIADC886	29,792	5.d.1.
2. Investment banking, advisory, and underwriting fees and commissions.....	RIADC888	0	5.d.2.
3. Fees and commissions from annuity sales.....	RIADC887	12,783	5.d.3.
4. Underwriting income from insurance and reinsurance activities.....	RIADC386	0	5.d.4.
5. Income from other insurance activities.....	RIADC387	837	5.d.5.
e. Venture capital revenue.....	RIADB491	0	5.e.
f. Net servicing fees.....	RIADB492	26,968	5.f.
g. Net securitization income.....	RIADB493	0	5.g.
h. Not applicable			5.h.
i. Net gains (losses) on sales of loans and leases.....	RIAD5416	142,366	5.i.
j. Net gains (losses) on sales of other real estate owned.....	RIAD5415	1,026	5.j.
k. Net gains (losses) on sales of other assets ⁴	RIADB496	5	5.k.
l. Other noninterest income [*]	RIADB497	162,961	5.l.
m. Total noninterest income (sum of items 5.a through 5.l.).....	RIAD4079	496,068	5.m.
6. Not available			6.
a. Realized gains (losses) on held-to-maturity securities.....	RIAD3521	0	6.a.
b. Realized gains (losses) on available-for-sale debt securities.....	RIAD3196	2,999	6.b.
7. Noninterest expense:			7.
a. Salaries and employee benefits.....	RIAD4135	528,960	7.a.
b. Expenses of premises and fixed assets (net of rental income) (excluding salaries and employee benefits and mortgage interest).....	RIAD4217	165,351	7.b.
c. Not available			7.c.
1. Goodwill impairment losses.....	RIADC216	0	7.c.1.
2. Amortization expense and impairment losses for other intangible assets.....	RIADC232	2,003	7.c.2.
d. Other noninterest expense [*]	RIAD4092	306,452	7.d.
e. Total noninterest expense (sum of items 7.a through 7.d.).....	RIAD4093	1,002,766	7.e.
8. Not available			8.
a. Income (loss) before change in net unrealized holding gains (losses) on equity securities not held for trading, applicable income taxes, and discontinued operations (item 3 plus or minus items 4, 5.m, 6.a, 6.b, and 7.e.).....	RIADHT69	777,751	8.a.
b. Change in net unrealized holding gains (losses) on equity securities not held for trading ⁵	RIADHT70	0	8.b.
c. Income (loss) before applicable income taxes and discontinued operations (sum of items 8.a and 8.b.).....	RIAD4301	777,751	8.c.
9. Applicable income taxes (on item 8.c.).....	RIAD4302	169,412	9.
10. Income (loss) before discontinued operations (item 8.c minus item 9.).....	RIAD4300	608,339	10.
11. Discontinued operations, net of applicable income taxes (Describe on Schedule RI-E - Explanations) [*]	RIADFT28	0	11.
12. Net income (loss) attributable to bank and noncontrolling (minority) interests (sum of items 10 and 11.).....	RIADG104	608,339	12.
13. LESS: Net income (loss) attributable to noncontrolling (minority) interests (if net income, report as a positive value; if net loss, report as a negative value).....	RIADG103	0	13.
14. Net income (loss) attributable to bank (item 12 minus item 13).....	RIAD4340	608,339	14.
1. Interest expense incurred to carry tax-exempt securities, loans, and leases acquired after August 7, 1986, that is not deductible for federal income tax purposes.....	RIAD4513	181	M.1.
Memorandum item 2 is to be completed by banks with \$1 billion or more in total assets			
2. Income from the sale and servicing of mutual funds and annuities in domestic offices (included in Schedule RI, item 8.).....	RIAD8431	42,575	M.2.
3. Income on tax-exempt loans and leases to states and political subdivisions in the U.S. (included in Schedule RI, items 1.a and 1.b.).....	RIAD4313	3	M.3.
4. Income on tax-exempt securities issued by states and political subdivisions in the U.S. (included in Schedule RI, item 1.d.(3)).....	RIAD4507	19	M.4.
5. Number of full-time equivalent employees at end of current period (round to nearest whole number).....	RIAD4150	17280	M.5.
6. Not applicable			M.6.

3. For banks required to complete Schedule RI, Memorandum item 8, trading revenue reported in Schedule RI, item 5.c, must equal the sum of Memorandum items 8.a through 8.e.

4. Exclude net gains (losses) on sales of trading assets and held-to-maturity and available-for-sale debt securities.

*. Describe on Schedule RI-E—Explanations.

5. Item 8.b is to be completed by all institutions. See the instructions this item and the Glossary entry for "Securities Activities" for further detail on accounting for investments in equity securities.

Dollar amounts in thousands

7. If the reporting institution has applied pushdown accounting this calendar year, report the date of the institution's acquisition (see instructions) ²	RIAD9106	0	M.7.
8. Trading revenue (from cash instruments and derivative instruments) (sum of Memorandum items 8.a through 8.e must equal Schedule RI, item 5.c):			M.8.
<i>Memorandum items 8.a through 8.e are to be completed by banks that reported average trading assets (Schedule RC-K, item 7) of \$2 million or more for any quarter of the preceding calendar year.</i>			
a. Interest rate exposures.....	RIAD8757	7,761	M.8.a.
b. Foreign exchange exposures.....	RIAD8758	2,324	M.8.b.
c. Equity security and index exposures.....	RIAD8759	0	M.8.c.
d. Commodity and other exposures.....	RIAD8760	1,110	M.8.d.
e. Credit exposures.....	RIADF186	1,441	M.8.e.
<i>Memorandum items 8.f through 8.h are to be completed by banks with \$100 billion or more in total assets that are required to complete Schedule RI, Memorandum items 8.a through 8.e, above.</i>			M.8.f.
f. Impact on trading revenue of changes in the creditworthiness of the bank's derivatives counterparties on the bank's derivative assets (year-to-date changes) (included in Memorandum items 8.a through 8.e above):			
1. Gross credit valuation adjustment (CVA).....	RIADFT36	8,314	M.8.f.1.
2. CVA hedge.....	RIADFT37	-12,357	M.8.f.2.
g. Impact on trading revenue of changes in the creditworthiness of the bank on the bank's derivative liabilities (year-to-date changes) (included in Memorandum items 8.a through 8.e above):			M.8.g.
1. Gross debit valuation adjustment (DVA).....	RIADFT38	5,001	M.8.g.1.
2. DVA hedge.....	RIADFT39	0	M.8.g.2.
h. Gross trading revenue, before including positive or negative net CVA and net DVA.....	RIADFT40	-678	M.8.h.
9. Net gains (losses) recognized in earnings on credit derivatives that economically hedge credit exposures held outside the trading account:			M.9.
a. Net gains (losses) on credit derivatives held for trading.....	RIADC889	0	M.9.a.
b. Net gains (losses) on credit derivatives held for purposes other than trading.....	RIADC890	0	M.9.b.
10. Credit losses on derivatives (see instructions).....	RIADA251	231	M.10.
11. Does the reporting bank have a Subchapter S election in effect for federal income tax purposes for the current tax year?.....	RIADA530	No	M.11.
<i>Memorandum item 12 is to be completed by banks that are required to complete Schedule RC-C, Part I, Memorandum items 8.b and 8.c and is to be completed semiannually in the June and December reports only.</i>			
12. Noncash income from negative amortization on closed-end loans secured by 1-4 family residential properties (included in Schedule RI, item 1.a.(1)(a)(1)).....	RIADF228	NR	M.12.
<i>Memorandum item 13 is to be completed by banks that have elected to account for assets and liabilities under a fair value option.</i>			M.13.
13. Net gains (losses) recognized in earnings on assets and liabilities that are reported at fair value under a fair value option:			
a. Net gains (losses) on assets.....	RIADF551	-49,672	M.13.a.
1. Estimated net gains (losses) on loans attributable to changes in instrument-specific credit risk.....	RIADF552	2,632	M.13.a.1.
b. Net gains (losses) on liabilities.....	RIADF553	0	M.13.b.
1. Estimated net gains (losses) on liabilities attributable to changes in instrument-specific credit risk.....	RIADF554	0	M.13.b.1.
14. Other-than-temporary impairment losses on held-to-maturity and available-for-sale debt securities ²	RIADJ321	NR	M.14.
<i>Memorandum item 15 is to be completed by institutions with \$1 billion or more in total assets that answered "Yes" to Schedule RC-E, Part I, Memorandum item 5.</i>			M.15.
15. Components of service charges on deposit accounts in domestic offices (sum of Memorandum items 15.a through 15.d must equal Schedule RI, item 5.b):			
a. Consumer overdraft-related service charges levied on those transaction account and nontransaction savings account deposit products intended primarily for individuals for personal, household, or family use.....	RIADH032	36,171	M.15.a.
b. Consumer account periodic maintenance charges levied on those transaction account and nontransaction savings account deposit products intended primarily for individuals for personal, household, or family use.....	RIADH033	8,386	M.15.b.
c. Consumer customer automated teller machine (ATM) fees levied on those transaction account and nontransaction savings account deposit products intended primarily for individuals for personal, household, or family use.....	RIADH034	8,877	M.15.c.
d. All other service charges on deposit accounts.....	RIADH035	41,212	M.15.d.

2. Report the date in YYYYMMDD format. For example, a bank acquired on March 1, 2019, would report 20190301.
2. Memorandum item 14 is to be completed only by institutions that have not adopted ASU 2016-13.

Schedule RI-A - Changes in Bank Equity Capital(Form Type - 031)

Dollar amounts in thousands

1. Total bank equity capital most recently reported for the December 31, 2020, Reports of Condition and Income (i.e., after adjustments from amended Reports of Income).....	RIAD3217	22,163,855	1.
2. Cumulative effect of changes in accounting principles and corrections of material accounting errors *	RIADB507	0	2.
3. Balance end of previous calendar year as restated (sum of items 1 and 2).....	RIADB508	22,163,855	3.
4. Net income (loss) attributable to bank (must equal Schedule RI, item 14).....	RIAD4340	608,339	4.
5. Sale, conversion, acquisition, or retirement of capital stock, net (excluding treasury stock transactions).....	RIADB509	0	5.
6. Treasury stock transactions, net.....	RIADB510	0	6.
7. Changes incident to business combinations, net.....	RIAD4356	0	7.
8. LESS: Cash dividends declared on preferred stock.....	RIAD4470	0	8.
9. LESS: Cash dividends declared on common stock.....	RIAD4460	300,000	9.
10. Other comprehensive income ¹	RIADB511	-352,485	10.
11. Other transactions with stockholders (including a parent holding company) (not included in items 5, 6, 8, or 9 above) *	RIAD4415	0	11.
12. Total bank equity capital end of current period (sum of items 3 through 11) (must equal Schedule RC, item 27.a)..	RIAD3210	22,119,709	12.

*. Describe on Schedule RI-E—Explanations

1. Includes, but is not limited to, changes in net unrealized holding gains (losses) on available-for-sale debt securities, changes in accumulated net gains (losses) on cash flow hedges, foreign currency translation adjustments, and pension and other postretirement plan-related changes other than net periodic benefit cost.

Schedule RI-B Part I - Charge-offs and Recoveries on Loans and Leases(Form Type - 031)

Part I includes charge-offs and recoveries through the allocated transfer risk reserve.

Dollar amounts in thousands		(Column A) Charge-offs Calendar year-to-date		(Column B) Recoveries Calendar year-to-date		
1. Loans secured by real estate:						1.
a. Construction, land development, and other land loans in domestic offices:						1.a.
1. 1-4 family residential construction loans.....	RIADC891	0	RIADC892	58		1.a.1.
2. Other construction loans and all land development and other land loans.....	RIADC893	0	RIADC894	0		1.a.2.
b. Secured by farmland in domestic offices.....	RIAD3584	0	RIAD3585	0		1.b.
c. Secured by 1-4 family residential properties in domestic offices:						1.c.
1. Revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit.....	RIAD5411	2,335	RIAD5412	3,641		1.c.1.
2. Closed-end loans secured by 1-4 family residential properties:						1.c.2.
a. Secured by first liens.....	RIADC234	559	RIADC217	1,788		1.c.2.a.
b. Secured by junior liens.....	RIADC235	1,076	RIADC218	6,815		1.c.2.b.
d. Secured by multifamily (5 or more) residential properties in domestic offices.....	RIAD3588	0	RIAD3589	120		1.d.
e. Secured by nonfarm nonresidential properties in domestic offices:						1.e.
1. Loans secured by owner-occupied nonfarm nonresidential properties.....	RIADC895	587	RIADC896	176		1.e.1.
2. Loans secured by other nonfarm nonresidential properties.....	RIADC897	15,508	RIADC898	26,507		1.e.2.
f. In foreign offices.....	RIADB512	0	RIADB513	0		1.f.
2. Not applicable						2.
3. Loans to finance agricultural production and other loans to farmers.....	RIAD4655	0	RIAD4665	0		3.
4. Commercial and industrial loans:						4.
a. To U.S. addressees (domicile).....	RIAD4645	104,909	RIAD4617	4,283		4.a.
b. To non-U.S. addressees (domicile).....	RIAD4646	0	RIAD4618	0		4.b.
5. Loans to individuals for household, family, and other personal expenditures:						5.
a. Credit cards.....	RIADB514	15,995	RIADB515	2,176		5.a.
b. Automobile loans.....	RIADK129	23,710	RIADK133	13,477		5.b.
c. Other (includes revolving credit plans other than credit cards and other consumer loans).....	RIADK205	38,626	RIADK206	8,687		5.c.
6. Loans to foreign governments and official institutions.....	RIAD4643	0	RIAD4627	0		6.
7. All other loans.....	RIAD4644	22,615	RIAD4628	1,565		7.
8. Lease financing receivables:						8.
a. Leases to individuals for household, family, and other personal expenditures.....	RIADF185	0	RIADF187	0		8.a.
b. All other leases.....	RIADC880	1,523	RIADF188	298		8.b.
9. Total (sum of items 1 through 8).....	RIAD4635	227,443	RIAD4605	69,591		9.
1. Loans to finance commercial real estate, construction, and land development activities (not secured by real estate) included in Schedule RI-B, part I, items 4 and 7, above.....	RIAD5409	0	RIAD5410	52		M.1.
2. Loans secured by real estate to non-U.S. addressees (domicile) (included in Schedule RI-B, part I, item 1, above).....	RIAD4652	0	RIAD4662	0		M.2.
3. Not applicable						M.3.

Dollar amounts in thousands

Memorandum item 4 is to be completed by banks that (1) together with affiliated institutions, have outstanding credit card receivables (as defined in the instructions) that exceed \$500 million as of the report date, or (2) are credit card specialty banks as defined for Uniform Bank Performance Report purposes.

4. Uncollectible retail credit card fees and finance charges reversed against income (i.e., not included in charge-offs against the allowance for loan and lease losses)².....

RIADC388	2,747	M.4.
----------	-------	------

2. Institutions that have adopted ASU 2016-13 should report in Memorandum item 4 uncollectible retail credit card fees and finance charges reversed against income (i.e. not included in charge-offs against the allowance for credit losses on loans and leases).

Schedule RI-B Part II - Changes in Allowances for Credit Losses(Form Type - 031)

Dollar amounts in thousands	(Column A) Loans and Leases Held for Investment		(Column B) Held-to-maturity Debt Securities		(Column C) Available-for-sale Debt Securities	
1. Balance most recently reported for the December 31, 2020, Reports of Condition and Income (i.e., after adjustments from amended Reports of Income).....	RIADB522	2,442,978	RIADJH88	0	RIADJH94	0
2. Recoveries (column A must equal Part I, item 9, column B, above).....	RIAD4605	69,591	RIADJH89	0	RIADJH95	0
3. LESS: Charge-offs (column A must equal Part I, item 9, column A, above less Schedule RI-B, Part II, item 4, column A).....	RIADC079	227,443	RIADJH92	0	RIADJH98	0
4. LESS: Write-downs arising from transfers of financial assets ³	RIAD5523	0	RIADJJ00	0	RIADJJ01	0
5. Provisions for credit losses ⁴	RIAD4230	-91,200	RIADJH90	0	RIADJH96	0
6. Adjustments* (see instructions for this schedule) *.....	RIADC233	0	RIADJH91	0	RIADJH97	0
7. Balance end of current period (sum of items 1, 2, 5, and 6, less items 3 and 4) (column A must equal Schedule RC, item 4.c).....	RIAD3123	2,193,926	RIADJH93	0	RIADJH99	0

Dollar amounts in thousands			
1. Allocated transfer risk reserve included in Schedule RI-B, Part II, item 7, column A, above.....	RIADC435	NR	M.1.
Memorandum items 2 and 3 are to be completed by banks that (1) together with affiliated institutions, have outstanding credit card receivables (as defined in the instructions) that exceed \$500 million as of the report date, or (2) are credit card specialty banks as defined for Uniform Bank Performance Report purposes.	RIADC389	2,712	M.2.
2. Separate valuation allowance for uncollectible retail credit card fees and finance charges.....	RIADC390	0	M.3.
3. Amount of allowance for loan and lease losses attributable to retail credit card fees and finance charges ¹	RIADC781	NR	M.4.
4. Amount of allowance for post-acquisition credit losses on purchased credit-impaired loans accounted for in accordance with FASB ASC 310-30 (former AICPA Statement of Position 03-3) (included in Schedule RI-B, Part II, item 7, column A, above) ²	RIADJJ02	0	M.5.
5. Provisions for credit losses on other financial assets measured at amortized cost (not included in item 5, above) ³ ...	RCFDJJ03	0	M.6.
6. Allowance for credit losses on other financial assets measured at amortized cost (not included in item 7, above) ³ ...	RIADMG93	-49,100	M.7.
7. Provisions for credit losses on off-balance-sheet credit exposures ³	RIADMG94	118,810	M.8.
8. Estimated amount of expected recoveries of amounts previously written off included within the allowance for credit losses on loans and leases held for investment (included in item 7, column A, "Balance end of current period," above) ³			

3. Institutions that have not yet adopted ASU 2016-13 should report write-downs arising from transfers of loans to a held-for-sale account in item 4, column A.
4. Institutions that have not yet adopted ASU 2016-13 should report the provision for loan and lease losses in item 5, column A and the amount reported must equal Schedule RI, item 4.
- *. Describe on Schedule RI-E - Explanations.
1. Institutions that have adopted ASU 2016-13 should report in Memorandum item 3 the amount of allowance for credit losses on loans and leases attributable to retail credit card fees and finance charges.
2. Memorandum item 4 is to be completed only by institutions that have not yet adopted ASU 2016-13.
3. Memorandum items 5, 6, 7, and 8 are to be completed only by institutions that have adopted ASU 2016-13.
3. Memorandum items 5, 6, 7, and 8 are to be completed only by institutions that have adopted ASU 2016-13.
3. Memorandum items 5, 6, 7, and 8 are to be completed only by institutions that have adopted ASU 2016-13.
3. Memorandum items 5, 6, 7, and 8 are to be completed only by institutions that have adopted ASU 2016-13.

Schedule RI-C Part I - Disaggregated Data on the Allowance for Loan and Lease Losses(Form Type - 031)

Schedule RI-C is to be completed by institutions with \$1 billion or more in total assets.

Dollar amounts in thousands		(Column A) Recorded Investment: Individually Evaluated for Impairment and Determined to be Impaired (ASC 310-10-35)	(Column B) Allowance Balance: Individually Evaluated for Impairment and Determined to be Impaired (ASC 310-10-35)	(Column C) Recorded Investment: Collectively Evaluated for Impairment (ASC 450-20)	(Column D) Allowance Balance: Collectively Evaluated for Impairment (ASC 450-20)	(Column E) Recorded Investment: Purchased Credit-Impaired Loans (ASC 310-30)	(Column F) Allowance Balance: Purchased Credit-Impaired Loans (ASC 310-30)	
1. Real estate loans:								1.
a. Construction loans.....	RCFDM708 NR	RCFDM709 NR	RCFDM710 NR	RCFDM711 NR	RCFDM712 NR	RCFDM713 NR		1.a.
b. Commercial real estate loans.....	RCFDM714 NR	RCFDM715 NR	RCFDM716 NR	RCFDM717 NR	RCFDM719 NR	RCFDM720 NR		1.b.
c. Residential real estate loans.....	RCFDM721 NR	RCFDM722 NR	RCFDM723 NR	RCFDM724 NR	RCFDM725 NR	RCFDM726 NR		1.c.
2. Commercial loans ³	RCFDM727 NR	RCFDM728 NR	RCFDM729 NR	RCFDM730 NR	RCFDM731 NR	RCFDM732 NR		2.
3. Credit cards.....	RCFDM733 NR	RCFDM734 NR	RCFDM735 NR	RCFDM736 NR	RCFDM737 NR	RCFDM738 NR		3.
4. Other consumer loans.....	RCFDM739 NR	RCFDM740 NR	RCFDM741 NR	RCFDM742 NR	RCFDM743 NR	RCFDM744 NR		4.
5. Unallocated, if any.....				RCFDM745 NR				5.
6. Total (for each column, sum of items 1.a through 5) ⁴	RCFDM746 NR	RCFDM747 NR	RCFDM748 NR	RCFDM749 NR	RCFDM750 NR	RCFDM751 NR		6.

3. Include all loans and leases not reported as real estate loans, credit cards, or other consumer loans in items 1, 3, or 4 of Schedule RI-C.

4. The sum of item 6, columns B, D, and F, must equal Schedule RC, item 4.c. Item 6, column E, must equal Schedule RC-C, Part I, Memorandum item 7.b. Item 6, column F, must equal Schedule RI-B, Part II, Memorandum item 4.

Schedule RI-C Part II - Disaggregated Data on the Allowances for Credit Losses(Form Type - 031)

Dollar amounts in thousands		(Column A) Amortized Cost	(Column B) Allowance Balance	
1. Real estate loans:				1.
a. Construction loans.....	RCFDJJ04	4,959,084	RCFDJJ12	247,341 1.a.
b. Commercial real estate loans.....	RCFDJJ05	10,115,826	RCFDJJ13	109,640 1.b.
c. Residential real estate loans.....	RCFDJJ06	31,671,213	RCFDJJ14	223,247 1.c.
2. Commercial loans ³	RCFDJJ07	45,859,053	RCFDJJ15	792,890 2.
3. Credit cards.....	RCFDJJ08	1,803,355	RCFDJJ16	122,293 3.
4. Other consumer loans.....	RCFDJJ09	28,921,055	RCFDJJ17	698,515 4.
5. Unallocated, if any.....			RCFDJJ18	0 5.
6. Total (sum of items 1.a. through 5) ⁴	RCFDJJ11	123,329,586	RCFDJJ19	2,193,926 6.

Dollar amounts in thousands				
7. Securities issued by states and political subdivisions in the U.S.....	RCFDJJ20		0	7.
8. Mortgage-backed securities (MBS) (including CMOs, REMICs, and stripped MBS).....	RCFDJJ21		0	8.
9. Asset-backed securities and structured financial products.....	RCFDJJ23		0	9.
10. Other debt securities.....	RCFDJJ24		0	10.
11. Total (sum of items 7 through 10) ⁵	RCFDJJ25		0	11.

Schedule RI-D - Income from Foreign Offices(Form Type - 031)

For all banks with foreign offices (including Edge or Agreement subsidiaries and IBFs) and total foreign office assets of \$10 billion or more where foreign office revenues, assets, or net income exceed 10 percent of consolidated total revenues, total assets, or net income.

Dollar amounts in thousands				
1. Total interest income in foreign offices.....	RIADC899		0	1.
2. Total interest expense in foreign offices.....	RIADC900		0	2.
3. Provision for loan and lease losses in foreign offices ¹	RIADKW02		0	3.
4. Noninterest income in foreign offices:				4.
a. Trading revenue.....	RIADC902		0	4.a.
b. Investment banking, advisory, brokerage, and underwriting fees and commissions.....	RIADC903		0	4.b.
c. Net securitization income.....	RIADC904		0	4.c.
d. Other noninterest income.....	RIADC905		0	4.d.
5. Realized gains (losses) on held-to-maturity and available-for-sale debt securities and change in net unrealized holding gains (losses) on equity securities not held for trading in foreign offices.....	RIADJA28		0	5.
6. Total noninterest expense in foreign offices.....	RIADC907		0	6.
7. Adjustments to pretax income in foreign offices for internal allocations to foreign offices to reflect the effects of equity capital on overall bank funding costs.....	RIADC908		0	7.
8. Applicable income taxes (on items 1 through 7).....	RIADC909		0	8.
9. Discontinued operations, net of applicable income taxes, in foreign offices.....	RIADGW64		0	9.
10. Net income attributable to foreign offices before internal allocations of income and expense (item 1 plus or minus items 2 through 9).....	RIADC911		0	10.
11. Not applicable				11.
12. Eliminations arising from the consolidation of foreign offices with domestic offices.....	RIADC913		0	12.
13. Consolidated net income attributable to foreign offices (sum of items 10 and 12).....	RIADC914		0	13.

3. Include all loans and leases not reported as real estate loans, credit cards, or other consumer loans in item 1, 3, or 4 of Schedule RI-C, Part II.
4. Item 6, column B must equal schedule RC, item 4.c.
5. Item 11 must equal Schedule RI-B, Part II, item 7, column B.
1. Institutions that have adopted ASU 2016-13 should report the provisions for credit losses in foreign offices for all financial assets and off-balance-sheet credit exposures that fall within the scope of the standard in item 3.

Schedule RI-E - Explanations (Form Type - 031)

Schedule RI-E is to be completed each quarter on a calendar year-to-date basis.

Detail all adjustments in Schedule RI-A and RI-B, all extraordinary items and other adjustments in Schedule RI, and all significant items of other noninterest income and other noninterest expense in Schedule RI. (See instructions for details.)

Dollar amounts in thousands

1. Other noninterest income (from Schedule RI, item 5.i) Itemize and describe amounts greater than \$100,000 that exceed 7 percent of Schedule RI, item 5.i:			1.
a. Income and fees from the printing and sale of checks.....	RIADC013	NR	1.a.
b. Earnings on/increase in value of cash surrender value of life insurance.....	RIADC014	13,692	1.b.
c. Income and fees from automated teller machines (ATMs).....	RIADC016	NR	1.c.
d. Rent and other income from other real estate owned.....	RIAD4042	NR	1.d.
e. Safe deposit box rent.....	RIADC015	NR	1.e.
f. Bank card and credit card interchange fees.....	RIADF555	41,545	1.f.
g. Income and fees from wire transfers.....	RIADT047	NR	1.g.
h. Disclose component and the dollar amount of that component:			1.h.
1. Describe component.....	TEXT4461	Click here for value	1.h.1.
2. Amount of component.....	RIAD4461	37,895	1.h.2.
i. Disclose component and the dollar amount of that component:			1.i.
1. Describe component.....	TEXT4462	Click here for value	1.i.1.
2. Amount of component.....	RIAD4462	37,547	1.i.2.
j. Disclose component and the dollar amount of that component:			1.j.
1. Describe component.....	TEXT4463	Click here for value	1.j.1.
2. Amount of component.....	RIAD4463	14,787	1.j.2.
2. Other noninterest expense (from Schedule RI, item 7.d) Itemize and describe amounts greater than \$100,000 that exceed 7 percent of Schedule RI, item 7.d:			2.
a. Data processing expenses.....	RIADC017	NR	2.a.
b. Advertising and marketing expenses.....	RIAD0497	21,820	2.b.
c. Directors' fees.....	RIAD4136	NR	2.c.
d. Printing, stationery, and supplies.....	RIADC018	NR	2.d.
e. Postage.....	RIAD8403	NR	2.e.
f. Legal fees and expenses.....	RIAD4141	NR	2.f.
g. FDIC deposit insurance assessments.....	RIAD4146	CONF	2.g.
h. Accounting and auditing expenses.....	RIADF556	NR	2.h.
i. Consulting and advisory expenses.....	RIADF557	40,373	2.i.
j. Automated teller machine (ATM) and interchange expenses.....	RIADF558	NR	2.j.
k. Telecommunications expenses.....	RIADF559	NR	2.k.
l. Other real estate owned expenses.....	RIADY923	NR	2.l.
m. Insurance expenses (not included in employee expenses, premises and fixed asset expenses, and other real estate owned expenses).....	RIADY924	NR	2.m.
n. Disclose component and the dollar amount of that component:			2.n.
1. Describe component.....	TEXT4464	Click here for value	2.n.1.
2. Amount of component.....	RIAD4464	59,043	2.n.2.
o. Disclose component and the dollar amount of that component:			2.o.
1. Describe component.....	TEXT4467	Click here for value	2.o.1.
2. Amount of component.....	RIAD4467	62,093	2.o.2.
p. Disclose component and the dollar amount of that component:			2.p.
1. Describe component.....	TEXT4468	NR	2.p.1.
2. Amount of component.....	RIAD4468	NR	2.p.2.
3. Discontinued operations and applicable income tax effect (from Schedule RI, item 11) (itemize and describe each discontinued operation):			3.
a. Disclose component, the gross dollar amount of that component, and its related income tax:			3.a.
1. Describe component.....	TEXTTFT29	NR	3.a.1.
2. Amount of component.....	RIADFT29	0	3.a.2.

Dollar amounts in thousands

3. Applicable income tax effect.....	RIADFT30	0	3.a.3.
b. Disclose component, the gross dollar amount of that component, and its related income tax:			3.b.
1. Describe component.....	TEXTFT31	NR	3.b.1.
2. Amount of component.....	RIADFT31	0	3.b.2.
3. Applicable income tax effect.....	RIADFT32	0	3.b.3.
4. Cumulative effect of changes in accounting principles and corrections of material accounting errors (from Schedule RI-A, item 2) (itemize and describe all such effects):			4.
a. Effect of adoption of Current Expected Credit Losses Methodology - ASU 2016-13 ¹	RIADJJ26	NR	4.a.
b. Effect of adoption of lease accounting standard - ASC Topic 842.....	RIADKW17	NR	4.b.
c. Disclose component and the dollar amount of that component:			4.c.
1. Describe component.....	TEXTB526	NR	4.c.1.
2. Amount of component.....	RIADB526	0	4.c.2.
d. Disclose component and the dollar amount of that component:			4.d.
1. Describe component.....	TEXTB527	NR	4.d.1.
2. Amount of component.....	RIADB527	0	4.d.2.
5. Other transactions with stockholders (including a parent holding company) (from Schedule RI-A, item 11) (itemize and describe all such transactions):			5.
a. Disclose component and the dollar amount of that component:			5.a.
1. Describe component.....	TEXT4498	NR	5.a.1.
2. Amount of component.....	RIAD4498	0	5.a.2.
b. Disclose component and the dollar amount of that component:			5.b.
1. Describe component.....	TEXT4499	NR	5.b.1.
2. Amount of component.....	RIAD4499	0	5.b.2.
6. Adjustments to allowances for credit losses (from Schedule RI-B, part II, item 6) (itemize and describe all adjustments): ³			6.
a. Initial allowances for credit losses recognized upon the acquisition of purchased credit-deteriorated assets on or after the effective date of ASU 2016-13 ¹	RIADJJ27	NR	6.a.
b. Effect of adoption of current expected credit losses methodology on allowances for credit losses ¹	RIADJJ28	NR	6.b.
c. Disclose component and the dollar amount of that component:			6.c.
1. Describe component.....	TEXT4521	NR	6.c.1.
2. Amount of component.....	RIAD4521	0	6.c.2.
d. Disclose component and the dollar amount of that component:			6.d.
1. Describe component.....	TEXT4522	NR	6.d.1.
2. Amount of component.....	RIAD4522	0	6.d.2.
7. Other explanations (the space below is provided for the bank to briefly describe, at its option, any other significant items affecting the Report of Income):			7.
a. Comments?.....	RIAD4769	No	7.a.
b. Other explanations.....	TEXT4769	NR	7.b.

(TEXT4461) Letter of Credit and Loan Fees

(TEXT4462) Syndication Fee Income

(TEXT4463) Foreign Exchange Trading Income

(TEXT4464) Capitalized Software Expense

(TEXT4467) Outside Services

-
1. Only institutions that have adopted ASU 2016-13 should report amounts in items 4.a, 6.a and 6.b, if applicable.
3. Institutions that have not adopted ASU 2016-13 should report the allowance for loan and lease losses in item 6, where applicable.
1. Only institutions that have adopted ASU 2016-13 should report amounts in items 4.a, 6.a and 6.b, if applicable.
1. Only institutions that have adopted ASU 2016-13 should report amounts in items 4.a, 6.a and 6.b, if applicable.

Schedule RC - Balance Sheet(Form Type - 031)

All schedules are to be reported in thousands of dollars. Unless otherwise indicated, report the amount outstanding as of the last business day of the quarter.

Dollar amounts in thousands

1. Cash and balances due from depository institutions (from Schedule RC-A):			1.
a. Noninterest-bearing balances and currency and coin ¹	RCFD0081	1,382,222	1.a.
b. Interest-bearing balances ²	RCFD0071	13,658,294	1.b.
2. Securities:			2.
a. Held-to-maturity securities (from Schedule RC-B, column A) ³	RCFDJJ34	2,994,711	2.a.
b. Available-for-sale debt securities (from Schedule RC-B, column D)	RCFD1773	24,466,614	2.b.
c. Equity securities with readily determinable fair values not held for trading ⁴	RCFDJA22	71,955	2.c.
3. Federal funds sold and securities purchased under agreements to resell:			3.
a. Federal funds sold in domestic offices	RCONB987	0	3.a.
b. Securities purchased under agreements to resell ⁵	RCFDB989	0	3.b.
4. Loans and lease financing receivables (from Schedule RC-C):			4.
a. Loans and leases held for sale	RCFD5369	4,283,477	4.a.
b. Loans and leases held for investment	RCFDB528	123,329,586	4.b.
c. LESS: Allowance for loan and lease losses ⁷	RCFD3123	2,193,926	4.c.
d. Loans and leases held for investment, net of allowance (item 4.b minus 4.c)	RCFDB529	121,135,660	4.d.
5. Trading assets (from Schedule RC-D)	RCFD3545	1,358,538	5.
6. Premises and fixed assets (including capitalized leases)	RCFD2145	1,526,837	6.
7. Other real estate owned (from Schedule RC-M)	RCFD2150	14,362	7.
8. Investments in unconsolidated subsidiaries and associated companies	RCFD2130	0	8.
9. Direct and indirect investments in real estate ventures	RCFD3656	1,849,973	9.
10. Intangible assets (from Schedule RC-M)	RCFD2143	7,942,208	10.
11. Other assets (from Schedule RC-F) ⁶	RCFD2160	6,497,535	11.
12. Total assets (sum of items 1 through 11)	RCFD2170	187,182,386	12.
13. Deposits:			13.
a. In domestic offices (sum of totals of columns A and C from Schedule RC-E, part I)	RCON2200	154,072,832	13.a.
1. Noninterest-bearing ⁸	RCON6631	47,019,203	13.a.1.
2. Interest-bearing	RCON6636	107,053,629	13.a.2.
b. In foreign offices, Edge and Agreement subsidiaries, and IBFs (from Schedule RC-E, part II)	RCFN2200	334,697	13.b.
1. Noninterest-bearing	RCFN6631	0	13.b.1.
2. Interest-bearing	RCFN6636	334,697	13.b.2.
14. Federal funds purchased and securities sold under agreements to repurchase:			14.
a. Federal funds purchased in domestic offices ⁹	RCONB993	0	14.a.
b. Securities sold under agreements to repurchase ¹⁰	RCFDB995	54,845	14.b.
15. Trading liabilities (from Schedule RC-D)	RCFD3548	111,353	15.
16. Other borrowed money (includes mortgage indebtedness and obligations under capitalized leases) (from Schedule RC-M)	RCFD3190	5,951,541	16.
17. Not applicable			17.
18. Not applicable			18.
19. Subordinated notes and debentures ¹	RCFD3200	1,125,000	19.

- Includes cash items in process of collection and unposted debits.
- Includes time certificates of deposit not held for trading.
- Institutions that have adopted ASU 2016-13 should report in item 2.a, amounts net of any applicable allowance for credit losses, and should equal to Schedule RC-B, item 8, column A less Schedule RI-B, Part II, item 7, column B.
- Item 2.c is to be completed by all institutions. See the instructions for this item and the Glossary entry for "Securities Activities" for further detail on accounting for investments in equity securities.
- Includes all securities resale agreements, regardless of maturity.
- Institutions that have adopted ASU 2016-13 should report in item 4.c the allowance for credit losses on loans and leases.
- Institutions that have adopted ASU 2016-13 should report in items 3.b and 11 amounts net of any applicable allowance for credit losses.
- Includes noninterest-bearing demand, time, and savings deposits.
- Report overnight Federal Home Loan Bank advances in Schedule RC, item 16, "Other borrowed money."
- Includes all securities repurchase agreements, regardless of maturity.
- Includes limited-life preferred stock and related surplus.

Dollar amounts in thousands

20. Other liabilities (from Schedule RC-G).....	RCFD2930	3,412,409	20.
21. Total liabilities (sum of items 13 through 20).....	RCFD2948	165,062,677	21.
22. Not applicable			22.
23. Perpetual preferred stock and related surplus.....	RCFD3838	75	23.
24. Common stock.....	RCFD3230	1	24.
25. Surplus (exclude all surplus related to preferred stock).....	RCFD3839	19,231,208	25.
26. Not available			26.
a. Retained earnings.....	RCFD3632	3,262,170	26.a.
b. Accumulated other comprehensive income ²	RCFDB530	-373,745	26.b.
c. Other equity capital components ³	RCFDA130	0	26.c.
27. Not available			27.
a. Total bank equity capital (sum of items 23 through 26.c).....	RCFD3210	22,119,709	27.a.
b. Noncontrolling (minority) interests in consolidated subsidiaries.....	RCFD3000	0	27.b.
28. Total equity capital (sum of items 27.a and 27.b).....	RCFDG105	22,119,709	28.
29. Total liabilities and equity capital (sum of items 21 and 28).....	RCFD3300	187,182,386	29.
1. Indicate in the box at the right the number of the statement below that best describes the most comprehensive level of auditing work performed for the bank by independent external auditors as of any date during 2020.....	RCFD6724	2a	M.1.
2. Bank's fiscal year-end date (report the date in MMDD format).....	RCON8678	1231	M.2.

Schedule RC-A - Cash and Balances Due From Depository Institutions(Form Type - 031)

Exclude assets held for trading.

Dollar amounts in thousands

	(Column A) Consolidated Bank		(Column B) Domestic Offices		
1. Cash items in process of collection, unposted debits, and currency and coin.....	RCFD0022	1,211,096			1.
a. Cash items in process of collection and unposted debits.....			RCON0020	431,594	1.a.
b. Currency and coin.....			RCON0080	779,502	1.b.
2. Balances due from depository institutions in the U.S.....	RCFD0082	134,521	RCON0082	134,521	2.
3. Balances due from banks in foreign countries and foreign central banks.....	RCFD0070	198,622	RCON0070	198,622	3.
4. Balances due from Federal Reserve Banks.....	RCFD0090	13,496,277	RCON0090	13,496,277	4.
5. Total.....	RCFD0010	15,040,516	RCON0010	15,040,516	5.

2. Includes, but is not limited to, net unrealized holding gains (losses) on available-for-sale securities, accumulated net gains (losses) on cash flow hedges, cumulative foreign currency translation adjustments, and accumulated defined benefit pension and other postretirement plan adjustments.
3. Includes treasury stock and unearned Employee Stock Ownership Plan shares.

Schedule RC-B - Securities(Form Type - 031)

Exclude assets held for trading.

Dollar amounts in thousands	(Column A) Held-to-maturity Amortized Cost	(Column B) Held-to-maturity Fair Value	(Column C) Available-for-sale Amortized Cost	(Column D) Available-for-sale Fair Value					
1. U.S. Treasury securities.....	RCFD0211	0	RCFD0213	0	RCFD1286	10,702	RCFD1287	10,703	1.
2. U.S. Government agency and sponsored agency obligations (exclude mortgage-backed securities) ¹	RCFDHT50	0	RCFDHT51	0	RCFDHT52	0	RCFDHT53	0	2.
3. Securities issued by states and political subdivisions in the U.S.	RCFD8496	0	RCFD8497	0	RCFD8498	2,920	RCFD8499	2,946	3.
4. Mortgage-backed securities (MBS):									4.
a. Residential mortgage pass-through securities:									4.a.
1. Guaranteed by GNMA.....	RCFDG300	613,134	RCFDG301	633,464	RCFDG302	1,716,275	RCFDG303	1,750,086	4.a.1.
2. Issued by FNMA and FHLMC.....	RCFDG304	92,042	RCFDG305	92,866	RCFDG306	13,516,940	RCFDG307	13,555,292	4.a.2.
3. Other pass-through securities.....	RCFDG308	0	RCFDG309	0	RCFDG310	319,904	RCFDG311	336,053	4.a.3.
b. Other residential mortgage-backed securities (include CMOs, REMICs, and stripped MBS):									4.b.
1. Issued or guaranteed by U.S. Government agencies or sponsored agencies ¹	RCFDG312	0	RCFDG313	0	RCFDG314	4,855,767	RCFDG315	4,993,205	4.b.1.
2. Collateralized by MBS issued or guaranteed by U.S. Government agencies or sponsored agencies ¹	RCFDG316	0	RCFDG317	0	RCFDG318	0	RCFDG319	0	4.b.2.
3. All other residential MBS.....	RCFDG320	0	RCFDG321	0	RCFDG322	4,235	RCFDG323	4,245	4.b.3.
c. Commercial MBS:									4.c.
1. Commercial mortgage pass-through securities:									4.c.1.
a. Issued or guaranteed by FNMA, FHLMC, or GNMA.....	RCFDK142	0	RCFDK143	0	RCFDK144	0	RCFDK145	0	4.c.1a.
b. Other pass-through securities.....	RCFDK146	0	RCFDK147	0	RCFDK148	0	RCFDK149	0	4.c.1b.
2. Other commercial MBS:									4.c.2.
a. Issued or guaranteed by U.S. Government agencies or sponsored agencies ¹	RCFDK150	1,434,137	RCFDK151	1,496,916	RCFDK152	3,875,418	RCFDK153	3,813,087	4.c.2a.
b. All other commercial MBS.....	RCFDK154	0	RCFDK155	0	RCFDK156	0	RCFDK157	0	4.c.2b.
5. Asset-backed securities and structured financial products:									5.
a. Asset-backed securities (ABS).....	RCFDC026	855,398	RCFDC988	853,563	RCFDC989	947	RCFDC027	997	5.a.
b. Structured financial products.....	RCFDHT58	0	RCFDHT59	0	RCFDHT60	0	RCFDHT61	0	5.b.
6. Other debt securities:									6.
a. Other domestic debt securities.....	RCFD1737	0	RCFD1738	0	RCFD1739	0	RCFD1741	0	6.a.
b. Other foreign debt securities.....	RCFD1742	0	RCFD1743	0	RCFD1744	0	RCFD1746	0	6.b.
7. Not applicable.									7.
8. Total (sum of items 1 through 6.b) ²	RCFD1754	2,994,711	RCFD1771	3,076,809	RCFD1772	24,303,108	RCFD1773	24,466,614	8.

Dollar amounts in thousands

1. Pledged securities ¹	RCFD0416	4,115,706	M.1.
2. Maturity and repricing data for debt securities (excluding those in nonaccrual status): ¹			M.2.
a. Securities issued by the U.S. Treasury, U.S. Government agencies, and states and political subdivisions in the U.S.; other non-mortgage debt securities; and mortgage pass-through securities other than those backed by closed-end first lien 1-4 family residential mortgages with a remaining maturity or next repricing date of: ²			M.2.a.
1. Three months or less.....	RCFDA549	201,789	M.2.a.1.
2. Over three months through 12 months.....	RCFDA550	0	M.2.a.2.
3. Over one year through three years.....	RCFDA551	0	M.2.a.3.
4. Over three years through five years.....	RCFDA552	0	M.2.a.4.
5. Over five years through 15 years.....	RCFDA553	665,309	M.2.a.5.
6. Over 15 years.....	RCFDA554	2,946	M.2.a.6.
b. Mortgage pass-through securities backed by closed-end first lien 1-4 family residential mortgages with a remaining maturity or next repricing date of: ²			M.2.b.
1. Three months or less.....	RCFDA555	78,170	M.2.b.1.
2. Over three months through 12 months.....	RCFDA556	49,879	M.2.b.2.
3. Over one year through three years.....	RCFDA557	59,286	M.2.b.3.
4. Over three years through five years.....	RCFDA558	22,604	M.2.b.4.
5. Over five years through 15 years.....	RCFDA559	4,198,731	M.2.b.5.
6. Over 15 years.....	RCFDA560	11,937,937	M.2.b.6.
c. Other mortgage-backed securities (include CMOs, REMICs, and stripped MBS; exclude mortgage pass-through securities) with an expected average life of: ⁵			M.2.c.
1. Three years or less.....	RCFDA561	2,711,954	M.2.c.1.
2. Over three years.....	RCFDA562	7,532,720	M.2.c.2.
d. Debt securities with a REMAINING MATURITY of one year or less (included in Memorandum items 2.a through 2.c above).....	RCFDA248	13,084	M.2.d.
<i>Memorandum item 3 is to be completed semiannually in the June and December reports only.</i>			
3. Amortized cost of held-to-maturity securities sold or transferred to available-for-sale or trading securities during the calendar year-to-date (report the amortized cost at date of sale or transfer).....	RCFD1778	NR	M.3.
4. Structured notes (included in the held-to-maturity and available-for-sale accounts in Schedule RC-B, items 2, 3, 5, and 6):			M.4.
a. Amortized cost.....	RCFD8782	0	M.4.a.
b. Fair value.....	RCFD8783	0	M.4.b.

- Includes Small Business Administration "Guaranteed Loan Pool Certificates"; U.S. Maritime Administration obligations; Export-Import Bank participation certificates; and obligations (other than mortgage-backed securities) issued by the Farm Credit System, the Federal Home Loan Bank System, the Federal Home Loan Mortgage Corporation, the Federal National Mortgage Association, the Financing Corporation, Resolution Funding Corporation, the Student Loan Marketing Association, and the Tennessee Valley Authority.
- U.S. Government agencies include, but are not limited to, such agencies as the Government National Mortgage Association (GNMA), the Federal Deposit Insurance Corporation (FDIC), and the National Credit Union Administration (NCUA). U.S. Government-sponsored agencies include, but are not limited to, such agencies as the Federal Home Loan Mortgage Corporation (FHLMC) and the Federal National Mortgage Association (FNMA).
- U.S. Government agencies include, but are not limited to, such agencies as the Government National Mortgage Association (GNMA), the Federal Deposit Insurance Corporation (FDIC), and the National Credit Union Administration (NCUA). U.S. Government-sponsored agencies include, but are not limited to, such agencies as the Federal Home Loan Mortgage Corporation (FHLMC) and the Federal National Mortgage Association (FNMA).
- For institutions that have adopted ASU 2016-13, the total reported in column A must equal Schedule RC, item 2.a, plus Schedule RI-B, Part II, item 7, column B. For institutions that have not adopted ASU 2016-13, the total reported in column A must equal Schedule RC, item 2.a. For all institutions, the total reported in column D must equal Schedule RC, item 2.b.

Dollar amounts in thousands		(Column A) Held-to-maturity Amortized Cost		(Column B) Held-to-maturity Fair Value		(Column C) Available-for-sale Amortized Cost		(Column D) Available-for-sale Fair Value	
Memorandum items 5.a through 5.f and 6.a through 6.g are to be completed by banks with \$10 billion or more in total assets.									
5. Asset-backed securities (ABS) (for each column, sum of Memorandum items 5.a through 5.f must equal Schedule RC-B, item 5.a). ¹									M.5.
a. Credit card receivables.....	RCFDB838	0	RCFDB839	0	RCFDB840	0	RCFDB841	0	M5a
b. Home equity lines.....	RCFDB842	0	RCFDB843	0	RCFDB844	947	RCFDB845	997	M5b
c. Automobile loans.....	RCFDB846	0	RCFDB847	0	RCFDB848	0	RCFDB849	0	M5c
d. Other consumer loans.....	RCFDB850	855,398	RCFDB851	853,563	RCFDB852	0	RCFDB853	0	M5d
e. Commercial and industrial loans.....	RCFDB854	0	RCFDB855	0	RCFDB856	0	RCFDB857	0	M5e
f. Other.....	RCFDB858	0	RCFDB859	0	RCFDB860	0	RCFDB861	0	M5.f
6. Structured financial products by underlying collateral or reference assets (for each column, sum of Memorandum items 6.a through 6.g must equal Schedule RC-B item 5.b):									M.6.
a. Trust preferred securities issued by financial institutions.....	RCFDG348	0	RCFDG349	0	RCFDG350	0	RCFDG351	0	M6a
b. Trust preferred securities issued by real estate investment trusts.....	RCFDG352	0	RCFDG353	0	RCFDG354	0	RCFDG355	0	M6b
c. Corporate and similar loans.....	RCFDG356	0	RCFDG357	0	RCFDG358	0	RCFDG359	0	M6c
d. 1-4 family residential MBS issued or guaranteed by U.S. government-sponsored enterprises (GSEs).....	RCFDG360	0	RCFDG361	0	RCFDG362	0	RCFDG363	0	M6d
e. 1-4 family residential MBS not issued or guaranteed by GSEs.....	RCFDG364	0	RCFDG365	0	RCFDG366	0	RCFDG367	0	M6e
f. Diversified (mixed) pools of structured financial products.....	RCFDG368	0	RCFDG369	0	RCFDG370	0	RCFDG371	0	M6.f
g. Other collateral or reference assets.....	RCFDG372	0	RCFDG373	0	RCFDG374	0	RCFDG375	0	M6g

- Includes held-to-maturity securities at amortized cost, available-for-sale debt securities at fair value, and equity securities with readily determinable fair values not held for trading (reported in Schedule RC, item 2.c) at fair value.
- Includes held-to-maturity securities at amortized cost, available-for-sale debt securities at fair value, and equity securities with readily determinable fair values not held for trading (reported in Schedule RC, item 2.c) at fair value.
- Report fixed-rate debt securities by remaining maturity and floating-rate debt securities by next repricing date.
- Report fixed-rate debt securities by remaining maturity and floating-rate debt securities by next repricing date.
- Sum of Memorandum items 2.c.(1) and 2.c.(2) plus any nonaccrual "Other mortgage-backed securities" included in Schedule RC-N, item 10, column C, must equal Schedule RC-B, sum of items 4.b and 4.c.(2), columns A and D.
- The \$10 billion asset size test is based on the total assets reported on the June 30, 2018, Report of Condition.

Schedule RC-C Part I - Loans and Leases(Form Type - 031)

Do not deduct the allowance for loan and lease losses or the allocated transfer risk reserve from amounts reported in this schedule. Report (1) loans and leases held for sale at the lower of cost or fair value, (2) loans and leases held for investment, net of unearned income, and (3) loans and leases accounted for at fair value under a fair value option. Exclude assets held for trading and commercial paper.

Dollar amounts in thousands		(Column A) Consolidated Bank		(Column B) Domestic Offices	
1. Loans secured by real estate ²	RCFD1410	NR			1.
a. Construction, land development, and other land loans:					1.a.
1. 1-4 family residential construction loans	RCFDF158	525,415	RCONF158	525,415	1.a.1.
2. Other construction loans and all land development and other land loans	RCFDF159	4,412,256	RCONF159	4,412,256	1.a.2.
b. Secured by farmland (including farm residential and other improvements)	RCFD1420	0	RCON1420	0	1.b.
c. Secured by 1-4 family residential properties:					1.c.
1. Revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit	RCFD1797	11,179,045	RCON1797	11,179,045	1.c.1.
2. Closed-end loans secured by 1-4 family residential properties:					1.c.2.
a. Secured by first liens	RCFD5367	24,316,335	RCON5367	24,316,335	1.c.2.a.
b. Secured by junior liens	RCFD5368	410,890	RCON5368	410,890	1.c.2.b.
d. Secured by multifamily (5 or more) residential properties	RCFD1460	1,002,067	RCON1460	1,002,067	1.d.
e. Secured by nonfarm nonresidential properties:					1.e.
1. Loans secured by owner-occupied nonfarm nonresidential properties	RCFDF160	4,549,990	RCONF160	4,549,990	1.e.1.
2. Loans secured by other nonfarm nonresidential properties	RCFDF161	7,494,652	RCONF161	7,494,652	1.e.2.
2. Loans to depository institutions and acceptances of other banks:					2.
a. To commercial banks in the U.S.			RCONB531	0	2.a.
1. To U.S. branches and agencies of foreign banks	RCFDB532	0			2.a.1.
2. To other commercial banks in the U.S.	RCFDB533	0			2.a.2.
b. To other depository institutions in the U.S.	RCFDB534	0	RCONB534	0	2.b.
c. To banks in foreign countries			RCONB535	120,917	2.c.
1. To foreign branches of other U.S. banks	RCFDB536	0			2.c.1.
2. To other banks in foreign countries	RCFDB537	120,917			2.c.2.
3. Loans to finance agricultural production and other loans to farmers	RCFD1590	0	RCON1590	0	3.
4. Commercial and industrial loans:					4.
a. To U.S. addressees (domicile)	RCFD1763	38,507,029	RCON1763	38,507,029	4.a.
b. To non-U.S. addressees (domicile)	RCFD1764	1,078,882	RCON1764	1,078,882	4.b.
5. Not applicable					5.
6. Loans to individuals for household, family, and other personal expenditures (i.e., consumer loans) (includes purchased paper):					6.
a. Credit cards	RCFDB538	1,479,032	RCONB538	1,479,032	6.a.
b. Other revolving credit plans	RCFDB539	173,849	RCONB539	173,849	6.b.
c. Automobile loans	RCFDK137	11,058,598	RCONK137	11,058,598	6.c.
d. Other consumer loans (includes single payment and installment loans other than automobile loans, and all student loans)	RCFDK207	16,509,810	RCONK207	16,509,810	6.d.
7. Loans to foreign governments and official institutions (including foreign central banks)	RCFD2081	0	RCON2081	0	7.
8. Obligations (other than securities and leases) of states and political subdivisions in the U.S.	RCFD2107	817	RCON2107	817	8.
9. Loans to nondepository financial institutions and other loans	RCFD1563	2,992,144			9.
a. Loans to nondepository financial institutions			RCONJ454	1,910,500	9.a.
b. Other loans:					9.b.
1. Loans for purchasing or carrying securities (secured and unsecured)			RCON1545	96,506	9.b.1.
2. All other loans (exclude consumer loans)			RCONJ451	985,138	9.b.2.
10. Lease financing receivables (net of unearned income)			RCON2165	1,801,335	10.
a. Leases to individuals for household, family, and other personal expenditures (i.e., consumer leases)	RCFDF162	0			10.a.
b. All other leases	RCFDF163	1,801,335			10.b.
11. LESS: Any unearned income on loans reflected in items 1-9 above	RCFD2123	0	RCON2123	0	11.
12. Total loans and leases held for investment and held for sale (item 12, column A must equal Schedule RC, sum of items 4.a and 4.b)	RCFD2122	127,613,063	RCON2122	127,613,063	12.

-
2. When reporting "Loans secured by real estate," "large institutions" and "highly complex institutions," as defined for deposit insurance assessment purposes in FDIC regulations, should complete items 1.a.(1) through 1.e.(2) in columns A and B (but not item 1 in column A); all other institutions should complete item 1 in column A and items 1.a.(1) through 1.e.(2) in column B (but not items 1.a.(1) through 1.e.(2) in column A).

Dollar amounts in thousands

1. Loans restructured in troubled debt restructurings that are in compliance with their modified terms (included in Schedule RC-C, part 1, and not reported as past due or nonaccrual in Schedule RC-N, Memorandum item 1):			M.1.
a. Construction, land development, and other land loans in domestic offices:			M.1.a.
1. 1-4 family residential construction loans.....	RCONK158	0	M.1.a.1.
2. Other construction loans and all land development and other land loans.....	RCONK159	0	M.1.a.2.
b. Loans secured by 1-4 family residential properties in domestic offices.....	RCONF576	358,135	M.1.b.
c. Secured by multifamily (5 or more) residential properties in domestic offices.....	RCONK160	0	M.1.c.
d. Secured by nonfarm nonresidential properties in domestic offices:			M.1.d.
1. Loans secured by owner-occupied nonfarm nonresidential properties.....	RCONK161	3,323	M.1.d.1.
2. Loans secured by other nonfarm nonresidential properties.....	RCONK162	77,701	M.1.d.2.
e. Commercial and industrial loans:			M.1.e.
1. To U.S. addressees (domicile).....	RCFDK163	192,252	M.1.e.1.
2. To non-U.S. addressees (domicile).....	RCFDK164	0	M.1.e.2.
f. All other loans (include loans to individuals for household, family, and other personal expenditures).....	RCFDK165	129,887	M.1.f.
Itemize loan categories included in Memorandum item 1.f, above that exceed 10 percent of total loans restructured in troubled debt restructurings that are in compliance with their modified terms (sum of Memorandum items 1.a through 1.f):			
1. Loans secured by farmland in domestic offices.....	RCONK166	0	M.1.f.1.
2. Not applicable			M.1.f.2.
3. Loans to finance agricultural production and other loans to farmers.....	RCFDK168	0	M.1.f.3.
4. Loans to individuals for household, family, and other personal expenditures:			M.1.f.4.
a. Credit cards.....	RCFDK098	0	M.1.f.4.a.
b. Automobile loans.....	RCFDK203	0	M.1.f.4.b.
c. Other (includes revolving credit plans other than credit cards and other consumer loans).....	RCFDK204	109,950	M.1.f.4.c.
g. Total loans restructured in troubled debt restructurings that are in compliance with their modified terms (sum of Memorandum items 1.a.(1) through 1.f).....	RCFDHK25	761,298	M.1.g.
2. Maturity and repricing data for loans and leases (excluding those in nonaccrual status):			M.2.
a. Closed-end loans secured by first liens on 1-4 family residential properties in domestic offices (reported in Schedule RC-C, part I, item 1.c.(2)(a), column B) with a remaining maturity or next repricing date of:			M.2.a.
1. Three months or less.....	RCONA564	4,373,578	M.2.a.1.
2. Over three months through 12 months.....	RCONA565	395,723	M.2.a.2.
3. Over one year through three years.....	RCONA566	1,026,324	M.2.a.3.
4. Over three years through five years.....	RCONA567	1,087,560	M.2.a.4.
5. Over five years through 15 years.....	RCONA568	6,366,353	M.2.a.5.
6. Over 15 years.....	RCONA569	10,814,431	M.2.a.6.
b. All loans and leases (reported in Schedule RC-C, part I, items 1 through 10, column A) EXCLUDING closed-end loans secured by first liens on 1-4 family residential properties in domestic offices (reported in Schedule RC-C, part I, item 1.c.(2)(a), column B) with a remaining maturity or next repricing date of:			M.2.b.
1. Three months or less.....	RCFDA570	55,758,315	M.2.b.1.
2. Over three months through 12 months.....	RCFDA571	2,969,565	M.2.b.2.
3. Over one year through three years.....	RCFDA572	10,908,660	M.2.b.3.
4. Over three years through five years.....	RCFDA573	12,132,495	M.2.b.4.
5. Over five years through 15 years.....	RCFDA574	16,749,776	M.2.b.5.
6. Over 15 years.....	RCFDA575	4,013,683	M.2.b.6.
c. Loans and leases (reported in Schedule RC-C, part I, items 1 through 10, column A) with a REMAINING MATURITY of one year or less (excluding those in nonaccrual status).....	RCFDA247	12,656,814	M.2.c.
3. Loans to finance commercial real estate, construction, and land development activities (not secured by real estate) included in Schedule RC-C, part I, items 4 and 9, column A ⁴	RCFD2746	2,469,201	M.3.
4. Adjustable rate closed-end loans secured by first liens on 1-4 family residential properties in domestic offices (included in Schedule RC-C, part I, item 1.c.(2)(a), column B).....	RCON5370	7,702,710	M.4.
5. Loans secured by real estate to non-U.S. addressees (domicile) (included in Schedule RC-C, Part I, item 1, column A, or Schedule RC-C, Part I, items 1.a.(1) through 1.e.(2), column A, as appropriate).....	RCFDB837	17,528	M.5.
Memorandum item 6 is to be completed by banks that (1) together with affiliated institutions, have outstanding credit card receivables (as defined in the instructions) that exceed \$500 million as of the report date, or (2) are credit card specialty banks as defined for Uniform Bank Performance Report purposes.			
6. Outstanding credit card fees and finance charges included in Schedule RC-C, part I, item 6.a, column A.....	RCFDC391	54,181	M.6.

4. Exclude loans secured by real estate that are included in Schedule RC-C, Part I, item 1, column A.

Dollar amounts in thousands

Memorandum items 7.a and 7.b are to be completed by all banks semiannually in the June and December reports only.

7. Purchased credit-impaired loans held for investment accounted for in accordance with FASB ASC 310-30 (former AICPA Statement of Position 03-3) (exclude loans held for sale):⁵

- a. Outstanding balance.....
- b. Amount included in Schedule RC-C, part I, items 1 through 9.....

Memorandum items 8.a, 8.b, and 8.c are to be completed semiannually in the June and December reports only.

8. Closed-end loans with negative amortization features secured by 1-4 family residential properties in domestic offices:

- a. Total amount of closed-end loans with negative amortization features secured by 1-4 family residential properties (included in Schedule RC-C, part I, items 1.c.(2)(a) and 1.c.(2)(b)).....

Memorandum items 8.b and 8.c are to be completed semiannually in the June and December reports only by banks that had closed-end loans with negative amortization features secured by 1-4 family residential properties (as reported in Schedule RC-C, Part I, Memorandum item 8.a) as of December 31, 2019, that exceeded the lesser of \$100 million or 5 percent of total loans and leases held for investment and held for sale in domestic offices (as reported in Schedule RC-C, Part I, item 12, column B).

- b. Total maximum remaining amount of negative amortization contractually permitted on closed-end loans secured by 1-4 family residential properties.....
- c. Total amount of negative amortization on closed-end loans secured by 1-4 family residential properties included in the amount reported in Memorandum item 8.a above.....

		M.7.
RCFDC779	NR	M.7.a.
RCFDC780	NR	M.7.b.
		M.8.
RCONF230	NR	M.8.a.
RCONF231	NR	M.8.b.
RCONF232	NR	M.8.c.

5. Memorandum item 7 is to be completed only by institutions that have not yet adopted ASU 2016-13.

Dollar amounts in thousands

9. Loans secured by 1-4 family residential properties in domestic offices in process of foreclosure (included in Schedule RC-C, part I, items 1.c.(1), 1.c.(2)(a), and 1.c.(2)(b)).....	RCONF577	141,410	M.9.
---	----------	---------	------

Dollar amounts in thousands

10. Not applicable			M.10.
11. Not applicable			M.11.

		(Column A) Fair value of acquired loans and leases at acquisition date	(Column B) Gross contractual amounts receivable at acquisition date	(Column C) Best estimate at acquisition date of contractual cash flows not expected to be collected
Dollar amounts in thousands				
Memorandum items 12.a, 12.b, 12.c, and 12.d are to be completed semiannually in the June and December reports only.				
12. Loans (not subject to the requirements of FASB ASC 310-30 (former AICPA Statement of Position 03-3)) and leases held for investment that were acquired in business combinations with acquisition dates in the current calendar year. ¹				
a. Loans secured by real estate.....	RCFDG091	NR	RCFDG092	NR
b. Commercial and industrial loans.....	RCFDG094	NR	RCFDG095	NR
c. Loans to individuals for household, family, and other personal expenditures.....	RCFDG097	NR	RCFDG098	NR
d. All other loans and all leases.....	RCFDG100	NR	RCFDG101	NR

Dollar amounts in thousands

Memoranda item 13 is to be completed by banks that had construction, land development, and other land loans in domestic offices (as reported in Schedule RC-C, Part I, item 1.a., column B) that exceeded 100 percent of the sum of tier 1 capital (as reported in Schedule RC-R, Part I, item 26) plus the allowance for loan and lease losses or the allowance for credit losses on loans and leases, as applicable (as reported in Schedule RC, item 4.c) as of December 31, 2020.							
13. Construction, land development, and other land loans in domestic offices with interest reserves:							M.13.
a. Amount of loans that provide for the use of interest reserves (included in Schedule RC-C, part I, item 1.a, column B)	RCONG376	0					M.13.a.
b. Amount of interest capitalized from interest reserves on construction, land development, and other land loans that is included in interest and fee income on loans during the quarter (included in Schedule RI, item 1.a.(1)(a)(2)).	RIADG377	0					M.13.b.
Memorandum item 14 is to be completed by all banks.	RCFDG378	67,002,817					M.14.
14. Pledged loans and leases.....							M.15.
Memorandum item 15 is to be completed for the December report only.							
15. Reverse mortgages in domestic offices:							M.15.a.
a. Reverse mortgages outstanding that are held for investment (included in Schedule RC-C, item 1.c, above):							M.15.a.1.
1. Home Equity Conversion Mortgage (HECM) reverse mortgages.....	RCONJ466	NR					M.15.a.2.
2. Proprietary reverse mortgages.....	RCONJ467	NR					M.15.b.
b. Estimated number of reverse mortgage loan referrals to other lenders during the year from whom compensation has been received for services performed in connection with the origination of the reverse mortgages:							M.15.b.1.
1. Home Equity Conversion Mortgage (HECM) reverse mortgages.....	RCONJ468	NR					M.15.b.2.
2. Proprietary reverse mortgages.....	RCONJ469	NR					M.15.c.
c. Principal amount of reverse mortgage originations that have been sold during the year:							M.15.c.1.
1. Home Equity Conversion Mortgage (HECM) reverse mortgages.....	RCONJ470	NR					M.15.c.2.
2. Proprietary reverse mortgages.....	RCONJ471	NR					M.16.
Memorandum item 16 is to be completed by all banks.	RCONLE75	1,314,294					M.17.
16. Revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit in domestic offices that have converted to non-revolving closed-end status (included in item 1.c.(1) above).....							M.17.a.
Amounts reported in Memorandum items 17.a and 17.b will not be made available to the public on an individual institution basis.							
17. Eligible loan modifications under Section 4013, Temporary Relief from Troubled Debt Restructurings, of the 2020 Coronavirus Aid, Relief, and Economic Security Act:							M.17.b.
a. Number of Section 4013 loans outstanding.....	RCONLG24	CONF					M.17.a.
b. Outstanding balance of Section 4013 loans.....	RCONLG25	CONF					M.17.b.

1. Institutions that have adopted ASU 2016-13 should report only loans held for investment not considered purchased credit-deteriorated in Memorandum item 12.

Schedule RC-C Part II - Loans to Small Businesses and Small Farms(Form Type - 031)

Report the number and amount currently outstanding as of the report date of business loans with "original amounts" of \$1,000,000 or less and farm loans with "original amounts" of \$500,000 or less. The following guidelines should be used to determine the "original amount" of a loan:

(1) For loans drawn down under lines of credit or loan commitments, the "original amount" of the loan is the size of the line of credit or loan commitment when the line of credit or loan commitment was most recently approved, extended, or renewed prior to the report date. However, if the amount currently outstanding as of the report date exceeds this size, the "original amount" is the amount currently outstanding on the report date. (2) For loan participations and syndications, the "original amount" of the loan participation or syndication is the entire amount of the credit originated by the lead lender. (3) For all other loans, the "original amount" is the total amount of the loan at origination or the amount currently outstanding as of the report date, whichever is larger.

Dollar amounts in thousands

1. Not applicable

2. Not applicable

		1.
		2.

Dollar amounts in thousands

3. Number and amount currently outstanding of "Loans secured by nonfarm nonresidential properties" in domestic offices reported in Schedule RC-C, part I, items 1.e.(1) and 1.e.(2), column B:

a. With original amounts of \$100,000 or less.....

b. With original amounts of more than \$100,000 through \$250,000.....

c. With original amounts of more than \$250,000 through \$1,000,000.....

4. Number and amount currently outstanding of "Commercial and industrial loans to U.S. addressees" in domestic offices reported in Schedule RC-C, part I, item 4.a, column B:

a. With original amounts of \$100,000 or less.....

b. With original amounts of more than \$100,000 through \$250,000.....

c. With original amounts of more than \$250,000 through \$1,000,000.....

(Column A) Number of Loans		(Column B) Amount Currently Outstanding		
				3.
RCN5564	130	RCN5565	5,468	3.a.
RCN5566	698	RCN5567	79,381	3.b.
RCN5568	1424	RCN5569	541,253	3.c.
				4.
RCN5570	164336	RCN5571	3,189,766	4.a.
RCN5572	9202	RCN5573	1,079,992	4.b.
RCN5574	5271	RCN5575	1,679,040	4.c.

Dollar amounts in thousands

5. Not applicable

6. Not applicable

		5.
		6.

Dollar amounts in thousands

7. Number and amount currently outstanding of "Loans secured by farmland (including farm residential and other improvements)" in domestic offices reported in Schedule RC-C, part I, item 1.b, column B:

a. With original amounts of \$100,000 or less.....

b. With original amounts of more than \$100,000 through \$250,000.....

c. With original amounts of more than \$250,000 through \$500,000.....

8. Number and amount currently outstanding of "Loans to finance agricultural production and other loans to farmers" in domestic offices reported in Schedule RC-C, part I, item 3, column B:

a. With original amounts of \$100,000 or less.....

b. With original amounts of more than \$100,000 through \$250,000.....

c. With original amounts of more than \$250,000 through \$500,000.....

(Column A) Number of Loans		(Column B) Amount Currently Outstanding		
				7.
RCN5578	0	RCN5579	0	7.a.
RCN5580	0	RCN5581	0	7.b.
RCN5582	0	RCN5583	0	7.c.
				8.
RCN5584	0	RCN5585	0	8.a.
RCN5586	0	RCN5587	0	8.b.
RCN5588	0	RCN5589	0	8.c.

Schedule RC-D - Trading Assets and Liabilities(Form Type - 031)

Schedule RC-D is to be completed by banks that reported total trading assets of \$10 million or more in any of the four preceding calendar quarters, and all banks meeting the FDIC's definition of a large or highly complex institution for deposit insurance assessment purposes.

Dollar amounts in thousands		Consolidated Bank	
1. U.S. Treasury securities.....	RCFD3531	0	1.
2. U.S. Government agency obligations (exclude mortgage-backed securities).....	RCFD3532	0	2.
3. Securities issued by states and political subdivisions in the U.S.....	RCFD3533	0	3.
4. Mortgage-backed securities (MBS):			4.
a. Residential mortgage pass-through securities issued or guaranteed by FNMA, FHLMC, or GNMA.....	RCFDG379	0	4.a.
b. Other residential MBS issued or guaranteed by U.S. Government agencies or sponsored agencies (include CMOs, REMICs, and stripped MBS) ¹	RCFDG380	0	4.b.
c. All other residential MBS.....	RCFDG381	0	4.c.
d. Commercial MBS issued or guaranteed by U.S. Government agencies or sponsored agencies ¹	RCFDK197	0	4.d.
e. All other commercial MBS.....	RCFDK198	0	4.e.
5. Other debt securities:			5.
a. Structured financial products.....	RCFDHT62	0	5.a.
b. All other debt securities.....	RCFDG386	0	5.b.
6. Loans:			6.
a. Loans secured by real estate			6.a.
1. Loans secured by 1-4 family residential properties.....	RCFDHT63	0	6.a.1.
2. All other loans secured by real estate.....	RCFDHT64	0	6.a.2.
b. Commercial and industrial loans.....	RCFDF614	93,898	6.b.
c. Loans to individuals for household, family, and other personal expenditures (i.e., consumer loans) (includes purchased paper).....	RCFDHT65	0	6.c.
d. Other loans.....	RCFDF618	2,348	6.d.
7. Not applicable			7.
8. Not applicable			8.
9. Other trading assets.....	RCFD3541	215	9.
10. Not applicable			10.
11. Derivatives with a positive fair value.....	RCFD3543	1,262,077	11.
12. Total trading assets (sum of items 1 through 11) (total of column A must equal Schedule RC, item 5).....	RCFD3545	1,358,538	12.
13. Not available			13.
a. Liability for short positions.....	RCFD3546	0	13.a.
b. Other trading liabilities.....	RCFDF624	265	13.b.
14. Derivatives with a negative fair value.....	RCFD3547	111,088	14.
15. Total trading liabilities (sum of items 13.a through 14) (total of column A must equal Schedule RC, item 15).....	RCFD3548	111,353	15.
1. Unpaid principal balance of loans measured at fair value (reported in Schedule RC-D, items 6.a through 6.d):			M.1.
a. Loans secured by real estate			M.1.a.
1. Loans secured by 1-4 family residential properties.....	RCFDHT66	0	M.1.a.1.
2. All other loans secured by real estate.....	RCFDHT67	0	M.1.a.2.
b. Commercial and industrial loans.....	RCFDF632	95,730	M.1.b.
c. Loans to individuals for household, family, and other personal expenditures (i.e., consumer loans) (includes purchased paper).....	RCFDHT68	0	M.1.c.
d. Other loans.....	RCFDF636	2,283	M.1.d.
Memorandum items 2 through 10 are to be completed by banks with \$10 billion or more in total trading assets.			M.2.
2. Loans measured at fair value that are past due 90 days or more: ¹			M.2.
a. Fair value.....	RCFDF639	NR	M.2.a.
b. Unpaid principal balance.....	RCFDF640	NR	M.2.b.

1. U.S. Government agencies include, but are not limited to, such agencies as the Government National Mortgage Association (GNMA), the Federal Deposit Insurance Corporation (FDIC), and the National Credit Union Administration (NCUA). U.S. Government-sponsored agencies include, but are not limited to, such agencies as the Federal Home Loan Mortgage Corporation (FHLMC) and the Federal National Mortgage Association (FNMA).

1. The \$10 billion trading asset-size test is based on total trading assets reported on the June 30, 2018, Report of Condition.

Dollar amounts in thousands

Memorandum items 3 through 10 are to be completed by banks with \$10 billion or more in total trading assets.

3. Structured financial products by underlying collateral or reference assets (for each column, sum of Memorandum items 3.a through 3.g must equal Schedule RC-D, sum of items 5.a.(1) through (3)):

Consolidated Bank		
		M.3.
a. Trust preferred securities issued by financial institutions.....	RCFDG299	NR M.3.a.
b. Trust preferred securities issued by real estate investment trusts.....	RCFDG332	NR M.3.b.
c. Corporate and similar loans.....	RCFDG333	NR M.3.c.
d. 1-4 family residential MBS issued or guaranteed by U.S. government-sponsored enterprises (GSEs).....	RCFDG334	NR M.3.d.
e. 1-4 family residential MBS not issued or guaranteed by GSEs.....	RCFDG335	NR M.3.e.
f. Diversified (mixed) pools of structured financial products.....	RCFDG651	NR M.3.f.
g. Other collateral or reference assets.....	RCFDG652	NR M.3.g.
4. Pledged trading assets:		M.4.
a. Pledged securities.....	RCFDG387	NR M.4.a.
b. Pledged loans.....	RCFDG388	NR M.4.b.

Dollar amounts in thousands

5. Asset-backed securities:			M.5.
a. Credit card receivables.....	RCFDF643	NR	M.5.a.
b. Home equity lines.....	RCFDF644	NR	M.5.b.
c. Automobile loans.....	RCFDF645	NR	M.5.c.
d. Other consumer loans.....	RCFDF646	NR	M.5.d.
e. Commercial and industrial loans.....	RCFDF647	NR	M.5.e.
f. Other.....	RCFDF648	NR	M.5.f.
6. Retained beneficial interests in securitizations (first-loss or equity tranches)			M.6.
7. Equity securities (included in Schedule RC-D, item 9, above):			M.7.
a. Readily determinable fair values.....	RCFDF652	NR	M.7.a.
b. Other.....	RCFDF653	NR	M.7.b.
8. Loans pending securitization.....	RCFDF654	NR	M.8.
9. Other trading assets (itemize and describe amounts included in Schedule RC-D, item 9, that are greater than \$1,000,000 and exceed 25% of the item): ¹			M.9.
a. Disclose component and the dollar amount of that component:			M.9.a.
1. Describe component.....	TEXTF655	NR	M.9.a.1.
2. Amount of component.....	RCFDF655	NR	M.9.a.2.
b. Disclose component and the dollar amount of that component:			M.9.b.
(TEXTF656) NR	RCFDF656	NR	M.9.b.1.
c. Disclose component and the dollar amount of that component:			M.9.c.
(TEXTF657) NR	RCFDF657	NR	M.9.c.1.
10. Other trading liabilities (itemize and describe amounts included in Schedule RC-D, item 13.b, that are greater than \$1,000,000 and exceed 25% of the item):			M.10.
a. Disclose component and the dollar amount of that component:			M.10.a.
1. Describe component.....	TEXTF658	NR	M.10.a.1.
2. Amount of component.....	RCFDF658	NR	M.10.a.2.
b. Disclose component and the dollar amount of that component:			M.10.b.
(TEXTF659) NR	RCFDF659	NR	M.10.b.1.
c. Disclose component and the dollar amount of that component:			M.10.c.
(TEXTF660) NR	RCFDF660	NR	M.10.c.1.

1. Exclude equity securities.

Schedule RC-E Part I - Deposits in Domestic Offices(Form Type - 031)

	(Column A) Transaction Accounts Total Transaction accounts (including total demand deposits)		(Column B) Transaction Accounts Memo: Total demand deposits (included in column A)		(Column C) Nontransaction Accounts Total nontransaction accounts (including MMDAs)	
Dollar amounts in thousands						
Deposits of:						
1. Individuals, partnerships, and corporations (include all certified and official checks).....	RCONB549	15,285,635			RCONB550	133,135,437
2. U.S. Government.....	RCON2202	6,181			RCON2520	0
3. States and political subdivisions in the U.S.....	RCON2203	1,995,344			RCON2530	3,634,720
4. Commercial banks and other depository institutions in the U.S.....	RCONB551	8,829			RCONB552	6,686
5. Banks in foreign countries.....	RCON2213	0			RCON2236	0
6. Foreign governments and official institutions (including foreign central banks).....	RCON2216	0			RCON2377	0
7. Total (sum of items 1 through 6) (sum of columns A and C must equal Schedule RC, item 13.a).....	RCON2215	17,295,989	RCON2210	11,909,054	RCON2385	136,776,843

Dollar amounts in thousands

1. Selected components of total deposits (i.e., sum of item 7, columns A and C):			M.1.
a. Total Individual Retirement Accounts (IRAs) and Keogh Plan accounts.....	RCON6835	3,955,502	M.1.a.
b. Total brokered deposits.....	RCON2365	5,477,674	M.1.b.
c. Brokered deposits of \$250,000 or less (fully insured brokered deposits) ²	RCONHK05	5,380,613	M.1.c.
d. Maturity data for brokered deposits:			M.1.d.
1. Brokered deposits of \$250,000 or less with a remaining maturity of one year or less (included in Memorandum item 1.c above).....	RCONHK06	5,380,613	M.1.d.1.
2. Not applicable			M.1.d.2.
3. Brokered deposits of more than \$250,000 with a remaining maturity of one year or less (included in Memorandum item 1.b above).....	RCONK220	97,061	M.1.d.3.
e. Preferred deposits (uninsured deposits of states and political subdivisions in the U.S. reported in item 3 above which are secured or collateralized as required under state law) (to be completed for the December report only).	RCON5590	NR	M.1.e.
f. Estimated amount of deposits obtained through the use of deposit listing services that are not brokered deposits.....	RCONK223	1,066,666	M.1.f.
g. Total reciprocal deposits (as of the report date).....	RCONJH83	915,264	M.1.g.
2. Components of total nontransaction accounts (sum of Memorandum items 2.a through 2.d must equal item 7, column C above):			M.2.
a. Savings deposits:			M.2.a.
1. Money market deposit accounts (MMDAs).....	RCON6810	52,669,108	M.2.a.1.
2. Other savings deposits (excludes MMDAs).....	RCON0352	76,614,597	M.2.a.2.
b. Total time deposits of less than \$100,000.....	RCON6648	3,233,631	M.2.b.
c. Total time deposits of \$100,000 through \$250,000.....	RCONJ473	1,803,653	M.2.c.
d. Total time deposits of more than \$250,000.....	RCONJ474	2,455,854	M.2.d.
e. Individual Retirement Accounts (IRAs) and Keogh Plan accounts of \$100,000 or more included in Memorandum items 2.c and 2.d above.....	RCONF233	248,173	M.2.e.
3. Maturity and repricing data for time deposits of \$250,000 or less:			M.3.
a. Time deposits of \$250,000 or less with a remaining maturity or next repricing date of:			M.3.a.
1. Three months or less.....	RCONHK07	1,591,773	M.3.a.1.
2. Over three months through 12 months.....	RCONHK08	2,604,247	M.3.a.2.
3. Over one year through three years.....	RCONHK09	689,525	M.3.a.3.
4. Over three years.....	RCONHK10	151,738	M.3.a.4.
b. Time deposits of \$250,000 or less with a REMAINING MATURITY of one year or less (included in Memorandum items 3.a.(1) and 3.a.(2) above) ³	RCONHK11	4,196,020	M.3.b.
4. Maturity and repricing data for time deposits of more than \$250,000:			M.4.
a. Time deposits of more than \$250,000 with a remaining maturity or next repricing date of:			M.4.a.
1. Three months or less.....	RCONHK12	1,832,753	M.4.a.1.
2. Over three months through 12 months.....	RCONHK13	486,004	M.4.a.2.
3. Over one year through three years.....	RCONHK14	114,229	M.4.a.3.
4. Over three years.....	RCONHK15	22,868	M.4.a.4.
b. Time deposits of more than \$250,000 with a REMAINING MATURITY of one year or less (included in Memorandum items 4.a.(1) and 4.a.(2) above) ³	RCONK222	2,318,757	M.4.b.
5. Does your institution offer one or more consumer deposit account products, i.e., transaction account or nontransaction savings account deposit products intended primarily for individuals for personal, household, or family use?.....	RCONP752	Yes	M.5.
Memorandum items 6 and 7 are to be completed by institutions with \$1 billion or more in total assets that answered "Yes" to Memorandum item 5 above.			M.6.
6. Components of total transaction account deposits of individuals, partnerships, and corporations (sum of Memorandum items 6.a and 6.b must be less than or equal to item 1, column A, above): ⁵			
a. Total deposits in those noninterest-bearing transaction account deposit products intended primarily for individuals for personal, household, or family use.....	RCONP753	2,549,129	M.6.a.
b. Total deposits in those interest-bearing transaction account deposit products intended primarily for individuals for personal, household, or family use.....	RCONP754	3,621,582	M.6.b.
7. Components of total nontransaction account deposits of individuals, partnerships, and corporations (sum of Memorandum items 7.a.(1), 7.a.(2), 7.b.(1), and 7.b.(2) plus all time deposits of individuals, partnerships, and corporations must equal item 1, column C, above):			M.7.

- The dollar amount used as the basis for reporting in Memorandum item 1.c reflects the deposit insurance limit in effect on the report date.
- Report both fixed- and floating-rate time deposits by remaining maturity. Exclude floating rate time deposits with a next repricing date of one year or less that have a remaining maturity of over one year.
- The \$1 billion asset size test is based on the total assets reported on the June 30, 2018, Report of Condition.

Dollar amounts in thousands

a. Money market deposit accounts (MMDAs) of individuals, partnerships, and corporations (sum of Memorandum items 7.a.(1) and 7.a.(2) must be less than or equal to Memorandum item 2.a.(1) above):			M.7.a.
1. Total deposits in those MMDA deposit products intended primarily for individuals for personal, household, or family use.....	RCONP756	24,639,984	M.7.a.1.
2. Deposits in all other MMDAs of individuals, partnerships, and corporations.....	RCONP757	27,881,315	M.7.a.2.
b. Other savings deposit accounts of individuals, partnerships, and corporations (sum of Memorandum items 7.b.(1) and 7.b.(2) must be less than or equal to Memorandum item 2.a.(2) above):			M.7.b.
1. Total deposits in those other savings deposit account deposit products intended primarily for individuals for personal, household, or family use.....	RCONP758	42,854,563	M.7.b.1.
2. Deposits in all other savings deposit accounts of individuals, partnerships, and corporations.....	RCONP759	30,325,847	M.7.b.2.

Schedule RC-E Part II - Deposits in Foreign Offices including Edge and Agreement subsidiaries and IBFs(Form Type - 031)

Dollar amounts in thousands

Deposits of:			
1. Individuals, partnerships, and corporations (include all certified and official checks).....	RCFNB553	334,697	1.
2. U.S. banks (including IBFs and foreign branches of U.S. banks) and other U.S. depository institutions.....	RCFNB554	0	2.
3. Foreign banks (including U.S. branches and agencies of foreign banks, including their IBFs).....	RCFN2625	0	3.
4. Foreign governments and official institutions (including foreign central banks).....	RCFN2650	0	4.
5. U.S. Government and states and political subdivisions in the U.S.....	RCFNB555	0	5.
6. Total.....	RCFN2200	334,697	6.
1. Time deposits with a remaining maturity of one year or less (included in Schedule RC, item 13.b).....	RCFNA245	334,697	M.1.

Schedule RC-F - Other Assets(Form Type - 031)

Dollar amounts in thousands

1. Accrued interest receivable ²	RCFDB556	496,270	1.
2. Net deferred tax assets ³	RCFD2148	0	2.
3. Interest-only strips receivable (not in the form of a security) ⁴	RCFDHT80	0	3.
4. Equity investments without readily determinable fair values ⁵	RCFD1752	595,179	4.
5. Life insurance assets:			5.
a. General account life insurance assets.....	RCFDK201	513,738	5.a.
b. Separate account life insurance assets.....	RCFDK202	252,850	5.b.
c. Hybrid account life insurance assets.....	RCFDK270	1,323,997	5.c.
6. All other assets (itemize and describe amounts greater than \$100,000 that exceed 25% of this item).....	RCFD2168	3,315,501	6.
a. Prepaid expenses.....	RCFD2166	NR	6.a.
b. Repossessed personal property (including vehicles).....	RCFD1578	NR	6.b.
c. Derivatives with a positive fair value held for purposes other than trading.....	RCFDC010	NR	6.c.
d. FDIC loss-sharing indemnification assets.....	RCFDJ448	NR	6.d.
e. Computer software.....	RCFDFT33	871,556	6.e.
f. Accounts receivable.....	RCFDFT34	1,087,286	6.f.
g. Receivables from foreclosed government-guaranteed mortgage loans.....	RCFDFT35	NR	6.g.
h. Disclose component and the dollar amount of that component:			6.h.
1. Describe component.....	TEXT3549	NR	6.h.1.
2. Amount of component.....	RCFD3549	NR	6.h.2.
i. Disclose component and the dollar amount of that component:			6.i.
1. Describe component.....	TEXT3550	NR	6.i.1.
2. Amount of component.....	RCFD3550	NR	6.i.2.
j. Disclose component and the dollar amount of that component:			6.j.
1. Describe component.....	TEXT3551	NR	6.j.1.
2. Amount of component.....	RCFD3551	NR	6.j.2.
7. Total (sum of items 1 through 6) (must equal Schedule RC, item 11).....	RCFD2160	6,497,535	7.

2. Include accrued interest receivable on loans, leases, debt securities, and other interest-bearing assets. Exclude accrued interest receivables on financial assets that are reported elsewhere on the balance sheet.
3. See discussion of deferred income taxes in Glossary entry on "income taxes."
4. Report interest-only strips receivable in the form of a security as available-for-sale securities in Schedule RC, item 2.b, or as trading assets in Schedule RC, item 5, as appropriate.
5. Include Federal Reserve stock, Federal Home Loan Bank stock, and bankers' bank stock.

Schedule RC-G - Other Liabilities(Form Type - 031)

Dollar amounts in thousands

1. Not available			1.
a. Interest accrued and unpaid on deposits in domestic offices ⁶	RCON3645	15,793	1.a.
b. Other expenses accrued and unpaid (includes accrued income taxes payable)	RCFD3646	427,783	1.b.
2. Net deferred tax liabilities ²	RCFD3049	609,016	2.
3. Allowance for credit losses on off-balance sheet credit exposures ⁷	RCFDB557	178,200	3.
4. All other liabilities (itemize and describe amounts greater than \$100,000 that exceed 25 percent of this item)	RCFD2938	2,181,617	4.
a. Accounts payable	RCFD3066	0	4.a.
b. Deferred compensation liabilities	RCFDC011	0	4.b.
c. Dividends declared but not yet payable	RCFD2932	0	4.c.
d. Derivatives with a negative fair value held for purposes other than trading	RCFDC012	0	4.d.
e. Operating lease liabilities	RCFDLB56	823,181	4.e.
f. Disclose component and the dollar amount of that component:			4.f.
1. Describe component	TEXT3552	Click here for value	4.f.1.
2. Amount of component	RCFD3552	895,791	4.f.2.
g. Disclose component and the dollar amount of that component:			4.g.
1. Describe component	TEXT3553	NR	4.g.1.
2. Amount of component	RCFD3553	0	4.g.2.
h. Disclose component and the dollar amount of that component:			4.h.
1. Describe component	TEXT3554	NR	4.h.1.
2. Amount of component	RCFD3554	0	4.h.2.
5. Total	RCFD2930	3,412,409	5.

(TEXT3552) CRA Related Deferred Payments

6. For savings banks, include "dividends" accrued and unpaid on deposits.

2. See discussion of deferred income taxes in Glossary entry on "income taxes."

7. Institutions that have adopted ASU 2016-13 should report in Schedule RC-G, item 3 the allowance for credit losses on those off-balance sheet credit exposures that are not unconditionally cancelable.

Schedule RC-H - Selected Balance Sheet Items for Domestic Offices(Form Type - 031)

To be completed only by banks with foreign offices.

Dollar amounts in thousands

1. Not applicable			1.
2. Not applicable			2.
3. Securities purchased under agreements to resell.....	RCONB989	0	3.
4. Securities sold under agreements to repurchase.....	RCONB995	54,845	4.
5. Other borrowed money.....	RCON3190	5,951,541	5.
<i>EITHER</i>			
6. Net due from own foreign offices, Edge and Agreement subsidiaries, and IBFs.....	RCON2163	0	6.
<i>OR</i>			
7. Net due to own foreign offices, Edge and Agreement subsidiaries, and IBFs.....	RCON2941	334,697	7.
8. Total assets (excludes net due from foreign offices, Edge and Agreement subsidiaries, and IBFs).....	RCON2192	187,182,386	8.
9. Total liabilities (excludes net due to foreign offices, Edge and Agreement subsidiaries, and IBFs).....	RCON3129	164,727,979	9.

Dollar amounts in thousands

	(Column A) Amortized Cost of Held-to-Maturity Securities		(Column B) Fair Value of Available-for-Sale Securities		
10. U.S. Treasury securities.....	RCON0211	0	RCON1287	10,703	10.
11. U.S. Government agency obligations (exclude mortgage-backed securities).....	RCON8492	0	RCON8495	0	11.
12. Securities issued by states and political subdivisions in the U.S.....	RCON8496	0	RCON8499	2,946	12.
13. Mortgage-backed securities (MBS):					13.
a. Mortgage pass-through securities:					13.a.
1. Issued or guaranteed by FNMA, FHLMC, or GNMA.....	RCONG389	705,176	RCONG390	15,305,378	13.a.1.
2. Other mortgage pass-through securities.....	RCON1709	0	RCON1713	336,053	13.a.2.
b. Other mortgage-backed securities (include CMOs, REMICs, and stripped MBS):					13.b.
1. Issued or guaranteed by U.S. Government agencies or sponsored agencies ¹	RCONG393	1,434,137	RCONG394	8,806,292	13.b.1.
2. All other mortgage-backed securities.....	RCON1733	0	RCON1736	4,245	13.b.2.
14. Other domestic debt securities (include domestic structured financial products and domestic asset-backed securities).....	RCONG397	855,398	RCONG398	997	14.
15. Other foreign debt securities (include foreign structured financial products and foreign asset-backed securities).....	RCONG399	0	RCONG400	0	15.
16. Not applicable.					16.
17. Total held-to-maturity and available-for-sale debt securities (sum of items 10 through 15).....	RCON1754	2,994,711	RCON1773	24,466,614	17.

Dollar amounts in thousands

18. Equity investments not held for trading:			18.
a. Equity securities with readily determinable fair values ⁴	RCONJA22	71,955	18.a.
b. Equity investments without readily determinable fair values.....	RCON1752	595,179	18.b.
<i>Items 19, 20 and 21 are to be completed by banks that reported total trading assets of \$10 million or more in any of the four preceding calendar quarters and all banks meeting the FDIC's definition of a large or highly complex institution for deposit insurance assessment purposes.</i>			
19. Total trading assets.....	RCON3545	1,358,538	19.
20. Total trading liabilities.....	RCON3548	111,353	20.
21. Total loans held for trading.....	RCONHT71	96,246	21.
<i>Item 22 is to be completed by banks that: (1) have elected to report financial instruments or servicing assets and liabilities at fair value under a fair value option with changes in fair value recognized in earnings, or (2) are required to complete Schedule RC-D, Trading Assets and Liabilities.</i>			
22. Total amount of fair value option loans held for investment and held for sale.....	RCONJF75	4,208,216	22.

- U.S. Government agencies include, but are not limited to, such agencies as the Government National Mortgage Association (GNMA), the Federal Deposit Insurance Corporation (FDIC), and the National Credit Union Administration (NCUA). U.S. Government-sponsored agencies include, but are not limited to, such agencies as the Federal Home Loan Mortgage Corporation (FHLMC) and the Federal National Mortgage Association (FNMA).
- Item 18.a is to be completed by all institutions. See the instructions for this item and the Glossary entry for "Securities Activities" for further detail on accounting for investments in equity securities.

Schedule RC-I - Assets and Liabilities of IBFs(Form Type - 031)

To be completed only by banks with IBFs and other "foreign" offices.

Dollar amounts in thousands

1. Total IBF assets of the consolidated bank (component of Schedule RC, item 12).....	RCFN2133	NR	1.
2. Total IBF liabilities (component of Schedule RC, item 21).....	RCFN2898	NR	2.

Schedule RC-K - Quarterly Averages(Form Type - 031)

Dollar amounts in thousands

1. Interest-bearing balances due from depository institutions.....	RCFD3381	10,653,875	1.
2. U.S. Treasury securities and U.S. Government agency obligations (excluding mortgage-backed securities) ²	RCFDB558	10,719	2.
3. Mortgage-backed securities ²	RCFDB559	25,396,935	3.
4. All other debt securities and equity securities with readily determinable fair values not held for trading ²	RCFDB560	950,060	4.
5. Federal funds sold and securities purchased under agreements to resell.....	RCFD3365	0	5.
6. Loans:			6.
a. Loans in domestic offices:			6.a.
1. Total loans.....	RCON3360	125,624,395	6.a.1.
2. Loans secured by real estate:			6.a.2.
a. Loans secured by 1-4 family residential properties.....	RCON3465	35,207,798	6.a.2.a.
b. All other loans secured by real estate.....	RCON3466	17,970,585	6.a.2.b.
3. Loans to finance agricultural production and other loans to farmers	RCON3386	0	6.a.3.
4. Commercial and industrial loans.....	RCON3387	41,434,254	6.a.4.
5. Loans to individuals for household, family, and other personal expenditures:			6.a.5.
a. Credit cards.....	RCONB561	1,527,324	6.a.5.a.
b. Other (includes revolving credit plans other than credit cards, automobile loans, and other consumer loans).....	RCONB562	27,512,886	6.a.5.b.
b. Total loans in foreign offices, Edge and Agreement subsidiaries, and IBFs.....	RCFN3360	0	6.b.
<i>Item 7 is to be completed by banks with total trading assets of \$10 million or more in any of the four preceding calendar quarters and all banks meeting the FDIC's definition of a large or highly complex institution for deposit insurance assessment purposes.</i>			
7. Trading assets.....	RCFD3401	1,644,835	7.
8. Lease financing receivables (net of unearned income).....	RCFD3484	1,904,887	8.
9. Total assets ⁴	RCFD3368	182,169,195	9.
10. Interest-bearing transaction accounts in domestic offices (interest-bearing demand deposits, NOW accounts, ATS accounts, and telephone and preauthorized transfer accounts).....	RCON3485	6,443,286	10.
11. Nontransaction accounts in domestic offices:			11.
a. Savings deposits (includes MMDAs).....	RCONB563	130,563,340	11.a.
b. Time deposits of \$250,000 or less.....	RCONHK16	5,647,148	11.b.
c. Time deposits of more than \$250,000.....	RCONHK17	2,705,254	11.c.
12. Interest-bearing deposits in foreign offices, EDGE and Agreement subsidiaries, and IBFs.....	RCFN3404	2,815,439	12.
13. Federal funds purchased and securities sold under agreements to repurchase.....	RCFD3353	139,655	13.
14. Other borrowed money (includes mortgage indebtedness and obligations under capitalized leases).....	RCFD3355	5,993,791	14.

2. Quarterly averages for all debt securities should be based on amortized cost.

2. Quarterly averages for all debt securities should be based on amortized cost.

4. The quarterly average for total assets should reflect securities not held for trading as follows: a) Debt securities at amortized cost, b) Equity securities with readily determinable fair values at fair value, c) Equity investments without readily determinable fair values, their balance sheet carrying values (i.e., fair value or, if elected, cost minus impairment, if any, plus or minus changes resulting from observable price changes).

Schedule RC-L - Derivatives and Off-Balance Sheet Items(Form Type - 031)

Please read carefully the instructions for the preparation of Schedule RC-L. Some of the amounts reported in Schedule RC-L are regarded as volume indicators and not necessarily as measures of risk.

Dollar amounts in thousands

1. Unused commitments:			1.
a. Revolving, open-end lines secured by 1-4 family residential properties, i.e., home equity lines.....	RCFD3814	17,286,928	1.a.
<i>Item 1.a.(1) is to be completed for the December report only.</i>			
1. Unused commitments for reverse mortgages outstanding that are held for investment in domestic offices..	RCONHT72	NR	1.a.1.
b. Credit card lines (Sum of items 1.b.(1) and 1.b.(2) must equal item 1.b.).....	RCFD3815	9,638,002	1.b.
<i>Items 1.b.(1) and 1.b.(2) are to be completed by banks with either \$300 million or more in total assets or \$300 million or more in credit card lines. (Sum of items 1.b.(1) and 1.b.(2) must equal item 1.b.)</i>			
<i>Items 1.b.(1) and 1.b.(2) are to be completed semiannually in the June and December reports only.</i>			
1. Unused consumer credit card lines.....	RCFDJ455	NR	1.b.1.
2. Other unused credit card lines.....	RCFDJ456	NR	1.b.2.
c. Commitments to fund commercial real estate, construction, and land development loans:			1.c.
1. Secured by real estate:			1.c.1.
a. 1-4 family residential construction loan commitments.....	RCFDF164	660,977	1.c.1.a.
b. Commercial real estate, other construction loan, and land development loan commitments.....	RCFDF165	4,102,358	1.c.1.b.
2. Not secured by real estate.....	RCFD6550	286,095	1.c.2.
d. Securities underwriting.....	RCFD3817	0	1.d.
e. Other unused commitments:			1.e.
1. Commercial and industrial loans.....	RCFDJ457	37,210,848	1.e.1.
2. Loans to financial institutions.....	RCFDJ458	2,680,775	1.e.2.
3. All other unused commitments.....	RCFDJ459	4,332,630	1.e.3.
2. Financial standby letters of credit and foreign office guarantees.....	RCFD3819	1,966,556	2.
<i>Item 2.a is to be completed by banks with \$1 billion or more in total assets.</i>			
a. Amount of financial standby letters of credit conveyed to others ¹	RCFD3820	0	2.a.
3. Performance standby letters of credit and foreign office guarantees.....	RCFD3821	63,961	3.
<i>Item 3.a is to be completed by banks with \$1 billion or more in total assets.</i>			
a. Amount of performance standby letters of credit conveyed to others ¹	RCFD3822	0	3.a.
4. Commercial and similar letters of credit.....	RCFD3411	46,648	4.
5. Not applicable			5.
6. Securities lent and borrowed:			6.
a. Securities lent (including customers' securities lent where the customer is indemnified against loss by the reporting bank).....	RCFD3433	0	6.a.
b. Securities borrowed.....	RCFD3432	0	6.b.

Dollar amounts in thousands

	(Column A) Sold Protection		(Column B) Purchased Protection		
7. Credit derivatives:					7.
a. Notional amounts:					7.a.
1. Credit default swaps.....	RCFDC968	0	RCFDC969	0	7.a.1.
2. Total return swaps.....	RCFDC970	0	RCFDC971	0	7.a.2.
3. Credit options.....	RCFDC972	0	RCFDC973	0	7.a.3.
4. Other credit derivatives.....	RCFDC974	3,299,926	RCFDC975	0	7.a.4.
b. Gross fair values:					7.b.
1. Gross positive fair value.....	RCFDC219	0	RCFDC221	0	7.b.1.
2. Gross negative fair value.....	RCFDC220	71,156	RCFDC222	0	7.b.2.

Dollar amounts in thousands

c. Notional amounts by regulatory capital treatment: ¹			7.c.
1. Positions covered under the Market Risk Rule:			7.c.1.
a. Sold protection.....	RCFDG401	0	7.c.1.a.
b. Purchased protection.....	RCFDG402	0	7.c.1.b.
2. All other positions:			7.c.2.
a. Sold protection.....	RCFDG403	3,299,926	7.c.2.a.
b. Purchased protection that is recognized as a guarantee for regulatory capital purposes.....	RCFDG404	0	7.c.2.b.
c. Purchased protection that is not recognized as a guarantee for regulatory capital purposes.....	RCFDG405	0	7.c.2.c.

	(Column A) Remaining Maturity of One Year or Less		(Column B) Remaining Maturity of Over One Year Through Five Years		(Column C) Remaining Maturity of Over Five Years		
d. Notional amounts by remaining maturity:							7.d.
1. Sold credit protection: ²							7.d.1.
a. Investment grade.....	RCFDG406	170,340	RCFDG407	2,856,985	RCFDG408	272,601	7d1a.
b. Subinvestment grade.....	RCFDG409	0	RCFDG410	0	RCFDG411	0	7d1b.
2. Purchased credit protection: ³							7.d.2.
a. Investment grade.....	RCFDG412	0	RCFDG413	0	RCFDG414	0	7d2a.
b. Subinvestment grade.....	RCFDG415	0	RCFDG416	0	RCFDG417	0	7d2b.

1. The asset-size tests and the \$300 million credit card lines test are based on the total assets and credit card lines reported in the June 30, 2018, Report of Condition.
1. The asset-size tests and the \$300 million credit card lines test are based on the total assets and credit card lines reported in the June 30, 2018, Report of Condition.

Dollar amounts in thousands

8. Spot foreign exchange contracts.....	RCFD8765	122,762	8.
9. All other off-balance sheet liabilities (exclude derivatives) (itemize and describe each component of this item over 25% of Schedule RC, item 27.a, "Total bank equity capital").....	RCFD3430	2,780,763	9.
a. Not applicable			9.a.
b. Commitments to purchase when-issued securities.....	RCFD3434	0	9.b.
c. Standby letters of credit issued by another party (e.g., a Federal Home Loan Bank) on the bank's behalf.....	RCFDC978	0	9.c.
d. Disclose component and the dollar amount of that component:			9.d.
1. Describe component.....	TEXT3555	NR	9.d.1.
2. Amount of component.....	RCFD3555	0	9.d.2.
e. Disclose component and the dollar amount of that component:			9.e.
1. Describe component.....	TEXT3556	NR	9.e.1.
2. Amount of component.....	RCFD3556	0	9.e.2.
f. Disclose component and the dollar amount of that component:			9.f.
(TEXT3557) NR	RCFD3557	0	9.f.1.
10. All other off-balance sheet assets (exclude derivatives) (itemize and describe each component of this item over 25% of Schedule RC, item 27.a, "Total bank equity capital").....	RCFD5591	0	10.
a. Commitments to sell when-issued securities.....	RCFD3435	0	10.a.
b. Disclose component and the dollar amount of that component:			10.b.
1. Describe component.....	TEXT5592	NR	10.b.1.
2. Amount of component.....	RCFD5592	0	10.b.2.
c. Disclose component and the dollar amount of that component:			10.c.
1. Describe component.....	TEXT5593	NR	10.c.1.
2. Amount of component.....	RCFD5593	0	10.c.2.
d. Disclose component and the dollar amount of that component:			10.d.
1. Describe component.....	TEXT5594	NR	10.d.1.
2. Amount of component.....	RCFD5594	0	10.d.2.
e. Disclose component and the dollar amount of that component:			10.e.
1. Describe component.....	TEXT5595	NR	10.e.1.
2. Amount of component.....	RCFD5595	0	10.e.2.
Items 11.a and 11.b are to be completed semiannually in the June and December reports only.			
11. Year-to-date merchant credit card sales volume:			11.
a. Sales for which the reporting bank is the acquiring bank.....	RCFDC223	NR	11.a.
b. Sales for which the reporting bank is the agent bank with risk.....	RCFDC224	NR	11.b.

- Sum of items 7.c.(1)(a) and 7.c.(2)(a), must equal sum of items 7.a.(1) through (4), column A. Sum of items 7.c.(1)(b), 7.c.(2)(b), and 7.c.(2)(c) must equal sum of items 7.a.(1) through (4), column B.
- Sum of items 7.d.(1)(a) and (b), columns A through C, must equal sum of items 7.a.(1) through (4), column A.
- Sum of items 7.d.(2)(a) and (b), columns A through C, must equal sum of items 7.a.(1) through (4), column B.

Dollar amounts in thousands	(Column A) Interest Rate Contracts	(Column B) Foreign Exchange Contracts	(Column C) Equity Derivative Contracts	(Column D) Commodity and Other Contracts	
12. Gross amounts (e.g., notional amounts):					12.
a. Futures contracts.....	RCFD8693 1,849,300	RCFD8694 0	RCFD8695 0	RCFD8696 0	12.a.
b. Forward contracts.....	RCFD8697 20,368,783	RCFD8698 6,254,589	RCFD8699 0	RCFD8700 0	12.b.
c. Exchange-traded option contracts:					12.c.
1. Written options.....	RCFD8701 0	RCFD8702 0	RCFD8703 0	RCFD8704 0	12c1.
2. Purchased options.....	RCFD8705 0	RCFD8706 0	RCFD8707 0	RCFD8708 0	12c2.
d. Over-the-counter option contracts:					12.d.
1. Written options.....	RCFD8709 4,115,095	RCFD8710 301,291	RCFD8711 0	RCFD8712 19,377	12d1.
2. Purchased options.....	RCFD8713 11,279,550	RCFD8714 303,162	RCFD8715 0	RCFD8716 939	12d2.
e. Swaps.....	RCFD3450 157,391,932	RCFD3826 11,871,458	RCFD8719 0	RCFD8720 273,528	12.e.
13. Total gross notional amount of derivative contracts held for trading.....	RCFDA126 134,624,581	RCFDA127 18,730,501	RCFD8723 0	RCFD8724 293,844	13.
14. Total gross notional amount of derivative contracts held for purposes other than trading.....	RCFD8725 60,380,078	RCFD8726 0	RCFD8727 0	RCFD8728 0	14.
a. Interest rate swaps where the bank has agreed to pay a fixed rate.....	RCFDA589 10,152,900				14.a.
15. Gross fair values of derivative contracts:					15.
a. Contracts held for trading:					15.a.
1. Gross positive fair value.....	RCFD8733 1,103,289	RCFD8734 272,876	RCFD8735 0	RCFD8736 134,831	15a1.
2. Gross negative fair value.....	RCFD8737 168,147	RCFD8738 213,549	RCFD8739 0	RCFD8740 138,025	15a2.
b. Contracts held for purposes other than trading:					15.b.
1. Gross positive fair value.....	RCFD8741 215,514	RCFD8742 0	RCFD8743 0	RCFD8744 0	15b1.
2. Gross negative fair value.....	RCFD8745 31,016	RCFD8746 0	RCFD8747 0	RCFD8748 0	15b2.

	(Column A) Banks and Securities Firms	(Column B)	(Column C) Hedge Funds	(Column D) Sovereign Governments	(Column E) Corporations and All Other Counterparties	
Dollar amounts in thousands						
Item 16 is to be completed only by banks with total assets of \$10 billion or more.						
16. Over-the counter derivatives: ¹						16.
a. Net current credit exposure.....	RCFDG418 186,966		RCFDG420 0	RCFDG421 0	RCFDG422 1,391,245	16.a.
b. Fair value of collateral:						16.b.
1. Cash - U.S. dollar.....	RCFDG423 233,841		RCFDG425 0	RCFDG426 0	RCFDG427 12,260	16.b.1.
2. Cash - Other currencies.....	RCFDG428 0		RCFDG430 0	RCFDG431 0	RCFDG432 0	16.b.2.
3. U.S. Treasury securities.....	RCFDG433 0		RCFDG435 0	RCFDG436 0	RCFDG437 0	16.b.3.
4. U.S. Government agency and U.S. Government-sponsored agency debt securities.....	RCFDG438 0		RCFDG440 0	RCFDG441 0	RCFDG442 0	16.b.4.
5. Corporate bonds.....	RCFDG443 0		RCFDG445 0	RCFDG446 0	RCFDG447 0	16.b.5.
6. Equity securities.....	RCFDG448 0		RCFDG450 0	RCFDG451 0	RCFDG452 0	16.b.6.
7. All other collateral.....	RCFDG453 0		RCFDG455 0	RCFDG456 0	RCFDG457 0	16.b.7.
8. Total fair value of collateral (sum of items 16.b.(1) through (7)).....	RCFDG458 233,841		RCFDG460 0	RCFDG461 0	RCFDG462 12,260	16.b.8.

1. The \$10 billion asset-size test is based on the total assets reported on the June 30, 2018, Report of Condition.

Schedule RC-M - Memoranda(Form Type - 031)

Dollar amounts in thousands

1. Extensions of credit by the reporting bank to its executive officers, directors, principal shareholders, and their related interests as of the report date:			1.
a. Aggregate amount of all extensions of credit to all executive officers, directors, principal shareholders, and their related interests.....	RCFD6164	90,473	1.a.
b. Number of executive officers, directors, and principal shareholders to whom the amount of all extensions of credit by the reporting bank (including extensions of credit to related interests) equals or exceeds the lesser of \$500,000 or 5 percent of total capital as defined for this purpose in agency regulations.....	RCFD6165	1	1.b.
2. Intangible assets:			2.
a. Mortgage servicing assets.....	RCFD3164	893,330	2.a.
1. Estimated fair value of mortgage servicing assets.....	RCFDA590	893,330	2.a.1.
b. Goodwill.....	RCFD3163	6,998,072	2.b.
c. All other intangible assets.....	RCFDJF76	50,806	2.c.
d. Total (sum of items 2.a, 2.b, and 2.c) (must equal Schedule RC, item 10).....	RCFD2143	7,942,208	2.d.
3. Other real estate owned:			3.
a. Construction, land development, and other land in domestic offices.....	RCON5508	0	3.a.
b. Farmland in domestic offices.....	RCON5509	0	3.b.
c. 1-4 family residential properties in domestic offices.....	RCON5510	13,750	3.c.
d. Multifamily (5 or more) residential properties in domestic offices.....	RCON5511	0	3.d.
e. Nonfarm nonresidential properties in domestic offices.....	RCON5512	612	3.e.
f. In foreign offices.....	RCFN5513	0	3.f.
g. Total (sum of items 3.a through 3.g) (must equal Schedule RC, item 7).....	RCFD2150	14,362	3.g.
4. Cost of equity securities with readily determinable fair values not held for trading (the fair value of which is reported in Schedule RC, item 2.c) ¹	RCFDJA29	NR	4.
5. Other borrowed money:			5.
a. Federal Home Loan Bank advances:			5.a.
1. Advances with a remaining maturity or next repricing date of: ¹			5.a.1.
a. One year or less.....	RCFDF055	68	5.a.1.a.
b. Over one year through three years.....	RCFDF056	97	5.a.1.b.
c. Over three years through five years.....	RCFDF057	13,599	5.a.1.c.
d. Over five years.....	RCFDF058	4,763	5.a.1.d.
2. Advances with a remaining maturity of one year or less (included in item 5.a.(1)(a) above) ²	RCFD2651	68	5.a.2.
3. Structured advances (included in items 5.a.(1)(a) - (d) above).....	RCFDF059	0	5.a.3.
b. Other borrowings:			5.b.
1. Other borrowings with a remaining maturity or next repricing date of: ³			5.b.1.
a. One year or less.....	RCFDF060	3,594,739	5.b.1.a.
b. Over one year through three years.....	RCFDF061	1,040,693	5.b.1.b.
c. Over three years through five years.....	RCFDF062	1,281,887	5.b.1.c.
d. Over five years.....	RCFDF063	15,695	5.b.1.d.
2. Other borrowings with a remaining maturity of one year or less (included in item 5.b.(1)(a) above) ⁴	RCFDB571	3,094,935	5.b.2.
c. Total (sum of items 5.a.(1)(a)-(d) and items 5.b.(1)(a)-(d)) (must equal Schedule RC, item 16).....	RCFD3190	5,951,541	5.c.
6. Does the reporting bank sell private label or third party mutual funds and annuities?.....	RCFDB569	Yes	6.
7. Assets under the reporting bank's management in proprietary mutual funds and annuities.....	RCFDB570	0	7.
8. Internet Web site addresses and physical office trade names:			8.
a. Uniform Resource Locator (URL) of the reporting institution's primary Internet Web site (home page), if any (Example: www.examplebank.com):.....	TEXT4087	Click here for value	8.a.

1. Item 4 is to be completed only by insured state banks that have been approved by the FDIC to hold grandfathered equity investments. See instructions for this item and the Glossary entry for "Securities Activities" for further detail on accounting for investments in equity securities.

1. Report fixed-rate advances by remaining maturity and floating-rate advances by next repricing date.

2. Report both fixed- and floating-rate advances by remaining maturity. Exclude floating-rate advances with a next repricing date of one year or less that have a remaining maturity of over one year.

3. Report fixed-rate other borrowings by remaining maturity and floating-rate other borrowings by next repricing date.

4. Report both fixed- and floating-rate other borrowings by remaining maturity. Exclude floating rate other borrowings with a next repricing date of one year or less that have a remaining maturity of over one year.

Dollar amounts in thousands

b. URLs of all other public-facing Internet Web sites that the reporting institution uses to accept or solicit deposits from the public, if any (Example: www.examplebank.biz): ¹			8.b.
1. URL 1.....	TE01N528	Click here for value	8.b.1.
2. URL 2.....	TE02N528	NR	8.b.2.
3. URL 3.....	TE03N528	NR	8.b.3.
4. URL 4.....	TE04N528	NR	8.b.4.
5. URL 5.....	TE05N528	NR	8.b.5.
6. URL 6.....	TE06N528	NR	8.b.6.
7. URL 7.....	TE07N528	NR	8.b.7.
8. URL 8.....	TE08N528	NR	8.b.8.
9. URL 9.....	TE09N528	NR	8.b.9.
10. URL 10.....	TE10N528	NR	8.b.10.
c. Trade names other than the reporting institution's legal title used to identify one or more of the institution's physical offices at which deposits are accepted or solicited from the public, if any:			8.c.
1. Trade name 1.....	TE01N529	Click here for value	8.c.1.
2. Trade name 2.....	TE02N529	Click here for value	8.c.2.
3. Trade name 3.....	TE03N529	NR	8.c.3.
4. Trade name 4.....	TE04N529	NR	8.c.4.
5. Trade name 5.....	TE05N529	NR	8.c.5.
6. Trade name 6.....	TE06N529	NR	8.c.6.
Item 9 is to be completed annually in the December report only.			
9. Do any of the bank's Internet Web sites have transactional capability, i.e., allow the bank's customers to execute transactions on their accounts through the Web site?.....		RCFD4088	NR 9.
10. Secured liabilities:			10.
a. Amount of "Federal funds purchased in domestic offices" that are secured (included in Schedule RC, item 14.a).....		RCONF064	0 10.a.
b. Amount of "Other borrowings" that are secured (included in Schedule RC-M, items 5.b.(1)(a) - (d)).....		RCFDF065	1,100,811 10.b.
11. Does the bank act as trustee or custodian for Individual Retirement Accounts, Health Savings Accounts, and other similar accounts?.....		RCONG463	Yes 11.
12. Does the bank provide custody, safekeeping, or other services involving the acceptance of orders for the sale or purchase of securities?.....		RCONG464	Yes 12.
13. Assets covered by loss-sharing agreements with the FDIC:			13.
a. Loans and leases (included in Schedule RC, items 4.a and 4.b):			13.a.
1. Loans secured by real estate in domestic offices:			13.a.1.
a. Construction, land development, and other land loans:			13.a.1.a.
1. 1-4 family residential construction loans.....		RCONK169	0 13.a.1.a.1.
2. Other construction loans and all land development and other land loans.....		RCONK170	0 13.a.1.a.2.
b. Secured by farmland.....		RCONK171	0 13.a.1.b.
c. Secured by 1-4 family residential properties:			13.a.1.c.
1. Revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit.....		RCONK172	0 13.a.1.c.1.
2. Closed-end loans secured by 1-4 family residential properties:			13.a.1.c.2.
a. Secured by first liens.....		RCONK173	0 13.a.1.c.2a.
b. Secured by junior liens.....		RCONK174	0 13.a.1.c.2b.
d. Secured by multifamily (5 or more) residential properties.....		RCONK175	0 13.a.1.d.
e. Secured by nonfarm nonresidential properties:			13.a.1.e.
1. Loans secured by owner-occupied nonfarm nonresidential properties.....		RCONK176	0 13.a.1.e.1.
2. Loans secured by other nonfarm nonresidential properties.....		RCONK177	0 13.a.1.e.2.
2. Not applicable			13.a.2.
3. Not applicable			13.a.3.
4. Not applicable			13.a.4.
5. All other loans and all leases.....		RCFDK183	0 13.a.5.

1. Report only highest level URLs (for example, report www.examplebank.biz, but do not also report www.examplebank.biz/checking). Report each top level domain name used (for example, report both www.examplebank.biz and www.examplebank.net).

Dollar amounts in thousands

b. Other real estate owned (included in Schedule RC, item 7):			13.b.
1. Construction, land development, and other land in domestic offices.....	RCONK187	0	13.b.1.
2. Farmland in domestic offices.....	RCONK188	0	13.b.2.
3. 1-4 family residential properties in domestic offices.....	RCONK189	0	13.b.3.
4. Multifamily (5 or more) residential properties in domestic offices.....	RCONK190	0	13.b.4.
5. Nonfarm nonresidential properties in domestic offices.....	RCONK191	0	13.b.5.
6. In foreign offices.....	RCFNK260	0	13.b.6.
7. Portion of covered other real estate owned included in items 13.b.(1) through (6) above that is protected by FDIC loss-sharing agreements.....	RCFDK192	0	13.b.7.
c. Debt securities (included in Schedule RC, items 2.a and 2.b).....	RCFDJ461	0	13.c.
d. Other assets (exclude FDIC loss-sharing indemnification assets).....	RCFDJ462	0	13.d.
<i>Items 14.a and 14.b are to be completed annually in the December report only.</i>			
14. Captive insurance and reinsurance subsidiaries:			14.
a. Total assets of captive insurance subsidiaries ²	RCFDK193	NR	14.a.
b. Total assets of captive reinsurance subsidiaries ²	RCFDK194	NR	14.b.
<i>Item 15 is to be completed by institutions that are required or have elected to be treated as a Qualified Thrift Lender.</i>			
15. Qualified Thrift Lender (QTL) test:			15.
a. Does the institution use the Home Owners' Loan Act (HOLA) QTL test or the Internal Revenue Service Domestic Building and Loan Association (IRS DBLA) test to determine its QTL compliance? (for the HOLA QTL test, enter 1; for the IRS DBLA test, enter 2).....	RCONL133	NR	15.a.
b. Has the institution been in compliance with the HOLA QTL test as of each month end during the quarter or the IRS DBLA test for its most recent taxable year, as applicable?.....	RCONL135	NR	15.b.
<i>Item 16.a and, if appropriate, items 16.b.(1) through 16.b.(3) are to be completed annually in the December report only.</i>			
16. International remittance transfers offered to consumers: ¹			16.
a. Estimated number of international remittance transfers provided by your institution during the calendar year ending on the report date.....	RCONN523	NR	16.a.
<i>Items 16.b.(1) through 16.b.(3) are to be completed by institutions that reported 501 or more international remittance transfers in item 16.a in either or both of the current report or the most recent prior report in which item 16.a was required to be completed.</i>			
b. Estimated dollar value of remittance transfers provided by your institution and usage of regulatory exceptions during the calendar year ending on the report date and:			16.b.
1. Estimated dollar value of international remittance transfers.....	RCONN524	NR	16.b.1.
2. Estimated number of international remittance transfers for which your institution applied the permanent exchange rate exception.....	RCONMM07	NR	16.b.2.
3. Estimated number of international remittance transfers for which your institution applied the permanent covered third-party exception.....	RCONMQ52	NR	16.b.3.
17. U.S. Small Business Administration Paycheck Protection Program (PPP) loans and the Federal Reserve PPP Liquidity Facility (PPPLF): ³			17.
a. Number of PPP loans outstanding.....	RCONLG26	70377	17.a.
b. Outstanding balance of PPP loans.....	RCONLG27	5,157,907	17.b.
c. Outstanding balance of PPP loans pledged to the PPPLF.....	RCONLG28	0	17.c.
d. Outstanding balance of borrowings from Federal Reserve Banks under the PPPLF with a remaining maturity of:			17.d.
1. One year or less.....	RCONLL59	0	17.d.1.
2. More than one year.....	RCONLL60	0	17.d.2.
e. Quarterly average amount of PPP loans pledged to the PPPLF and excluded from "Total assets for the leverage ratio" reported in Schedule RC-R, Part I, item 30.....	RCONLL57	0	17.e.
18. Money Market Mutual Fund Liquidity Facility (MMLF):			18.
a. Outstanding balance of assets purchased under the MMLF.....	RCONLL61	0	18.a.
b. Quarterly average amount of assets purchased under the MMLF and excluded from "Total assets for the leverage ratio" reported in Schedule RC-R, Part I, item 30.....	RCONLL58	0	18.b.

(TE01N528) www.citizensaccess.com

- Report total assets before eliminating intercompany transactions between the consolidated insurance or reinsurance subsidiary and other offices or consolidated subsidiaries of the reporting bank.
- Report information about international electronic transfers of funds offered to consumers in the United States that: (a) are "remittance transfers" as defined by subpart B of Regulation E (12 CFR § 1005.30(e)), or (b) would qualify as "remittance transfers" under subpart B of Regulation E (12 CFR § 1005.30(e)) but are excluded from that definition only because the provider is not providing those transfers in the normal course of its business. See 12 CFR § 1005.30(f). For purposes of this item 16, such transfers are excluded.
- Paycheck Protection Program (PPP) covered loans as defined in section 7(a)(36) of the Small Business Act (15 U.S.C. 636(a)(36)). The PPP was established by Section 1102 of the 2020 Coronavirus Aid, Relief, and Economic Security Act.

(TE01N529) Citizens Bank

(TE02N529) Citizens Access

(TEXT4087) www.citizensbank.com

Schedule RC-N - Past Due and Nonaccrual Loans Leases and Other Assets(Form Type - 031)

Dollar amounts in thousands	(Column A) Past due 30 through 89 days and still accruing	(Column B) Past due 90 days or more and still accruing	(Column C) Nonaccrual				
1. Loans secured by real estate:				1.			
a. Construction, land development, and other land loans in domestic offices:				1.a.			
1. 1-4 family residential construction loans.....	RCONF172	0	RCONF174	0	RCONF176	2,881	1.a.1.
2. Other construction loans and all land development and other land loans.....	RCONF173	3,501	RCONF175	9,000	RCONF177	386	1.a.2.
b. Secured by farmland in domestic offices.....	RCON3493	0	RCON3494	0	RCON3495	0	1.b.
c. Secured by 1-4 family residential properties in domestic offices:							1.c.
1. Revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit.....	RCON5398	39,649	RCON5399	0	RCON5400	227,183	1.c.1.
2. Closed-end loans secured by 1-4 family residential properties:							1.c.2.
a. Secured by first liens.....	RCONC236	42,748	RCONC237	1,106,540	RCONC229	252,366	1c2a.
b. Secured by junior liens.....	RCONC238	4,703	RCONC239	0	RCONC230	25,004	1c2b.
d. Secured by multifamily (5 or more) residential properties in domestic offices.....	RCON3499	0	RCON3500	0	RCON3501	279	1.d.
e. Secured by nonfarm nonresidential properties in domestic offices:							1.e.
1. Loans secured by owner-occupied nonfarm nonresidential properties.....	RCONF178	2,900	RCONF180	2,558	RCONF182	62,109	1.e.1.
2. Loans secured by other nonfarm nonresidential properties.....	RCONF179	970	RCONF181	0	RCONF183	99,073	1.e.2.
f. In foreign offices.....	RCFNB572	0	RCFNB573	0	RCFNB574	0	1.f.
2. Loans to depository institutions and acceptances of other banks:							2.
a. To U.S. banks and other U.S. depository institutions.....	RCFD5377	0	RCFD5378	0	RCFD5379	0	2.a.
b. To foreign banks.....	RCFD5380	0	RCFD5381	0	RCFD5382	0	2.b.
3. Loans to finance agricultural production and other loans to farmers.....	RCFD1594	0	RCFD1597	0	RCFD1583	0	3.
4. Commercial and industrial loans:							4.
a. To U.S. addressees (domicile).....	RCFD1251	153,982	RCFD1252	79	RCFD1253	226,893	4.a.
b. To non-U.S. addressees (domicile).....	RCFD1254	9,000	RCFD1255	0	RCFD1256	3,664	4.b.
5. Loans to individuals for household, family, and other personal expenditures:							5.
a. Credit cards.....	RCFDB575	15,667	RCFDB576	0	RCFDB577	15,574	5.a.
b. Automobile loans.....	RCFDK213	121,531	RCFDK214	0	RCFDK215	65,682	5.b.
c. Other (includes revolving credit plans other than credit cards and other consumer loans).....	RCFDK216	76,661	RCFDK217	10,800	RCFDK218	33,363	5.c.
6. Loans to foreign governments and official institutions.....	RCFD5389	0	RCFD5390	0	RCFD5391	0	6.
7. All other loans.....	RCFD5459	3,545	RCFD5460	0	RCFD5461	860	7.
8. Lease financing receivables:							8.
a. Leases to individuals for household, family, and other personal expenditures.....	RCFDF166	0	RCFDF167	0	RCFDF168	0	8.a.
b. All other leases.....	RCFDF169	2,331	RCFDF170	369	RCFDF171	1,285	8.b.
9. Total loans and leases (sum of items 1 through 8.b).....	RCFD1406	477,188	RCFD1407	1,129,346	RCFD1403	1,016,602	9.
10. Debt securities and other assets (exclude other real estate owned and other repossessed assets).....	RCFD3505	567	RCFD3506	563	RCFD3507	0	10.
11. Loans and leases reported in items 1 through 8 above that are wholly or partially guaranteed by the U.S. Government, excluding loans and leases covered by loss-sharing agreements with the FDIC:.....	RCFDK036	15,589	RCFDK037	1,104,369	RCFDK038	40,360	11.
a. Guaranteed portion of loans and leases included in item 11 above, excluding rebooked "GNMA loans".....	RCFDK039	5,033	RCFDK040	5,844	RCFDK041	7,848	11.a.
b. Rebooked "GNMA loans" that have been repurchased or are eligible for repurchase included in item 11 above.....	RCFDK042	10,419	RCFDK043	1,098,476	RCFDK044	32,449	11.b.
12. Loans and leases reported in items 1 through 8 above that are covered by loss-sharing agreements with the FDIC:							12.
a. Loans secured by real estate in domestic offices:							12.a.
1. Construction, land development, and other land loans:							12.a.1.
a. 1-4 family residential construction loans.....	RCONK045	0	RCONK046	0	RCONK047	0	12a1a.

Dollar amounts in thousands		(Column A) Past due 30 through 89 days and still accruing		(Column B) Past due 90 days or more and still accruing		(Column C) Nonaccrual	
b. Other construction loans and all land development and other land loans.....	RCONK048	0	RCONK049	0	RCONK050	0	12a1b
2. Secured by farmland.....	RCONK051	0	RCONK052	0	RCONK053	0	12a.2.
3. Secured by 1-4 family residential properties:							12a.3.
a. Revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit.....	RCONK054	0	RCONK055	0	RCONK056	0	12a3a
b. Closed-end loans secured by 1-4 family residential properties:							12a3b
1. Secured by first liens.....	RCONK057	0	RCONK058	0	RCONK059	0	12a31.
2. Secured by junior liens.....	RCONK060	0	RCONK061	0	RCONK062	0	12a32
4. Secured by multifamily (5 or more) residential properties.....	RCONK063	0	RCONK064	0	RCONK065	0	12a.4.
5. Secured by nonfarm nonresidential properties:							12a.5.
a. Loans secured by owner-occupied nonfarm nonresidential properties.....	RCONK066	0	RCONK067	0	RCONK068	0	12a5a
b. Loans secured by other nonfarm nonresidential properties.....	RCONK069	0	RCONK070	0	RCONK071	0	12a5b
b. Not applicable							12.b.
c. Not applicable							12.c.
d. Not applicable							12.d.
e. All other loans and all leases.....	RCFDK087	0	RCFDK088	0	RCFDK089	0	12.e.
f. Portion of covered loans and leases included in items 12.a through 12.e above that is protected by FDIC loss-sharing agreements.....	RCFDK102	0	RCFDK103	0	RCFDK104	0	12.f.
1. Loans restructured in troubled debt restructurings included in Schedule RC-N, items 1 through 7, above (and not reported in Schedule RC-C, Part 1, Memorandum item 1):							M.1.
a. Construction, land development, and other land loans in domestic offices:							M.1.a.
1. 1-4 family residential construction loans.....	RCONK105	0	RCONK106	0	RCONK107	0	M1a1.
2. Other construction loans and all land development and other land loans.....	RCONK108	0	RCONK109	9,000	RCONK110	0	M1a2
b. Loans secured by 1-4 family residential properties in domestic offices..	RCONF661	15,511	RCONF662	13,807	RCONF663	131,316	M.1.b.
c. Secured by multifamily (5 or more) residential properties in domestic offices.....	RCONK111	0	RCONK112	0	RCONK113	0	M.1.c.
d. Secured by nonfarm nonresidential properties in domestic offices:							M.1.d.
1. Loans secured by owner-occupied nonfarm nonresidential properties.....	RCONK114	2,160	RCONK115	0	RCONK116	39,866	M1d1.
2. Loans secured by other nonfarm nonresidential properties.....	RCONK117	0	RCONK118	0	RCONK119	0	M1d2
e. Commercial and industrial loans:							M.1.e.
1. To U.S. addressees (domicile).....	RCFDK120	143	RCFDK121	0	RCFDK122	42,574	M1e1.
2. To non-U.S. addressees (domicile).....	RCFDK123	0	RCFDK124	0	RCFDK125	0	M1e2
f. All other loans (include loans to individuals for household, family, and other personal expenditures).....	RCFDK126	5,058	RCFDK127	1,306	RCFDK128	56,965	M.1.f.
<i>Itemize loan categories included in Memorandum item 1.f, above that exceed 10 percent of total loans restructured in troubled debt restructurings that are past due 30 days or more or in nonaccrual status (sum of Memorandum items 1.a through 1.f, columns A through C):</i>							
1. Loans secured by farmland in domestic offices.....	RCONK130	0	RCONK131	0	RCONK132	0	M1f1.
2. Not applicable							M1f2.
3. Loans to finance agricultural production and other loans to farmers.....	RCFDK138	0	RCFDK139	0	RCFDK140	0	M1f3.
4. Loans to individuals for household, family, and other personal expenditures:							M1f4.
a. Credit cards.....	RCFDK274	0	RCFDK275	0	RCFDK276	0	M1f4a
b. Automobile loans.....	RCFDK277	0	RCFDK278	0	RCFDK279	42,529	M1f4b
c. Other (includes revolving credit plans other than credit cards and other consumer loans).....	RCFDK280	3,256	RCFDK281	0	RCFDK282	0	M1f4c
g. Total loans restructured in troubled debt restructurings included in Schedule RC-N, items 1 through 7, above and not reported in Schedule RC-C, Part I, Memorandum item 1 (sum of items Memorandum item 1.a.(1) through Memorandum item 1.f) ¹	RCFDHK26	22,872	RCFDHK27	24,113	RCFDHK28	270,721	M.1.g.

1. Exclude amounts reported in Memorandum items 1.f.(1) through 1.f.(4) when calculating the total in Memorandum item 1.g.

Dollar amounts in thousands	(Column A) Past due 30 through 89 days and still accruing		(Column B) Past due 90 days or more and still accruing		(Column C) Nonaccrual		
2. Loans to finance commercial real estate, construction, and land development activities (not secured by real estate) included in Schedule RC-N, items 4 and 7, above.....	RCFD6558	0	RCFD6559	0	RCFD6560	679	M.2.
3. Loans secured by real estate to non-U.S. addressees (domicile) (included in Schedule RC-N, item 1, above).....	RCFD1248	479	RCFD1249	0	RCFD1250	1,231	M.3.
4. Not applicable							M.4.
5. Loans and leases held for sale (included in Schedule RC-N, items 1 through 8, above).....	RCFDC240	803	RCFDC241	438	RCFDC226	8,991	M.5.

Dollar amounts in thousands		(Column A) Past due 30 through 89 days		(Column B) Past due 90 days or more	
6. Derivative contracts: Fair value of amounts carried as assets.....		RCFD3529	0	RCFD3530	0

Dollar amounts in thousands			
<i>Memorandum items 7, 8, 9.a, and 9.b are to be completed semiannually in the June and December reports only.</i>			
7. Additions to nonaccrual assets during the previous six months.....	RCFDC410	NR	M.7.
8. Nonaccrual assets sold during the previous six months.....	RCFDC411	NR	M.8.

Dollar amounts in thousands	(Column A) Past due 30 through 89 days and still accruing		(Column B) Past due 90 days or more and still accruing		(Column C) Nonaccrual		
9. Purchased credit-impaired loans accounted for in accordance with FASB ASC 310-30 (former AICPA Stament of Position 03-3): ²							M.9.
a. Outstanding balance.....	RCFDL183	NR	RCFDL184	NR	RCFDL185	NR	M.9.a.
b. Amount included in Schedule RC-N, items 1 through 7, above.....	RCFDL186	NR	RCFDL187	NR	RCFDL188	NR	M.9.b.

2. Memorandum items 9.a and 9.b should be completed only by institutions that have not yet adopted ASU 2016-13.

Schedule RC-O - Other Data for Deposit Insurance and FICO Assessments(Form Type - 031)

All FDIC-insured depository institutions must complete items 1 through 9, 10, and 11, Memorandum item 1, and, if applicable, item 9.a, Memorandum items 2, 3, and 6 through 18 each quarter. Unless otherwise indicated, complete items 1 through 11 and Memorandum items 1 through 3 on an "unconsolidated single FDIC certificate number basis" (see instructions) and complete Memorandum items 6 through 18 on a fully consolidated basis.

Dollar amounts in thousands

1. Total deposit liabilities before exclusions (gross) as defined in Section 3(l) of the Federal Deposit Insurance Act and FDIC regulations.....	RCFDF236	155,584,900	1.
2. Total allowable exclusions, including interest accrued and unpaid on allowable exclusions (including foreign deposits).....	RCFDF237	334,700	2.
3. Total foreign deposits, including interest accrued and unpaid thereon (included in item 2 above).....	RCFNF234	334,700	3.
4. Average consolidated total assets for the calendar quarter.....	RCFDK652	182,169,195	4.
a. Averaging method used (for daily averaging, enter 1; for weekly averaging, enter 2).....	RCFDK653	1	4.a.
5. Average tangible equity for the calendar quarter ¹	RCFDK654	16,062,317	5.
6. Holdings of long-term unsecured debt issued by other FDIC-insured depository institutions.....	RCFDK655	0	6.
7. Unsecured "Other borrowings" with a remaining maturity of (sum of items 7.a through 7.d must be less than or equal to Schedule RC-M, items 5.b.(1)(a)-(d) minus item 10.b):			7.
a. One year or less.....	RCFDG465	2,012,307	7.a.
b. Over one year through three years.....	RCFDG466	1,538,009	7.b.
c. Over three years through five years.....	RCFDG467	1,281,887	7.c.
d. Over five years.....	RCFDG468	0	7.d.
8. Subordinated notes and debentures with a remaining maturity of (sum of items 8.a through 8.d must equal Schedule RC, item 19):			8.
a. One year or less.....	RCFDG469	0	8.a.
b. Over one year through three years.....	RCFDG470	0	8.b.
c. Over three years through five years.....	RCFDG471	0	8.c.
d. Over five years.....	RCFDG472	1,125,000	8.d.
9. Brokered reciprocal deposits (included in Schedule RC-E, Part I, Memorandum item 1.b).....	RCONG803	0	9.
Item 9.a is to be completed on a fully consolidated basis by all institutions that own another insured depository institution.			
a. Fully consolidated brokered reciprocal deposits.....	RCONL190	NR	9.a.
10. Banker's bank certification: Does the reporting institution meet both the statutory definition of a banker's bank and the business conduct test set forth in FDIC regulations? If the answer to item 10 is "YES," complete items 10.a and 10.b.....	RCFDK656	No	10.
If the answer to item 10 is "YES," complete items 10.a and 10.b.			
a. Banker's bank deduction.....	RCFDK657	NR	10.a.
b. Banker's bank deduction limit.....	RCFDK658	NR	10.b.
11. Custodial bank certification: Does the reporting institution meet the definition of a custodial bank set forth in FDIC regulations? If the answer to item 11 is "YES," complete items 11.a and 11.b.....	RCFDK659	No	11.
If the answer to item 11 is "YES," complete items 11.a and 11.b.			
a. Custodial bank deduction.....	RCFDK660	NR	11.a.
b. Custodial bank deduction limit.....	RCFDK661	NR	11.b.
1. Total deposit liabilities of the bank (including related interest accrued and unpaid) less allowable exclusions (including related interest accrued and unpaid) (sum of Memorandum items 1.a.(1), 1.b.(1), 1.c.(1), and 1.d.(1) must equal Schedule RC-O, item 1 less item 2):			M.1.
a. Deposit accounts (excluding retirement accounts) of \$250,000 or less: ¹			M.1.a.
1. Amount of deposit accounts (excluding retirement accounts) of \$250,000 or less.....	RCONF049	68,528,416	M.1.a.1.
2. Number of deposit accounts (excluding retirement accounts) of \$250,000 or less.....	RCONF050	4937917	M.1.a.2.
b. Deposit accounts (excluding retirement accounts) of more than \$250,000: ¹			M.1.b.
1. Amount of deposit accounts (excluding retirement accounts) of more than \$250,000.....	RCONF051	82,766,272	M.1.b.1.
2. Number of deposit accounts (excluding retirement accounts) of more than \$250,000.....	RCONF052	55172	M.1.b.2.
c. Retirement deposit accounts of \$250,000 or less: ¹			M.1.c.
1. Amount of retirement deposit accounts of \$250,000 or less.....	RCONF045	3,841,520	M.1.c.1.
2. Number of retirement deposit accounts of \$250,000 or less.....	RCONF046	95452	M.1.c.2.
d. Retirement deposit accounts of more than \$250,000: ¹			M.1.d.

1. See instructions for averaging methods. For deposit insurance assessment purposes, tangible equity is defined as Tier 1 capital as set forth in the banking agencies' regulatory capital standards and reported in Schedule RC-R, Part I, item 26, except as described in the instructions.

1. The dollar amounts used as the basis for reporting in Memorandum items 1.a through 1.d reflect the deposit insurance limits in effect on the report date.

Dollar amounts in thousands

1. Amount of retirement deposit accounts of more than \$250,000.....	RCONF047	113,993	M.1.d.1.
2. Number of retirement deposit accounts of more than \$250,000.....	RCONF048	241	M.1.d.2.
<i>Memorandum item 2 is to be completed by banks with \$1 billion or more in total assets.</i>			
2. Estimated amount of uninsured deposits in domestic offices of the bank and in insured branches in Puerto Rico and U.S. territories and possessions, including related interest accrued and unpaid (see instructions) ³	RCON5597	74,307,389	M.2.
3. Has the reporting institution been consolidated with a parent bank or savings association in that parent bank's or parent savings association's Call Report? If so, report the legal title and FDIC Certificate Number of the parent bank or parent savings association:			M.3.
a. Legal title.....	TEXTA545	NR	M.3.a.
b. FDIC Certificate Number.....	RCONA545	0	M.3.b.
4. Dually payable deposits in the reporting institution's foreign branches.....	RCFNGW43	0	M.4.
5. Not applicable			M.5.
<i>Memorandum items 6 through 12 are to be completed by "large institutions" and "highly complex institutions" as defined in FDIC regulations.</i>			
6. Criticized and classified items:			M.6.
a. Special mention.....	RCFDK663	CONF	M.6.a.
b. Substandard.....	RCFDK664	CONF	M.6.b.
c. Doubtful.....	RCFDK665	CONF	M.6.c.
d. Loss.....	RCFDK666	CONF	M.6.d.
7. "Nontraditional 1-4 family residential mortgage loans" as defined for assessment purposes only in FDIC regulations:			M.7.
a. Nontraditional 1-4 family residential mortgage loans.....	RCFDN025	CONF	M.7.a.
b. Securitizations of nontraditional 1-4 family residential mortgage loans.....	RCFDN026	CONF	M.7.b.
8. "Higher-risk consumer loans" as defined for assessment purposes only in FDIC regulations:			M.8.
a. Higher-risk consumer loans.....	RCFDN027	CONF	M.8.a.
b. Securitizations of higher-risk consumer loans.....	RCFDN028	CONF	M.8.b.
9. "Higher-risk commercial and industrial loans and securities" as defined for assessment purposes only in FDIC regulations:			M.9.
a. Higher-risk commercial and industrial loans and securities.....	RCFDN029	CONF	M.9.a.
b. Securitizations of higher-risk commercial and industrial loans and securities.....	RCFDN030	CONF	M.9.b.
10. Commitments to fund construction, land development, and other land loans secured by real estate for the consolidated bank:			M.10.
a. Total unfunded commitments.....	RCFDK676	3,767,147	M.10.a.
b. Portion of unfunded commitments guaranteed or insured by the U.S. government (including the FDIC).....	RCFDK677	0	M.10.b.
11. Amount of other real estate owned recoverable from the U.S. government under guarantee or insurance provisions (excluding FDIC loss-sharing agreements).....	RCFDK669	256	M.11.
12. Nonbrokered time deposits of more than \$250,000 in domestic offices (included in Schedule RC-E, Memorandum item 2.d).....	RCONK678	2,358,793	M.12.
<i>Memorandum item 13.a is to be completed by "large institutions" and "highly complex institutions" as defined in FDIC regulations. Memorandum items 13.b through 13.h are to be completed by "large institutions" only.</i>			
13. Portion of funded loans and securities in domestic and foreign offices guaranteed or insured by the U.S. government (including FDIC loss-sharing agreements):			M.13.
a. Construction, land development, and other land loans secured by real estate.....	RCFDN177	0	M.13.a.
b. Loans secured by multifamily residential and nonfarm nonresidential properties.....	RCFDN178	47,075	M.13.b.
c. Closed-end loans secured by first liens on 1-4 family residential properties.....	RCFDN179	1,400,896	M.13.c.
d. Closed-end loans secured by junior liens on 1-4 family residential properties and revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit.....	RCFDN180	1,446	M.13.d.
e. Commercial and industrial loans.....	RCFDN181	5,319,157	M.13.e.
f. Credit card loans to individuals for household, family, and other personal expenditures.....	RCFDN182	0	M.13.f.
g. All other loans to individuals for household, family, and other personal expenditures.....	RCFDN183	45,683	M.13.g.
h. Non-agency residential mortgage-backed securities.....	RCFDM963	0	M.13.h.
<i>Memorandum items 14 and 15 are to be completed by "highly complex institutions" as defined in FDIC regulations.</i>			
14. Amount of the institution's largest counterparty exposure.....	RCFDK673	CONF	M.14.
15. Total amount of the institution's 20 largest counterparty exposures.....	RCFDK674	CONF	M.15.
<i>Memorandum item 16 is to be completed by "large institutions" and "highly complex institutions" as defined in FDIC regulations.</i>			
16. Portion of loans restructured in troubled debt restructurings that are in compliance with their modified terms and are guaranteed or insured by the U.S. government (including the FDIC) (included in Schedule RC-C, part I, Memorandum item 1).....	RCFDL189	91,244	M.16.

3. Uninsured deposits should be estimated based on the deposit insurance limits set forth in Memorandum items 1.a through 1.d.

Dollar amounts in thousands

Memorandum item 17 is to be completed on a fully consolidated basis by those "large institutions" and "highly complex institutions" as defined in FDIC regulations that own another insured depository institution.

17. Selected fully consolidated data for deposit insurance assessment purposes:

- a. Total deposit liabilities before exclusions (gross) as defined in Section 3(l) of the Federal Deposit Insurance Act and FDIC regulations.....
- b. Total allowable exclusions, including interest accrued and unpaid on allowable exclusions (including foreign deposits).....
- c. Unsecured "Other borrowings" with a remaining maturity of one year or less.....
- d. Estimated amount of uninsured deposits in domestic offices of the institution and in insured branches in Puerto Rico and U.S. territories and possessions, including related interest accrued and unpaid.....

		M.17.
RCFDL194	NR	M.17.a.
RCFDL195	NR	M.17.b.
RCFDL196	NR	M.17.c.
RCONL197	NR	M.17.d.

	(Column A) Two-Year Probability of Default (PD) <= 1%	(Column B) Two-Year Probability of Default (PD) 1.01–4%	(Column C) Two-Year Probability of Default (PD) 4.01–7%	(Column D) Two-Year Probability of Default (PD) 7.01–10%	(Column E) Two-Year Probability of Default (PD) 10.01–14%	(Column F) Two-Year Probability of Default (PD) 14.01–16%	(Column G) Two-Year Probability of Default (PD) 16.01–18%	(Column H) Two-Year Probability of Default (PD) 18.01–20%	(Column I) Two-Year Probability of Default (PD) 20.01–22%	(Column J) Two-Year Probability of Default (PD) 22.01–26%	(Column K) Two-Year Probability of Default (PD) 26.01–30%	(Column L) Two-Year Probability of Default (PD) > 30%	(Column M) Two-Year Probability of Default (PD) Unscoreable	(Column N) Two-Year Probability of Default (PD) Total	(Column O) PDs Were Derived Using	
Dollar amounts in thousands																
18. Outstanding balance of 1-4 family residential mortgage loans, consumer loans, and consumer leases by two-year probability of default:															M18	
a. "Nontraditional 1-4 family residential mortgage loans" as defined for assessment purposes only in FDIC regulations.....	RCFDM964 CONF	RCFDM965 CONF	RCFDM966 CONF	RCFDM967 CONF	RCFDM968 CONF	RCFDM969 CONF	RCFDM970 CONF	RCFDM971 CONF	RCFDM972 CONF	RCFDM973 CONF	RCFDM974 CONF	RCFDM975 CONF	RCFDM976 CONF	RCFDM977 CONF	RCFDM978 CONF	M18a
b. Closed-end loans secured by first liens on 1-4 family residential properties.....	RCFDM979 CONF	RCFDM980 CONF	RCFDM981 CONF	RCFDM982 CONF	RCFDM983 CONF	RCFDM984 CONF	RCFDM985 CONF	RCFDM986 CONF	RCFDM987 CONF	RCFDM988 CONF	RCFDM989 CONF	RCFDM990 CONF	RCFDM991 CONF	RCFDM992 CONF	RCFDM993 CONF	M18b
c. Closed-end loans secured by junior liens on 1-4 family residential properties.....	RCFDM994 CONF	RCFDM995 CONF	RCFDM996 CONF	RCFDM997 CONF	RCFDM998 CONF	RCFDM999 CONF	RCFDN001 CONF	RCFDN002 CONF	RCFDN003 CONF	RCFDN004 CONF	RCFDN005 CONF	RCFDN006 CONF	RCFDN007 CONF	RCFDN008 CONF	RCFDN009 CONF	M18c
d. Revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit.....	RCFDN010 CONF	RCFDN011 CONF	RCFDN012 CONF	RCFDN013 CONF	RCFDN014 CONF	RCFDN015 CONF	RCFDN016 CONF	RCFDN017 CONF	RCFDN018 CONF	RCFDN019 CONF	RCFDN020 CONF	RCFDN021 CONF	RCFDN022 CONF	RCFDN023 CONF	RCFDN024 CONF	M18d
e. Credit cards.....	RCFDN040 CONF	RCFDN041 CONF	RCFDN042 CONF	RCFDN043 CONF	RCFDN044 CONF	RCFDN045 CONF	RCFDN046 CONF	RCFDN047 CONF	RCFDN048 CONF	RCFDN049 CONF	RCFDN050 CONF	RCFDN051 CONF	RCFDN052 CONF	RCFDN053 CONF	RCFDN054 CONF	M18e
f. Automobile loans.....	RCFDN055 CONF	RCFDN056 CONF	RCFDN057 CONF	RCFDN058 CONF	RCFDN059 CONF	RCFDN060 CONF	RCFDN061 CONF	RCFDN062 CONF	RCFDN063 CONF	RCFDN064 CONF	RCFDN065 CONF	RCFDN066 CONF	RCFDN067 CONF	RCFDN068 CONF	RCFDN069 CONF	M18f
g. Student loans.....	RCFDN070 CONF	RCFDN071 CONF	RCFDN072 CONF	RCFDN073 CONF	RCFDN074 CONF	RCFDN075 CONF	RCFDN076 CONF	RCFDN077 CONF	RCFDN078 CONF	RCFDN079 CONF	RCFDN080 CONF	RCFDN081 CONF	RCFDN082 CONF	RCFDN083 CONF	RCFDN084 CONF	M18g
h. Other consumer loans and revolving credit plans other than credit cards.....	RCFDN085 CONF	RCFDN086 CONF	RCFDN087 CONF	RCFDN088 CONF	RCFDN089 CONF	RCFDN090 CONF	RCFDN091 CONF	RCFDN092 CONF	RCFDN093 CONF	RCFDN094 CONF	RCFDN095 CONF	RCFDN096 CONF	RCFDN097 CONF	RCFDN098 CONF	RCFDN099 CONF	M18h
i. Consumer leases.....	RCFDN100 CONF	RCFDN101 CONF	RCFDN102 CONF	RCFDN103 CONF	RCFDN104 CONF	RCFDN105 CONF	RCFDN106 CONF	RCFDN107 CONF	RCFDN108 CONF	RCFDN109 CONF	RCFDN110 CONF	RCFDN111 CONF	RCFDN112 CONF	RCFDN113 CONF	RCFDN114 CONF	M18i
j. Total.....	RCFDN115 CONF	RCFDN116 CONF	RCFDN117 CONF	RCFDN118 CONF	RCFDN119 CONF	RCFDN120 CONF	RCFDN121 CONF	RCFDN122 CONF	RCFDN123 CONF	RCFDN124 CONF	RCFDN125 CONF	RCFDN126 CONF	RCFDN127 CONF	RCFDN128 CONF		M18j

Schedule RC-P - 1-4 Family Residential Mortgage Banking Activities in Domestic Offices(Form Type - 031)

Schedule RC-P is to be completed by banks at which either 1-4 family residential mortgage loan originations and purchases for resale from all sources, loan sales, or quarter-end loans held for sale or trading in domestic offices exceed \$10 million for two consecutive quarters.

Dollar amounts in thousands

1. Retail originations during the quarter of 1-4 family residential mortgage loans for sale ¹	RCONHT81	2,318,451	1.
2. Wholesale originations and purchases during the quarter of 1-4 family residential mortgage loans for sale ²	RCONHT82	7,397,228	2.
3. 1-4 family residential mortgage loans sold during the quarter.....	RCONFT04	8,772,209	3.
4. 1-4 family residential mortgage loans held for sale or trading at quarter-end (included in Schedule RC, items 4.a and 5.).....	RCONFT05	4,208,216	4.
5. Noninterest income for the quarter from the sale, securitization, and servicing of 1-4 family residential mortgage loans (included in Schedule RI, items 5.c, 5.f, 5.g, and 5.i).....	RIADHT85	164,820	5.
6. Repurchases and indemnifications of 1-4 family residential mortgage loans during the quarter.....	RCONHT86	6,943	6.
7. Representation and warranty reserves for 1-4 family residential mortgage loans sold:			7.
a. For representations and warranties made to U.S. government agencies and government-sponsored agencies..	RCONL191	CONF	7.a.
b. For representations and warranties made to other parties.....	RCONL192	CONF	7.b.
c. Total representation and warranty reserves (sum of items 7.a and 7.b).....	RCONM288	9,491	7.c.

Schedule RC-Q - Assets and Liabilities Measured at Fair Value on a Recurring Basis(Form Type - 031)

Schedule RC-Q is to be completed by banks that:

- (1) Have elected to report financial instruments or servicing assets and liabilities at fair value under a fair value option with changes in fair value recognized in earnings, or
(2) Are required to complete Schedule RC-D, Trading Assets and Liabilities.

	(Column A) Total Fair Value Reported on Schedule RC	(Column B) LESS: Amounts Netted in the Determination of Total Fair Value	(Column C) Level 1 Fair Value Measurements	(Column D) Level 2 Fair Value Measurements	(Column E) Level 3 Fair Value Measurements	
Dollar amounts in thousands						
1. Available-for-sale debt securities and equity securities with readily determinable fair values not held for trading ¹	RCFDJA36 24,538,569	RCFDG474 0	RCFDG475 82,658	RCFDG476 24,455,911	RCFDG477 0	1.
2. Federal funds sold and securities purchased under agreements to resell.....	RCFDG478 0	RCFDG479 0	RCFDG480 0	RCFDG481 0	RCFDG482 0	2.
3. Loans and leases held for sale.....	RCFDG483 4,208,216	RCFDG484 0	RCFDG485 0	RCFDG486 4,208,216	RCFDG487 0	3.
4. Loans and leases held for investment.....	RCFDG488 0	RCFDG489 0	RCFDG490 0	RCFDG491 0	RCFDG492 0	4.
5. Trading assets:						5.
a. Derivative assets.....	RCFD3543 1,262,077	RCFDG493 248,918	RCFDG494 2	RCFDG495 1,510,993	RCFDG496 0	5.a.
b. Other trading assets.....	RCFDG497 96,461	RCFDG498 0	RCFDG499 0	RCFDG500 96,461	RCFDG501 0	5.b.
1. Nontrading securities at fair value with changes in fair value reported in current earnings (included in Schedule RC-Q, item 5.b, above).....	RCFDF240 0	RCFDF684 0	RCFDF692 0	RCFDF241 0	RCFDF242 0	5.b.1.
6. All other assets.....	RCFDG391 928,912	RCFDG392 179,932	RCFDG395 485	RCFDG396 177,599	RCFDG804 930,760	6.
7. Total assets measured at fair value on a recurring basis (sum of items 1 through 5.b plus item 6).....	RCFDG502 31,034,235	RCFDG503 428,850	RCFDG504 83,145	RCFDG505 30,449,180	RCFDG506 930,760	7.
8. Deposits.....	RCFDF252 0	RCFDF686 0	RCFDF694 0	RCFDF253 0	RCFDF254 0	8.
9. Federal funds purchased and securities sold under agreements to repurchase.....	RCFDG507 0	RCFDG508 0	RCFDG509 0	RCFDG510 0	RCFDG511 0	9.
10. Trading liabilities:						10.
a. Derivative liabilities.....	RCFD3547 111,088	RCFDG512 408,633	RCFDG513 19	RCFDG514 519,702	RCFDG515 0	10.a.
b. Other trading liabilities.....	RCFDG516 265	RCFDG517 0	RCFDG518 0	RCFDG519 265	RCFDG520 0	10.b.

1. Exclude originations and purchases of 1-4 family residential mortgage loans that are held for investment.
1. The amount reported in item 1, column A, must equal the sum of Schedule RC, items 2.b and 2.c.

	(Column A) Total Fair Value Reported on Schedule RC	(Column B) LESS: Amounts Netted in the Determination of Total Fair Value	(Column C) Level 1 Fair Value Measurements	(Column D) Level 2 Fair Value Measurements	(Column E) Level 3 Fair Value Measurements	
Dollar amounts in thousands						
11. Other borrowed money.....	RCFDG521 0	RCFDG522 0	RCFDG523 0	RCFDG524 0	RCFDG525 0	11.
12. Subordinated notes and debentures.....	RCFDG526 0	RCFDG527 0	RCFDG528 0	RCFDG529 0	RCFDG530 0	12.
13. All other liabilities.....	RCFDG805 0	RCFDG806 31,016	RCFDG807 205	RCFDG808 30,811	RCFDG809 0	13.
14. Total liabilities measured at fair value on a recurring basis (sum of items 8 through 13).....	RCFDG531 111,353	RCFDG532 439,649	RCFDG533 224	RCFDG534 550,778	RCFDG535 0	14.
1. All other assets (itemize and describe amounts included in Schedule RC-Q, item 6, that are greater than \$100,000 and exceed 25% of item 6):						M.1.
a. Mortgage servicing assets.....	RCFDG536 893,330	RCFDG537 NR	RCFDG538 NR	RCFDG539 NR	RCFDG540 893,330	M.1.a.

	(Column A) Total Fair Value Reported on Schedule RC	(Column B) LESS: Amounts Netted in the Determination of Total Fair Value	(Column C) Level 1 Fair Value Measurements	(Column D) Level 2 Fair Value Measurements	(Column E) Level 3 Fair Value Measurements	
Dollar amounts in thousands						
b. Nontrading derivative assets.....	RCFDG541 NR	RCFDG542 NR	RCFDG543 NR	RCFDG544 NR	RCFDG545 NR	M.1.b.

Dollar amounts in thousands			
c. Disclose component and the dollar amount of that component:			M.1.c.
1. Describe component.....	TEXTG546	NR	M.1.c.1.

	(Column A) Total Fair Value Reported on Schedule RC	(Column B) LESS: Amounts Netted in the Determination of Total Fair Value	(Column C) Level 1 Fair Value Measurements	(Column D) Level 2 Fair Value Measurements	(Column E) Level 3 Fair Value Measurements	
Dollar amounts in thousands						
2. Amount of component.....	RCFDG546 NR	RCFDG547 NR	RCFDG548 NR	RCFDG549 NR	RCFDG550 NR	M.1.c.2.

Dollar amounts in thousands		
d. Disclose component and the dollar amount of that component:		M.1.d.
1. Describe component.....	TEXTG551	NR M.1.d.1.

	(Column A) Total Fair Value Reported on Schedule RC	(Column B) LESS: Amounts Netted in the Determination of Total Fair Value	(Column C) Level 1 Fair Value Measurements	(Column D) Level 2 Fair Value Measurements	(Column E) Level 3 Fair Value Measurements	
Dollar amounts in thousands						
2. Amount of component.....	RCFDG551 NR	RCFDG552 NR	RCFDG553 NR	RCFDG554 NR	RCFDG555 NR	M.1.d.2.

Dollar amounts in thousands		
e. Disclose component and the dollar amount of that component:		M.1.e.
1. Describe component.....	TEXTG556	NR M.1.e.1.

	(Column A) Total Fair Value Reported on Schedule RC	(Column B) LESS: Amounts Netted in the Determination of Total Fair Value	(Column C) Level 1 Fair Value Measurements	(Column D) Level 2 Fair Value Measurements	(Column E) Level 3 Fair Value Measurements	
Dollar amounts in thousands						
2. Amount of component.....	RCFDG556 NR	RCFDG557 NR	RCFDG558 NR	RCFDG559 NR	RCFDG560 NR	M.1.e.2.

Dollar amounts in thousands		
f. Disclose component and the dollar amount of that component:		M.1.f.
1. Describe component.....	TEXTG561	NR M.1.f.1.

	(Column A) Total Fair Value Reported on Schedule RC	(Column B) LESS: Amounts Netted in the Determination of Total Fair Value	(Column C) Level 1 Fair Value Measurements	(Column D) Level 2 Fair Value Measurements	(Column E) Level 3 Fair Value Measurements	
Dollar amounts in thousands						
2. Amount of component.....	RCFDG561 NR	RCFDG562 NR	RCFDG563 NR	RCFDG564 NR	RCFDG565 NR	M.1.f.2.
2. All other liabilities (itemize and describe amounts included in Schedule RC-Q, item 13, that are greater than \$100,000 and exceed 25% of item 13):						M.2.
a. Loan commitments (not accounted for as derivatives).....	RCFDF261 NR	RCFDF689 NR	RCFDF697 NR	RCFDF262 NR	RCFDF263 NR	M.2.a.
b. Nontrading derivative liabilities.....	RCFDG566 NR	RCFDG567 31,016	RCFDG568 205	RCFDG569 30,811	RCFDG570 NR	M.2.b.

Dollar amounts in thousands						
c. Disclose component and the dollar amount of that component:						M.2.c.
1. Describe component.....	TEXTG571				NR	M.2.c.1.

	(Column A) Total Fair Value Reported on Schedule RC	(Column B) LESS: Amounts Netted in the Determination of Total Fair Value	(Column C) Level 1 Fair Value Measurements	(Column D) Level 2 Fair Value Measurements	(Column E) Level 3 Fair Value Measurements	
Dollar amounts in thousands						
2. Amount of component.....	RCFDG571 NR	RCFDG572 NR	RCFDG573 NR	RCFDG574 NR	RCFDG575 NR	M.2.c.2.

Dollar amounts in thousands						
d. Disclose component and the dollar amount of that component:						M.2.d.
1. Describe component.....	TEXTG576				NR	M.2.d.1.

	(Column A) Total Fair Value Reported on Schedule RC	(Column B) LESS: Amounts Netted in the Determination of Total Fair Value	(Column C) Level 1 Fair Value Measurements	(Column D) Level 2 Fair Value Measurements	(Column E) Level 3 Fair Value Measurements	
Dollar amounts in thousands						
2. Amount of component.....	RCFDG576 NR	RCFDG577 NR	RCFDG578 NR	RCFDG579 NR	RCFDG580 NR	M.2.d.2.

Dollar amounts in thousands						
e. Disclose component and the dollar amount of that component:						M.2.e.
1. Describe component.....	TEXTG581				NR	M.2.e.1.

	(Column A) Total Fair Value Reported on Schedule RC	(Column B) LESS: Amounts Netted in the Determination of Total Fair Value	(Column C) Level 1 Fair Value Measurements	(Column D) Level 2 Fair Value Measurements	(Column E) Level 3 Fair Value Measurements	
Dollar amounts in thousands						
2. Amount of component.....	RCFDG581 NR	RCFDG582 NR	RCFDG583 NR	RCFDG584 NR	RCFDG585 NR	M.2.e.2.

Dollar amounts in thousands						
f. Disclose component and the dollar amount of that component:						M.2.f.
1. Describe component						M.2.f.1.
(TEXTG586) NR						

	(Column A) Total Fair Value Reported on Schedule RC	(Column B) LESS: Amounts Netted in the Determination of Total Fair Value	(Column C) Level 1 Fair Value Measurements	(Column D) Level 2 Fair Value Measurements	(Column E) Level 3 Fair Value Measurements	
Dollar amounts in thousands						
2. Amount of component.....	RCFDG586 NR	RCFDG587 NR	RCFDG588 NR	RCFDG589 NR	RCFDG590 NR	M.2.f.2.

Dollar amounts in thousands	Consolidated Bank		
3. Loans measured at fair value (included in Schedule RC-C, Part I, items 1 through 9):			M.3.
a. Loans secured by real estate:			M.3.a.
1. Secured by 1-4 family residential properties.....	RCFDHT87	4,208,216	M.3.a.1.
2. All other loans secured by real estate.....	RCFDHT88	0	M.3.a.2.
b. Commercial and industrial loans.....	RCFDF585	0	M.3.b.
c. Loans to individuals for household, family, and other personal expenditures (i.e., consumer loans) (includes purchased paper).....	RCFDHT89	0	M.3.c.
d. Other loans.....	RCFDF589	0	M.3.d.
4. Unpaid principal balance of loans measured at fair value (reported in Schedule RC-Q, Memorandum item 3):			M.4.
a. Loans secured by real estate:			M.4.a.
1. Secured by 1-4 family residential properties.....	RCFDHT91	4,164,692	M.4.a.1.
2. All other loans secured by real estate.....	RCFDHT92	0	M.4.a.2.
b. Commercial and industrial loans.....	RCFDF597	0	M.4.b.
c. Loans to individuals for household, family, and other personal expenditures (i.e., consumer loans) (includes purchased paper).....	RCFDHT93	0	M.4.c.
d. Other loans.....	RCFDF601	0	M.4.d.

Schedule RC-R Part I - Regulatory Capital Components and Ratios(Form Type - 031)

Part I is to be completed on a consolidated basis.

Dollar amounts in thousands

1. Common stock plus related surplus, net of treasury stock and unearned employee stock ownership plan (ESOP) shares.....	RCFAP742	19,231,209	1.
2. Retained earnings ¹	RCFAKW00	3,755,097	2.
<i>To be completed only by institutions that have adopted ASU 2016-13:</i>			
a. Does your institution have a CECL transition election in effect as of the quarter-end report date? (enter "0" for No; enter "1" for Yes with a 3-year CECL transition election; enter "2" for Yes with a 5-year 2020 CECL transition election.).....	RCOAJJ29	2	2.a.
3. Accumulated other comprehensive income (AOCI).....	RCFAB530	-373,745	3.
a. AOCI opt-out election (enter "1" for Yes; enter "0" for No.) (Advanced approaches institutions must enter "0" for No.).....	RCOAP838	1	3.a.
4. Common equity tier 1 minority interest includable in common equity tier 1 capital.....	RCFAP839	0	4.
5. Common equity tier 1 capital before adjustments and deductions (sum of items 1 through 4).....	RCFAP840	22,612,561	5.
6. LESS: Goodwill net of associated deferred tax liabilities (DTLs).....	RCFAP841	6,618,768	6.
7. LESS: Intangible assets (other than goodwill and mortgage servicing assets (MSAs)), net of associated DTLs.....	RCFAP842	50,805	7.
8. LESS: Deferred tax assets (DTAs) that arise from net operating loss and tax credit carryforwards, net of any related valuation allowances and net of DTLs.....	RCFAP843	0	8.
9. AOCI-related adjustments (items 9.a through 9.e are effective January 1, 2015) (if entered "1" for Yes in item 3.a, complete only items 9.a through 9.e; if entered "0" for No in item 3.a, complete only item 9.f):			9.
a. LESS: Net unrealized gains (losses) on available-for-sale debt securities (if a gain, report as a positive value; if a loss, report as a negative value).....	RCFAP844	123,694	9.a.
b. Not applicable.			9.b.
c. LESS: Accumulated net gains (losses) on cash flow hedges (if a gain, report as a positive value; if a loss, report as a negative value).....	RCFAP846	-56,213	9.c.
d. LESS: Amounts recorded in AOCI attributed to defined benefit postretirement plans resulting from the initial and subsequent application of the relevant GAAP standards that pertain to such plans (if a gain, report as a positive value; if a loss, report as a negative value).....	RCFAP847	-388,846	9.d.
e. LESS: Net unrealized gains (losses) on held-to-maturity securities that are included in AOCI (if a gain, report as a positive value; if a loss, report as a negative value).....	RCFAP848	-52,380	9.e.
f. LESS: Accumulated net gain (loss) on cash flow hedges included in AOCI, net of applicable income taxes, that relate to the hedging of items that are not recognized at fair value on the balance sheet (if a gain, report as a positive value; if a loss, report as a negative value) (To be completed only by institutions that entered "0" for No in item 3.a.).....	RCFAP849	NR	9.f.
10. Other deductions from (additions to) common equity tier 1 capital before threshold-based deductions:			10.
a. LESS: Unrealized net gain (loss) related to changes in the fair value of liabilities that are due to changes in own credit risk (if a gain, report as a positive value; if a loss, report as a negative value).....	RCFAQ258	0	10.a.
b. LESS: All other deductions from (additions to) common equity tier 1 capital before threshold-based deductions.	RCFAP850	51,671	10.b.

Dollar amounts in thousands		(Column A) Non-advanced Approaches Institutions		(Column B) Advanced Approaches Institutions	
11. LESS: Non-significant investments in the capital of unconsolidated financial institutions in the form of common stock that exceed the 10 percent threshold for non-significant investments.....				RCFWP851	NR 11.
12. Subtotal (for column A, item 5 minus items 6 through 10.b; for column B, item 5 minus items 6 through 11).....	RCFAP852	16,265,062	RCFWP852	NR	12.
13. Not available					13.
a. LESS: Investments in the capital of unconsolidated financial institutions, net of associated DTLs, that exceed 25 percent of item 12.....	RCFALB58	0			13.a.
b. LESS: Significant investments in the capital of unconsolidated financial institutions in the form of common stock, net of associated DTLs, that exceed the 10 percent common equity tier 1 capital deduction threshold.....			RCFWP853	NR	13.b.
14. Not available					14.
a. LESS: MSAs, net of associated DTLs, that exceed 25 percent of item 12.....	RCFALB59	0			14.a.
b. LESS: MSAs, net of associated DTLs, that exceed the 10 percent common equity tier 1 capital deduction threshold.....			RCFWP854	NR	14.b.
15. Not available					15.
a. LESS: DTAs arising from temporary differences that could not be realized through net operating loss carrybacks, net of related valuation allowances and net of DTLs, that exceed 25 percent of item 12.....	RCFALB60	0			15.a.
b. LESS: DTAs arising from temporary differences that could not be realized through net operating loss carrybacks, net of related valuation allowances and net of DTLs, that exceed the 10 percent common equity tier 1 capital deduction threshold.....			RCFWP855	NR	15.b.
16. LESS: Amount of significant investments in the capital of unconsolidated financial institutions in the form of common stock, net of associated DTLs; MSAs, net of associated DTLs; and DTAs arising from temporary differences that could not be realized through net operating loss carrybacks, net of related valuation allowances and net of DTLs; that exceeds the 15 percent common equity tier 1 capital deduction threshold.....			RCFWP856	NR	16.
17. LESS: Deductions applied to common equity tier 1 capital due to insufficient amounts of additional tier 1 capital and tier 2 capital to cover deductions.....	RCFAP857	0	RCFWP857	NR	17.
18. Total adjustments and deductions for common equity tier 1 capital ³	RCFAP858	0	RCFWP858	NR	18.
19. Common equity tier 1 capital (item 12 minus item 18).....	RCFAP859	16,265,062	RCFWP859	NR	19.

Dollar amounts in thousands			
20. Additional tier 1 capital instruments plus related surplus.....	RCFAP860	75	20.
21. Non-qualifying capital instruments subject to phase out from additional tier 1 capital	RCFAP861	0	21.
22. Tier 1 minority interest not included in common equity tier 1 capital.....	RCFAP862	0	22.
23. Additional tier 1 capital before deductions (sum of items 20, 21, and 22).....	RCFAP863	75	23.
24. LESS: Additional tier 1 capital deductions.....	RCFAP864	0	24.
25. Additional tier 1 capital (greater of item 23 minus item 24, or zero).....	RCFAP865	75	25.
26. Tier 1 capital ¹	RCFA8274	16,265,137	26.
27. Average total consolidated assets ²	RCFAKW03	182,776,639	27.
28. LESS: Deductions from common equity tier 1 capital and additional tier 1 capital (sum of items 6, 7, 8, 10.b, 13 through 15, 17, and certain elements of item 24 - see instructions) ³	RCFAP875	6,721,244	28.
29. LESS: Other deductions from (additions to) assets for leverage ratio purposes.....	RCFAB596	-371,849	29.
30. Total assets for the leverage ratio (item 27 minus items 28 and 29).....	RCFAA224	176,427,244	30.
31. Leverage ratio (item 26 divided by 30).....	RCFA7204	9.2192%	31.
a. Does your institution have a community bank leverage ratio (CBLR) framework election in effect as of the quarter-end report date? (enter "1" for Yes; enter "0" for No).....	RCOALE74	0	31.a.

1. Institutions that have adopted ASU 2016-13 and have elected to apply the 3-year or the 5-year 2020 CECL transition provision should include the applicable portion of the CECL transitional amount or the modified CECL transitional amount, respectively, in this item.

Dollar amounts in thousands		(Column A) Amount		(Column B) Percentage	
32. Total assets *	RCFA2170	NR			32.
33. Trading assets and trading liabilities (Schedule RC, sum of items 5 and 15). Report as a dollar amount in Column A and as a percentage of total assets (5% limit) in Column B.	RCFAKX77	NR	RCFAKX78	NR	33.
34. Off-balance sheet exposures:					34.
a. Unused portion of conditionally cancellable commitments	RCFAKX79	NR			34.a.
b. Securities lent and borrowed (Schedule RC-L, sum of items 6.a and 6.b)	RCFAKX80	NR			34.b.
c. Other off-balance sheet exposures	RCFAKX81	NR			34.c.
d. Total off-balance sheet exposures (sum of items 34.a through 34.c). Report as a dollar amount in Column A and as a percentage of total assets (25% limit) in Column B.	RCFAKX82	NR	RCFAKX83	NR	34.d.

Dollar amounts in thousands		(Column A) Amount		(Column B) Percentage	
35. Unconditionally cancellable commitments	RCFAS540	NR			35.
36. Investments in the tier 2 capital of unconsolidated financial institutions	RCFALB61	NR			36.
37. Allocated transfer risk reserve	RCFA3128	NR			37.
38. Amount of allowances for credit losses on purchased credit-deteriorated assets:					38.
a. Loans and leases held for investment	RCFAJJ30	NR			38.a.
b. Held-to-maturity debt securities	RCFAJJ31	NR			38.b.
c. Other financial assets measured at amortized cost	RCFAJJ32	NR			38.c.
39. Tier 2 capital instruments plus related surplus	RCFAP866	1,125,000			39.
40. Non-qualifying capital instruments subject to phase-out from tier 2 capital	RCFAP867	0			40.
41. Total capital minority interest that is not included in tier 1 capital	RCFAP868	0			41.
42. Allowance for loan and lease losses and eligible credit reserves includable in tier 2 capital					42.
a. Allowance for loan and lease losses includable in tier 2 capital ¹	RCFA5310	1,764,682			42.a.
b. (Advanced approaches institutions that exit parallel run only): Eligible credit reserves includable in tier 2 capital	RCFW5310	NR			42.b.
43. Not applicable.					43.
44. Tier 2 capital before deductions					44.
a. Tier 2 capital before deductions (sum of items 39 through 42)	RCFAP870	2,889,682			44.a.
b. (Advanced approaches institutions that exit parallel run only): Tier 2 capital before deductions (sum of items 39 through 41, plus item 42.b)	RCFWP870	NR			44.b.
45. LESS: Tier 2 capital deductions	RCFAP872	0			45.
46. Tier 2 capital					46.
a. Tier 2 capital (greater of item 44.a minus item 45, or zero)	RCFA5311	2,889,682			46.a.
b. (Advanced approaches institutions that exit parallel run only): Tier 2 capital (greater of item 44.b minus item 45, or zero)	RCFW5311	NR			46.b.
47. Total capital					47.
a. Total capital (sum of items 26 and 46.a)	RCFA3792	19,154,819			47.a.
b. (Advanced approaches institutions that exit parallel run only): Total capital (sum of items 26 and 46.b)	RCFW3792	NR			47.b.
48. Total risk-weighted assets					48.
a. Total risk-weighted assets (from Schedule RC-R, Part II, item 31)	RCFAA223	147,393,522			48.a.
b. (Advanced approaches institutions that exit parallel run only): Total risk-weighted assets using advanced approaches rule (from FFIEC 101 Schedule A, item 60)	RCFWA223	NR			48.b.

- Beginning with the June 30, 2020, report date, all non-advanced approaches institutions should report in item 18, column A, the sum of items 13.a, 14.a, 15.a, and 17, column A; all advanced approaches institutions should report in item 18, column B, the sum of items 13.b, 14.b, 15.b, 16, and 17, column B.
- Beginning with the June 30, 2020, report date, all non-advanced approaches institutions should report the sum of item 19, column A, and item 25 in item 26; all advanced approaches institutions should report the sum of item 19, column B, and item 25 in item 26.
- Institutions that have adopted ASU 2016-13 and have elected to apply the 3-year or the 5-year 2020 CECL transition provision should include the applicable portion of the CECL transitional amount or the modified CECL transitional amount, respectively, in item 27.
- Beginning with the June 30, 2020, report date, all non-advanced approaches institutions should report in item 28 the sum of items 6, 7, 8, 10.b, 13.a, 14.a, 15.a, 17 (column A), and certain elements of item 24 - see instructions; all advanced approaches institutions should report in item 28, the sum of items 6, 7, 8, 10.b, 11, 13.b, 14.b, 15.b, 16, 17 (column B), and certain elements of item 24 - see instructions.

Dollar amounts in thousands		(Column A) Percentage		(Column B) Percentage	
49. Common equity tier 1 capital ratio (Column A: item 19, column A or B, as applicable, divided by item 48.a) (Advanced approaches institutions that exit parallel run only: Column B: item 19, column B, divided by item 48.b).....	RCFAP793	11.0351%	RCFWP793	NR	49.
50. Tier 1 capital ratio (Column A: item 26 divided by item 48.a) (Advanced approaches institutions that exit parallel run only: Column B: item 26 divided by item 48.b).....	RCFA7206	11.0352%	RCFW7206	NR	50.
51. Total capital ratio (Column A: item 47.a divided by item 48.a) (Advanced approaches institutions that exit parallel run only: Column B: item 47.b divided by item 48.b).....	RCFA7205	12.9957%	RCFW7205	NR	51.

Dollar amounts in thousands			
52. Institution-specific capital buffer necessary to avoid limitations on distributions and discretionary bonus payments:			52.
a. Capital conservation buffer.....	RCFAH311	4.9957%	52.a.
b. Advanced approaches institutions and institutions subject to Category III capital standards only: Total applicable capital buffer.....	RCFWH312	NR	52.b.
53. Eligible retained income ¹	RCFAH313	NR	53.
54. Distributions and discretionary bonus payments during the quarter ²	RCFAH314	NR	54.
55. Advanced approaches institutions and institutions subject to Category III capital standards only: Supplementary leverage ratio information:			55.
a. Total leverage exposure ³	RCFAH015	NR	55.a.
b. Supplementary leverage ratio.....	RCFAH036	NR	55.b.

*. For report dates through December 31, 2021, report the lesser of total assets reported in Schedule RC, item 12, as of December 31, 2019, or the current report date, which must be less than \$10 billion.

1. Institutions that have adopted ASU 2016-13 should report the adjusted allowances for credit losses (AACL), as defined in the regulatory capital rule, in item 30.a.
1. Institutions must complete item 53 only if the amount reported in item 52.a above is less than or equal to 2.5000 percent (plus any other applicable buffer if the institution is an advanced approaches institution or a Category III institution).
2. Institutions must complete item 54 only if the amount reported in Schedule RC-R, Part I, item 46.a, in the Call Report for the December 31, 2019, report date was less than or equal to 2.5000 percent (plus any other applicable buffer if the institution is an advanced approaches institution or a Category III institution).
3. Institutions that have adopted ASU 2016-13 and have elected to apply the 3-year or the 5-year 2020 CECL transition provision should include the applicable portion of the CECL transitional amount or the modified CECL transitional amount, respectively, in item 55.a.

Schedule RC-R Part II - Risk-Weighted Assets(Form Type - 031)

Institutions are required to assign a 100 percent risk weight to all assets not specifically assigned a risk weight under Subpart D of the federal banking agencies' regulatory capital rules and not deducted from tier 1 or tier 2 capital.

	(Column A) Totals from Schedule RC	(Column B) Adjustments to Totals Reported in Column A	(Column C) Allocation by Risk-Weight Category 0%	(Column D) Allocation by Risk-Weight Category 2%	(Column E) Allocation by Risk-Weight Category 4%	(Column F) Allocation by Risk-Weight Category 10%	(Column G) Allocation by Risk-Weight Category 20%	(Column H) Allocation by Risk-Weight Category 50%	(Column I) Allocation by Risk-Weight Category 100%	(Column J) Allocation by Risk-Weight Category 150%	
Dollar amounts in thousands											
1. Cash and balances due from depository institutions.....	RCFDD957 15,040,517	RCFDS396 7,541	RCFDD958 14,275,779				RCFDD959 756,083	RCFDS397 815	RCFDD960 208	RCFDS398 91	1.
2. Securities:											2.
a. Held-to-maturity securities ³	RCFDD961 2,139,314	RCFDS399 -52,380	RCFDD962 2,099,652	RCFDHJ74 0	RCFDHJ75 0		RCFDD963 92,042	RCFDD964 0	RCFDD965 0	RCFDS400 0	2.a.
b. Available-for-sale debt securities and equity securities with readily determinable fair values not held for trading.....	RCFDJA21 24,214,429	RCFDS402 210,125	RCFDD967 8,877,157	RCFDHJ76 0	RCFDHJ77 0		RCFDD968 15,124,227	RCFDD969 2,920	RCFDD970 0	RCFDS403 0	2.b.
3. Federal funds sold and securities purchased under agreements to resell:											3.
a. Federal funds sold in domestic offices.....	RCOND971 0		RCOND972 0				RCOND973 0	RCONS410 0	RCOND974 0	RCONS411 0	3.a.
b. Securities purchased under agreements to resell.....	RCFDH171 0	RCFDH172 0									3.b.
4. Loans and leases held for sale:											4.
a. Residential mortgage exposures.....	RCFDS413 4,208,216	RCFDS414 0	RCFDH173 0				RCFDS415 241,732	RCFDS416 3,818,861	RCFDS417 147,623		4.a.
b. High volatility commercial real estate exposures.....	RCFDS419 0	RCFDS420 0	RCFDH174 0				RCFDH175 0	RCFDH176 0	RCFDH177 0	RCFDS421 0	4.b.
c. Exposures past due 90 days or more or on nonaccrual ³	RCFDS423 7,461	RCFDS424 0	RCFDS425 0	RCFDHJ78 0	RCFDHJ79 0		RCFDS426 0	RCFDS427 0	RCFDS428 0	RCFDS429 7,461	4.c.

	(Column K) Allocation by Risk-Weight Category 250%	(Column L) Allocation by Risk-Weight Category 300%	(Column M) Allocation by Risk-Weight Category 400%	(Column N) Allocation by Risk-Weight Category 600%	(Column O) Allocation by Risk-Weight Category 625%	(Column P) Allocation by Risk-Weight Category 937.5%	(Column Q) Allocation by Risk-Weight Category 1,250%	(Column R) Application of Other Risk-Weighting Approaches Exposure Amount	(Column S) Application of Other Risk-Weighting Approaches Risk-Weighted Asset Amount	
Dollar amounts in thousands										
1. Cash and balances due from depository institutions										1.
2. Securities:										2.
a. Held-to-maturity securities										2.a.
b. Available-for-sale debt securities and equity securities with readily determinable fair values not held for trading.....	RCFDH270 NR	RCFDS405 0		RCFDS406 0				RCFDH271 0	RCFDH272 0	2.b.
3. Federal funds sold and securities purchased under agreements to resell:										3.
a. Federal funds sold in domestic offices										3.a.

3. Institutions that have adopted ASU 2016-13 should report as a negative number allowances eligible for inclusion in tier 2 capital in Column B, which excludes PCD allowances.

3. For loans and leases held for sale, exclude residential mortgage exposures, high volatility commercial real estate exposures, or sovereign exposures that are past due 90 days or more or on nonaccrual.

	(Column K) Allocation by Risk-Weight Category 250%	(Column L) Allocation by Risk-Weight Category 300%	(Column M) Allocation by Risk-Weight Category 400%	(Column N) Allocation by Risk-Weight Category 600%	(Column O) Allocation by Risk-Weight Category 625%	(Column P) Allocation by Risk-Weight Category 937.5%	(Column Q) Allocation by Risk-Weight Category 1,250%	(Column R) Application of Other Risk-Weighting Approaches Exposure Amount	(Column S) Application of Other Risk-Weighting Approaches Risk-Weighted Asset Amount	
Dollar amounts in thousands										
b. Securities purchased under agreements to resell										3.b.
4. Loans and leases held for sale:										4.
a. Residential mortgage exposures.....								RCFDH273 0	RCFDH274 0	4.a.
b. High volatility commercial real estate exposures.....								RCFDH275 0	RCFDH276 0	4.b.

	(Column K) Allocation by Risk-Weight Category 250%	(Column L) Allocation by Risk-Weight Category 300%	(Column M) Allocation by Risk-Weight Category 400%	(Column N) Allocation by Risk-Weight Category 600%	(Column O) Allocation by Risk-Weight Category 625%	(Column P) Allocation by Risk-Weight Category 937.5%	(Column Q) Allocation by Risk-Weight Category 1,250%	(Column R) Application of Other Risk-Weighting Approaches Exposure Amount	(Column S) Application of Other Risk-Weighting Approaches Risk-Weighted Asset Amount	
Dollar amounts in thousands										
c. Exposures past due 90 days or more or on nonaccrual ⁶								RCFDH277 0	RCFDH278 0	4.c.

	(Column A) Totals from Schedule RC	(Column B) Adjustments to Totals Reported in Column A	(Column C) Allocation by Risk-Weight Category 0%	(Column D) Allocation by Risk-Weight Category 2%	(Column E) Allocation by Risk-Weight Category 4%	(Column F) Allocation by Risk-Weight Category 10%	(Column G) Allocation by Risk-Weight Category 20%	(Column H) Allocation by Risk-Weight Category 50%	(Column I) Allocation by Risk-Weight Category 100%	(Column J) Allocation by Risk-Weight Category 150%	
Dollar amounts in thousands											
4. Loans and leases held for sale (continued):											4.
d. All other exposures.....	RCFDS431 67,800	RCFDS432 0	RCFDS433 0	RCFDHJ80 0	RCFDHJ81 0		RCFDS434 3,573	RCFDS435 0	RCFDS436 64,227	RCFDS437 0	4.d.
5. Loans and leases held for investment:											5.
a. Residential mortgage exposures.....	RCFDS439 31,674,120	RCFDS440 -26	RCFDH178 0				RCFDS441 1,158,454	RCFDS442 23,600,384	RCFDS443 6,915,308		5.a.
b. High volatility commercial real estate exposures.....	RCFDS445 373,193	RCFDS446 0	RCFDH179 0				RCFDH180 0	RCFDH181 0	RCFDH182 0	RCFDS447 373,193	5.b.
c. Exposures past due 90 days or more or on nonaccrual ⁷	RCFDS449 635,090	RCFDS450 0	RCFDS451 0	RCFDHJ82 0	RCFDHJ83 0		RCFDS452 0	RCFDS453 0	RCFDS454 2,918	RCFDS455 632,172	5.c.
d. All other exposures.....	RCFDS457 89,459,454	RCFDS458 31	RCFDS459 5,160,732	RCFDHJ84 0	RCFDHJ85 0		RCFDS460 171,918	RCFDS461 79,756	RCFDS462 84,047,017	RCFDS463 0	5.d.
6. LESS: Allowance for loan and lease losses.....	RCFD3123 2,193,926	RCFD3123 2,193,926									6.
7. Trading assets.....	RCFDD976 1,358,538	RCFDS466 1,358,538	RCFDD977 0	RCFDHJ86 0	RCFDHJ87 0		RCFDD978 0	RCFDD979 0	RCFDD980 0	RCFDS467 0	7.
8. All other assets ⁸	RCFDD981 17,823,824	RCFDS469 6,710,121	RCFDD982 617,349	RCFDHJ88 0	RCFDHJ89 0		RCFDD983 62,262	RCFDD984 2,387	RCFDD985 7,956,211	RCFDH185 317	8.
a. Separate account bank-owned life insurance											8.a.
b. Default fund contributions to central counterparties											8.b.

	(Column K) Allocation by Risk-Weight Category 250%	(Column L) Allocation by Risk-Weight Category 300%	(Column M) Allocation by Risk-Weight Category 400%	(Column N) Allocation by Risk-Weight Category 600%	(Column O) Allocation by Risk-Weight Category 625%	(Column P) Allocation by Risk-Weight Category 937.5%	(Column Q) Allocation by Risk-Weight Category 1,250%	(Column R) Application of Other Risk-Weighting Approaches Exposure Amount	(Column S) Application of Other Risk-Weighting Approaches Risk-Weighted Asset Amount	
Dollar amounts in thousands										
4. Loans and leases held for sale (continued):										4.
d. All other exposures.....								RCFDH279 0	RCFDH280 0	4.d.
5. Loans and leases held for investment:										5.
a. Residential mortgage exposures.....								RCFDH281 0	RCFDH282 0	5.a.
b. High volatility commercial real estate exposures.....								RCFDH283 0	RCFDH284 0	5.b.
c. Exposures past due 90 days or more or on nonaccrual ¹¹								RCFDH285 0	RCFDH286 0	5.c.
d. All other exposures.....								RCFDH287 0	RCFDH288 0	5.d.
6. LESS: Allowance for loan and lease losses										6.
7. Trading assets.....	RCFDH289 NR	RCFDH186 0	RCFDH290 0	RCFDH187 0				RCFDH291 0	RCFDH292 0	7.
8. All other assets ¹²	RCFDH293 893,330	RCFDH188 0	RCFDS470 0	RCFDS471 0				RCFDH294 0	RCFDH295 0	8.
a. Separate account bank-owned life insurance.....								RCFDH296 1,576,847	RCFDH297 1,461,115	8.a.
b. Default fund contributions to central counterparties.....								RCFDH298 5,000	RCFDH299 900	8.b.

6. For loans and leases held for sale, exclude residential mortgage exposures, high volatility commercial real estate exposures, or sovereign exposures that are past due 90 days or more or on nonaccrual.
7. For loans and leases, net of unearned income, exclude residential mortgage exposures, high volatility commercial real estate exposures, or sovereign exposures that are past due 90 days or more or on nonaccrual.
8. Includes premises and fixed assets; other real estate owned; investments in unconsolidated subsidiaries and associated companies; direct and indirect investments in real estate ventures; intangible assets; and other assets.
11. For loans and leases, net of unearned income, exclude residential mortgage exposures, high volatility commercial real estate exposures, or sovereign exposures that are past due 90 days or more or on nonaccrual.
12. Includes premises and fixed assets; other real estate owned; investments in unconsolidated subsidiaries and associated companies; direct and indirect investments in real estate ventures; intangible assets; and other assets.

	(Column A) Totals	(Column B) Adjustments to Totals Reported in Column A	(Column Q) Exposure Amount 1,250%	(Column T) Total Risk-Weighted Asset Amount by Calculation Methodology SSFA	(Column U) Total Risk-Weighted Asset Amount by Calculation Methodology Gross-Up	
Dollar amounts in thousands						
9. On-balance sheet securitization exposures:						9.
a. Held-to-maturity securities.....	RCFDS475 855,398	RCFDS476 855,398	RCFDS477 0	RCFDS478 171,080	RCFDS479 0	9.a.
b. Available-for-sale securities.....	RCFDS480 324,139	RCFDS481 324,139	RCFDS482 0	RCFDS483 64,828	RCFDS484 0	9.b.
c. Trading assets.....	RCFDS485 0	RCFDS486 0	RCFDS487 0	RCFDS488 0	RCFDS489 0	9.c.
d. All other on-balance sheet securitization exposures.....	RCFDS490 1,194,819	RCFDS491 1,194,819	RCFDS492 0	RCFDS493 238,964	RCFDS494 0	9.d.
10. Off-balance sheet securitization exposures.....	RCFDS495 1,653,836	RCFDS496 1,653,836	RCFDS497 0	RCFDS498 330,767	RCFDS499 0	10.

	(Column A) Totals From Schedule RC	(Column B) Adjustments to Totals Reported in Column A	(Column C) Allocation by Risk-Weight Category 0%	(Column D) Allocation by Risk-Weight Category 2%	(Column E) Allocation by Risk-Weight Category 4%	(Column F) Allocation by Risk-Weight Category 10%	(Column G) Allocation by Risk-Weight Category 20%	(Column H) Allocation by Risk-Weight Category 50%	(Column I) Allocation by Risk-Weight Category 100%	(Column J) Allocation by Risk-Weight Category 150%	
Dollar amounts in thousands											
11. Total balance sheet assets ¹⁴	RCFDD2170 187,182,386	RCFDS500 8,414,380	RCFDD987 31,030,669	RCFDHJ90 0	RCFDHJ91 0		RCFDD988 17,610,291	RCFDD989 27,505,123	RCFDD990 99,133,512	RCFDS503 1,013,234	11.

	(Column K) Allocation by Risk-Weight Category 250%	(Column L) Allocation by Risk-Weight Category 300%	(Column M) Allocation by Risk-Weight Category 400%	(Column N) Allocation by Risk-Weight Category 600%	(Column O) Allocation by Risk-Weight Category 625%	(Column P) Allocation by Risk-Weight Category 937.5%	(Column Q) Allocation by Risk-Weight Category 1,250%	(Column R) Application of Other Risk-Weighting Approaches Exposure Amount	
Dollar amounts in thousands									
11. Total balance sheet assets ¹⁴	RCFDS504 893,330	RCFDS505 0	RCFDS506 0	RCFDS507 0			RCFDS510 0	RCFDH300 1,581,847	11.

	(Column A) Face, Notional, or Other Amount	(Column B) Credit Equivalent Amount	(Column C) Allocation by Risk-Weight Category 0%	(Column D) Allocation by Risk-Weight Category 2%	(Column E) Allocation by Risk-Weight Category 4%	(Column F) Allocation by Risk-Weight Category 10%	(Column G) Allocation by Risk-Weight Category 20%	(Column H) Allocation by Risk-Weight Category 50%	(Column I) Allocation by Risk-Weight Category 100%	(Column J) Allocation by Risk-Weight Category 150%	
Dollar amounts in thousands											
12. Financial standby letters of credit	RCFDD991 1,966,556	RCFDD992 1,966,556	RCFDD993 3,290	RCFDHJ92 0	RCFDHJ93 0		RCFDD994 2,783	RCFDD995 20,739	RCFDD996 1,904,902	RCFDS511 34,843	12.
13. Performance standby letters of credit and transaction-related contingent items	RCFDD997 63,961	RCFDD998 31,981	RCFDD999 0				RCFDG603 0	RCFDG604 0	RCFDG605 31,980	RCFDS512 0	13.
14. Commercial and similar letters of credit with an original maturity of one year or less	RCFDG606 31,137	RCFDG607 6,227	RCFDG608 0	RCFDHJ94 0	RCFDHJ95 0		RCFDG609 492	RCFDG610 764	RCFDG611 4,971	RCFDS513 0	14.
15. Retained recourse on small business obligations sold with recourse	RCFDG612 0	RCFDG613 0	RCFDG614 0				RCFDG615 0	RCFDG616 0	RCFDG617 0	RCFDS514 0	15.

	(Column A) Face, Notional, or Other Amount	(Column B) Credit Equivalent Amount	(Column C) Allocation by Risk-Weight Category 0%	(Column D) Allocation by Risk-Weight Category 2%	(Column E) Allocation by Risk-Weight Category 4%	(Column F) Allocation by Risk-Weight Category 10%	(Column G) Allocation by Risk-Weight Category 20%	(Column H) Allocation by Risk-Weight Category 50%	(Column I) Allocation by Risk-Weight Category 100%	(Column J) Allocation by Risk-Weight Category 150%	
Dollar amounts in thousands											
16. Repo-style transactions ²¹	RCFDS515 0	RCFDS516 0	RCFDS517 0	RCFDS518 0	RCFDS519 0		RCFDS520 0	RCFDS521 0	RCFDS522 0	RCFDS523 0	16.
17. All other off-balance sheet liabilities	RCFDG618 91,753	RCFDG619 91,753	RCFDG620 0				RCFDG621 50,293	RCFDG622 0	RCFDG623 41,459	RCFDS524 0	17.
18. Unused commitments: [*]											18.
a. Original maturity of one year or less	RCFDS525 2,480,803	RCFDS526 496,161	RCFDS527 96	RCFDHJ96 0	RCFDHJ97 0		RCFDS528 0	RCFDS529 0	RCFDS530 496,022	RCFDS531 42	18.a.

14. For each of columns A through R of item 11, report the sum of items 1 through 9. For item 11, the sum of columns B through R must equal column A. Item 11, column A, must equal Schedule RC, item 12.

21. Includes securities purchased under agreements to resell (reverse repos), securities sold under agreements to repurchase (repos), securities borrowed, and securities lent.

*. Excludes unused commitments to asset-backed commercial paper conduits.

	(Column A) Face, Notional, or Other Amount	(Column B) Credit Equivalent Amount	(Column C) Allocation by Risk-Weight Category 0%	(Column D) Allocation by Risk-Weight Category 2%	(Column E) Allocation by Risk-Weight Category 4%	(Column F) Allocation by Risk-Weight Category 10%	(Column G) Allocation by Risk-Weight Category 20%	(Column H) Allocation by Risk-Weight Category 50%	(Column I) Allocation by Risk-Weight Category 100%	(Column J) Allocation by Risk-Weight Category 150%	
Dollar amounts in thousands											
b. Original maturity exceeding one year.....	RCFDG624 39,014,735	RCFDG625 19,507,368	RCFDG626 3,196	RCFDHJ98 0	RCFDHJ99 0		RCFDG627 65,939	RCFDG628 514	RCFDG629 19,400,730	RCFDS539 36,989	18.b.
19. Unconditionally cancelable commitments.....	RCFDS540 33,064,750	RCFDS541 0									19.
20. Over-the-counter derivatives.....		RCFDS542 1,979,676	RCFDS543 0	RCFDHK00 0	RCFDHK01 0	RCFDS544 0	RCFDS545 138,482	RCFDS546 0	RCFDS547 1,841,194	RCFDS548 0	20.
21. Centrally cleared derivatives.....		RCFDS549 482,432	RCFDS550 0	RCFDS551 0	RCFDS552 482,432		RCFDS554 0	RCFDS555 0	RCFDS556 0	RCFDS557 0	21.
22. Unsettled transactions (failed trades) ²²	RCFDH191 0		RCFDH193 0				RCFDH194 0	RCFDH195 0	RCFDH196 0	RCFDH197 0	22.

22. For item 22, the sum of columns C through Q must equal column A.

	(Column O) Allocation by Risk-Weight Category 625%	(Column P) Allocation by Risk-Weight Category 937.5%	(Column Q) Allocation by Risk-Weight Category 1,250%	(Column R) Application of Other Risk-Weighting Approaches Credit Equivalent Amount	(Column S) Application of Other Risk-Weighting Approaches Risk-Weighted Asset Amount	
Dollar amounts in thousands						
16. Repo-style transactions ²⁴				RCFDH301 0	RCFDH302 0	16.
17. All other off-balance sheet liabilities						17.
18. Unused commitments: [*]						18.
a. Original maturity of one year or less.....				RCFDH303 0	RCFDH304 0	18.a.
b. Original maturity exceeding one year.....				RCFDH307 0	RCFDH308 0	18.b.
19. Unconditionally cancelable commitments						19.
20. Over-the-counter derivatives.....				RCFDH309 0	RCFDH310 0	20.
21. Centrally cleared derivatives						21.
22. Unsettled transactions (failed trades) ²⁵	RCFDH198 0	RCFDH199 0	RCFDH200 0			22.

24. Includes securities purchased under agreements to resell (reverse repos), securities sold under agreements to repurchase (repos), securities borrowed, and securities lent.

*. Excludes unused commitments to asset-backed commercial paper conduits.

25. For item 22, the sum of columns C through Q must equal column A.

Dollar amounts in thousands		(Column C) Allocation by Risk-Weight Category 0%	(Column D) Allocation by Risk-Weight Category 2%	(Column E) Allocation by Risk-Weight Category 4%	(Column F) Allocation by Risk-Weight Category 10%	(Column G) Allocation by Risk-Weight Category 20%	(Column H) Allocation by Risk-Weight Category 50%	(Column I) Allocation by Risk-Weight Category 100%	(Column J) Allocation by Risk-Weight Category 150%	
23. Total assets, derivatives, off-balance sheet items, and other items subject to risk weighting by risk-weight category (for each of columns C through P, sum of items 11 through 22; for column Q, sum of items 10 through 22).....		RCFDG630 31,037,251	RCFDS558 0	RCFDS559 482,432	RCFDS560 0	RCFDG631 17,868,280	RCFDG632 27,527,140	RCFDG633 122,854,770	RCFDS561 1,085,108	23.
24. Risk weight factor										24.
25. Risk-weighted assets by risk-weight category (for each column, item 23 multiplied by item 24).....		RCFDG634 0	RCFDS569 0	RCFDS570 19,297	RCFDS571 0	RCFDG635 3,573,656	RCFDG636 13,763,570	RCFDG637 122,854,770	RCFDS572 1,627,662	25.

Dollar amounts in thousands		(Column K) Allocation by Risk-Weight Category 250%	(Column L) Allocation by Risk-Weight Category 300%	(Column M) Allocation by Risk-Weight Category 400%	(Column N) Allocation by Risk-Weight Category 600%	(Column O) Allocation by Risk-Weight Category 625%	(Column P) Allocation by Risk-Weight Category 937.5%	(Column Q) Allocation by Risk-Weight Category 1,250%	
23. Total assets, derivatives, off-balance sheet items, and other items subject to risk weighting by risk-weight category (for each of columns C through P, sum of items 11 through 22; for column Q, sum of items 10 through 22).....		RCFDS562 893,330	RCFDS563 0	RCFDS564 0	RCFDS565 0	RCFDS566 0	RCFDS567 0	RCFDS568 0	23.
24. Risk weight factor									24.
25. Risk-weighted assets by risk-weight category (for each column, item 23 multiplied by item 24).....		RCFDS573 2,233,325	RCFDS574 0	RCFDS575 0	RCFDS576 0	RCFDS577 0	RCFDS578 0	RCFDS579 0	25.

Dollar amounts in thousands

26. Risk-weighted assets base for purposes of calculating the allowance for loan and lease losses 1.25 percent threshold.....	RCFDS580	146,340,034	26.
27. Standardized market-risk weighted assets (applicable only to banks that are covered by the market risk capital rule).....	RCFDS581	1,053,588	27.
28. Risk-weighted assets before deductions for excess allowance of loan and lease losses and allocated risk transfer risk reserve ²⁷	RCFDB704	147,393,522	28.
29. LESS: Excess allowance for loan and lease losses.....	RCFDA222	0	29.
30. LESS: Allocated transfer risk reserve.....	RCFD3128	0	30.
31. Total risk-weighted assets (item 28 minus items 29 and 30).....	RCFDG641	147,393,522	31.
1. Current credit exposure across all derivative contracts covered by the regulatory capital rules.....	RCFDG642	1,250,622	M.1.

Dollar amounts in thousands

	(Column A) With a remaining maturity of One year or less		(Column B) With a remaining maturity of Over one year through five years		(Column C) With a remaining maturity of Over five years		
2. Notional principal amounts of over-the-counter derivative contracts:							M.2.
a. Interest rate.....	RCFDS582	26,536,683	RCFDS583	25,170,572	RCFDS584	8,424,118	M.2.a.
b. Foreign exchange rate and gold.....	RCFDS585	11,839,481	RCFDS586	6,292,773	RCFDS587	296,956	M.2.b.
c. Credit (investment grade reference asset).....	RCFDS588	0	RCFDS589	0	RCFDS590	0	M.2.c.
d. Credit (non-investment grade reference asset).....	RCFDS591	0	RCFDS592	0	RCFDS593	0	M.2.d.
e. Equity.....	RCFDS594	0	RCFDS595	0	RCFDS596	0	M.2.e.
f. Precious metals (except gold).....	RCFDS597	0	RCFDS598	0	RCFDS599	0	M.2.f.
g. Other.....	RCFDS600	169,900	RCFDS601	104,567	RCFDS602	0	M.2.g.
3. Notional principal amounts of centrally cleared derivative contracts:							M.3.
a. Interest rate.....	RCFDS603	35,872,411	RCFDS604	94,885,781	RCFDS605	0	M.3.a.
b. Foreign exchange rate and gold.....	RCFDS606	0	RCFDS607	0	RCFDS608	0	M.3.b.
c. Credit (investment grade reference asset).....	RCFDS609	0	RCFDS610	0	RCFDS611	0	M.3.c.
d. Credit (non-investment grade reference asset).....	RCFDS612	0	RCFDS613	0	RCFDS614	0	M.3.d.
e. Equity.....	RCFDS615	0	RCFDS616	0	RCFDS617	0	M.3.e.
f. Precious metals (except gold).....	RCFDS618	0	RCFDS619	0	RCFDS620	0	M.3.f.
g. Other.....	RCFDS621	0	RCFDS622	0	RCFDS623	0	M.3.g.

Dollar amounts in thousands

4. Amount of allowances for credit losses on purchased credit-deteriorated assets: ¹			M.4.
a. Loans and leases held for investment.....	RCFDJJ30	0	M.4.a.
b. Held-to-maturity debt securities.....	RCFDJJ31	0	M.4.b.
c. Other financial assets measured at amortized cost.....	RCFDJJ32	0	M.4.c.

27. Sum of items 2.b through 20, column S; items 9.a, 9.b, 9.c, 9.d, and 10, columns T and U; item 25, columns C through Q; and item 27 (if applicable).

1. Memorandum items 4.a through 4.c should be completed only by institutions that have adopted ASU 2016-13.

Schedule RC-S - Servicing Securitization and Asset Sale Activities(Form Type - 031)

Dollar amounts in thousands	(Column A) 1-4 Family Residential Loans	(Column B) Home Equity Lines	(Column C) Credit Card Receivables	(Column D) Auto Loans	(Column E) Other Consumer Loans	(Column F) Commercial and Industrial Loans	(Column G) All Other Loans, All Leases, and All Other Assets	
1. Outstanding principal balance of assets sold and securitized by the reporting bank with servicing retained or with recourse or other seller-provided credit enhancements.....	RCFDB705 0	RCFDB706 0	RCFDB707 0	RCFDB708 0	RCFDB709 0	RCFDB710 0	RCFDB711 0	1.
2. Maximum amount of credit exposure arising from recourse or other seller-provided credit enhancements provided to structures reported in item 1	RCFDHU09 0	RCFDHU10 0	RCFDHU11 0	RCFDHU12 0	RCFDHU13 0	RCFDHU14 0	RCFDHU15 0	2.
<i>Item 3 is to be completed by banks with \$100 billion or more in total assets.</i>								
3. Reporting bank's unused commitments to provide liquidity to structures reported in item 1 ¹	RCFDB726 0	RCFDB727 0	RCFDB728 0	RCFDB729 0	RCFDB730 0	RCFDB731 0	RCFDB732 0	3.
4. Past due loan amounts included in item 1:								4.
a. 30-89 days past due.....	RCFDB733 0	RCFDB734 0	RCFDB735 0	RCFDB736 0	RCFDB737 0	RCFDB738 0	RCFDB739 0	4.a.
b. 90 days or more past due.....	RCFDB740 0	RCFDB741 0	RCFDB742 0	RCFDB743 0	RCFDB744 0	RCFDB745 0	RCFDB746 0	4.b.
5. Charge-offs and recoveries on assets sold and securitized with servicing retained or with recourse or other seller-provided credit enhancements (calendar year-to-date):								5.
a. Charge-offs.....	RIADB747 0	RIADB748 0	RIADB749 0	RIADB750 0	RIADB751 0	RIADB752 0	RIADB753 0	5.a.
b. Recoveries.....	RIADB754 0	RIADB755 0	RIADB756 0	RIADB757 0	RIADB758 0	RIADB759 0	RIADB760 0	5.b.
<i>Item 6 is to be completed by banks with \$10 billion or more in total assets.</i>								
6. Total amount of ownership (or seller's) interest carried as securities or loans ¹		RCFDHU16 0	RCFDHU17 0			RCFDHU18 0		6.
7. Not applicable								7.
8. Not applicable								8.
9. Maximum amount of credit exposure arising from credit enhancements provided by the reporting bank to other institutions' securitization structures in the form of standby letters of credit, purchased subordinated securities, and other enhancements.....	RCFDB776 0			RCFDB779 0	RCFDB780 0	RCFDB781 0	RCFDB782 0	9.
<i>Item 10 is to be completed by banks with \$10 billion or more in total assets.</i>								
10. Reporting bank's unused commitments to provide liquidity to other institutions' securitization structures ¹	RCFDB783 0			RCFDB786 0	RCFDB787 0	RCFDB788 0	RCFDB789 0	10.
11. Assets sold with recourse or other seller-provided credit enhancements and not securitized by the reporting bank.....	RCFDB790 2,797						RCFDB796 54,782	11.
12. Maximum amount of credit exposure arising from recourse or other seller-provided credit enhancements provided to assets reported in item 11....	RCFDB797 2,797						RCFDB803 54,782	12.

1. The \$100 billion asset-size test is based on the total assets reported on the June 30, 2018, Report of Condition.
 1. The \$10 billion asset-size test is based on the total assets reported on the June 30, 2018, Report of Condition.
 1. The \$10 billion asset-size test is based on the total assets reported on the June 30, 2018, Report of Condition.

Dollar amounts in thousands

1. Not applicable			M.1.
2. Outstanding principal balance of assets serviced for others (includes participations serviced for others):			M.2.
a. Closed-end 1-4 family residential mortgages serviced with recourse or other servicer-provided credit enhancements.....	RCFDB804	2,797	M.2.a.
b. Closed-end 1-4 family residential mortgages serviced with no recourse or other servicer-provided credit enhancements.....	RCFDB805	81,802,538	M.2.b.
c. Other financial assets (includes home equity lines) ¹	RCFDA591	3,646,092	M.2.c.
d. 1-4 family residential mortgages serviced for others that are in process of foreclosure at quarter-end (includes closed-end and open-end loans).....	RCFDF699	104,075	M.2.d.
<i>Memorandum item 3 is to be completed by banks with \$10 billion or more in total assets.</i>			
3. Asset-backed commercial paper conduits: ²			M.3.
a. Maximum amount of credit exposure arising from credit enhancements provided to conduit structures in the form of standby letters of credit, subordinated securities, and other enhancements:			M.3.a.
1. Conduits sponsored by the bank, a bank affiliate, or the bank's holding company.....	RCFDB806	0	M.3.a.1.
2. Conduits sponsored by other unrelated institutions.....	RCFDB807	0	M.3.a.2.
b. Unused commitments to provide liquidity to conduit structures:			M.3.b.
1. Conduits sponsored by the bank, a bank affiliate, or the bank's holding company.....	RCFDB808	0	M.3.b.1.
2. Conduits sponsored by other unrelated institutions.....	RCFDB809	0	M.3.b.2.
4. Outstanding credit card fees and finance charges included in Schedule RC-S, item 1, column C ²	RCFDC407	0	M.4.

Schedule RC-T - Fiduciary and Related Services(Form Type - 031)

Dollar amounts in thousands

1. Does the institution have fiduciary powers? (If "NO," do not complete Schedule RC-T.).....	RCFDA345	Yes	1.
2. Does the institution exercise the fiduciary powers it has been granted?.....	RCFDA346	Yes	2.
3. Does the institution have any fiduciary or related activity (in the form of assets or accounts) to report in this schedule? (If "NO," do not complete the rest of Schedule RC-T.).....	RCFDB867	Yes	3.

Dollar amounts in thousands	(Column A) Managed Assets		(Column B) Non-Managed Assets		(Column C) Number of Managed Accounts		(Column D) Number of Non-Managed Accounts	
4. Personal trust and agency accounts.....	RCFDB868	659,469	RCFDB869	36,181	RCFDB870	526	RCFDB871	38
5. Employee benefit and retirement-related trust and agency accounts:								
a. Employee benefit - defined contribution.....	RCFDB872	207,309	RCFDB873	140,269	RCFDB874	10	RCFDB875	22
b. Employee benefit - defined benefit.....	RCFDB876	108,276	RCFDB877	115,879	RCFDB878	8	RCFDB879	6
c. Other employee benefit and retirement-related accounts.....	RCFDB880	209,874	RCFDB881	35,959	RCFDB882	339	RCFDB883	11
6. Corporate trust and agency accounts.....	RCFDB884	1,195	RCFDB885	8,655	RCFDC001	2	RCFDC002	45
7. Investment management and investment advisory agency accounts.....	RCFDB886	2,145,021	RCFDJ253	1,927	RCFDB888	744	RCFDJ254	5
8. Foundation and endowment trust and agency accounts.....	RCFDJ255	290,169	RCFDJ256	18,596	RCFDJ257	77	RCFDJ258	50
9. Other fiduciary accounts.....	RCFDB890	0	RCFDB891	0	RCFDB892	0	RCFDB893	0
10. Total fiduciary accounts (sum of items 4 through 9).....	RCFDB894	3,621,313	RCFDB895	357,466	RCFDB896	1706	RCFDB897	177
11. Custody and safekeeping accounts.....			RCFDB898	3,041,065			RCFDB899	478
12. Fiduciary accounts held in foreign offices (included in items 10 and 11).....	RCFNB900	0	RCFNB901	0	RCFNB902	0	RCFNB903	0
13. Individual Retirement Accounts, Health Savings Accounts, and other similar accounts (included in items 5.c and 11).....	RCFDJ259	200,090	RCFDJ260	2,416	RCFDJ261	333	RCFDJ262	6

- Memorandum item 2.c is to be completed if the principal balance of other financial assets serviced for others is more than \$10 million.
- The \$10 billion asset-size test is based on the total assets reported on the June 30, 2018, Report of Condition.
- Memorandum item 4 is to be completed by banks that (1) together with affiliated institutions, have outstanding credit card receivables (as defined in the instructions) that exceed \$500 million as of the report date, or (2) are credit card specialty banks as defined for Uniform Bank Performance Report purposes.

Dollar amounts in thousands

14. Personal trust and agency accounts.....	RIADB904	1,667	14.
15. Employee benefit and retirement-related trust and agency accounts:			15.
a. Employee benefit - defined contribution.....	RIADB905	279	15.a.
b. Employee benefit - defined benefit.....	RIADB906	116	15.b.
c. Other employee benefit and retirement-related accounts.....	RIADB907	340	15.c.
16. Corporate trust and agency accounts.....	RIADA479	26	16.
17. Investment management and investment advisory agency accounts.....	RIADJ315	2,828	17.
18. Foundation and endowment trust and agency accounts.....	RIADJ316	463	18.
19. Other fiduciary accounts.....	RIADA480	0	19.
20. Custody and safekeeping accounts.....	RIADB909	383	20.
21. Other fiduciary and related services income.....	RIADB910	5,946	21.
22. Total gross fiduciary and related services income (sum of items 14 through 21) (must equal Schedule RI, item 5.a).....	RIAD4070	12,048	22.
a. Fiduciary and related services income - foreign offices (included in item 22).....	RIADB912	0	22.a.
23. Less: Expenses.....	RIADC058	NR	23.
24. Less: Net losses from fiduciary and related services.....	RIADA488	NR	24.
25. Plus: Intracompany income credits for fiduciary and related services.....	RIADB911	NR	25.
26. Net fiduciary and related services income.....	RIADA491	NR	26.

	(Column A) Personal Trust and Agency and Investment Management Agency Accounts		(Column B) Employee Benefit and Retirement-Related Trust and Agency Accounts		(Column C) All Other Accounts	
Dollar amounts in thousands						
1. Managed assets held in fiduciary accounts:						M.1.
a. Noninterest-bearing deposits.....	RCFDJ263	NR	RCFDJ264	NR	RCFDJ265	NR
b. Interest-bearing deposits.....	RCFDJ266	NR	RCFDJ267	NR	RCFDJ268	NR
c. U.S. Treasury and U.S. Government agency obligations.....	RCFDJ269	NR	RCFDJ270	NR	RCFDJ271	NR
d. State, county, and municipal obligations.....	RCFDJ272	NR	RCFDJ273	NR	RCFDJ274	NR
e. Money market mutual funds.....	RCFDJ275	NR	RCFDJ276	NR	RCFDJ277	NR
f. Equity mutual funds.....	RCFDJ278	NR	RCFDJ279	NR	RCFDJ280	NR
g. Other mutual funds.....	RCFDJ281	NR	RCFDJ282	NR	RCFDJ283	NR
h. Common trust funds and collective investment funds.....	RCFDJ284	NR	RCFDJ285	NR	RCFDJ286	NR
i. Other short-term obligations.....	RCFDJ287	NR	RCFDJ288	NR	RCFDJ289	NR
j. Other notes and bonds.....	RCFDJ290	NR	RCFDJ291	NR	RCFDJ292	NR
k. Investments in unregistered funds and private equity investments.....	RCFDJ293	NR	RCFDJ294	NR	RCFDJ295	NR
l. Other common and preferred stocks.....	RCFDJ296	NR	RCFDJ297	NR	RCFDJ298	NR
m. Real estate mortgages.....	RCFDJ299	NR	RCFDJ300	NR	RCFDJ301	NR
n. Real estate.....	RCFDJ302	NR	RCFDJ303	NR	RCFDJ304	NR
o. Miscellaneous assets.....	RCFDJ305	NR	RCFDJ306	NR	RCFDJ307	NR
p. Total managed assets held in fiduciary accounts (for each column, sum of Memorandum items 1.a through 1.o).....	RCFDJ308	NR	RCFDJ309	NR	RCFDJ310	NR

	(Column A) Managed Assets		(Column B) Number of Managed Accounts		
Dollar amounts in thousands					
q. Investments of managed fiduciary accounts in advised or sponsored mutual funds.....	RCFDJ311	NR	RCFDJ312	NR	M.1.q.

Dollar amounts in thousands		(Column A) Number of Issues	(Column B) Principal Amount Outstanding	
2. Corporate trust and agency accounts:				M.2.
a. Corporate and municipal trusteeships.....	RCFDB927	NR	RCFDB928	NR M.2.a.
1. Issues reported in Memorandum item 2.a that are in default.....	RCFDJ313	NR	RCFDJ314	NR M.2.a.1.
b. Transfer agent, registrar, paying agent, and other corporate agency.....	RCFDB929	NR		M.2.b.

Dollar amounts in thousands		(Column A) Number of Funds	(Column B) Market Value of Fund Assets	
Memoranda items 3.a through 3.g are to be completed by banks with collective investment funds and common trust funds with a total market value of \$1 billion or more as of the preceding December 31.				M.3.
3. Collective investment funds and common trust funds:				
a. Domestic equity.....	RCFDB931	NR	RCFDB932	NR M.3.a.
b. International/Global equity.....	RCFDB933	NR	RCFDB934	NR M.3.b.
c. Stock/Bond blend.....	RCFDB935	NR	RCFDB936	NR M.3.c.
d. Taxable bond.....	RCFDB937	NR	RCFDB938	NR M.3.d.
e. Municipal bond.....	RCFDB939	NR	RCFDB940	NR M.3.e.
f. Short term investments/Money market.....	RCFDB941	NR	RCFDB942	NR M.3.f.
g. Specialty/Other.....	RCFDB943	NR	RCFDB944	NR M.3.g.
h. Total collective investment funds (sum of Memorandum items 3.a through 3.g).....	RCFDB945	0	RCFDB946	0 M.3.h.

Dollar amounts in thousands		(Column A) Gross Losses Managed Accounts	(Column B) Gross Losses Non-Managed Accounts	(Column C) Recoveries	
4. Fiduciary settlements, surcharges, and other losses:					M.4.
a. Personal trust and agency accounts.....	RIADB947	NR	RIADB948	NR	RIADB949 NR M.4.a.
b. Employee benefit and retirement-related trust and agency accounts.....	RIADB950	NR	RIADB951	NR	RIADB952 NR M.4.b.
c. Investment management agency accounts.....	RIADB953	NR	RIADB954	NR	RIADB955 NR M.4.c.
d. Other fiduciary accounts and related services.....	RIADB956	NR	RIADB957	NR	RIADB958 NR M.4.d.
e. Total fiduciary settlements, surcharges, and other losses (sum of Memorandum items 4.a through 4.d) (sum of columns A and B minus column C must equal Schedule RC-T, item 24).....	RIADB959	NR	RIADB960	NR	RIADB961 NR M.4.e.

Schedule RC-V - Variable Interest Entities(Form Type - 031)

Dollar amounts in thousands		(Column A) Securitization Vehicles	(Column B) Other VIEs	
1. Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs:				1.
a. Cash and balances due from depository institutions.....	RCFDJ981	0	RCFDJF84	0 1.a.
b. Securities not held for trading.....	RCFDHU20	0	RCFDHU21	0 1.b.
c. Loans and leases held for investment, net of allowance, and held for sale.....	RCFDHU22	0	RCFDHU23	0 1.c.
d. Other real estate owned.....	RCFDK009	0	RCFDJF89	0 1.d.
e. Other assets.....	RCFDJF91	0	RCFDJF90	0 1.e.
2. Liabilities of consolidated VIEs for which creditors do not have recourse to the general credit of the reporting bank:				2.
a. Other borrowed money.....	RCFDJF92	0	RCFDJF85	0 2.a.
b. Other liabilities.....	RCFDJF93	0	RCFDJF86	0 2.b.
3. All other assets of consolidated VIEs (not included in items 1.a. through 1.e above).....	RCFDK030	0	RCFDJF87	0 3.
4. All other liabilities of consolidated VIEs (not included in items 2.a through 2.b above).....	RCFDK033	0	RCFDJF88	0 4.
Dollar amounts in thousands				
5. Total assets of asset-backed commercial paper (ABCP) conduit VIEs.....	RCFDJF77	0		5.
6. Total liabilities of ABCP conduit VIEs.....	RCFDJF78	0		6.

Optional Narrative Statement Concerning the Amounts Reported in the Consolidated Reports of Condition and Income(Form Type - 031)

Dollar amounts in thousands		
1. Comments?.....	RCON6979	No 1.
2. Bank Management Statement.....	TEXT6980	NR 2.

Appendix H.2

HSBC Call Report (Mar. 31, 2021)

Federal Financial Institutions Examination Council



Consolidated Reports of Condition and Income for A Bank With Domestic and Foreign Offices - FFIEC 031

Institution Name	HSBC BANK USA, NATIONAL ASSOCIATION
City	TYSONS
State	VA
Zip Code	22102
Call Report Report Date	3/31/2021
Report Type	031
RSSD-ID	413208
FDIC Certificate Number	57890
OCC Charter Number	24522
ABA Routing Number	21001088
Last updated on	5/3/2021



Consolidated Reports of Condition and Income for A Bank With Domestic and Foreign Offices - FFIEC 031

Report at the close of business March 31, 2021

This report is required by law: 12 U.S.C. §324 (State member banks); 12 U.S.C. §1817 (State non member banks); 12 U.S.C. §161 (National banks); and 12 U.S.C. §1464 (Savings associations).

Unless the context indicates otherwise, the term "bank" in this report form refers to both banks and savings associations.

NOTE: Each bank's board of directors and senior management are responsible for establishing and maintaining an effective system of internal control, including controls over the Reports of Condition and Income. The Reports of Condition and Income are to be prepared in accordance with federal regulatory authority instructions. The Reports of Condition and Income must be signed by the Chief Financial Officer (CFO) of the reporting bank (or by the individual performing an equivalent function) and attested to by not less than two directors (trustees) for state non member banks and three directors for state member banks, national banks, and savings associations.

I, the undersigned CFO (or equivalent) of the named bank, attest that the Reports of Condition and Income (including the supporting

Signature of Chief Financial Officer (or Equivalent)

Date of Signature

(20210331)

(RCON 9999)

This report form is to be filed by (1) banks with branches and consolidated subsidiaries in U.S. territories and possessions, Edge or Agreement subsidiaries, foreign branches, consolidated foreign subsidiaries, or International Banking Facilities, (2) banks with domestic offices only and total consolidated assets of \$100 billion or more, and (3) banks that are advanced approaches institutions for regulatory capital purposes.

schedules) for this report date have been prepared in conformance with the instructions issued by the appropriate Federal regulatory authority and are true and correct to the best of my knowledge and belief.

We, the undersigned directors (trustees), attest to the correctness of the Reports of Condition and Income (including the supporting schedules) for this report date and declare that the Reports of Condition and Income have been examined by us and to the best of our knowledge and belief have been prepared in conformance with the instructions issued by the appropriate Federal regulatory authority and are true and correct.

Director (Trustee)

Director (Trustee)

Director (Trustee)

Submission of Reports

Each bank must file its Reports of Condition and Income (Call Report) data by either:

- Using computer software to prepare its Call Report and then submitting the report data directly to the FFIEC's Central Data Repository (CDR), an Internet-based system for datacollection (<https://cdr.ffiec.gov/cdr/>), or
- Completing its Call Report in paper form and arranging with a software vendor or another party to convert the data in to the electronic format that can be processed by the CDR. The software vendor or other party then must electronically submit the bank's data file to the CDR.

For technical assistance with submissions to the CDR, please contact the CDR Help Desk by telephone at (888) CDR-3111, by fax at (703) 774-3946, or by e-mail at CDR.Help@cdr.ffiec.gov.

FDIC Certificate Number **57890** (RSSD 9050)

To fulfill the signature and attestation requirement for the Reports of Condition and Income for this report date, attach your bank's completed signature page (or a photocopy or a computer generated version of this page) to the hard-copy record of the data file submitted to the CDR that your bank must place in its files.

The appearance of your bank's hard-copy record of the submitted data file need not match exactly the appearance of the FFIEC's sample report forms, but should show at least the caption of each Call Report item and the reported amount.

HSBC BANK USA, NATIONAL ASSOCIATION

Legal Title of Bank (RSSD 9017)

TYSONS

City (RSSD 9130)

VA

State Abbreviation (RSSD 9200)

22102

Zip Code (RSSD 9220)

Legal Entity Identifier (LEI)

11E8VN30JCEQV1H4R804 (RCON 9224)

The estimated average burden associated with this information collection is 50.4 hours per respondent and is estimated to vary from 20 to 775 hours per response, depending on individual circumstances. Burden estimates include the time for reviewing instructions, gathering and maintaining data in the required form, and completing the information collection, but exclude the time for compiling and maintaining business records in the normal course of a respondent's activities. A Federal agency may not conduct or sponsor, and an organization (or a person) is not required to respond to a collection of information, unless it displays a currently valid OMB control number. Comments concerning the accuracy of this burden estimate and suggestions for reducing this burden should be directed to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503, and to one of the following: Secretary, Board of Governors of the Federal Reserve System, 20th and C Streets, NW, Washington, DC 20551; Legislative and Regulatory Analysis Division, Office of the Comptroller of the Currency, Washington, DC 20219; Assistant Executive Secretary, Federal Deposit Insurance Corporation, Washington, DC 20429.

Consolidated Reports of Condition and Income for A Bank With Domestic and Foreign Offices - FFIEC 031

Table of Contents

Signature Page.....	1	Schedule RC-C Part I - Loans and Leases(Form Type - 031).....	24
Table of Contents.....	2	Schedule RC-C Part II - Loans to Small Businesses and Small Farms(Form Type - 031).....	29
Emergency Contact Information.....	4	Schedule RC-D - Trading Assets and Liabilities(Form Type - 031).....	30
Contact Information for the Reports of Condition and Income.....	4	Schedule RC-E Part I - Deposits in Domestic Offices(Form Type - 031).....	32
USA PATRIOT Act Section 314(a) Anti-Money Laundering Contact Information.....	5	Schedule RC-E Part II - Deposits in Foreign Offices including Edge and Agreement subsidiaries and IBFs(Form Type - 031).....	34
Bank Demographic Information(Form Type - 031).....	6	Schedule RC-F - Other Assets(Form Type - 031).....	35
Contact Information(Form Type - 031).....	6	Schedule RC-G - Other Liabilities(Form Type - 031).....	36
Schedule RI - Income Statement(Form Type - 031).....	8	Schedule RC-H - Selected Balance Sheet Items for Domestic Offices(Form Type - 031).....	37
Schedule RI-A - Changes in Bank Equity Capital(Form Type - 031).....	11	Schedule RC-I - Assets and Liabilities of IBFs(Form Type - 031).....	38
Schedule RI-B Part I - Charge-offs and Recoveries on Loans and Leases(Form Type - 031).....	12	Schedule RC-K - Quarterly Averages(Form Type - 031).....	38
Schedule RI-B Part II - Changes in Allowances for Credit Losses(Form Type - 031).....	13	Schedule RC-L - Derivatives and Off-Balance Sheet Items(Form Type - 031).....	39
Schedule RI-C Part I - Disaggregated Data on the Allowance for Loan and Lease Losses(Form Type - 031).....	14	Schedule RC-M - Memoranda(Form Type - 031).....	43
Schedule RI-C Part II - Disaggregated Data on the Allowances for Credit Losses(Form Type - 031).....	15	Schedule RC-N - Past Due and Nonaccrual Loans Leases and Other Assets(Form Type - 031).....	47
Schedule RI-D - Income from Foreign Offices(Form Type - 031).....	15	Schedule RC-O - Other Data for Deposit Insurance and FICO Assessments(Form Type - 031).....	50
Schedule RI-E - Explanations (Form Type - 031).....	16	Schedule RC-P - 1-4 Family Residential Mortgage Banking Activities in Domestic Offices(Form Type - 031).....	54
Schedule RC - Balance Sheet(Form Type - 031).....	19		
Schedule RC-A - Cash and Balances Due From Depository Institutions(Form Type - 031).....	20		
Schedule RC-B - Securities(Form Type - 031).....	21		

For information or assistance, national banks, state nonmember banks, and savings associations should contact the FDIC's Data Collection and Analysis Section, 550 17th Street, NW, Washington, DC 20429, toll free on (800) 688-FDIC(3342), Monday through Friday between 8:00 a.m. and 5:00 p.m., Eastern Time. State member banks should contact their Federal Reserve District Bank.

Board of Governors of the Federal Reserve System, Federal Deposit Insurance Corporation, Office of the Comptroller of the Currency

Legend: NR - Not Reported, CONF - Confidential

Schedule RC-Q - Assets and Liabilities Measured at Fair Value on a Recurring Basis(Form Type - 031).....	54
Schedule RC-R Part I - Regulatory Capital Components and Ratios(Form Type - 031).....	59
Schedule RC-R Part II - Risk-Weighted Assets(Form Type - 031).....	63
Schedule RC-S - Servicing Securitization and Asset Sale Activities(Form Type - 031).....	73
Schedule RC-T - Fiduciary and Related Services(Form Type - 031).....	74
Schedule RC-V - Variable Interest Entities(Form Type - 031).....	76
Optional Narrative Statement Concerning the Amounts Reported in the Consolidated Reports of Condition and Income(Form Type - 031).....	77

For information or assistance, national banks, state nonmember banks, and savings associations should contact the FDIC's Data Collection and Analysis Section, 550 17th Street, NW, Washington, DC 20429, toll free on (800) 688-FDIC(3342), Monday through Friday between 8:00 a.m. and 5:00 p.m., Eastern Time. State member banks should contact their Federal Reserve District Bank.

Board of Governors of the Federal Reserve System, Federal Deposit Insurance Corporation, Office of the Comptroller of the Currency
Legend: NR - Not Reported, CONF - Confidential

Contact Information for the Reports of Condition and Income

To facilitate communication between the Agencies and the bank concerning the Reports of Condition and Income, please provide contact information for (1) the Chief Financial Officer (or equivalent) of the bank signing the reports for this quarter, and (2) the person at the bank—other than the Chief Financial Officer (or equivalent)—to whom questions about the reports should be directed. If the Chief Financial Officer (or equivalent) is the primary contact for questions about the reports, please provide contact information for another person at the bank who will serve as a secondary contact for communications between the Agencies and the bank concerning the Reports of Condition and Income. Enter “none” for the contact’s e-mail address or fax number if not available. Contact information for the Reports of Condition and Income is for the confidential use of the Agencies and will not be released to the public.

Chief Financial Officer (or Equivalent) Signing the Reports

CONF

Name (TEXT C490)

CONF

Title (TEXT C491)

CONF

E-mail Address (TEXT C492)

CONF

Area Code / Phone Number / Extension (TEXT C493)

CONF

Area Code / FAX Number (TEXT C494)

Other Person to Whom Questions about the Reports Should be Directed

CONF

Name (TEXT C495)

CONF

Title (TEXT C496)

CONF

E-mail Address (TEXT 4086)

CONF

Area Code / Phone Number / Extension (TEXT 8902)

CONF

Area Code / FAX Number (TEXT 9116)

Emergency Contact Information

This information is being requested so the Agencies can distribute critical, time-sensitive information to emergency contacts at banks. Please provide primary contact information for a senior official of the bank who has decision-making authority. Also provide information for a secondary contact if available. Enter “none” for the contact’s e-mail address or fax number if not available. Emergency contact information is for the confidential use of the Agencies and will not be released to the public.

Primary Contact

CONF

Name (TEXT C366)

CONF

Title (TEXT C367)

CONF

E-mail Address (TEXT C368)

CONF

Area Code / Phone Number / Extension (TEXT C369)

CONF

Area Code / FAX Number (TEXT C370)

Secondary Contact

CONF

Name (TEXT C371)

CONF

Title (TEXT C372)

CONF

E-mail Address (TEXT C373)

CONF

Area Code / Phone Number / Extension (TEXT C374)

CONF

Area Code / FAX Number (TEXT C375)

USA PATRIOT Act Section 314(a) Anti-Money Laundering

Contact Information

This information is being requested to identify points-of-contact who are in charge of your bank's USA PATRIOT Act Section 314(a) information requests. Bank personnel listed could be contacted by law enforcement officers or the Financial Crimes Enforcement Network (FinCEN) for additional information related to specific Section 314(a) search requests or other anti-terrorist financing and anti- money laundering matters. Communications sent by FinCEN to the bank for purposes other than Section 314(a) notifications will state the intended purpose and should be directed to the appropriate bank personnel for review. Any disclosure of customer records to law enforcement officers or FinCEN must be done in compliance with applicable law, including the Right to Financial Privacy Act (12 U.S.C. 3401 et seq.).

Please provide information for a primary and secondary contact. Information for a third and fourth contact may be provided at the bank's option. Enter "none" for the contact's e-mail address if not available. This contact information is for the confidential use of the Agencies, FinCEN, and law enforcement officers and will not be released to the public.

Primary Contact

CONF
Name (TEXT C437)

CONF
Title (TEXT C438)

CONF
E-mail Address (TEXT C439)

CONF
Area Code / Phone Number / Extension (TEXT C440)

Secondary Contact

CONF
Name (TEXT C442)

CONF
Title (TEXT C443)

CONF
E-mail Address (TEXT C444)

CONF
Area Code / Phone Number / Extension (TEXT 8902)

Third Contact

CONF
Name (TEXT C870)

CONF
Title (TEXT C871)

CONF
E-mail Address (TEXT C368)

CONF
Area Code / Phone Number / Extension (TEXT C873)

Fourth Contact

CONF
Name (TEXT C875)

CONF
Title (TEXT C876)

CONF
E-mail Address (TEXT C877)

CONF
Area Code / Phone Number / Extension (TEXT C878)

Bank Demographic Information(Form Type - 031)

Dollar amounts in thousands

1. Reporting date.....	RCON9999	20210331	1.
2. FDIC certificate number.....	RSSD9050	57890	2.
3. Legal title of bank.....	RSSD9017	Click here for value	3.
4. City.....	RSSD9130	Tysons	4.
5. State abbreviation.....	RSSD9200	VA	5.
6. Zip code.....	RSSD9220	22102	6.
7. Legal Entity Identifier (LEI) (Report only if your institution already has an LEI.).....	RCON9224	Click here for value	7.

(RCON9224) 1IE8VN30JCEQV1H4R804

(RSSD9017) HSBC Bank USA N.A.

Contact Information(Form Type - 031)

Dollar amounts in thousands

1. Contact Information for the Reports of Condition and Income			1.
a. Chief Financial Officer (or Equivalent) Signing the Reports			1.a.
1. Name.....	TEXTC490	CONF	1.a.1.
2. Title.....	TEXTC491	CONF	1.a.2.
3. E-mail Address.....	TEXTC492	CONF	1.a.3.
4. Telephone.....	TEXTC493	CONF	1.a.4.
5. FAX.....	TEXTC494	CONF	1.a.5.
b. Other Person to Whom Questions about the Reports Should be Directed			1.b.
1. Name.....	TEXTC495	CONF	1.b.1.
2. Title.....	TEXTC496	CONF	1.b.2.
3. E-mail Address.....	TEXT4086	CONF	1.b.3.
4. Telephone.....	TEXT8902	CONF	1.b.4.
5. FAX.....	TEXT9116	CONF	1.b.5.
2. Person to whom questions about Schedule RC-T - Fiduciary and Related Services should be directed			2.
a. Name and Title.....	TEXTB962	CONF	2.a.
b. E-mail Address.....	TEXTB926	CONF	2.b.
c. Telephone.....	TEXTB963	CONF	2.c.
d. FAX.....	TEXTB964	CONF	2.d.
3. Emergency Contact Information			3.
a. Primary Contact			3.a.
1. Name.....	TEXTC366	CONF	3.a.1.
2. Title.....	TEXTC367	CONF	3.a.2.
3. E-mail Address.....	TEXTC368	CONF	3.a.3.
4. Telephone.....	TEXTC369	CONF	3.a.4.
5. FAX.....	TEXTC370	CONF	3.a.5.
b. Secondary Contact			3.b.
1. Name.....	TEXTC371	CONF	3.b.1.
2. Title.....	TEXTC372	CONF	3.b.2.
3. E-mail Address.....	TEXTC373	CONF	3.b.3.
4. Telephone.....	TEXTC374	CONF	3.b.4.
5. FAX.....	TEXTC375	CONF	3.b.5.
4. USA PATRIOT Act Section 314(a) Anti-Money Laundering Contact Information			4.
a. Primary Contact			4.a.

Dollar amounts in thousands

1. Name.....	TEXTC437	CONF	4.a.1.
2. Title.....	TEXTC438	CONF	4.a.2.
3. E-mail Address.....	TEXTC439	CONF	4.a.3.
4. Telephone.....	TEXTC440	CONF	4.a.4.
b. Secondary Contact			4.b.
1. Name.....	TEXTC442	CONF	4.b.1.
2. Title.....	TEXTC443	CONF	4.b.2.
3. E-mail Address.....	TEXTC444	CONF	4.b.3.
4. Telephone.....	TEXTC445	CONF	4.b.4.
c. Third Contact			4.c.
1. Name.....	TEXTC870	CONF	4.c.1.
2. Title.....	TEXTC871	CONF	4.c.2.
3. E-mail Address.....	TEXTC872	CONF	4.c.3.
4. Telephone.....	TEXTC873	CONF	4.c.4.
d. Fourth Contact			4.d.
1. Name.....	TEXTC875	CONF	4.d.1.
2. Title.....	TEXTC876	CONF	4.d.2.
3. E-mail Address.....	TEXTC877	CONF	4.d.3.
4. Telephone.....	TEXTC878	CONF	4.d.4.
5. Chief Executive Officer Contact Information			5.
a. Chief Executive Officer			5.a.
1. Name.....	TEXTFT42	CONF	5.a.1.
2. E-mail Address.....	TEXTFT44	CONF	5.a.2.
3. Telephone.....	TEXTFT43	CONF	5.a.3.
4. FAX.....	TEXTFT45	CONF	5.a.4.

Schedule RI - Income Statement(Form Type - 031)

All Report of Income schedules are to be reported on a calendar year-to-date basis in thousands of dollars.

Dollar amounts in thousands

1. Interest income:			1.
a. Interest and fee income on loans:			1.a.
1. In domestic offices:			1.a.1.
a. Loans secured by real estate:			1.a.1.a.
1. Loans secured by 1-4 family residential properties.....	RIAD4435	142,934	1.a.1.a.1.
2. All other loans secured by real estate.....	RIAD4436	67,353	1.a.1.a.2.
b. Loans to finance agricultural production and other loans to farmers.....	RIAD4024	168	1.a.1.b.
c. Commercial and industrial loans.....	RIAD4012	138,888	1.a.1.c.
d. Loans to individuals for household, family, and other personal expenditures:			1.a.1.d.
1. Credit cards.....	RIADB485	21,346	1.a.1.d.1.
2. Other (includes revolving credit plans other than credit cards, automobile loans, and other consumer loans).....	RIADB486	5,294	1.a.1.d.2.
e. Loans to foreign governments and official institutions.....	RIAD4056	165	1.a.1.e.
f. All other loans in domestic offices.....	RIADB487	73,546	1.a.1.f.
2. In foreign offices, Edge and Agreement subsidiaries, and IBFs.....	RIAD4059	0	1.a.2.
3. Total interest and fee income on loans (sum of items 1.a.(1)(a) through 1.a.(2)).....	RIAD4010	449,694	1.a.3.
b. Income from lease financing receivables.....	RIAD4065	0	1.b.
c. Interest income on balances due from depository institutions ¹	RIAD4115	7,408	1.c.
d. Interest and dividend income on securities:			1.d.
1. U.S. Treasury securities and U.S. Government agency obligations (excluding mortgage-backed securities).....	RIADB488	45,829	1.d.1.
2. Mortgage-backed securities.....	RIADB489	124,174	1.d.2.
3. All other securities (includes securities issued by states and political subdivisions in the U.S.).....	RIAD4060	7,394	1.d.3.
e. Interest income from trading assets.....	RIAD4069	48,425	1.e.
f. Interest income on federal funds sold and securities purchased under agreements to resell.....	RIAD4020	8,897	1.f.
g. Other interest income.....	RIAD4518	6,634	1.g.
h. Total interest income (sum of items 1.a.(3) through 1.g.).....	RIAD4107	698,455	1.h.
2. Interest expense:			2.
a. Interest on deposits:			2.a.
1. Interest on deposits in domestic offices:			2.a.1.
a. Transaction accounts (interest-bearing demand deposits, NOW accounts, ATS accounts, and telephone and preauthorized transfer accounts).....	RIAD4508	15,084	2.a.1.a.
b. Nontransaction accounts:			2.a.1.b.
1. Savings deposits (includes MMDAs).....	RIAD0093	35,680	2.a.1.b.1.
2. Time deposits of \$250,000 or less.....	RIADHK03	10,022	2.a.1.b.2.
3. Time deposits of more than \$250,000.....	RIADHK04	26,917	2.a.1.b.3.
2. Interest on deposits in foreign offices, Edge and Agreement subsidiaries, and IBFs.....	RIAD4172	449	2.a.2.
b. Expense of federal funds purchased and securities sold under agreements to repurchase.....	RIAD4180	871	2.b.
c. Interest on trading liabilities and other borrowed money.....	RIAD4185	20,729	2.c.
d. Interest on subordinated notes and debentures.....	RIAD4200	23,818	2.d.
e. Total interest expense (sum of items 2.a through 2.d.).....	RIAD4073	133,570	2.e.
3. Net interest income (item 1.h minus 2.e.).....	RIAD4074	564,885	3.
4. Provision for loan and lease losses ¹	RIADJJ33	-227,778	4.
5. Noninterest income:			5.
a. Income from fiduciary activities ²	RIAD4070	19,035	5.a.
b. Service charges on deposit accounts in domestic offices.....	RIAD4080	37,019	5.b.

1. Includes interest income on time certificates of deposit not held for trading.

1. Institutions that have adopted ASU 2016-13 should report in item 4, the provisions for credit losses for all financial assets and off-balance-sheet credit exposures that fall within the scope of the standard.

2. For banks required to complete Schedule RC-T, items 14 through 22, income from fiduciary activities reported in Schedule RI, item 5.a, must equal the amount reported in Schedule RC-T, item 22.

Dollar amounts in thousands

c. Trading revenue ³	RIADA220	49,736	5.c.
d. Income from securities-related and insurance activities:			5.d.
1. Fees and commissions from securities brokerage.....	RIADC886	382	5.d.1.
2. Investment banking, advisory, and underwriting fees and commissions.....	RIADC888	6,035	5.d.2.
3. Fees and commissions from annuity sales.....	RIADC887	0	5.d.3.
4. Underwriting income from insurance and reinsurance activities.....	RIADC386	0	5.d.4.
5. Income from other insurance activities.....	RIADC387	0	5.d.5.
e. Venture capital revenue.....	RIADB491	0	5.e.
f. Net servicing fees.....	RIADB492	3,889	5.f.
g. Net securitization income.....	RIADB493	0	5.g.
h. Not applicable			5.h.
i. Net gains (losses) on sales of loans and leases.....	RIAD5416	10,723	5.i.
j. Net gains (losses) on sales of other real estate owned.....	RIAD5415	301	5.j.
k. Net gains (losses) on sales of other assets ⁴	RIADB496	3,428	5.k.
l. Other noninterest income [*]	RIADB497	198,661	5.l.
m. Total noninterest income (sum of items 5.a through 5.l).....	RIAD4079	329,209	5.m.
6. Not available			6.
a. Realized gains (losses) on held-to-maturity securities.....	RIAD3521	0	6.a.
b. Realized gains (losses) on available-for-sale debt securities.....	RIAD3196	29,498	6.b.
7. Noninterest expense:			7.
a. Salaries and employee benefits.....	RIAD4135	164,477	7.a.
b. Expenses of premises and fixed assets (net of rental income) (excluding salaries and employee benefits and mortgage interest).....	RIAD4217	32,137	7.b.
c. Not available			7.c.
1. Goodwill impairment losses.....	RIADC216	0	7.c.1.
2. Amortization expense and impairment losses for other intangible assets.....	RIADC232	1,625	7.c.2.
d. Other noninterest expense [*]	RIAD4092	458,764	7.d.
e. Total noninterest expense (sum of items 7.a through 7.d).....	RIAD4093	657,003	7.e.
8. Not available			8.
a. Income (loss) before change in net unrealized holding gains (losses) on equity securities not held for trading, applicable income taxes, and discontinued operations (item 3 plus or minus items 4, 5.m, 6.a, 6.b, and 7.e).....	RIADHT69	494,367	8.a.
b. Change in net unrealized holding gains (losses) on equity securities not held for trading ⁵	RIADHT70	-2,355	8.b.
c. Income (loss) before applicable income taxes and discontinued operations (sum of items 8.a and 8.b).....	RIAD4301	492,012	8.c.
9. Applicable income taxes (on item 8.c).....	RIAD4302	129,287	9.
10. Income (loss) before discontinued operations (item 8.c minus item 9).....	RIAD4300	362,725	10.
11. Discontinued operations, net of applicable income taxes (Describe on Schedule RI-E - Explanations) [*]	RIADFT28	0	11.
12. Net income (loss) attributable to bank and noncontrolling (minority) interests (sum of items 10 and 11).....	RIADG104	362,725	12.
13. LESS: Net income (loss) attributable to noncontrolling (minority) interests (if net income, report as a positive value; if net loss, report as a negative value).....	RIADG103	0	13.
14. Net income (loss) attributable to bank (item 12 minus item 13).....	RIAD4340	362,725	14.
1. Interest expense incurred to carry tax-exempt securities, loans, and leases acquired after August 7, 1986, that is not deductible for federal income tax purposes.....	RIAD4513	5	M.1.
Memorandum item 2 is to be completed by banks with \$1 billion or more in total assets			
2. Income from the sale and servicing of mutual funds and annuities in domestic offices (included in Schedule RI, item 8).....	RIAD8431	4,666	M.2.
3. Income on tax-exempt loans and leases to states and political subdivisions in the U.S. (included in Schedule RI, items 1.a and 1.b).....	RIAD4313	0	M.3.
4. Income on tax-exempt securities issued by states and political subdivisions in the U.S. (included in Schedule RI, item 1.d.(3)).....	RIAD4507	72	M.4.
5. Number of full-time equivalent employees at end of current period (round to nearest whole number).....	RIAD4150	3788	M.5.
6. Not applicable			M.6.

3. For banks required to complete Schedule RI, Memorandum item 8, trading revenue reported in Schedule RI, item 5.c, must equal the sum of Memorandum items 8.a through 8.e.

4. Exclude net gains (losses) on sales of trading assets and held-to-maturity and available-for-sale debt securities.

*. Describe on Schedule RI-E—Explanations.

5. Item 8.b is to be completed by all institutions. See the instructions this item and the Glossary entry for "Securities Activities" for further detail on accounting for investments in equity securities.

Dollar amounts in thousands

7. If the reporting institution has applied pushdown accounting this calendar year, report the date of the institution's acquisition (see instructions) ²	RIAD9106	0	M.7.
8. Trading revenue (from cash instruments and derivative instruments) (sum of Memorandum items 8.a through 8.e must equal Schedule RI, item 5.c):			M.8.
<i>Memorandum items 8.a through 8.e are to be completed by banks that reported average trading assets (Schedule RC-K, item 7) of \$2 million or more for any quarter of the preceding calendar year.</i>			
a. Interest rate exposures.....	RIAD8757	-180,106	M.8.a.
b. Foreign exchange exposures.....	RIAD8758	115,581	M.8.b.
c. Equity security and index exposures.....	RIAD8759	-19,278	M.8.c.
d. Commodity and other exposures.....	RIAD8760	-80,873	M.8.d.
e. Credit exposures.....	RIADF186	214,412	M.8.e.
<i>Memorandum items 8.f through 8.h are to be completed by banks with \$100 billion or more in total assets that are required to complete Schedule RI, Memorandum items 8.a through 8.e, above.</i>			M.8.f.
f. Impact on trading revenue of changes in the creditworthiness of the bank's derivatives counterparties on the bank's derivative assets (year-to-date changes) (included in Memorandum items 8.a through 8.e above):			
1. Gross credit valuation adjustment (CVA).....	RIADFT36	14,681	M.8.f.1.
2. CVA hedge.....	RIADFT37	-4,379	M.8.f.2.
g. Impact on trading revenue of changes in the creditworthiness of the bank on the bank's derivative liabilities (year-to-date changes) (included in Memorandum items 8.a through 8.e above):			M.8.g.
1. Gross debit valuation adjustment (DVA).....	RIADFT38	-655	M.8.g.1.
2. DVA hedge.....	RIADFT39	0	M.8.g.2.
h. Gross trading revenue, before including positive or negative net CVA and net DVA.....	RIADFT40	40,088	M.8.h.
9. Net gains (losses) recognized in earnings on credit derivatives that economically hedge credit exposures held outside the trading account:			M.9.
a. Net gains (losses) on credit derivatives held for trading.....	RIADC889	0	M.9.a.
b. Net gains (losses) on credit derivatives held for purposes other than trading.....	RIADC890	-6,343	M.9.b.
10. Credit losses on derivatives (see instructions).....	RIADA251	0	M.10.
11. Does the reporting bank have a Subchapter S election in effect for federal income tax purposes for the current tax year?.....	RIADA530	No	M.11.
<i>Memorandum item 12 is to be completed by banks that are required to complete Schedule RC-C, Part I, Memorandum items 8.b and 8.c and is to be completed semiannually in the June and December reports only.</i>			
12. Noncash income from negative amortization on closed-end loans secured by 1-4 family residential properties (included in Schedule RI, item 1.a.(1)(a)(1)).....	RIADF228	NR	M.12.
<i>Memorandum item 13 is to be completed by banks that have elected to account for assets and liabilities under a fair value option.</i>			M.13.
13. Net gains (losses) recognized in earnings on assets and liabilities that are reported at fair value under a fair value option:			
a. Net gains (losses) on assets.....	RIADF551	1,149	M.13.a.
1. Estimated net gains (losses) on loans attributable to changes in instrument-specific credit risk.....	RIADF552	0	M.13.a.1.
b. Net gains (losses) on liabilities.....	RIADF553	51,166	M.13.b.
1. Estimated net gains (losses) on liabilities attributable to changes in instrument-specific credit risk.....	RIADF554	0	M.13.b.1.
14. Other-than-temporary impairment losses on held-to-maturity and available-for-sale debt securities ²	RIADJ321	NR	M.14.
<i>Memorandum item 15 is to be completed by institutions with \$1 billion or more in total assets that answered "Yes" to Schedule RC-E, Part I, Memorandum item 5.</i>			M.15.
15. Components of service charges on deposit accounts in domestic offices (sum of Memorandum items 15.a through 15.d must equal Schedule RI, item 5.b):			
a. Consumer overdraft-related service charges levied on those transaction account and nontransaction savings account deposit products intended primarily for individuals for personal, household, or family use.....	RIADH032	784	M.15.a.
b. Consumer account periodic maintenance charges levied on those transaction account and nontransaction savings account deposit products intended primarily for individuals for personal, household, or family use.....	RIADH033	1,768	M.15.b.
c. Consumer customer automated teller machine (ATM) fees levied on those transaction account and nontransaction savings account deposit products intended primarily for individuals for personal, household, or family use.....	RIADH034	0	M.15.c.
d. All other service charges on deposit accounts.....	RIADH035	34,468	M.15.d.

2. Report the date in YYYYMMDD format. For example, a bank acquired on March 1, 2019, would report 20190301.
2. Memorandum item 14 is to be completed only by institutions that have not adopted ASU 2016-13.

Schedule RI-A - Changes in Bank Equity Capital(Form Type - 031)

Dollar amounts in thousands

1. Total bank equity capital most recently reported for the December 31, 2020, Reports of Condition and Income (i.e., after adjustments from amended Reports of Income).....	RIAD3217	21,842,978	1.
2. Cumulative effect of changes in accounting principles and corrections of material accounting errors *	RIADB507	0	2.
3. Balance end of previous calendar year as restated (sum of items 1 and 2).....	RIADB508	21,842,978	3.
4. Net income (loss) attributable to bank (must equal Schedule RI, item 14).....	RIAD4340	362,725	4.
5. Sale, conversion, acquisition, or retirement of capital stock, net (excluding treasury stock transactions).....	RIADB509	0	5.
6. Treasury stock transactions, net.....	RIADB510	0	6.
7. Changes incident to business combinations, net.....	RIAD4356	0	7.
8. LESS: Cash dividends declared on preferred stock.....	RIAD4470	25,406	8.
9. LESS: Cash dividends declared on common stock.....	RIAD4460	0	9.
10. Other comprehensive income ¹	RIADB511	-648,439	10.
11. Other transactions with stockholders (including a parent holding company) (not included in items 5, 6, 8, or 9 above) *	RIAD4415	-75,461	11.
12. Total bank equity capital end of current period (sum of items 3 through 11) (must equal Schedule RC, item 27.a)..	RIAD3210	21,456,397	12.

*. Describe on Schedule RI-E—Explanations

1. Includes, but is not limited to, changes in net unrealized holding gains (losses) on available-for-sale debt securities, changes in accumulated net gains (losses) on cash flow hedges, foreign currency translation adjustments, and pension and other postretirement plan-related changes other than net periodic benefit cost.

Schedule RI-B Part I - Charge-offs and Recoveries on Loans and Leases (Form Type - 031)

Part I includes charge-offs and recoveries through the allocated transfer risk reserve.

Dollar amounts in thousands		(Column A) Charge-offs Calendar year-to-date		(Column B) Recoveries Calendar year-to-date		
1. Loans secured by real estate:						1.
a. Construction, land development, and other land loans in domestic offices:						1.a.
1. 1-4 family residential construction loans.....	RIADC891	0	RIADC892	0		1.a.1.
2. Other construction loans and all land development and other land loans.....	RIADC893	0	RIADC894	0		1.a.2.
b. Secured by farmland in domestic offices.....	RIAD3584	0	RIAD3585	0		1.b.
c. Secured by 1-4 family residential properties in domestic offices:						1.c.
1. Revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit.....	RIAD5411	440	RIAD5412	775		1.c.1.
2. Closed-end loans secured by 1-4 family residential properties:						1.c.2.
a. Secured by first liens.....	RIADC234	858	RIADC217	3,047		1.c.2.a.
b. Secured by junior liens.....	RIADC235	28	RIADC218	785		1.c.2.b.
d. Secured by multifamily (5 or more) residential properties in domestic offices.....	RIAD3588	0	RIAD3589	9		1.d.
e. Secured by nonfarm nonresidential properties in domestic offices:						1.e.
1. Loans secured by owner-occupied nonfarm nonresidential properties.....	RIADC895	0	RIADC896	0		1.e.1.
2. Loans secured by other nonfarm nonresidential properties.....	RIADC897	0	RIADC898	0		1.e.2.
f. In foreign offices.....	RIADB512	0	RIADB513	0		1.f.
2. Not applicable						2.
3. Loans to finance agricultural production and other loans to farmers.....	RIAD4655	0	RIAD4665	0		3.
4. Commercial and industrial loans:						4.
a. To U.S. addressees (domicile).....	RIAD4645	1,903	RIAD4617	1,274		4.a.
b. To non-U.S. addressees (domicile).....	RIAD4646	0	RIAD4618	0		4.b.
5. Loans to individuals for household, family, and other personal expenditures:						5.
a. Credit cards.....	RIADB514	18,526	RIADB515	1,969		5.a.
b. Automobile loans.....	RIADK129	0	RIADK133	0		5.b.
c. Other (includes revolving credit plans other than credit cards and other consumer loans).....	RIADK205	3,949	RIADK206	390		5.c.
6. Loans to foreign governments and official institutions.....	RIAD4643	0	RIAD4627	0		6.
7. All other loans.....	RIAD4644	0	RIAD4628	55		7.
8. Lease financing receivables:						8.
a. Leases to individuals for household, family, and other personal expenditures.....	RIADF185	0	RIADF187	0		8.a.
b. All other leases.....	RIADC880	0	RIADF188	0		8.b.
9. Total (sum of items 1 through 8).....	RIAD4635	25,704	RIAD4605	8,304		9.
1. Loans to finance commercial real estate, construction, and land development activities (not secured by real estate) included in Schedule RI-B, part I, items 4 and 7, above.....	RIAD5409	0	RIAD5410	0		M.1.
2. Loans secured by real estate to non-U.S. addressees (domicile) (included in Schedule RI-B, part I, item 1, above).....	RIAD4652	0	RIAD4662	0		M.2.
3. Not applicable						M.3.

Dollar amounts in thousands

Memorandum item 4 is to be completed by banks that (1) together with affiliated institutions, have outstanding credit card receivables (as defined in the instructions) that exceed \$500 million as of the report date, or (2) are credit card specialty banks as defined for Uniform Bank Performance Report purposes.

4. Uncollectible retail credit card fees and finance charges reversed against income (i.e., not included in charge-offs against the allowance for loan and lease losses)².....

RIADC388	2,387	M.4.
----------	-------	------

2. Institutions that have adopted ASU 2016-13 should report in Memorandum item 4 uncollectible retail credit card fees and finance charges reversed against income (i.e. not included in charge-offs against the allowance for credit losses on loans and leases).

Schedule RI-B Part II - Changes in Allowances for Credit Losses(Form Type - 031)

Dollar amounts in thousands	(Column A) Loans and Leases Held for Investment		(Column B) Held-to-maturity Debt Securities		(Column C) Available-for-sale Debt Securities	
1. Balance most recently reported for the December 31, 2020, Reports of Condition and Income (i.e., after adjustments from amended Reports of Income).....	RIADB522	1,014,651	RIADJH88	1,618	RIADJH94	1,470
2. Recoveries (column A must equal Part I, item 9, column B, above).....	RIAD4605	8,304	RIADJH89	0	RIADJH95	0
3. LESS: Charge-offs (column A must equal Part I, item 9, column A, above less Schedule RI-B, Part II, item 4, column A).....	RIADC079	25,704	RIADJH92	0	RIADJH98	0
4. LESS: Write-downs arising from transfers of financial assets ³	RIAD5523	0	RIADJJ00	0	RIADJJ01	0
5. Provisions for credit losses ⁴	RIAD4230	-143,963	RIADJH90	-34	RIADJH96	-366
6. Adjustments* (see instructions for this schedule) *.....	RIADC233	-146	RIADJH91	0	RIADJH97	0
7. Balance end of current period (sum of items 1, 2, 5, and 6, less items 3 and 4) (column A must equal Schedule RC, item 4.c).....	RIAD3123	853,142	RIADJH93	1,584	RIADJH99	1,104

Dollar amounts in thousands			
1. Allocated transfer risk reserve included in Schedule RI-B, Part II, item 7, column A, above.....	RIADC435	0	M.1.
<i>Memorandum items 2 and 3 are to be completed by banks that (1) together with affiliated institutions, have outstanding credit card receivables (as defined in the instructions) that exceed \$500 million as of the report date, or (2) are credit card specialty banks as defined for Uniform Bank Performance Report purposes.</i>	RIADC389	0	M.2.
2. Separate valuation allowance for uncollectible retail credit card fees and finance charges.....			
3. Amount of allowance for loan and lease losses attributable to retail credit card fees and finance charges ¹	RIADC390	4,491	M.3.
4. Amount of allowance for post-acquisition credit losses on purchased credit-impaired loans accounted for in accordance with FASB ASC 310-30 (former AICPA Statement of Position 03-3) (included in Schedule RI-B, Part II, item 7, column A, above) ²	RIADC781	NR	M.4.
5. Provisions for credit losses on other financial assets measured at amortized cost (not included in item 5, above) ³ ...	RIADJJ02	0	M.5.
6. Allowance for credit losses on other financial assets measured at amortized cost (not included in item 7, above) ³ ...	RCFDJJ03	1,906	M.6.
7. Provisions for credit losses on off-balance-sheet credit exposures ³	RIADMG93	-83,415	M.7.
8. Estimated amount of expected recoveries of amounts previously written off included within the allowance for credit losses on loans and leases held for investment (included in item 7, column A, "Balance end of current period," above) ³	RIADMG94	88,339	M.8.

3. Institutions that have not yet adopted ASU 2016-13 should report write-downs arising from transfers of loans to a held-for-sale account in item 4, column A.
4. Institutions that have not yet adopted ASU 2016-13 should report the provision for loan and lease losses in item 5, column A and the amount reported must equal Schedule RI, item 4.
- *. Describe on Schedule RI-E - Explanations.
1. Institutions that have adopted ASU 2016-13 should report in Memorandum item 3 the amount of allowance for credit losses on loans and leases attributable to retail credit card fees and finance charges.
2. Memorandum item 4 is to be completed only by institutions that have not yet adopted ASU 2016-13.
3. Memorandum items 5, 6, 7, and 8 are to be completed only by institutions that have adopted ASU 2016-13.
3. Memorandum items 5, 6, 7, and 8 are to be completed only by institutions that have adopted ASU 2016-13.
3. Memorandum items 5, 6, 7, and 8 are to be completed only by institutions that have adopted ASU 2016-13.
3. Memorandum items 5, 6, 7, and 8 are to be completed only by institutions that have adopted ASU 2016-13.

Schedule RI-C Part I - Disaggregated Data on the Allowance for Loan and Lease Losses(Form Type - 031)

Schedule RI-C is to be completed by institutions with \$1 billion or more in total assets.

Dollar amounts in thousands		(Column A) Recorded Investment: Individually Evaluated for Impairment and Determined to be Impaired (ASC 310-10-35)	(Column B) Allowance Balance: Individually Evaluated for Impairment and Determined to be Impaired (ASC 310-10-35)	(Column C) Recorded Investment: Collectively Evaluated for Impairment (ASC 450-20)	(Column D) Allowance Balance: Collectively Evaluated for Impairment (ASC 450-20)	(Column E) Recorded Investment: Purchased Credit-Impaired Loans (ASC 310-30)	(Column F) Allowance Balance: Purchased Credit-Impaired Loans (ASC 310-30)	
1. Real estate loans:								1.
a. Construction loans.....	RCFDM708 NR	RCFDM709 NR	RCFDM710 NR	RCFDM711 NR	RCFDM712 NR	RCFDM713 NR		1.a.
b. Commercial real estate loans.....	RCFDM714 NR	RCFDM715 NR	RCFDM716 NR	RCFDM717 NR	RCFDM719 NR	RCFDM720 NR		1.b.
c. Residential real estate loans.....	RCFDM721 NR	RCFDM722 NR	RCFDM723 NR	RCFDM724 NR	RCFDM725 NR	RCFDM726 NR		1.c.
2. Commercial loans ³	RCFDM727 NR	RCFDM728 NR	RCFDM729 NR	RCFDM730 NR	RCFDM731 NR	RCFDM732 NR		2.
3. Credit cards.....	RCFDM733 NR	RCFDM734 NR	RCFDM735 NR	RCFDM736 NR	RCFDM737 NR	RCFDM738 NR		3.
4. Other consumer loans.....	RCFDM739 NR	RCFDM740 NR	RCFDM741 NR	RCFDM742 NR	RCFDM743 NR	RCFDM744 NR		4.
5. Unallocated, if any.....				RCFDM745 NR				5.
6. Total (for each column, sum of items 1.a through 5) ⁴	RCFDM746 NR	RCFDM747 NR	RCFDM748 NR	RCFDM749 NR	RCFDM750 NR	RCFDM751 NR		6.

3. Include all loans and leases not reported as real estate loans, credit cards, or other consumer loans in items 1, 3, or 4 of Schedule RI-C.

4. The sum of item 6, columns B, D, and F, must equal Schedule RC, item 4.c. Item 6, column E, must equal Schedule RC-C, Part I, Memorandum item 7.b. Item 6, column F, must equal Schedule RI-B, Part II, Memorandum item 4.

Schedule RI-C Part II - Disaggregated Data on the Allowances for Credit Losses(Form Type - 031)

Dollar amounts in thousands		(Column A) Amortized Cost	(Column B) Allowance Balance	
1. Real estate loans:				1.
a. Construction loans.....	RCFDJJ04	1,952,292	RCFDJJ12	4,170 1.a.
b. Commercial real estate loans.....	RCFDJJ05	8,106,802	RCFDJJ13	108,230 1.b.
c. Residential real estate loans.....	RCFDJJ06	19,132,453	RCFDJJ14	11,327 1.c.
2. Commercial loans ³	RCFDJJ07	31,436,622	RCFDJJ15	558,000 2.
3. Credit cards.....	RCFDJJ08	937,396	RCFDJJ16	144,004 3.
4. Other consumer loans.....	RCFDJJ09	301,231	RCFDJJ17	27,410 4.
5. Unallocated, if any.....			RCFDJJ18	0 5.
6. Total (sum of items 1.a. through 5) ⁴	RCFDJJ11	61,866,796	RCFDJJ19	853,141 6.

Dollar amounts in thousands				
7. Securities issued by states and political subdivisions in the U.S.....	RCFDJJ20		1	7.
8. Mortgage-backed securities (MBS) (including CMOs, REMICs, and stripped MBS).....	RCFDJJ21		1,583	8.
9. Asset-backed securities and structured financial products.....	RCFDJJ23		0	9.
10. Other debt securities.....	RCFDJJ24		0	10.
11. Total (sum of items 7 through 10) ⁵	RCFDJJ25		1,584	11.

Schedule RI-D - Income from Foreign Offices(Form Type - 031)

For all banks with foreign offices (including Edge or Agreement subsidiaries and IBFs) and total foreign office assets of \$10 billion or more where foreign office revenues, assets, or net income exceed 10 percent of consolidated total revenues, total assets, or net income.

Dollar amounts in thousands				
1. Total interest income in foreign offices.....	RIADC899		0	1.
2. Total interest expense in foreign offices.....	RIADC900		0	2.
3. Provision for loan and lease losses in foreign offices ¹	RIADKW02		0	3.
4. Noninterest income in foreign offices:				4.
a. Trading revenue.....	RIADC902		0	4.a.
b. Investment banking, advisory, brokerage, and underwriting fees and commissions.....	RIADC903		0	4.b.
c. Net securitization income.....	RIADC904		0	4.c.
d. Other noninterest income.....	RIADC905		0	4.d.
5. Realized gains (losses) on held-to-maturity and available-for-sale debt securities and change in net unrealized holding gains (losses) on equity securities not held for trading in foreign offices.....	RIADJA28		0	5.
6. Total noninterest expense in foreign offices.....	RIADC907		0	6.
7. Adjustments to pretax income in foreign offices for internal allocations to foreign offices to reflect the effects of equity capital on overall bank funding costs.....	RIADC908		0	7.
8. Applicable income taxes (on items 1 through 7).....	RIADC909		0	8.
9. Discontinued operations, net of applicable income taxes, in foreign offices.....	RIADGW64		0	9.
10. Net income attributable to foreign offices before internal allocations of income and expense (item 1 plus or minus items 2 through 9).....	RIADC911		0	10.
11. Not applicable				11.
12. Eliminations arising from the consolidation of foreign offices with domestic offices.....	RIADC913		0	12.
13. Consolidated net income attributable to foreign offices (sum of items 10 and 12).....	RIADC914		0	13.

3. Include all loans and leases not reported as real estate loans, credit cards, or other consumer loans in item 1, 3, or 4 of Schedule RI-C, Part II.
4. Item 6, column B must equal schedule RC, item 4.c.
5. Item 11 must equal Schedule RI-B, Part II, item 7, column B.
1. Institutions that have adopted ASU 2016-13 should report the provisions for credit losses in foreign offices for all financial assets and off-balance-sheet credit exposures that fall within the scope of the standard in item 3.

Schedule RI-E - Explanations (Form Type - 031)

Schedule RI-E is to be completed each quarter on a calendar year-to-date basis.

Detail all adjustments in Schedule RI-A and RI-B, all extraordinary items and other adjustments in Schedule RI, and all significant items of other noninterest income and other noninterest expense in Schedule RI. (See instructions for details.)

Dollar amounts in thousands

1. Other noninterest income (from Schedule RI, item 5.i) Itemize and describe amounts greater than \$100,000 that exceed 7 percent of Schedule RI, item 5.i:			1.
a. Income and fees from the printing and sale of checks.....	RIADC013	0	1.a.
b. Earnings on/increase in value of cash surrender value of life insurance.....	RIADC014	0	1.b.
c. Income and fees from automated teller machines (ATMs).....	RIADC016	0	1.c.
d. Rent and other income from other real estate owned.....	RIAD4042	0	1.d.
e. Safe deposit box rent.....	RIADC015	0	1.e.
f. Bank card and credit card interchange fees.....	RIADF555	15,289	1.f.
g. Income and fees from wire transfers.....	RIADT047	33,909	1.g.
h. Disclose component and the dollar amount of that component:			1.h.
1. Describe component.....	TEXT4461	Click here for value	1.h.1.
2. Amount of component.....	RIAD4461	54,484	1.h.2.
i. Disclose component and the dollar amount of that component:			1.i.
1. Describe component.....	TEXT4462	Click here for value	1.i.1.
2. Amount of component.....	RIAD4462	42,071	1.i.2.
j. Disclose component and the dollar amount of that component:			1.j.
1. Describe component.....	TEXT4463	Click here for value	1.j.1.
2. Amount of component.....	RIAD4463	22,840	1.j.2.
2. Other noninterest expense (from Schedule RI, item 7.d) Itemize and describe amounts greater than \$100,000 that exceed 7 percent of Schedule RI, item 7.d:			2.
a. Data processing expenses.....	RIADC017	0	2.a.
b. Advertising and marketing expenses.....	RIAD0497	0	2.b.
c. Directors' fees.....	RIAD4136	0	2.c.
d. Printing, stationery, and supplies.....	RIADC018	0	2.d.
e. Postage.....	RIAD8403	0	2.e.
f. Legal fees and expenses.....	RIAD4141	0	2.f.
g. FDIC deposit insurance assessments.....	RIAD4146	CONF	2.g.
h. Accounting and auditing expenses.....	RIADF556	0	2.h.
i. Consulting and advisory expenses.....	RIADF557	0	2.i.
j. Automated teller machine (ATM) and interchange expenses.....	RIADF558	0	2.j.
k. Telecommunications expenses.....	RIADF559	0	2.k.
l. Other real estate owned expenses.....	RIADY923	0	2.l.
m. Insurance expenses (not included in employee expenses, premises and fixed asset expenses, and other real estate owned expenses).....	RIADY924	0	2.m.
n. Disclose component and the dollar amount of that component:			2.n.
1. Describe component.....	TEXT4464	Click here for value	2.n.1.
2. Amount of component.....	RIAD4464	359,541	2.n.2.
o. Disclose component and the dollar amount of that component:			2.o.
1. Describe component.....	TEXT4467	NR	2.o.1.
2. Amount of component.....	RIAD4467	0	2.o.2.
p. Disclose component and the dollar amount of that component:			2.p.
1. Describe component.....	TEXT4468	NR	2.p.1.
2. Amount of component.....	RIAD4468	0	2.p.2.
3. Discontinued operations and applicable income tax effect (from Schedule RI, item 11) (itemize and describe each discontinued operation):			3.
a. Disclose component, the gross dollar amount of that component, and its related income tax:			3.a.
1. Describe component.....	TEXTFT29	NR	3.a.1.
2. Amount of component.....	RIADFT29	0	3.a.2.

Dollar amounts in thousands

3. Applicable income tax effect.....	RIADFT30	0	3.a.3.
b. Disclose component, the gross dollar amount of that component, and its related income tax:			3.b.
1. Describe component.....	TEXTFT31	NR	3.b.1.
2. Amount of component.....	RIADFT31	0	3.b.2.
3. Applicable income tax effect.....	RIADFT32	0	3.b.3.
4. Cumulative effect of changes in accounting principles and corrections of material accounting errors (from Schedule RI-A, item 2) (itemize and describe all such effects):			4.
a. Effect of adoption of Current Expected Credit Losses Methodology - ASU 2016-13 ¹	RIADJJ26	NR	4.a.
b. Effect of adoption of lease accounting standard - ASC Topic 842.....	RIADKW17	NR	4.b.
c. Disclose component and the dollar amount of that component:			4.c.
1. Describe component.....	TEXTB526	NR	4.c.1.
2. Amount of component.....	RIADB526	0	4.c.2.
d. Disclose component and the dollar amount of that component:			4.d.
1. Describe component.....	TEXTB527	NR	4.d.1.
2. Amount of component.....	RIADB527	0	4.d.2.
5. Other transactions with stockholders (including a parent holding company) (from Schedule RI-A, item 11) (itemize and describe all such transactions):			5.
a. Disclose component and the dollar amount of that component:			5.a.
1. Describe component.....	TEXT4498	Click here for value	5.a.1.
2. Amount of component.....	RIAD4498	-46,106	5.a.2.
b. Disclose component and the dollar amount of that component:			5.b.
1. Describe component.....	TEXT4499	Click here for value	5.b.1.
2. Amount of component.....	RIAD4499	-29,355	5.b.2.
6. Adjustments to allowances for credit losses (from Schedule RI-B, part II, item 6) (itemize and describe all adjustments): ³			6.
a. Initial allowances for credit losses recognized upon the acquisition of purchased credit-deteriorated assets on or after the effective date of ASU 2016-13 ¹	RIADJJ27	NR	6.a.
b. Effect of adoption of current expected credit losses methodology on allowances for credit losses ¹	RIADJJ28	NR	6.b.
c. Disclose component and the dollar amount of that component:			6.c.
1. Describe component.....	TEXT4521	Click here for value	6.c.1.
2. Amount of component.....	RIAD4521	-146	6.c.2.
d. Disclose component and the dollar amount of that component:			6.d.
1. Describe component.....	TEXT4522	NR	6.d.1.
2. Amount of component.....	RIAD4522	0	6.d.2.
7. Other explanations (the space below is provided for the bank to briefly describe, at its option, any other significant items affecting the Report of Income):			7.
a. Comments?.....	RIAD4769	Yes	7.a.
b. Other explanations.....	TEXT4769	Click here for value	7.b.

(TEXT4461) Income from Affiliates

(TEXT4462) Commitment facility line fees

(TEXT4463) Fee income syndication fees

(TEXT4464) Operating expenses paid to Affiliates

(TEXT4498) Employee Benefit Plan

- Only institutions that have adopted ASU 2016-13 should report amounts in items 4.a, 6.a and 6.b, if applicable.
- Institutions that have not adopted ASU 2016-13 should report the allowance for loan and lease losses in item 6, where applicable.
- Only institutions that have adopted ASU 2016-13 should report amounts in items 4.a, 6.a and 6.b, if applicable.
- Only institutions that have adopted ASU 2016-13 should report amounts in items 4.a, 6.a and 6.b, if applicable.

(TEXT4499) Dissolution of Entity

(TEXT4521) Foreign Currency Translation

(TEXT4769) Fee income on letters of credit \$18,340

Schedule RC - Balance Sheet(Form Type - 031)

All schedules are to be reported in thousands of dollars. Unless otherwise indicated, report the amount outstanding as of the last business day of the quarter.

Dollar amounts in thousands

1. Cash and balances due from depository institutions (from Schedule RC-A):			1.
a. Noninterest-bearing balances and currency and coin ¹	RCFD0081	1,446,832	1.a.
b. Interest-bearing balances ²	RCFD0071	53,472,088	1.b.
2. Securities:			2.
a. Held-to-maturity securities (from Schedule RC-B, column A) ³	RCFDJJ34	7,836,444	2.a.
b. Available-for-sale debt securities (from Schedule RC-B, column D)	RCFD1773	34,659,100	2.b.
c. Equity securities with readily determinable fair values not held for trading ⁴	RCFDJA22	137,959	2.c.
3. Federal funds sold and securities purchased under agreements to resell:			3.
a. Federal funds sold in domestic offices	RCONB987	0	3.a.
b. Securities purchased under agreements to resell ⁵	RCFDB989	3,760,302	3.b.
4. Loans and lease financing receivables (from Schedule RC-C):			4.
a. Loans and leases held for sale	RCFD5369	351,396	4.a.
b. Loans and leases held for investment	RCFDB528	61,866,797	4.b.
c. LESS: Allowance for loan and lease losses ⁷	RCFD3123	853,142	4.c.
d. Loans and leases held for investment, net of allowance (item 4.b minus 4.c)	RCFDB529	61,013,655	4.d.
5. Trading assets (from Schedule RC-D)	RCFD3545	25,821,313	5.
6. Premises and fixed assets (including capitalized leases)	RCFD2145	633,358	6.
7. Other real estate owned (from Schedule RC-M)	RCFD2150	2,459	7.
8. Investments in unconsolidated subsidiaries and associated companies	RCFD2130	13,103	8.
9. Direct and indirect investments in real estate ventures	RCFD3656	1	9.
10. Intangible assets (from Schedule RC-M)	RCFD2143	475,326	10.
11. Other assets (from Schedule RC-F) ⁶	RCFD2160	5,288,254	11.
12. Total assets (sum of items 1 through 11)	RCFD2170	194,911,590	12.
13. Deposits:			13.
a. In domestic offices (sum of totals of columns A and C from Schedule RC-E, part I)	RCON2200	154,567,806	13.a.
1. Noninterest-bearing ⁸	RCON6631	36,875,936	13.a.1.
2. Interest-bearing	RCON6636	117,691,870	13.a.2.
b. In foreign offices, Edge and Agreement subsidiaries, and IBFs (from Schedule RC-E, part II)	RCFN2200	7,198,483	13.b.
1. Noninterest-bearing	RCFN6631	0	13.b.1.
2. Interest-bearing	RCFN6636	7,198,483	13.b.2.
14. Federal funds purchased and securities sold under agreements to repurchase:			14.
a. Federal funds purchased in domestic offices ⁹	RCONB993	0	14.a.
b. Securities sold under agreements to repurchase ¹⁰	RCFDB995	1,723,513	14.b.
15. Trading liabilities (from Schedule RC-D)	RCFD3548	2,319,561	15.
16. Other borrowed money (includes mortgage indebtedness and obligations under capitalized leases) (from Schedule RC-M)	RCFD3190	3,571,219	16.
17. Not applicable			17.
18. Not applicable			18.
19. Subordinated notes and debentures ¹	RCFD3200	1,632,967	19.

- Includes cash items in process of collection and unposted debits.
- Includes time certificates of deposit not held for trading.
- Institutions that have adopted ASU 2016-13 should report in item 2.a, amounts net of any applicable allowance for credit losses, and should equal to Schedule RC-B, item 8, column A less Schedule RI-B, Part II, item 7, column B.
- Item 2.c is to be completed by all institutions. See the instructions for this item and the Glossary entry for "Securities Activities" for further detail on accounting for investments in equity securities.
- Includes all securities resale agreements, regardless of maturity.
- Institutions that have adopted ASU 2016-13 should report in item 4.c the allowance for credit losses on loans and leases.
- Institutions that have adopted ASU 2016-13 should report in items 3.b and 11 amounts net of any applicable allowance for credit losses.
- Includes noninterest-bearing demand, time, and savings deposits.
- Report overnight Federal Home Loan Bank advances in Schedule RC, item 16, "Other borrowed money."
- Includes all securities repurchase agreements, regardless of maturity.
- Includes limited-life preferred stock and related surplus.

Dollar amounts in thousands

20. Other liabilities (from Schedule RC-G).....	RCFD2930	2,441,576	20.
21. Total liabilities (sum of items 13 through 20).....	RCFD2948	173,455,125	21.
22. Not applicable			22.
23. Perpetual preferred stock and related surplus.....	RCFD3838	2,500,000	23.
24. Common stock.....	RCFD3230	2,001	24.
25. Surplus (exclude all surplus related to preferred stock).....	RCFD3839	16,038,524	25.
26. Not available			26.
a. Retained earnings.....	RCFD3632	2,871,323	26.a.
b. Accumulated other comprehensive income ²	RCFDB530	44,549	26.b.
c. Other equity capital components ³	RCFDA130	0	26.c.
27. Not available			27.
a. Total bank equity capital (sum of items 23 through 26.c).....	RCFD3210	21,456,397	27.a.
b. Noncontrolling (minority) interests in consolidated subsidiaries.....	RCFD3000	68	27.b.
28. Total equity capital (sum of items 27.a and 27.b).....	RCFDG105	21,456,465	28.
29. Total liabilities and equity capital (sum of items 21 and 28).....	RCFD3300	194,911,590	29.
1. Indicate in the box at the right the number of the statement below that best describes the most comprehensive level of auditing work performed for the bank by independent external auditors as of any date during 2020.....	RCFD6724	2a	M.1.
2. Bank's fiscal year-end date (report the date in MMDD format).....	RCON8678	1231	M.2.

Schedule RC-A - Cash and Balances Due From Depository Institutions(Form Type - 031)

Exclude assets held for trading.

Dollar amounts in thousands

	(Column A) Consolidated Bank		(Column B) Domestic Offices		
1. Cash items in process of collection, unposted debits, and currency and coin.....	RCFD0022	637,692			1.
a. Cash items in process of collection and unposted debits.....			RCON0020	317,018	1.a.
b. Currency and coin.....			RCON0080	320,674	1.b.
2. Balances due from depository institutions in the U.S.....	RCFD0082	54,362	RCON0082	54,362	2.
3. Balances due from banks in foreign countries and foreign central banks.....	RCFD0070	875,671	RCON0070	875,512	3.
4. Balances due from Federal Reserve Banks.....	RCFD0090	53,351,194	RCON0090	53,351,194	4.
5. Total.....	RCFD0010	54,918,919	RCON0010	54,918,760	5.

2. Includes, but is not limited to, net unrealized holding gains (losses) on available-for-sale securities, accumulated net gains (losses) on cash flow hedges, cumulative foreign currency translation adjustments, and accumulated defined benefit pension and other postretirement plan adjustments.
3. Includes treasury stock and unearned Employee Stock Ownership Plan shares.

Schedule RC-B - Securities(Form Type - 031)

Exclude assets held for trading.

Dollar amounts in thousands	(Column A) Held-to-maturity Amortized Cost	(Column B) Held-to-maturity Fair Value	(Column C) Available-for-sale Amortized Cost	(Column D) Available-for-sale Fair Value	
1. U.S. Treasury securities.....	RCFD0211	0	RCFD0213	0	RCFD1286 13,573,778 RCFD1287 13,689,884 1.
2. U.S. Government agency and sponsored agency obligations (exclude mortgage-backed securities) ¹	RCFDHT50	0	RCFDHT51	0	RCFDHT52 1,590,730 RCFDHT53 1,618,662 2.
3. Securities issued by states and political subdivisions in the U.S.....	RCFD8496	7,818	RCFD8497	8,342	RCFD8498 0 RCFD8499 0 3.
4. Mortgage-backed securities (MBS):					4.
a. Residential mortgage pass-through securities:					4.a.
1. Guaranteed by GNMA.....	RCFDG300	1,673,795	RCFDG301	1,731,513	RCFDG302 5,716,490 RCFDG303 5,755,438 4.a.1.
2. Issued by FNMA and FHLMC.....	RCFDG304	1,001,368	RCFDG305	1,040,822	RCFDG306 6,699,765 RCFDG307 6,749,719 4.a.2.
3. Other pass-through securities.....	RCFDG308	0	RCFDG309	0	RCFDG310 119 RCFDG311 118 4.a.3.
b. Other residential mortgage-backed securities (include CMOs, REMICs, and stripped MBS):					4.b.
1. Issued or guaranteed by U.S. Government agencies or sponsored agencies ¹	RCFDG312	4,289,048	RCFDG313	4,478,763	RCFDG314 3,563,484 RCFDG315 3,527,714 4.b.1.
2. Collateralized by MBS issued or guaranteed by U.S. Government agencies or sponsored agencies ¹	RCFDG316	0	RCFDG317	0	RCFDG318 0 RCFDG319 0 4.b.2.
3. All other residential MBS.....	RCFDG320	1,575	RCFDG321	1,681	RCFDG322 0 RCFDG323 0 4.b.3.
c. Commercial MBS:					4.c.
1. Commercial mortgage pass-through securities:					4.c.1.
a. Issued or guaranteed by FNMA, FHLMC, or GNMA.....	RCFDK142	0	RCFDK143	0	RCFDK144 0 RCFDK145 0 4.c.1a.
b. Other pass-through securities.....	RCFDK146	0	RCFDK147	0	RCFDK148 0 RCFDK149 0 4.c.1b.
2. Other commercial MBS:					4.c.2.
a. Issued or guaranteed by U.S. Government agencies or sponsored agencies ¹	RCFDK150	864,424	RCFDK151	904,219	RCFDK152 165,059 RCFDK153 166,622 4.c.2a.
b. All other commercial MBS.....	RCFDK154	0	RCFDK155	0	RCFDK156 0 RCFDK157 0 4.c.2b.
5. Asset-backed securities and structured financial products:					5.
a. Asset-backed securities (ABS).....	RCFDC026	0	RCFDC988	0	RCFDC989 133,903 RCFDC027 129,765 5.a.
b. Structured financial products.....	RCFDHT58	0	RCFDHT59	0	RCFDHT60 0 RCFDHT61 0 5.b.
6. Other debt securities:					6.
a. Other domestic debt securities.....	RCFD1737	0	RCFD1738	0	RCFD1739 0 RCFD1741 0 6.a.
b. Other foreign debt securities.....	RCFD1742	0	RCFD1743	0	RCFD1744 3,017,398 RCFD1746 3,021,178 6.b.
7. Not applicable.					7.
8. Total (sum of items 1 through 6.b) ²	RCFD1754	7,838,028	RCFD1771	8,165,340	RCFD1772 34,460,726 RCFD1773 34,659,100 8.

Dollar amounts in thousands

1. Pledged securities ¹	RCFD0416	9,697,919	M.1.
2. Maturity and repricing data for debt securities (excluding those in nonaccrual status): ¹			M.2.
a. Securities issued by the U.S. Treasury, U.S. Government agencies, and states and political subdivisions in the U.S.; other non-mortgage debt securities; and mortgage pass-through securities other than those backed by closed-end first lien 1-4 family residential mortgages with a remaining maturity or next repricing date of: ²			M.2.a.
1. Three months or less.....	RCFDA549	1,687,977	M.2.a.1.
2. Over three months through 12 months.....	RCFDA550	1,639,051	M.2.a.2.
3. Over one year through three years.....	RCFDA551	2,119,465	M.2.a.3.
4. Over three years through five years.....	RCFDA552	2,891,229	M.2.a.4.
5. Over five years through 15 years.....	RCFDA553	6,382,448	M.2.a.5.
6. Over 15 years.....	RCFDA554	3,747,136	M.2.a.6.
b. Mortgage pass-through securities backed by closed-end first lien 1-4 family residential mortgages with a remaining maturity or next repricing date of: ²			M.2.b.
1. Three months or less.....	RCFDA555	18,033	M.2.b.1.
2. Over three months through 12 months.....	RCFDA556	52,468	M.2.b.2.
3. Over one year through three years.....	RCFDA557	139,935	M.2.b.3.
4. Over three years through five years.....	RCFDA558	542,289	M.2.b.4.
5. Over five years through 15 years.....	RCFDA559	4,148,141	M.2.b.5.
6. Over 15 years.....	RCFDA560	10,279,572	M.2.b.6.
c. Other mortgage-backed securities (include CMOs, REMICs, and stripped MBS; exclude mortgage pass-through securities) with an expected average life of: ⁵			M.2.c.
1. Three years or less.....	RCFDA561	3,148,823	M.2.c.1.
2. Over three years.....	RCFDA562	5,700,561	M.2.c.2.
d. Debt securities with a REMAINING MATURITY of one year or less (included in Memorandum items 2.a through 2.c above).....	RCFDA248	3,400,772	M.2.d.
<i>Memorandum item 3 is to be completed semiannually in the June and December reports only.</i>			
3. Amortized cost of held-to-maturity securities sold or transferred to available-for-sale or trading securities during the calendar year-to-date (report the amortized cost at date of sale or transfer).....	RCFD1778	NR	M.3.
4. Structured notes (included in the held-to-maturity and available-for-sale accounts in Schedule RC-B, items 2, 3, 5, and 6):			M.4.
a. Amortized cost.....	RCFD8782	0	M.4.a.
b. Fair value.....	RCFD8783	0	M.4.b.

- Includes Small Business Administration "Guaranteed Loan Pool Certificates"; U.S. Maritime Administration obligations; Export-Import Bank participation certificates; and obligations (other than mortgage-backed securities) issued by the Farm Credit System, the Federal Home Loan Bank System, the Federal Home Loan Mortgage Corporation, the Federal National Mortgage Association, the Financing Corporation, Resolution Funding Corporation, the Student Loan Marketing Association, and the Tennessee Valley Authority.
- U.S. Government agencies include, but are not limited to, such agencies as the Government National Mortgage Association (GNMA), the Federal Deposit Insurance Corporation (FDIC), and the National Credit Union Administration (NCUA). U.S. Government-sponsored agencies include, but are not limited to, such agencies as the Federal Home Loan Mortgage Corporation (FHLMC) and the Federal National Mortgage Association (FNMA).
- U.S. Government agencies include, but are not limited to, such agencies as the Government National Mortgage Association (GNMA), the Federal Deposit Insurance Corporation (FDIC), and the National Credit Union Administration (NCUA). U.S. Government-sponsored agencies include, but are not limited to, such agencies as the Federal Home Loan Mortgage Corporation (FHLMC) and the Federal National Mortgage Association (FNMA).
- For institutions that have adopted ASU 2016-13, the total reported in column A must equal Schedule RC, item 2.a, plus Schedule RI-B, Part II, item 7, column B. For institutions that have not adopted ASU 2016-13, the total reported in column A must equal Schedule RC, item 2.a. For all institutions, the total reported in column D must equal Schedule RC, item 2.b.

Dollar amounts in thousands		(Column A) Held-to-maturity Amortized Cost		(Column B) Held-to-maturity Fair Value		(Column C) Available-for-sale Amortized Cost		(Column D) Available-for-sale Fair Value	
Memorandum items 5.a through 5.f and 6.a through 6.g are to be completed by banks with \$10 billion or more in total assets.									
5. Asset-backed securities (ABS) (for each column, sum of Memorandum items 5.a through 5.f must equal Schedule RC-B, item 5.a). ¹									M.5.
a. Credit card receivables.....	RCFDB838	0	RCFDB839	0	RCFDB840	0	RCFDB841	0	M5a.
b. Home equity lines.....	RCFDB842	0	RCFDB843	0	RCFDB844	25,948	RCFDB845	24,891	M5b.
c. Automobile loans.....	RCFDB846	0	RCFDB847	0	RCFDB848	0	RCFDB849	0	M5c.
d. Other consumer loans.....	RCFDB850	0	RCFDB851	0	RCFDB852	0	RCFDB853	0	M5d.
e. Commercial and industrial loans.....	RCFDB854	0	RCFDB855	0	RCFDB856	0	RCFDB857	0	M5e.
f. Other.....	RCFDB858	0	RCFDB859	0	RCFDB860	107,955	RCFDB861	104,874	M5.f.
6. Structured financial products by underlying collateral or reference assets (for each column, sum of Memorandum items 6.a through 6.g must equal Schedule RC-B item 5.b):									M.6.
a. Trust preferred securities issued by financial institutions.....	RCFDG348	0	RCFDG349	0	RCFDG350	0	RCFDG351	0	M6a.
b. Trust preferred securities issued by real estate investment trusts.....	RCFDG352	0	RCFDG353	0	RCFDG354	0	RCFDG355	0	M6b.
c. Corporate and similar loans.....	RCFDG356	0	RCFDG357	0	RCFDG358	0	RCFDG359	0	M6c.
d. 1-4 family residential MBS issued or guaranteed by U.S. government-sponsored enterprises (GSEs).....	RCFDG360	0	RCFDG361	0	RCFDG362	0	RCFDG363	0	M6d.
e. 1-4 family residential MBS not issued or guaranteed by GSEs.....	RCFDG364	0	RCFDG365	0	RCFDG366	0	RCFDG367	0	M6e.
f. Diversified (mixed) pools of structured financial products.....	RCFDG368	0	RCFDG369	0	RCFDG370	0	RCFDG371	0	M6.f.
g. Other collateral or reference assets.....	RCFDG372	0	RCFDG373	0	RCFDG374	0	RCFDG375	0	M6g.

- Includes held-to-maturity securities at amortized cost, available-for-sale debt securities at fair value, and equity securities with readily determinable fair values not held for trading (reported in Schedule RC, item 2.c) at fair value.
- Includes held-to-maturity securities at amortized cost, available-for-sale debt securities at fair value, and equity securities with readily determinable fair values not held for trading (reported in Schedule RC, item 2.c) at fair value.
- Report fixed-rate debt securities by remaining maturity and floating-rate debt securities by next repricing date.
- Report fixed-rate debt securities by remaining maturity and floating-rate debt securities by next repricing date.
- Sum of Memorandum items 2.c.(1) and 2.c.(2) plus any nonaccrual "Other mortgage-backed securities" included in Schedule RC-N, item 10, column C, must equal Schedule RC-B, sum of items 4.b and 4.c.(2), columns A and D.
- The \$10 billion asset size test is based on the total assets reported on the June 30, 2018, Report of Condition.

Schedule RC-C Part I - Loans and Leases(Form Type - 031)

Do not deduct the allowance for loan and lease losses or the allocated transfer risk reserve from amounts reported in this schedule. Report (1) loans and leases held for sale at the lower of cost or fair value, (2) loans and leases held for investment, net of unearned income, and (3) loans and leases accounted for at fair value under a fair value option. Exclude assets held for trading and commercial paper.

Dollar amounts in thousands		(Column A) Consolidated Bank		(Column B) Domestic Offices	
1. Loans secured by real estate ²	RCFD1410	NR			1.
a. Construction, land development, and other land loans:					1.a.
1. 1-4 family residential construction loans	RCFDF158	0	RCONF158	0	1.a.1.
2. Other construction loans and all land development and other land loans	RCFDF159	1,952,293	RCONF159	1,952,293	1.a.2.
b. Secured by farmland (including farm residential and other improvements)	RCFD1420	0	RCON1420	0	1.b.
c. Secured by 1-4 family residential properties:					1.c.
1. Revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit	RCFD1797	663,692	RCON1797	663,692	1.c.1.
2. Closed-end loans secured by 1-4 family residential properties:					1.c.2.
a. Secured by first liens	RCFD5367	18,528,633	RCON5367	18,528,633	1.c.2.a.
b. Secured by junior liens	RCFD5368	34,907	RCON5368	34,907	1.c.2.b.
d. Secured by multifamily (5 or more) residential properties	RCFD1460	3,015,127	RCON1460	3,015,127	1.d.
e. Secured by nonfarm nonresidential properties:					1.e.
1. Loans secured by owner-occupied nonfarm nonresidential properties	RCFDF160	507,671	RCONF160	507,671	1.e.1.
2. Loans secured by other nonfarm nonresidential properties	RCFDF161	4,584,004	RCONF161	4,584,004	1.e.2.
2. Loans to depository institutions and acceptances of other banks:					2.
a. To commercial banks in the U.S.			RCONB531	17,089	2.a.
1. To U.S. branches and agencies of foreign banks	RCFDB532	8,305			2.a.1.
2. To other commercial banks in the U.S.	RCFDB533	8,784			2.a.2.
b. To other depository institutions in the U.S.	RCFDB534	5	RCONB534	5	2.b.
c. To banks in foreign countries:			RCONB535	77,594	2.c.
1. To foreign branches of other U.S. banks	RCFDB536	0			2.c.1.
2. To other banks in foreign countries	RCFDB537	77,594			2.c.2.
3. Loans to finance agricultural production and other loans to farmers	RCFD1590	45,250	RCON1590	45,250	3.
4. Commercial and industrial loans:					4.
a. To U.S. addressees (domicile)	RCFD1763	18,318,981	RCON1763	18,318,981	4.a.
b. To non-U.S. addressees (domicile)	RCFD1764	4,048,422	RCON1764	4,048,422	4.b.
5. Not applicable					5.
6. Loans to individuals for household, family, and other personal expenditures (i.e., consumer loans) (includes purchased paper):					6.
a. Credit cards	RCFDB538	937,396	RCONB538	937,396	6.a.
b. Other revolving credit plans	RCFDB539	71,893	RCONB539	71,893	6.b.
c. Automobile loans	RCFDK137	0	RCONK137	0	6.c.
d. Other consumer loans (includes single payment and installment loans other than automobile loans, and all student loans)	RCFDK207	229,338	RCONK207	229,338	6.d.
7. Loans to foreign governments and official institutions (including foreign central banks)	RCFD2081	734,987	RCON2081	734,987	7.
8. Obligations (other than securities and leases) of states and political subdivisions in the U.S.	RCFD2107	0	RCON2107	0	8.
9. Loans to nondepository financial institutions and other loans:	RCFD1563	8,450,912			9.
a. Loans to nondepository financial institutions			RCONJ454	7,989,932	9.a.
b. Other loans:					9.b.
1. Loans for purchasing or carrying securities (secured and unsecured)			RCON1545	4,015	9.b.1.
2. All other loans (exclude consumer loans)			RCONJ451	456,964	9.b.2.
10. Lease financing receivables (net of unearned income)			RCON2165	0	10.
a. Leases to individuals for household, family, and other personal expenditures (i.e., consumer leases)	RCFDF162	0			10.a.
b. All other leases	RCFDF163	0			10.b.
11. LESS: Any unearned income on loans reflected in items 1-9 above	RCFD2123	0	RCON2123	0	11.
12. Total loans and leases held for investment and held for sale (item 12, column A must equal Schedule RC, sum of items 4.a and 4.b)	RCFD2122	62,218,194	RCON2122	62,218,193	12.

2. When reporting "Loans secured by real estate," "large institutions" and "highly complex institutions," as defined for deposit insurance assessment purposes in FDIC regulations, should complete items 1.a.(1) through 1.e.(2) in columns A and B (but not item 1 in column A); all other institutions should complete item 1 in column A and items 1.a.(1) through 1.e.(2) in column B (but not items 1.a.(1) through 1.e.(2) in column A).

Dollar amounts in thousands

1. Loans restructured in troubled debt restructurings that are in compliance with their modified terms (included in Schedule RC-C, part 1, and not reported as past due or nonaccrual in Schedule RC-N, Memorandum item 1):			M.1.
a. Construction, land development, and other land loans in domestic offices:			M.1.a.
1. 1-4 family residential construction loans.....	RCONK158	0	M.1.a.1.
2. Other construction loans and all land development and other land loans.....	RCONK159	0	M.1.a.2.
b. Loans secured by 1-4 family residential properties in domestic offices.....	RCONF576	464,295	M.1.b.
c. Secured by multifamily (5 or more) residential properties in domestic offices.....	RCONK160	0	M.1.c.
d. Secured by nonfarm nonresidential properties in domestic offices:			M.1.d.
1. Loans secured by owner-occupied nonfarm nonresidential properties.....	RCONK161	0	M.1.d.1.
2. Loans secured by other nonfarm nonresidential properties.....	RCONK162	0	M.1.d.2.
e. Commercial and industrial loans:			M.1.e.
1. To U.S. addressees (domicile).....	RCFDK163	16,977	M.1.e.1.
2. To non-U.S. addressees (domicile).....	RCFDK164	0	M.1.e.2.
f. All other loans (include loans to individuals for household, family, and other personal expenditures).....	RCFDK165	4,491	M.1.f.
Itemize loan categories included in Memorandum item 1.f, above that exceed 10 percent of total loans restructured in troubled debt restructurings that are in compliance with their modified terms (sum of Memorandum items 1.a through 1.f):			
1. Loans secured by farmland in domestic offices.....	RCONK166	0	M.1.f.1.
2. Not applicable			M.1.f.2.
3. Loans to finance agricultural production and other loans to farmers.....	RCFDK168	0	M.1.f.3.
4. Loans to individuals for household, family, and other personal expenditures:			M.1.f.4.
a. Credit cards.....	RCFDK098	0	M.1.f.4.a.
b. Automobile loans.....	RCFDK203	0	M.1.f.4.b.
c. Other (includes revolving credit plans other than credit cards and other consumer loans).....	RCFDK204	0	M.1.f.4.c.
g. Total loans restructured in troubled debt restructurings that are in compliance with their modified terms (sum of Memorandum items 1.a.(1) through 1.f).....	RCFDHK25	485,763	M.1.g.
2. Maturity and repricing data for loans and leases (excluding those in nonaccrual status):			M.2.
a. Closed-end loans secured by first liens on 1-4 family residential properties in domestic offices (reported in Schedule RC-C, part I, item 1.c.(2)(a), column B) with a remaining maturity or next repricing date of:			M.2.a.
1. Three months or less.....	RCONA564	929,602	M.2.a.1.
2. Over three months through 12 months.....	RCONA565	2,797,316	M.2.a.2.
3. Over one year through three years.....	RCONA566	3,661,986	M.2.a.3.
4. Over three years through five years.....	RCONA567	2,771,006	M.2.a.4.
5. Over five years through 15 years.....	RCONA568	5,794,018	M.2.a.5.
6. Over 15 years.....	RCONA569	1,355,997	M.2.a.6.
b. All loans and leases (reported in Schedule RC-C, part I, items 1 through 10, column A) EXCLUDING closed-end loans secured by first liens on 1-4 family residential properties in domestic offices (reported in Schedule RC-C, part I, item 1.c.(2)(a), column B) with a remaining maturity or next repricing date of:			M.2.b.
1. Three months or less.....	RCFDA570	40,030,701	M.2.b.1.
2. Over three months through 12 months.....	RCFDA571	1,715,165	M.2.b.2.
3. Over one year through three years.....	RCFDA572	647,738	M.2.b.3.
4. Over three years through five years.....	RCFDA573	394,363	M.2.b.4.
5. Over five years through 15 years.....	RCFDA574	315,883	M.2.b.5.
6. Over 15 years.....	RCFDA575	34,740	M.2.b.6.
c. Loans and leases (reported in Schedule RC-C, part I, items 1 through 10, column A) with a REMAINING MATURITY of one year or less (excluding those in nonaccrual status).....	RCFDA247	16,495,893	M.2.c.
3. Loans to finance commercial real estate, construction, and land development activities (not secured by real estate) included in Schedule RC-C, part I, items 4 and 9, column A ⁴	RCFD2746	330,729	M.3.
4. Adjustable rate closed-end loans secured by first liens on 1-4 family residential properties in domestic offices (included in Schedule RC-C, part I, item 1.c.(2)(a), column B).....	RCON5370	899,443	M.4.
5. Loans secured by real estate to non-U.S. addressees (domicile) (included in Schedule RC-C, Part I, item 1, column A, or Schedule RC-C, Part I, items 1.a.(1) through 1.e.(2), column A, as appropriate).....	RCFDB837	1,304,349	M.5.
Memorandum item 6 is to be completed by banks that (1) together with affiliated institutions, have outstanding credit card receivables (as defined in the instructions) that exceed \$500 million as of the report date, or (2) are credit card specialty banks as defined for Uniform Bank Performance Report purposes.			
6. Outstanding credit card fees and finance charges included in Schedule RC-C, part I, item 6.a, column A.....	RCFDC391	0	M.6.

4. Exclude loans secured by real estate that are included in Schedule RC-C, Part I, item 1, column A.

Dollar amounts in thousands

Memorandum items 7.a and 7.b are to be completed by all banks semiannually in the June and December reports only.

7. Purchased credit-impaired loans held for investment accounted for in accordance with FASB ASC 310-30 (former AICPA Statement of Position 03-3) (exclude loans held for sale):⁵

- a. Outstanding balance.....
- b. Amount included in Schedule RC-C, part I, items 1 through 9.....

		M.7.
RCFDC779	NR	M.7.a.
RCFDC780	NR	M.7.b.

Memorandum items 8.a, 8.b, and 8.c are to be completed semiannually in the June and December reports only.

8. Closed-end loans with negative amortization features secured by 1-4 family residential properties in domestic offices:

- a. Total amount of closed-end loans with negative amortization features secured by 1-4 family residential properties (included in Schedule RC-C, part I, items 1.c.(2)(a) and 1.c.(2)(b)).....

		M.8.
RCONF230	NR	M.8.a.

Memorandum items 8.b and 8.c are to be completed semiannually in the June and December reports only by banks that had closed-end loans with negative amortization features secured by 1-4 family residential properties (as reported in Schedule RC-C, Part I, Memorandum item 8.a) as of December 31, 2019, that exceeded the lesser of \$100 million or 5 percent of total loans and leases held for investment and held for sale in domestic offices (as reported in Schedule RC-C, Part I, item 12, column B).

- b. Total maximum remaining amount of negative amortization contractually permitted on closed-end loans secured by 1-4 family residential properties.....
- c. Total amount of negative amortization on closed-end loans secured by 1-4 family residential properties included in the amount reported in Memorandum item 8.a above.....

RCONF231	NR	M.8.b.
RCONF232	NR	M.8.c.

5. Memorandum item 7 is to be completed only by institutions that have not yet adopted ASU 2016-13.

Dollar amounts in thousands

9. Loans secured by 1-4 family residential properties in domestic offices in process of foreclosure (included in Schedule RC-C, part I, items 1.c.(1), 1.c.(2)(a), and 1.c.(2)(b)).....	RCONF577	102,089	M.9.
---	----------	---------	------

Dollar amounts in thousands

10. Not applicable			M.10.
11. Not applicable			M.11.

		(Column A) Fair value of acquired loans and leases at acquisition date	(Column B) Gross contractual amounts receivable at acquisition date	(Column C) Best estimate at acquisition date of contractual cash flows not expected to be collected
Dollar amounts in thousands				
Memorandum items 12.a, 12.b, 12.c, and 12.d are to be completed semiannually in the June and December reports only.				
12. Loans (not subject to the requirements of FASB ASC 310-30 (former AICPA Statement of Position 03-3)) and leases held for investment that were acquired in business combinations with acquisition dates in the current calendar year. ¹				
a. Loans secured by real estate.....	RCFDG091	NR	RCFDG092	NR
b. Commercial and industrial loans.....	RCFDG094	NR	RCFDG095	NR
c. Loans to individuals for household, family, and other personal expenditures.....	RCFDG097	NR	RCFDG098	NR
d. All other loans and all leases.....	RCFDG100	NR	RCFDG101	NR

Dollar amounts in thousands

Memoranda item 13 is to be completed by banks that had construction, land development, and other land loans in domestic offices (as reported in Schedule RC-C, Part I, item 1.a., column B) that exceeded 100 percent of the sum of tier 1 capital (as reported in Schedule RC-R, Part I, item 26) plus the allowance for loan and lease losses or the allowance for credit losses on loans and leases, as applicable (as reported in Schedule RC, item 4.c) as of December 31, 2020.							
13. Construction, land development, and other land loans in domestic offices with interest reserves:							M.13.
a. Amount of loans that provide for the use of interest reserves (included in Schedule RC-C, part I, item 1.a, column B)	RCONG376	0					M.13.a.
b. Amount of interest capitalized from interest reserves on construction, land development, and other land loans that is included in interest and fee income on loans during the quarter (included in Schedule RI, item 1.a.(1)(a)(2)).	RIADG377	0					M.13.b.
Memorandum item 14 is to be completed by all banks.	RCFDG378	18,937,928					M.14.
14. Pledged loans and leases.....							M.15.
Memorandum item 15 is to be completed for the December report only.							
15. Reverse mortgages in domestic offices:							M.15.a.
a. Reverse mortgages outstanding that are held for investment (included in Schedule RC-C, item 1.c, above):							M.15.a.1.
1. Home Equity Conversion Mortgage (HECM) reverse mortgages.....	RCONJ466	NR					M.15.a.2.
2. Proprietary reverse mortgages.....	RCONJ467	NR					M.15.b.
b. Estimated number of reverse mortgage loan referrals to other lenders during the year from whom compensation has been received for services performed in connection with the origination of the reverse mortgages:							M.15.b.1.
1. Home Equity Conversion Mortgage (HECM) reverse mortgages.....	RCONJ468	NR					M.15.b.2.
2. Proprietary reverse mortgages.....	RCONJ469	NR					M.15.c.
c. Principal amount of reverse mortgage originations that have been sold during the year:							M.15.c.1.
1. Home Equity Conversion Mortgage (HECM) reverse mortgages.....	RCONJ470	NR					M.15.c.2.
2. Proprietary reverse mortgages.....	RCONJ471	NR					M.16.
Memorandum item 16 is to be completed by all banks.	RCONLE75	0					M.17.
16. Revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit in domestic offices that have converted to non-revolving closed-end status (included in item 1.c.(1) above).....							M.17.a.
Amounts reported in Memorandum items 17.a and 17.b will not be made available to the public on an individual institution basis.							
17. Eligible loan modifications under Section 4013, Temporary Relief from Troubled Debt Restructurings, of the 2020 Coronavirus Aid, Relief, and Economic Security Act:							M.17.b.
a. Number of Section 4013 loans outstanding.....	RCONLG24	CONF					M.17.a.
b. Outstanding balance of Section 4013 loans.....	RCONLG25	CONF					M.17.b.

1. Institutions that have adopted ASU 2016-13 should report only loans held for investment not considered purchased credit-deteriorated in Memorandum item 12.

Schedule RC-C Part II - Loans to Small Businesses and Small Farms(Form Type - 031)

Report the number and amount currently outstanding as of the report date of business loans with "original amounts" of \$1,000,000 or less and farm loans with "original amounts" of \$500,000 or less. The following guidelines should be used to determine the "original amount" of a loan:
 (1) For loans drawn down under lines of credit or loan commitments, the "original amount" of the loan is the size of the line of credit or loan commitment when the line of credit or loan commitment was most recently approved, extended, or renewed prior to the report date. However, if the amount currently outstanding as of the report date exceeds this size, the "original amount" is the amount currently outstanding on the report date. (2) For loan participations and syndications, the "original amount" of the loan participation or syndication is the entire amount of the credit originated by the lead lender. (3) For all other loans, the "original amount" is the total amount of the loan at origination or the amount currently outstanding as of the report date, whichever is larger.

Dollar amounts in thousands

1. Not applicable
 2. Not applicable

		1.
		2.

Dollar amounts in thousands

3. Number and amount currently outstanding of "Loans secured by nonfarm nonresidential properties" in domestic offices reported in Schedule RC-C, part I, items 1.e.(1) and 1.e.(2), column B:

- a. With original amounts of \$100,000 or less.....
 b. With original amounts of more than \$100,000 through \$250,000.....
 c. With original amounts of more than \$250,000 through \$1,000,000.....

4. Number and amount currently outstanding of "Commercial and industrial loans to U.S. addressees" in domestic offices reported in Schedule RC-C, part I, item 4.a, column B:

- a. With original amounts of \$100,000 or less.....
 b. With original amounts of more than \$100,000 through \$250,000.....
 c. With original amounts of more than \$250,000 through \$1,000,000.....

(Column A) Number of Loans		(Column B) Amount Currently Outstanding		
				3.
RCO5564	5	RCO5565	80	3.a.
RCO5566	14	RCO5567	1,174	3.b.
RCO5568	87	RCO5569	24,589	3.c.
				4.
RCO5570	2867	RCO5571	112,784	4.a.
RCO5572	1137	RCO5573	164,093	4.b.
RCO5574	1042	RCO5575	431,015	4.c.

Dollar amounts in thousands

5. Not applicable
 6. Not applicable

		5.
		6.

Dollar amounts in thousands

7. Number and amount currently outstanding of "Loans secured by farmland (including farm residential and other improvements)" in domestic offices reported in Schedule RC-C, part I, item 1.b, column B:

- a. With original amounts of \$100,000 or less.....
 b. With original amounts of more than \$100,000 through \$250,000.....
 c. With original amounts of more than \$250,000 through \$500,000.....

8. Number and amount currently outstanding of "Loans to finance agricultural production and other loans to farmers" in domestic offices reported in Schedule RC-C, part I, item 3, column B:

- a. With original amounts of \$100,000 or less.....
 b. With original amounts of more than \$100,000 through \$250,000.....
 c. With original amounts of more than \$250,000 through \$500,000.....

(Column A) Number of Loans		(Column B) Amount Currently Outstanding		
				7.
RCO5578	0	RCO5579	0	7.a.
RCO5580	0	RCO5581	0	7.b.
RCO5582	0	RCO5583	0	7.c.
				8.
RCO5584	1	RCO5585	44	8.a.
RCO5586	0	RCO5587	0	8.b.
RCO5588	0	RCO5589	0	8.c.

Schedule RC-D - Trading Assets and Liabilities(Form Type - 031)

Schedule RC-D is to be completed by banks that reported total trading assets of \$10 million or more in any of the four preceding calendar quarters, and all banks meeting the FDIC's definition of a large or highly complex institution for deposit insurance assessment purposes.

Dollar amounts in thousands		Consolidated Bank	
1. U.S. Treasury securities.....	RCFD3531	2,615,784	1.
2. U.S. Government agency obligations (exclude mortgage-backed securities).....	RCFD3532	0	2.
3. Securities issued by states and political subdivisions in the U.S.....	RCFD3533	0	3.
4. Mortgage-backed securities (MBS):			4.
a. Residential mortgage pass-through securities issued or guaranteed by FNMA, FHLMC, or GNMA.....	RCFDG379	60,922	4.a.
b. Other residential MBS issued or guaranteed by U.S. Government agencies or sponsored agencies (include CMOs, REMICs, and stripped MBS) ¹	RCFDG380	18,000	4.b.
c. All other residential MBS.....	RCFDG381	24,200	4.c.
d. Commercial MBS issued or guaranteed by U.S. Government agencies or sponsored agencies ¹	RCFDK197	0	4.d.
e. All other commercial MBS.....	RCFDK198	0	4.e.
5. Other debt securities:			5.
a. Structured financial products.....	RCFDHT62	66,039	5.a.
b. All other debt securities.....	RCFDG386	8,229,517	5.b.
6. Loans:			6.
a. Loans secured by real estate			6.a.
1. Loans secured by 1-4 family residential properties.....	RCFDHT63	0	6.a.1.
2. All other loans secured by real estate.....	RCFDHT64	0	6.a.2.
b. Commercial and industrial loans.....	RCFDF614	0	6.b.
c. Loans to individuals for household, family, and other personal expenditures (i.e., consumer loans) (includes purchased paper).....	RCFDHT65	0	6.c.
d. Other loans.....	RCFDF618	0	6.d.
7. Not applicable			7.
8. Not applicable			8.
9. Other trading assets.....	RCFD3541	12,246,822	9.
10. Not applicable			10.
11. Derivatives with a positive fair value.....	RCFD3543	2,560,029	11.
12. Total trading assets (sum of items 1 through 11) (total of column A must equal Schedule RC, item 5).....	RCFD3545	25,821,313	12.
13. Not available			13.
a. Liability for short positions.....	RCFD3546	655,374	13.a.
b. Other trading liabilities.....	RCFDF624	0	13.b.
14. Derivatives with a negative fair value.....	RCFD3547	1,664,187	14.
15. Total trading liabilities (sum of items 13.a through 14) (total of column A must equal Schedule RC, item 15).....	RCFD3548	2,319,561	15.
1. Unpaid principal balance of loans measured at fair value (reported in Schedule RC-D, items 6.a through 6.d):			M.1.
a. Loans secured by real estate			M.1.a.
1. Loans secured by 1-4 family residential properties.....	RCFDHT66	0	M.1.a.1.
2. All other loans secured by real estate.....	RCFDHT67	0	M.1.a.2.
b. Commercial and industrial loans.....	RCFDF632	0	M.1.b.
c. Loans to individuals for household, family, and other personal expenditures (i.e., consumer loans) (includes purchased paper).....	RCFDHT68	0	M.1.c.
d. Other loans.....	RCFDF636	0	M.1.d.
Memorandum items 2 through 10 are to be completed by banks with \$10 billion or more in total trading assets.			
2. Loans measured at fair value that are past due 90 days or more: ¹			M.2.
a. Fair value.....	RCFDF639	0	M.2.a.
b. Unpaid principal balance.....	RCFDF640	0	M.2.b.

1. U.S. Government agencies include, but are not limited to, such agencies as the Government National Mortgage Association (GNMA), the Federal Deposit Insurance Corporation (FDIC), and the National Credit Union Administration (NCUA). U.S. Government-sponsored agencies include, but are not limited to, such agencies as the Federal Home Loan Mortgage Corporation (FHLMC) and the Federal National Mortgage Association (FNMA).

1. The \$10 billion trading asset-size test is based on total trading assets reported on the June 30, 2018, Report of Condition.

Dollar amounts in thousands		Consolidated Bank	
Memorandum items 3 through 10 are to be completed by banks with \$10 billion or more in total trading assets.			
3. Structured financial products by underlying collateral or reference assets (for each column, sum of Memorandum items 3.a through 3.g must equal Schedule RC-D, sum of items 5.a.(1) through (3)):			M.3.
a. Trust preferred securities issued by financial institutions.....	RCFDG299	40,690	M.3.a.
b. Trust preferred securities issued by real estate investment trusts.....	RCFDG332	25,349	M.3.b.
c. Corporate and similar loans.....	RCFDG333	0	M.3.c.
d. 1-4 family residential MBS issued or guaranteed by U.S. government-sponsored enterprises (GSEs).....	RCFDG334	0	M.3.d.
e. 1-4 family residential MBS not issued or guaranteed by GSEs.....	RCFDG335	0	M.3.e.
f. Diversified (mixed) pools of structured financial products.....	RCFDG651	0	M.3.f.
g. Other collateral or reference assets.....	RCFDG652	0	M.3.g.
4. Pledged trading assets:			M.4.
a. Pledged securities.....	RCFDG387	1,114,758	M.4.a.
b. Pledged loans.....	RCFDG388	0	M.4.b.

Dollar amounts in thousands			
5. Asset-backed securities:			M.5.
a. Credit card receivables.....	RCFDF643	0	M.5.a.
b. Home equity lines.....	RCFDF644	0	M.5.b.
c. Automobile loans.....	RCFDF645	0	M.5.c.
d. Other consumer loans.....	RCFDF646	62,630	M.5.d.
e. Commercial and industrial loans.....	RCFDF647	0	M.5.e.
f. Other.....	RCFDF648	0	M.5.f.
6. Retained beneficial interests in securitizations (first-loss or equity tranches)			M.6.
7. Equity securities (included in Schedule RC-D, item 9, above):			M.7.
a. Readily determinable fair values.....	RCFDF652	7,749,787	M.7.a.
b. Other.....	RCFDF653	0	M.7.b.
8. Loans pending securitization.....	RCFDF654	0	M.8.
9. Other trading assets (itemize and describe amounts included in Schedule RC-D, item 9, that are greater than \$1,000,000 and exceed 25% of the item): ¹			M.9.
a. Disclose component and the dollar amount of that component:			M.9.a.
1. Describe component.....	TEXTF655	Click here for value	M.9.a.1.
2. Amount of component.....	RCFDF655	4,497,035	M.9.a.2.
b. Disclose component and the dollar amount of that component:			M.9.b.
(TEXTF656) NR	RCFDF656	0	M.9.b.1.
c. Disclose component and the dollar amount of that component:			M.9.c.
(TEXTF657) NR	RCFDF657	0	M.9.c.1.
10. Other trading liabilities (itemize and describe amounts included in Schedule RC-D, item 13.b, that are greater than \$1,000,000 and exceed 25% of the item):			M.10.
a. Disclose component and the dollar amount of that component:			M.10.a.
1. Describe component.....	TEXTF658	NR	M.10.a.1.
2. Amount of component.....	RCFDF658	0	M.10.a.2.
b. Disclose component and the dollar amount of that component:			M.10.b.
(TEXTF659) NR	RCFDF659	0	M.10.b.1.
c. Disclose component and the dollar amount of that component:			M.10.c.
(TEXTF660) NR	RCFDF660	0	M.10.c.1.

(TEXTF655) Precious Metals Inventory

1. Exclude equity securities.

Schedule RC-E Part I - Deposits in Domestic Offices(Form Type - 031)

Dollar amounts in thousands		(Column A) Transaction Accounts Total Transaction accounts (including total demand deposits)	(Column B) Transaction Accounts Memo: Total demand deposits (included in column A)	(Column C) Nontransaction Accounts Total nontransaction accounts (including MMDAs)	
Deposits of:					
1. Individuals, partnerships, and corporations (include all certified and official checks).....	RCONB549	39,403,897		RCONB550	104,969,918 1.
2. U.S. Government.....	RCON2202	227		RCON2520	0 2.
3. States and political subdivisions in the U.S.....	RCON2203	1,199		RCON2530	338,366 3.
4. Commercial banks and other depository institutions in the U.S.....	RCONB551	325,292		RCONB552	63,001 4.
5. Banks in foreign countries.....	RCON2213	6,917,694		RCON2236	218,042 5.
6. Foreign governments and official institutions (including foreign central banks).....	RCON2216	231,588		RCON2377	2,098,582 6.
7. Total (sum of items 1 through 6) (sum of columns A and C must equal Schedule RC, item 13.a).....	RCON2215	46,879,897	RCON2210	28,373,762	RCON2385 107,687,909 7.

Dollar amounts in thousands

1. Selected components of total deposits (i.e., sum of item 7, columns A and C):			M.1.
a. Total Individual Retirement Accounts (IRAs) and Keogh Plan accounts.....	RCON6835	0	M.1.a.
b. Total brokered deposits.....	RCON2365	23,641,153	M.1.b.
c. Brokered deposits of \$250,000 or less (fully insured brokered deposits) ²	RCONHK05	19,564,147	M.1.c.
d. Maturity data for brokered deposits:			M.1.d.
1. Brokered deposits of \$250,000 or less with a remaining maturity of one year or less (included in Memorandum item 1.c above).....	RCONHK06	16,725,073	M.1.d.1.
2. Not applicable			M.1.d.2.
3. Brokered deposits of more than \$250,000 with a remaining maturity of one year or less (included in Memorandum item 1.b above).....	RCONK220	4,077,006	M.1.d.3.
e. Preferred deposits (uninsured deposits of states and political subdivisions in the U.S. reported in item 3 above which are secured or collateralized as required under state law) (to be completed for the December report only).	RCON5590	NR	M.1.e.
f. Estimated amount of deposits obtained through the use of deposit listing services that are not brokered deposits.....	RCONK223	0	M.1.f.
g. Total reciprocal deposits (as of the report date).....	RCONJH83	0	M.1.g.
2. Components of total nontransaction accounts (sum of Memorandum items 2.a through 2.d must equal item 7, column C above):			M.2.
a. Savings deposits:			M.2.a.
1. Money market deposit accounts (MMDAs).....	RCON6810	29,084,248	M.2.a.1.
2. Other savings deposits (excludes MMDAs).....	RCON0352	58,180,567	M.2.a.2.
b. Total time deposits of less than \$100,000.....	RCON6648	4,061,759	M.2.b.
c. Total time deposits of \$100,000 through \$250,000.....	RCONJ473	252,128	M.2.c.
d. Total time deposits of more than \$250,000.....	RCONJ474	16,109,208	M.2.d.
e. Individual Retirement Accounts (IRAs) and Keogh Plan accounts of \$100,000 or more included in Memorandum items 2.c and 2.d above.....	RCONF233	0	M.2.e.
3. Maturity and repricing data for time deposits of \$250,000 or less:			M.3.
a. Time deposits of \$250,000 or less with a remaining maturity or next repricing date of:			M.3.a.
1. Three months or less.....	RCONHK07	454,588	M.3.a.1.
2. Over three months through 12 months.....	RCONHK08	990,760	M.3.a.2.
3. Over one year through three years.....	RCONHK09	1,380,986	M.3.a.3.
4. Over three years.....	RCONHK10	1,487,552	M.3.a.4.
b. Time deposits of \$250,000 or less with a REMAINING MATURITY of one year or less (included in Memorandum items 3.a.(1) and 3.a.(2) above) ³	RCONHK11	1,445,348	M.3.b.
4. Maturity and repricing data for time deposits of more than \$250,000:			M.4.
a. Time deposits of more than \$250,000 with a remaining maturity or next repricing date of:			M.4.a.
1. Three months or less.....	RCONHK12	10,909,928	M.4.a.1.
2. Over three months through 12 months.....	RCONHK13	2,906,745	M.4.a.2.
3. Over one year through three years.....	RCONHK14	23,603	M.4.a.3.
4. Over three years.....	RCONHK15	2,268,932	M.4.a.4.
b. Time deposits of more than \$250,000 with a REMAINING MATURITY of one year or less (included in Memorandum items 4.a.(1) and 4.a.(2) above) ³	RCONK222	13,816,673	M.4.b.
5. Does your institution offer one or more consumer deposit account products, i.e., transaction account or nontransaction savings account deposit products intended primarily for individuals for personal, household, or family use?.....	RCONP752	Yes	M.5.
Memorandum items 6 and 7 are to be completed by institutions with \$1 billion or more in total assets that answered "Yes" to Memorandum item 5 above.			M.6.
6. Components of total transaction account deposits of individuals, partnerships, and corporations (sum of Memorandum items 6.a and 6.b must be less than or equal to item 1, column A, above): ⁵			
a. Total deposits in those noninterest-bearing transaction account deposit products intended primarily for individuals for personal, household, or family use.....	RCONP753	283,046	M.6.a.
b. Total deposits in those interest-bearing transaction account deposit products intended primarily for individuals for personal, household, or family use.....	RCONP754	13,931,715	M.6.b.
7. Components of total nontransaction account deposits of individuals, partnerships, and corporations (sum of Memorandum items 7.a.(1), 7.a.(2), 7.b.(1), and 7.b.(2) plus all time deposits of individuals, partnerships, and corporations must equal item 1, column C, above):			M.7.

- The dollar amount used as the basis for reporting in Memorandum item 1.c reflects the deposit insurance limit in effect on the report date.
- Report both fixed- and floating-rate time deposits by remaining maturity. Exclude floating rate time deposits with a next repricing date of one year or less that have a remaining maturity of over one year.
- The \$1 billion asset size test is based on the total assets reported on the June 30, 2018, Report of Condition.

Dollar amounts in thousands

a. Money market deposit accounts (MMDAs) of individuals, partnerships, and corporations (sum of Memorandum items 7.a.(1) and 7.a.(2) must be less than or equal to Memorandum item 2.a.(1) above):			M.7.a.
1. Total deposits in those MMDA deposit products intended primarily for individuals for personal, household, or family use.....	RCONP756	2,913,334	M.7.a.1.
2. Deposits in all other MMDAs of individuals, partnerships, and corporations.....	RCONP757	25,117,364	M.7.a.2.
b. Other savings deposit accounts of individuals, partnerships, and corporations (sum of Memorandum items 7.b.(1) and 7.b.(2) must be less than or equal to Memorandum item 2.a.(2) above):			M.7.b.
1. Total deposits in those other savings deposit account deposit products intended primarily for individuals for personal, household, or family use.....	RCONP758	40,193,857	M.7.b.1.
2. Deposits in all other savings deposit accounts of individuals, partnerships, and corporations.....	RCONP759	17,547,043	M.7.b.2.

Schedule RC-E Part II - Deposits in Foreign Offices including Edge and Agreement subsidiaries and IBFs(Form Type - 031)

Dollar amounts in thousands

Deposits of:			
1. Individuals, partnerships, and corporations (include all certified and official checks).....	RCFNB553	157,000	1.
2. U.S. banks (including IBFs and foreign branches of U.S. banks) and other U.S. depository institutions.....	RCFNB554	0	2.
3. Foreign banks (including U.S. branches and agencies of foreign banks, including their IBFs).....	RCFN2625	6,775,369	3.
4. Foreign governments and official institutions (including foreign central banks).....	RCFN2650	266,114	4.
5. U.S. Government and states and political subdivisions in the U.S.....	RCFNB555	0	5.
6. Total.....	RCFN2200	7,198,483	6.
1. Time deposits with a remaining maturity of one year or less (included in Schedule RC, item 13.b).....	RCFNA245	157,000	M.1.

Schedule RC-F - Other Assets(Form Type - 031)

Dollar amounts in thousands

1. Accrued interest receivable ²	RCFDB556	285,721	1.
2. Net deferred tax assets ³	RCFD2148	1,019,889	2.
3. Interest-only strips receivable (not in the form of a security) ⁴	RCFDHT80	0	3.
4. Equity investments without readily determinable fair values ⁵	RCFD1752	904,515	4.
5. Life insurance assets:			5.
a. General account life insurance assets.....	RCFDK201	6,890	5.a.
b. Separate account life insurance assets.....	RCFDK202	229,654	5.b.
c. Hybrid account life insurance assets.....	RCFDK270	0	5.c.
6. All other assets (itemize and describe amounts greater than \$100,000 that exceed 25% of this item).....	RCFD2168	2,841,585	6.
a. Prepaid expenses.....	RCFD2166	0	6.a.
b. Repossessed personal property (including vehicles).....	RCFD1578	0	6.b.
c. Derivatives with a positive fair value held for purposes other than trading.....	RCFDC010	0	6.c.
d. FDIC loss-sharing indemnification assets.....	RCFDJ448	0	6.d.
e. Computer software.....	RCFDFT33	0	6.e.
f. Accounts receivable.....	RCFDFT34	0	6.f.
g. Receivables from foreclosed government-guaranteed mortgage loans.....	RCFDFT35	0	6.g.
h. Disclose component and the dollar amount of that component:			6.h.
1. Describe component.....	TEXT3549	Click here for value	6.h.1.
2. Amount of component.....	RCFD3549	944,552	6.h.2.
i. Disclose component and the dollar amount of that component:			6.i.
1. Describe component.....	TEXT3550	NR	6.i.1.
2. Amount of component.....	RCFD3550	0	6.i.2.
j. Disclose component and the dollar amount of that component:			6.j.
1. Describe component.....	TEXT3551	NR	6.j.1.
2. Amount of component.....	RCFD3551	0	6.j.2.
7. Total (sum of items 1 through 6) (must equal Schedule RC, item 11).....	RCFD2160	5,288,254	7.

(TEXT3549) Miscellaneous Assets

2. Include accrued interest receivable on loans, leases, debt securities, and other interest-bearing assets. Exclude accrued interest receivables on financial assets that are reported elsewhere on the balance sheet.
3. See discussion of deferred income taxes in Glossary entry on "income taxes."
4. Report interest-only strips receivable in the form of a security as available-for-sale securities in Schedule RC, item 2.b, or as trading assets in Schedule RC, item 5, as appropriate.
5. Include Federal Reserve stock, Federal Home Loan Bank stock, and bankers' bank stock.

Schedule RC-G - Other Liabilities(Form Type - 031)

Dollar amounts in thousands

1. Not available			1.
a. Interest accrued and unpaid on deposits in domestic offices ⁶	RCON3645	47,351	1.a.
b. Other expenses accrued and unpaid (includes accrued income taxes payable)	RCFD3646	415,076	1.b.
2. Net deferred tax liabilities ²	RCFD3049	0	2.
3. Allowance for credit losses on off-balance sheet credit exposures ⁷	RCFDB557	153,707	3.
4. All other liabilities (itemize and describe amounts greater than \$100,000 that exceed 25 percent of this item)	RCFD2938	1,825,442	4.
a. Accounts payable	RCFD3066	0	4.a.
b. Deferred compensation liabilities	RCFDC011	0	4.b.
c. Dividends declared but not yet payable	RCFD2932	0	4.c.
d. Derivatives with a negative fair value held for purposes other than trading	RCFDC012	0	4.d.
e. Operating lease liabilities	RCFDLB56	595,329	4.e.
f. Disclose component and the dollar amount of that component:			4.f.
1. Describe component	TEXT3552	NR	4.f.1.
2. Amount of component	RCFD3552	0	4.f.2.
g. Disclose component and the dollar amount of that component:			4.g.
1. Describe component	TEXT3553	NR	4.g.1.
2. Amount of component	RCFD3553	0	4.g.2.
h. Disclose component and the dollar amount of that component:			4.h.
1. Describe component	TEXT3554	NR	4.h.1.
2. Amount of component	RCFD3554	0	4.h.2.
5. Total	RCFD2930	2,441,576	5.

6. For savings banks, include "dividends" accrued and unpaid on deposits.

2. See discussion of deferred income taxes in Glossary entry on "income taxes."

7. Institutions that have adopted ASU 2016-13 should report in Schedule RC-G, item 3 the allowance for credit losses on those off-balance sheet credit exposures that are not unconditionally cancelable.

Schedule RC-H - Selected Balance Sheet Items for Domestic Offices(Form Type - 031)

To be completed only by banks with foreign offices.

Dollar amounts in thousands

1. Not applicable			1.
2. Not applicable			2.
3. Securities purchased under agreements to resell.....	RCONB989	3,760,302	3.
4. Securities sold under agreements to repurchase.....	RCONB995	1,723,513	4.
5. Other borrowed money.....	RCON3190	3,571,219	5.
<i>EITHER</i>			
6. Net due from own foreign offices, Edge and Agreement subsidiaries, and IBFs.....	RCON2163	0	6.
<i>OR</i>			
7. Net due to own foreign offices, Edge and Agreement subsidiaries, and IBFs.....	RCON2941	7,198,701	7.
8. Total assets (excludes net due from foreign offices, Edge and Agreement subsidiaries, and IBFs).....	RCON2192	194,911,530	8.
9. Total liabilities (excludes net due to foreign offices, Edge and Agreement subsidiaries, and IBFs).....	RCON3129	166,256,364	9.

Dollar amounts in thousands

	(Column A) Amortized Cost of Held-to-Maturity Securities		(Column B) Fair Value of Available-for-Sale Securities		
10. U.S. Treasury securities.....	RCON0211	0	RCON1287	13,689,883	10.
11. U.S. Government agency obligations (exclude mortgage-backed securities).....	RCON8492	0	RCON8495	1,618,662	11.
12. Securities issued by states and political subdivisions in the U.S.....	RCON8496	7,817	RCON8499	0	12.
13. Mortgage-backed securities (MBS):					13.
a. Mortgage pass-through securities:					13.a.
1. Issued or guaranteed by FNMA, FHLMC, or GNMA.....	RCONG389	2,675,163	RCONG390	12,505,157	13.a.1.
2. Other mortgage pass-through securities.....	RCON1709	0	RCON1713	118	13.a.2.
b. Other mortgage-backed securities (include CMOs, REMICs, and stripped MBS):					13.b.
1. Issued or guaranteed by U.S. Government agencies or sponsored agencies ¹	RCONG393	5,153,472	RCONG394	3,694,336	13.b.1.
2. All other mortgage-backed securities.....	RCON1733	1,575	RCON1736	0	13.b.2.
14. Other domestic debt securities (include domestic structured financial products and domestic asset-backed securities).....	RCONG397	0	RCONG398	129,765	14.
15. Other foreign debt securities (include foreign structured financial products and foreign asset-backed securities).....	RCONG399	0	RCONG400	3,021,178	15.
16. Not applicable.					16.
17. Total held-to-maturity and available-for-sale debt securities (sum of items 10 through 15).....	RCON1754	7,838,027	RCON1773	34,659,099	17.

Dollar amounts in thousands

18. Equity investments not held for trading:			18.
a. Equity securities with readily determinable fair values ⁴	RCONJA22	137,959	18.a.
b. Equity investments without readily determinable fair values.....	RCON1752	904,515	18.b.
<i>Items 19, 20 and 21 are to be completed by banks that reported total trading assets of \$10 million or more in any of the four preceding calendar quarters and all banks meeting the FDIC's definition of a large or highly complex institution for deposit insurance assessment purposes.</i>			
19. Total trading assets.....	RCON3545	25,821,313	19.
20. Total trading liabilities.....	RCON3548	2,319,561	20.
21. Total loans held for trading.....	RCONHT71	0	21.
<i>Item 22 is to be completed by banks that: (1) have elected to report financial instruments or servicing assets and liabilities at fair value under a fair value option with changes in fair value recognized in earnings, or (2) are required to complete Schedule RC-D, Trading Assets and Liabilities.</i>			
22. Total amount of fair value option loans held for investment and held for sale.....	RCONJF75	83,442	22.

- U.S. Government agencies include, but are not limited to, such agencies as the Government National Mortgage Association (GNMA), the Federal Deposit Insurance Corporation (FDIC), and the National Credit Union Administration (NCUA). U.S. Government-sponsored agencies include, but are not limited to, such agencies as the Federal Home Loan Mortgage Corporation (FHLMC) and the Federal National Mortgage Association (FNMA).
- Item 18.a is to be completed by all institutions. See the instructions for this item and the Glossary entry for "Securities Activities" for further detail on accounting for investments in equity securities.

Schedule RC-I - Assets and Liabilities of IBFs(Form Type - 031)

To be completed only by banks with IBFs and other "foreign" offices.

Dollar amounts in thousands

1. Total IBF assets of the consolidated bank (component of Schedule RC, item 12).....	RCFN2133	0	1.
2. Total IBF liabilities (component of Schedule RC, item 21).....	RCFN2898	7,198,492	2.

Schedule RC-K - Quarterly Averages(Form Type - 031)

Dollar amounts in thousands

1. Interest-bearing balances due from depository institutions.....	RCFD3381	29,111,831	1.
2. U.S. Treasury securities and U.S. Government agency obligations (excluding mortgage-backed securities) ²	RCFDB558	16,911,789	2.
3. Mortgage-backed securities ²	RCFDB559	25,085,521	3.
4. All other debt securities and equity securities with readily determinable fair values not held for trading ²	RCFDB560	4,177,889	4.
5. Federal funds sold and securities purchased under agreements to resell.....	RCFD3365	24,651,576	5.
6. Loans:			6.
a. Loans in domestic offices:			6.a.
1. Total loans.....	RCON3360	63,847,540	6.a.1.
2. Loans secured by real estate:			6.a.2.
a. Loans secured by 1-4 family residential properties.....	RCON3465	19,243,009	6.a.2.a.
b. All other loans secured by real estate.....	RCON3466	10,285,487	6.a.2.b.
3. Loans to finance agricultural production and other loans to farmers	RCON3386	46,282	6.a.3.
4. Commercial and industrial loans.....	RCON3387	22,827,444	6.a.4.
5. Loans to individuals for household, family, and other personal expenditures:			6.a.5.
a. Credit cards.....	RCONB561	989,208	6.a.5.a.
b. Other (includes revolving credit plans other than credit cards, automobile loans, and other consumer loans).....	RCONB562	305,325	6.a.5.b.
b. Total loans in foreign offices, Edge and Agreement subsidiaries, and IBFs.....	RCFN3360	0	6.b.
<i>Item 7 is to be completed by banks with total trading assets of \$10 million or more in any of the four preceding calendar quarters and all banks meeting the FDIC's definition of a large or highly complex institution for deposit insurance assessment purposes.</i>			
7. Trading assets.....	RCFD3401	27,312,059	7.
8. Lease financing receivables (net of unearned income).....	RCFD3484	0	8.
9. Total assets ⁴	RCFD3368	199,789,110	9.
10. Interest-bearing transaction accounts in domestic offices (interest-bearing demand deposits, NOW accounts, ATS accounts, and telephone and preauthorized transfer accounts).....	RCON3485	31,117,373	10.
11. Nontransaction accounts in domestic offices:			11.
a. Savings deposits (includes MMDAs).....	RCONB563	86,433,554	11.a.
b. Time deposits of \$250,000 or less.....	RCONHK16	4,681,958	11.b.
c. Time deposits of more than \$250,000.....	RCONHK17	18,543,027	11.c.
12. Interest-bearing deposits in foreign offices, EDGE and Agreement subsidiaries, and IBFs.....	RCFN3404	5,672,522	12.
13. Federal funds purchased and securities sold under agreements to repurchase.....	RCFD3353	2,449,474	13.
14. Other borrowed money (includes mortgage indebtedness and obligations under capitalized leases).....	RCFD3355	4,722,256	14.

2. Quarterly averages for all debt securities should be based on amortized cost.

2. Quarterly averages for all debt securities should be based on amortized cost.

4. The quarterly average for total assets should reflect securities not held for trading as follows: a) Debt securities at amortized cost, b) Equity securities with readily determinable fair values at fair value, c) Equity investments without readily determinable fair values, their balance sheet carrying values (i.e., fair value or, if elected, cost minus impairment, if any, plus or minus changes resulting from observable price changes).

Schedule RC-L - Derivatives and Off-Balance Sheet Items(Form Type - 031)

Please read carefully the instructions for the preparation of Schedule RC-L. Some of the amounts reported in Schedule RC-L are regarded as volume indicators and not necessarily as measures of risk.

Dollar amounts in thousands

1. Unused commitments:			1.
a. Revolving, open-end lines secured by 1-4 family residential properties, i.e., home equity lines.....	RCFD3814	696,729	1.a.
Item 1.a.(1) is to be completed for the December report only.			
1. Unused commitments for reverse mortgages outstanding that are held for investment in domestic offices..	RCONHT72	NR	1.a.1.
b. Credit card lines (Sum of items 1.b.(1) and 1.b.(2) must equal item 1.b.).....	RCFD3815	6,633,222	1.b.
Items 1.b.(1) and 1.b.(2) are to be completed by banks with either \$300 million or more in total assets or \$300 million or more in credit card lines. (Sum of items 1.b.(1) and 1.b.(2) must equal item 1.b.)			
Items 1.b.(1) and 1.b.(2) are to be completed semiannually in the June and December reports only.			
1. Unused consumer credit card lines.....	RCFDJ455	NR	1.b.1.
2. Other unused credit card lines.....	RCFDJ456	NR	1.b.2.
c. Commitments to fund commercial real estate, construction, and land development loans:			1.c.
1. Secured by real estate:			1.c.1.
a. 1-4 family residential construction loan commitments.....	RCFDF164	0	1.c.1.a.
b. Commercial real estate, other construction loan, and land development loan commitments.....	RCFDF165	1,025,455	1.c.1.b.
2. Not secured by real estate.....	RCFD6550	193,734	1.c.2.
d. Securities underwriting.....	RCFD3817	0	1.d.
e. Other unused commitments:			1.e.
1. Commercial and industrial loans.....	RCFDJ457	65,280,971	1.e.1.
2. Loans to financial institutions.....	RCFDJ458	16,511,768	1.e.2.
3. All other unused commitments.....	RCFDJ459	2,452,249	1.e.3.
2. Financial standby letters of credit and foreign office guarantees.....	RCFD3819	5,994,544	2.
Item 2.a is to be completed by banks with \$1 billion or more in total assets.			
a. Amount of financial standby letters of credit conveyed to others ¹	RCFD3820	162,380	2.a.
3. Performance standby letters of credit and foreign office guarantees.....	RCFD3821	3,070,039	3.
Item 3.a is to be completed by banks with \$1 billion or more in total assets.			
a. Amount of performance standby letters of credit conveyed to others ¹	RCFD3822	204,569	3.a.
4. Commercial and similar letters of credit.....	RCFD3411	305,771	4.
5. Not applicable			5.
6. Securities lent and borrowed:			6.
a. Securities lent (including customers' securities lent where the customer is indemnified against loss by the reporting bank).....	RCFD3433	0	6.a.
b. Securities borrowed.....	RCFD3432	0	6.b.

Dollar amounts in thousands

	(Column A) Sold Protection		(Column B) Purchased Protection		
7. Credit derivatives:					7.
a. Notional amounts:					7.a.
1. Credit default swaps.....	RCFDC968	15,731,124	RCFDC969	19,198,802	7.a.1.
2. Total return swaps.....	RCFDC970	231,643	RCFDC971	8,338,429	7.a.2.
3. Credit options.....	RCFDC972	0	RCFDC973	0	7.a.3.
4. Other credit derivatives.....	RCFDC974	0	RCFDC975	0	7.a.4.
b. Gross fair values:					7.b.
1. Gross positive fair value.....	RCFDC219	134,694	RCFDC221	220,513	7.b.1.
2. Gross negative fair value.....	RCFDC220	85,376	RCFDC222	175,365	7.b.2.

Dollar amounts in thousands

c. Notional amounts by regulatory capital treatment: ¹			7.c.
1. Positions covered under the Market Risk Rule:			7.c.1.
a. Sold protection.....	RCFDG401	15,962,767	7.c.1.a.
b. Purchased protection.....	RCFDG402	24,675,090	7.c.1.b.
2. All other positions:			7.c.2.
a. Sold protection.....	RCFDG403	0	7.c.2.a.
b. Purchased protection that is recognized as a guarantee for regulatory capital purposes.....	RCFDG404	2,450,000	7.c.2.b.
c. Purchased protection that is not recognized as a guarantee for regulatory capital purposes.....	RCFDG405	412,141	7.c.2.c.

	(Column A) Remaining Maturity of One Year or Less		(Column B) Remaining Maturity of Over One Year Through Five Years		(Column C) Remaining Maturity of Over Five Years		
d. Notional amounts by remaining maturity:							7.d.
1. Sold credit protection: ²							7.d.1.
a. Investment grade.....	RCFDG406	1,175,230	RCFDG407	4,636,497	RCFDG408	243,891	7d1a.
b. Subinvestment grade.....	RCFDG409	941,625	RCFDG410	8,323,513	RCFDG411	642,011	7d1b.
2. Purchased credit protection: ³							7.d.2.
a. Investment grade.....	RCFDG412	5,175,516	RCFDG413	6,514,671	RCFDG414	402,282	7d2a.
b. Subinvestment grade.....	RCFDG415	5,425,510	RCFDG416	8,817,383	RCFDG417	1,201,869	7d2b.

1. The asset-size tests and the \$300 million credit card lines test are based on the total assets and credit card lines reported in the June 30, 2018, Report of Condition.
1. The asset-size tests and the \$300 million credit card lines test are based on the total assets and credit card lines reported in the June 30, 2018, Report of Condition.

Dollar amounts in thousands

8. Spot foreign exchange contracts.....	RCFD8765	40,631,799	8.
9. All other off-balance sheet liabilities (exclude derivatives) (itemize and describe each component of this item over 25% of Schedule RC, item 27.a, "Total bank equity capital").....	RCFD3430	0	9.
a. Not applicable			9.a.
b. Commitments to purchase when-issued securities.....	RCFD3434	0	9.b.
c. Standby letters of credit issued by another party (e.g., a Federal Home Loan Bank) on the bank's behalf.....	RCFDC978	0	9.c.
d. Disclose component and the dollar amount of that component:			9.d.
1. Describe component.....	TEXT3555	NR	9.d.1.
2. Amount of component.....	RCFD3555	0	9.d.2.
e. Disclose component and the dollar amount of that component:			9.e.
1. Describe component.....	TEXT3556	NR	9.e.1.
2. Amount of component.....	RCFD3556	0	9.e.2.
f. Disclose component and the dollar amount of that component:			9.f.
(TEXT3557) NR	RCFD3557	0	9.f.1.
10. All other off-balance sheet assets (exclude derivatives) (itemize and describe each component of this item over 25% of Schedule RC, item 27.a, "Total bank equity capital").....	RCFD5591	0	10.
a. Commitments to sell when-issued securities.....	RCFD3435	0	10.a.
b. Disclose component and the dollar amount of that component:			10.b.
1. Describe component.....	TEXT5592	NR	10.b.1.
2. Amount of component.....	RCFD5592	0	10.b.2.
c. Disclose component and the dollar amount of that component:			10.c.
1. Describe component.....	TEXT5593	NR	10.c.1.
2. Amount of component.....	RCFD5593	0	10.c.2.
d. Disclose component and the dollar amount of that component:			10.d.
1. Describe component.....	TEXT5594	NR	10.d.1.
2. Amount of component.....	RCFD5594	0	10.d.2.
e. Disclose component and the dollar amount of that component:			10.e.
1. Describe component.....	TEXT5595	NR	10.e.1.
2. Amount of component.....	RCFD5595	0	10.e.2.
Items 11.a and 11.b are to be completed semiannually in the June and December reports only.			
11. Year-to-date merchant credit card sales volume:			11.
a. Sales for which the reporting bank is the acquiring bank.....	RCFDC223	NR	11.a.
b. Sales for which the reporting bank is the agent bank with risk.....	RCFDC224	NR	11.b.

- Sum of items 7.c.(1)(a) and 7.c.(2)(a), must equal sum of items 7.a.(1) through (4), column A. Sum of items 7.c.(1)(b), 7.c.(2)(b), and 7.c.(2)(c) must equal sum of items 7.a.(1) through (4), column B.
- Sum of items 7.d.(1)(a) and (b), columns A through C, must equal sum of items 7.a.(1) through (4), column A.
- Sum of items 7.d.(2)(a) and (b), columns A through C, must equal sum of items 7.a.(1) through (4), column B.

Dollar amounts in thousands	(Column A) Interest Rate Contracts	(Column B) Foreign Exchange Contracts	(Column C) Equity Derivative Contracts	(Column D) Commodity and Other Contracts	
12. Gross amounts (e.g., notional amounts):					12.
a. Futures contracts.....	RCFD8693 20,897,219	RCFD8694 1,817,371	RCFD8695 2,340	RCFD8696 763,586	12.a.
b. Forward contracts.....	RCFD8697 3,420,254	RCFD8698 528,194,443	RCFD8699 0	RCFD8700 49,365,770	12.b.
c. Exchange-traded option contracts:					12.c.
1. Written options.....	RCFD8701 600,850	RCFD8702 0	RCFD8703 0	RCFD8704 0	12c1.
2. Purchased options.....	RCFD8705 2,023,015	RCFD8706 0	RCFD8707 0	RCFD8708 0	12c2.
d. Over-the-counter option contracts:					12.d.
1. Written options.....	RCFD8709 20,165,126	RCFD8710 36,853,894	RCFD8711 9,110,237	RCFD8712 1,212,205	12d1.
2. Purchased options.....	RCFD8713 20,558,224	RCFD8714 37,193,224	RCFD8715 11,856,453	RCFD8716 1,236,002	12d2.
e. Swaps.....	RCFD3450 297,284,548	RCFD3826 602,763,089	RCFD8719 12,627,200	RCFD8720 0	12.e.
13. Total gross notional amount of derivative contracts held for trading.....	RCFDA126 355,451,524	RCFDA127 1,206,822,021	RCFD8723 31,158,290	RCFD8724 52,577,563	13.
14. Total gross notional amount of derivative contracts held for purposes other than trading.....	RCFD8725 9,497,712	RCFD8726 0	RCFD8727 2,437,940	RCFD8728 0	14.
a. Interest rate swaps where the bank has agreed to pay a fixed rate.....	RCFDA589 907,762				14.a.
15. Gross fair values of derivative contracts:					15.
a. Contracts held for trading:					15.a.
1. Gross positive fair value.....	RCFD8733 6,619,829	RCFD8734 16,921,252	RCFD8735 2,317,434	RCFD8736 1,375,475	15a1.
2. Gross negative fair value.....	RCFD8737 6,312,118	RCFD8738 15,842,333	RCFD8739 2,742,598	RCFD8740 1,227,672	15a2.
b. Contracts held for purposes other than trading:					15.b.
1. Gross positive fair value.....	RCFD8741 60,489	RCFD8742 0	RCFD8743 264,906	RCFD8744 0	15b1.
2. Gross negative fair value.....	RCFD8745 2,480	RCFD8746 0	RCFD8747 2,483	RCFD8748 0	15b2.

	(Column A) Banks and Securities Firms	(Column B)	(Column C) Hedge Funds	(Column D) Sovereign Governments	(Column E) Corporations and All Other Counterparties	
Dollar amounts in thousands						
Item 16 is to be completed only by banks with total assets of \$10 billion or more.						
16. Over-the counter derivatives: ¹						16.
a. Net current credit exposure.....	RCFDG418 2,578,827		RCFDG420 177,572	RCFDG421 8,479	RCFDG422 3,303,660	16.a.
b. Fair value of collateral:						16.b.
1. Cash - U.S. dollar.....	RCFDG423 2,332,883		RCFDG425 243,500	RCFDG426 0	RCFDG427 1,277,275	16.b.1.
2. Cash - Other currencies.....	RCFDG428 123,731		RCFDG430 0	RCFDG431 0	RCFDG432 64,814	16.b.2.
3. U.S. Treasury securities.....	RCFDG433 51,007		RCFDG435 91,100	RCFDG436 0	RCFDG437 219,259	16.b.3.
4. U.S. Government agency and U.S. Government-sponsored agency debt securities.....	RCFDG438 0		RCFDG440 0	RCFDG441 0	RCFDG442 174,499	16.b.4.
5. Corporate bonds.....	RCFDG443 0		RCFDG445 0	RCFDG446 0	RCFDG447 129,956	16.b.5.
6. Equity securities.....	RCFDG448 0		RCFDG450 0	RCFDG451 0	RCFDG452 0	16.b.6.
7. All other collateral.....	RCFDG453 603,168		RCFDG455 0	RCFDG456 0	RCFDG457 200,979	16.b.7.
8. Total fair value of collateral (sum of items 16.b.(1) through (7)).....	RCFDG458 3,110,789		RCFDG460 334,600	RCFDG461 0	RCFDG462 2,066,782	16.b.8.

1. The \$10 billion asset-size test is based on the total assets reported on the June 30, 2018, Report of Condition.

Schedule RC-M - Memoranda(Form Type - 031)

Dollar amounts in thousands

1. Extensions of credit by the reporting bank to its executive officers, directors, principal shareholders, and their related interests as of the report date:			1.
a. Aggregate amount of all extensions of credit to all executive officers, directors, principal shareholders, and their related interests.....	RCFD6164	6,113	1.a.
b. Number of executive officers, directors, and principal shareholders to whom the amount of all extensions of credit by the reporting bank (including extensions of credit to related interests) equals or exceeds the lesser of \$500,000 or 5 percent of total capital as defined for this purpose in agency regulations.....	RCFD6165	2	1.b.
2. Intangible assets:			2.
a. Mortgage servicing assets.....	RCFD3164	10,828	2.a.
1. Estimated fair value of mortgage servicing assets.....	RCFDA590	10,828	2.a.1.
b. Goodwill.....	RCFD3163	458,000	2.b.
c. All other intangible assets.....	RCFDJF76	6,498	2.c.
d. Total (sum of items 2.a, 2.b, and 2.c) (must equal Schedule RC, item 10).....	RCFD2143	475,326	2.d.
3. Other real estate owned:			3.
a. Construction, land development, and other land in domestic offices.....	RCON5508	0	3.a.
b. Farmland in domestic offices.....	RCON5509	0	3.b.
c. 1-4 family residential properties in domestic offices.....	RCON5510	2,459	3.c.
d. Multifamily (5 or more) residential properties in domestic offices.....	RCON5511	0	3.d.
e. Nonfarm nonresidential properties in domestic offices.....	RCON5512	0	3.e.
f. In foreign offices.....	RCFN5513	0	3.f.
g. Total (sum of items 3.a through 3.g) (must equal Schedule RC, item 7).....	RCFD2150	2,459	3.g.
4. Cost of equity securities with readily determinable fair values not held for trading (the fair value of which is reported in Schedule RC, item 2.c) ¹	RCFDJA29	NR	4.
5. Other borrowed money:			5.
a. Federal Home Loan Bank advances:			5.a.
1. Advances with a remaining maturity or next repricing date of: ¹			5.a.1.
a. One year or less.....	RCFDF055	2,750,000	5.a.1.a.
b. Over one year through three years.....	RCFDF056	0	5.a.1.b.
c. Over three years through five years.....	RCFDF057	0	5.a.1.c.
d. Over five years.....	RCFDF058	0	5.a.1.d.
2. Advances with a remaining maturity of one year or less (included in item 5.a.(1)(a) above) ²	RCFD2651	1,750,000	5.a.2.
3. Structured advances (included in items 5.a.(1)(a) - (d) above).....	RCFDF059	0	5.a.3.
b. Other borrowings:			5.b.
1. Other borrowings with a remaining maturity or next repricing date of: ³			5.b.1.
a. One year or less.....	RCFDF060	821,219	5.b.1.a.
b. Over one year through three years.....	RCFDF061	0	5.b.1.b.
c. Over three years through five years.....	RCFDF062	0	5.b.1.c.
d. Over five years.....	RCFDF063	0	5.b.1.d.
2. Other borrowings with a remaining maturity of one year or less (included in item 5.b.(1)(a) above) ⁴	RCFDB571	534,528	5.b.2.
c. Total (sum of items 5.a.(1)(a)-(d) and items 5.b.(1)(a)-(d)) (must equal Schedule RC, item 16).....	RCFD3190	3,571,219	5.c.
6. Does the reporting bank sell private label or third party mutual funds and annuities?.....	RCFDB569	Yes	6.
7. Assets under the reporting bank's management in proprietary mutual funds and annuities.....	RCFDB570	44,483,275	7.
8. Internet Web site addresses and physical office trade names:			8.
a. Uniform Resource Locator (URL) of the reporting institution's primary Internet Web site (home page), if any (Example: www.examplebank.com):.....	TEXT4087	Click here for value	8.a.

- Item 4 is to be completed only by insured state banks that have been approved by the FDIC to hold grandfathered equity investments. See instructions for this item and the Glossary entry for "Securities Activities" for further detail on accounting for investments in equity securities.
- Report fixed-rate advances by remaining maturity and floating-rate advances by next repricing date.
- Report both fixed- and floating-rate advances by remaining maturity. Exclude floating-rate advances with a next repricing date of one year or less that have a remaining maturity of over one year.
- Report fixed-rate other borrowings by remaining maturity and floating-rate other borrowings by next repricing date.
- Report both fixed- and floating-rate other borrowings by remaining maturity. Exclude floating rate other borrowings with a next repricing date of one year or less that have a remaining maturity of over one year.

Dollar amounts in thousands

b. URLs of all other public-facing Internet Web sites that the reporting institution uses to accept or solicit deposits from the public, if any (Example: www.examplebank.biz): ¹			8.b.
1. URL 1.....	TE01N528	Click here for value	8.b.1.
2. URL 2.....	TE02N528	NR	8.b.2.
3. URL 3.....	TE03N528	NR	8.b.3.
4. URL 4.....	TE04N528	NR	8.b.4.
5. URL 5.....	TE05N528	NR	8.b.5.
6. URL 6.....	TE06N528	NR	8.b.6.
7. URL 7.....	TE07N528	NR	8.b.7.
8. URL 8.....	TE08N528	NR	8.b.8.
9. URL 9.....	TE09N528	NR	8.b.9.
10. URL 10.....	TE10N528	NR	8.b.10.
c. Trade names other than the reporting institution's legal title used to identify one or more of the institution's physical offices at which deposits are accepted or solicited from the public, if any:			8.c.
1. Trade name 1.....	TE01N529	NR	8.c.1.
2. Trade name 2.....	TE02N529	NR	8.c.2.
3. Trade name 3.....	TE03N529	NR	8.c.3.
4. Trade name 4.....	TE04N529	NR	8.c.4.
5. Trade name 5.....	TE05N529	NR	8.c.5.
6. Trade name 6.....	TE06N529	NR	8.c.6.
Item 9 is to be completed annually in the December report only.			
9. Do any of the bank's Internet Web sites have transactional capability, i.e., allow the bank's customers to execute transactions on their accounts through the Web site?.....		RCFD4088	NR 9.
10. Secured liabilities:			10.
a. Amount of "Federal funds purchased in domestic offices" that are secured (included in Schedule RC, item 14.a).....		RCONF064	0 10.a.
b. Amount of "Other borrowings" that are secured (included in Schedule RC-M, items 5.b.(1)(a) - (d)).....		RCFDF065	0 10.b.
11. Does the bank act as trustee or custodian for Individual Retirement Accounts, Health Savings Accounts, and other similar accounts?.....		RCONG463	Yes 11.
12. Does the bank provide custody, safekeeping, or other services involving the acceptance of orders for the sale or purchase of securities?.....		RCONG464	Yes 12.
13. Assets covered by loss-sharing agreements with the FDIC:			13.
a. Loans and leases (included in Schedule RC, items 4.a and 4.b):			13.a.
1. Loans secured by real estate in domestic offices:			13.a.1.
a. Construction, land development, and other land loans:			13.a.1.a.
1. 1-4 family residential construction loans.....		RCONK169	0 13.a.1.a.1.
2. Other construction loans and all land development and other land loans.....		RCONK170	0 13.a.1.a.2.
b. Secured by farmland.....		RCONK171	0 13.a.1.b.
c. Secured by 1-4 family residential properties:			13.a.1.c.
1. Revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit.....		RCONK172	0 13.a.1.c.1.
2. Closed-end loans secured by 1-4 family residential properties:			13.a.1.c.2.
a. Secured by first liens.....		RCONK173	0 13.a.1.c.2a.
b. Secured by junior liens.....		RCONK174	0 13.a.1.c.2b.
d. Secured by multifamily (5 or more) residential properties.....		RCONK175	0 13.a.1.d.
e. Secured by nonfarm nonresidential properties:			13.a.1.e.
1. Loans secured by owner-occupied nonfarm nonresidential properties.....		RCONK176	0 13.a.1.e.1.
2. Loans secured by other nonfarm nonresidential properties.....		RCONK177	0 13.a.1.e.2.
2. Not applicable			13.a.2.
3. Not applicable			13.a.3.
4. Not applicable			13.a.4.
5. All other loans and all leases.....		RCFDK183	0 13.a.5.

1. Report only highest level URLs (for example, report www.examplebank.biz, but do not also report www.examplebank.biz/checking). Report each top level domain name used (for example, report both www.examplebank.biz and www.examplebank.net).

Dollar amounts in thousands

b. Other real estate owned (included in Schedule RC, item 7):			13.b.
1. Construction, land development, and other land in domestic offices.....	RCONK187	0	13.b.1.
2. Farmland in domestic offices.....	RCONK188	0	13.b.2.
3. 1-4 family residential properties in domestic offices.....	RCONK189	0	13.b.3.
4. Multifamily (5 or more) residential properties in domestic offices.....	RCONK190	0	13.b.4.
5. Nonfarm nonresidential properties in domestic offices.....	RCONK191	0	13.b.5.
6. In foreign offices.....	RCFNK260	0	13.b.6.
7. Portion of covered other real estate owned included in items 13.b.(1) through (6) above that is protected by FDIC loss-sharing agreements.....	RCFDK192	0	13.b.7.
c. Debt securities (included in Schedule RC, items 2.a and 2.b).....	RCFDJ461	0	13.c.
d. Other assets (exclude FDIC loss-sharing indemnification assets).....	RCFDJ462	0	13.d.
<i>Items 14.a and 14.b are to be completed annually in the December report only.</i>			
14. Captive insurance and reinsurance subsidiaries:			14.
a. Total assets of captive insurance subsidiaries ²	RCFDK193	NR	14.a.
b. Total assets of captive reinsurance subsidiaries ²	RCFDK194	NR	14.b.
<i>Item 15 is to be completed by institutions that are required or have elected to be treated as a Qualified Thrift Lender.</i>			
15. Qualified Thrift Lender (QTL) test:			15.
a. Does the institution use the Home Owners' Loan Act (HOLA) QTL test or the Internal Revenue Service Domestic Building and Loan Association (IRS DBLA) test to determine its QTL compliance? (for the HOLA QTL test, enter 1; for the IRS DBLA test, enter 2).....	RCONL133	NR	15.a.
b. Has the institution been in compliance with the HOLA QTL test as of each month end during the quarter or the IRS DBLA test for its most recent taxable year, as applicable?.....	RCONL135	NR	15.b.
<i>Item 16.a and, if appropriate, items 16.b.(1) through 16.b.(3) are to be completed annually in the December report only.</i>			
16. International remittance transfers offered to consumers: ¹			16.
a. Estimated number of international remittance transfers provided by your institution during the calendar year ending on the report date.....	RCONN523	NR	16.a.
<i>Items 16.b.(1) through 16.b.(3) are to be completed by institutions that reported 501 or more international remittance transfers in item 16.a in either or both of the current report or the most recent prior report in which item 16.a was required to be completed.</i>			
b. Estimated dollar value of remittance transfers provided by your institution and usage of regulatory exceptions during the calendar year ending on the report date and:			16.b.
1. Estimated dollar value of international remittance transfers.....	RCONN524	NR	16.b.1.
2. Estimated number of international remittance transfers for which your institution applied the permanent exchange rate exception.....	RCONMM07	NR	16.b.2.
3. Estimated number of international remittance transfers for which your institution applied the permanent covered third-party exception.....	RCONMQ52	NR	16.b.3.
17. U.S. Small Business Administration Paycheck Protection Program (PPP) loans and the Federal Reserve PPP Liquidity Facility (PPPLF): ³			17.
a. Number of PPP loans outstanding.....	RCONLG26	4659	17.a.
b. Outstanding balance of PPP loans.....	RCONLG27	1,295,383	17.b.
c. Outstanding balance of PPP loans pledged to the PPPLF.....	RCONLG28	0	17.c.
d. Outstanding balance of borrowings from Federal Reserve Banks under the PPPLF with a remaining maturity of:			17.d.
1. One year or less.....	RCONLL59	0	17.d.1.
2. More than one year.....	RCONLL60	0	17.d.2.
e. Quarterly average amount of PPP loans pledged to the PPPLF and excluded from "Total assets for the leverage ratio" reported in Schedule RC-R, Part I, item 30.....	RCONLL57	0	17.e.
18. Money Market Mutual Fund Liquidity Facility (MMLF):			18.
a. Outstanding balance of assets purchased under the MMLF.....	RCONLL61	0	18.a.
b. Quarterly average amount of assets purchased under the MMLF and excluded from "Total assets for the leverage ratio" reported in Schedule RC-R, Part I, item 30.....	RCONLL58	0	18.b.

(TE01N528) <https://www.hsbcdirect.com/>

- Report total assets before eliminating intercompany transactions between the consolidated insurance or reinsurance subsidiary and other offices or consolidated subsidiaries of the reporting bank.
- Report information about international electronic transfers of funds offered to consumers in the United States that: (a) are "remittance transfers" as defined by subpart B of Regulation E (12 CFR § 1005.30(e)), or (b) would qualify as "remittance transfers" under subpart B of Regulation E (12 CFR § 1005.30(e)) but are excluded from that definition only because the provider is not providing those transfers in the normal course of its business. See 12 CFR § 1005.30(f). For purposes of this item 16, such transfers are excluded.
- Paycheck Protection Program (PPP) covered loans as defined in section 7(a)(36) of the Small Business Act (15 U.S.C. 636(a)(36)). The PPP was established by Section 1102 of the 2020 Coronavirus Aid, Relief, and Economic Security Act.

(TEXT4087) <https://www.us.hsbc.com/>

Schedule RC-N - Past Due and Nonaccrual Loans Leases and Other Assets(Form Type - 031)

Dollar amounts in thousands	(Column A) Past due 30 through 89 days and still accruing	(Column B) Past due 90 days or more and still accruing	(Column C) Nonaccrual				
1. Loans secured by real estate:					1.		
a. Construction, land development, and other land loans in domestic offices:					1.a.		
1. 1-4 family residential construction loans.....	RCONF172	0	RCONF174	0	RCONF176	0	1.a.1.
2. Other construction loans and all land development and other land loans.....	RCONF173	59,001	RCONF175	0	RCONF177	7,737	1.a.2.
b. Secured by farmland in domestic offices.....	RCON3493	0	RCON3494	0	RCON3495	0	1.b.
c. Secured by 1-4 family residential properties in domestic offices:							1.c.
1. Revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit.....	RCON5398	2,252	RCON5399	0	RCON5400	54,331	1.c.1.
2. Closed-end loans secured by 1-4 family residential properties:							1.c.2.
a. Secured by first liens.....	RCONC236	174,691	RCONC237	0	RCONC229	1,218,708	1c2a
b. Secured by junior liens.....	RCONC238	254	RCONC239	0	RCONC230	9,947	1c2b
d. Secured by multifamily (5 or more) residential properties in domestic offices.....	RCON3499	19,521	RCON3500	0	RCON3501	0	1.d.
e. Secured by nonfarm nonresidential properties in domestic offices:							1.e.
1. Loans secured by owner-occupied nonfarm nonresidential properties.....	RCONF178	1,917	RCONF180	0	RCONF182	18,514	1.e.1.
2. Loans secured by other nonfarm nonresidential properties.....	RCONF179	8,645	RCONF181	0	RCONF183	31,017	1.e.2.
f. In foreign offices.....	RCFNB572	0	RCFNB573	0	RCFNB574	0	1.f.
2. Loans to depository institutions and acceptances of other banks:							2.
a. To U.S. banks and other U.S. depository institutions.....	RCFD5377	0	RCFD5378	0	RCFD5379	0	2.a.
b. To foreign banks.....	RCFD5380	0	RCFD5381	0	RCFD5382	0	2.b.
3. Loans to finance agricultural production and other loans to farmers.....	RCFD1594	0	RCFD1597	0	RCFD1583	0	3.
4. Commercial and industrial loans:							4.
a. To U.S. addressees (domicile).....	RCFD1251	58,779	RCFD1252	500	RCFD1253	230,999	4.a.
b. To non-U.S. addressees (domicile).....	RCFD1254	5,103	RCFD1255	0	RCFD1256	108,311	4.b.
5. Loans to individuals for household, family, and other personal expenditures:							5.
a. Credit cards.....	RCFDB575	17,342	RCFDB576	27,841	RCFDB577	0	5.a.
b. Automobile loans.....	RCFDK213	0	RCFDK214	0	RCFDK215	0	5.b.
c. Other (includes revolving credit plans other than credit cards and other consumer loans).....	RCFDK216	5,249	RCFDK217	2,897	RCFDK218	0	5.c.
6. Loans to foreign governments and official institutions.....	RCFD5389	0	RCFD5390	0	RCFD5391	0	6.
7. All other loans.....	RCFD5459	3,928	RCFD5460	839	RCFD5461	90,115	7.
8. Lease financing receivables:							8.
a. Leases to individuals for household, family, and other personal expenditures.....	RCFDF166	0	RCFDF167	0	RCFDF168	0	8.a.
b. All other leases.....	RCFDF169	0	RCFDF170	0	RCFDF171	0	8.b.
9. Total loans and leases (sum of items 1 through 8.b).....	RCFD1406	356,682	RCFD1407	32,077	RCFD1403	1,769,679	9.
10. Debt securities and other assets (exclude other real estate owned and other repossessed assets).....	RCFD3505	0	RCFD3506	0	RCFD3507	0	10.
11. Loans and leases reported in items 1 through 8 above that are wholly or partially guaranteed by the U.S. Government, excluding loans and leases covered by loss-sharing agreements with the FDIC:.....	RCFDK036	32,112	RCFDK037	0	RCFDK038	116,175	11.
a. Guaranteed portion of loans and leases included in item 11 above, excluding rebooked "GNMA loans".....	RCFDK039	1,875	RCFDK040	0	RCFDK041	116,135	11.a.
b. Rebooked "GNMA loans" that have been repurchased or are eligible for repurchase included in item 11 above.....	RCFDK042	30,180	RCFDK043	0	RCFDK044	0	11.b.
12. Loans and leases reported in items 1 through 8 above that are covered by loss-sharing agreements with the FDIC:							12.
a. Loans secured by real estate in domestic offices:							12.a.
1. Construction, land development, and other land loans:							12a1.
a. 1-4 family residential construction loans.....	RCONK045	0	RCONK046	0	RCONK047	0	12a1a.

Dollar amounts in thousands	(Column A) Past due 30 through 89 days and still accruing		(Column B) Past due 90 days or more and still accruing		(Column C) Nonaccrual		
b. Other construction loans and all land development and other land loans.....	RCONK048	0	RCONK049	0	RCONK050	0	12a1b
2. Secured by farmland.....	RCONK051	0	RCONK052	0	RCONK053	0	12a2.
3. Secured by 1-4 family residential properties:							12a.3.
a. Revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit.....	RCONK054	0	RCONK055	0	RCONK056	0	12a3a
b. Closed-end loans secured by 1-4 family residential properties:							12a3b
1. Secured by first liens.....	RCONK057	0	RCONK058	0	RCONK059	0	12a31.
2. Secured by junior liens.....	RCONK060	0	RCONK061	0	RCONK062	0	12a32
4. Secured by multifamily (5 or more) residential properties.....	RCONK063	0	RCONK064	0	RCONK065	0	12a.4.
5. Secured by nonfarm nonresidential properties:							12a.5.
a. Loans secured by owner-occupied nonfarm nonresidential properties.....	RCONK066	0	RCONK067	0	RCONK068	0	12a5a
b. Loans secured by other nonfarm nonresidential properties.....	RCONK069	0	RCONK070	0	RCONK071	0	12a5b
b. Not applicable							12.b.
c. Not applicable							12.c.
d. Not applicable							12.d.
e. All other loans and all leases.....	RCFDK087	0	RCFDK088	0	RCFDK089	0	12.e.
f. Portion of covered loans and leases included in items 12.a through 12.e above that is protected by FDIC loss-sharing agreements.....	RCFDK102	0	RCFDK103	0	RCFDK104	0	12.f.
1. Loans restructured in troubled debt restructurings included in Schedule RC-N, items 1 through 7, above (and not reported in Schedule RC-C, Part 1, Memorandum item 1):							M.1.
a. Construction, land development, and other land loans in domestic offices:							M.1.a.
1. 1-4 family residential construction loans.....	RCONK105	0	RCONK106	0	RCONK107	0	M1a1.
2. Other construction loans and all land development and other land loans.....	RCONK108	0	RCONK109	0	RCONK110	0	M1a2
b. Loans secured by 1-4 family residential properties in domestic offices..	RCONF661	63,042	RCONF662	0	RCONF663	88,043	M.1.b.
c. Secured by multifamily (5 or more) residential properties in domestic offices.....	RCONK111	0	RCONK112	0	RCONK113	0	M.1.c.
d. Secured by nonfarm nonresidential properties in domestic offices:							M.1.d.
1. Loans secured by owner-occupied nonfarm nonresidential properties.....	RCONK114	0	RCONK115	0	RCONK116	10,568	M1d1.
2. Loans secured by other nonfarm nonresidential properties.....	RCONK117	0	RCONK118	0	RCONK119	0	M1d2
e. Commercial and industrial loans:							M.1.e.
1. To U.S. addressees (domicile).....	RCFDK120	0	RCFDK121	0	RCFDK122	134,907	M1e1.
2. To non-U.S. addressees (domicile).....	RCFDK123	0	RCFDK124	0	RCFDK125	0	M1e2
f. All other loans (include loans to individuals for household, family, and other personal expenditures).....	RCFDK126	247	RCFDK127	302	RCFDK128	0	M.1.f.
Itemize loan categories included in Memorandum item 1.f, above that exceed 10 percent of total loans restructured in troubled debt restructurings that are past due 30 days or more or in nonaccrual status (sum of Memorandum items 1.a through 1.f, columns A through C):							
1. Loans secured by farmland in domestic offices.....	RCONK130	0	RCONK131	0	RCONK132	0	M1f1.
2. Not applicable							M1f2.
3. Loans to finance agricultural production and other loans to farmers.....	RCFDK138	0	RCFDK139	0	RCFDK140	0	M1f3.
4. Loans to individuals for household, family, and other personal expenditures:							M1f4.
a. Credit cards.....	RCFDK274	0	RCFDK275	0	RCFDK276	0	M1f4a
b. Automobile loans.....	RCFDK277	0	RCFDK278	0	RCFDK279	0	M1f4b
c. Other (includes revolving credit plans other than credit cards and other consumer loans).....	RCFDK280	0	RCFDK281	0	RCFDK282	0	M1f4c
g. Total loans restructured in troubled debt restructurings included in Schedule RC-N, items 1 through 7, above and not reported in Schedule RC-C, Part I, Memorandum item 1 (sum of items Memorandum item 1.a.(1) through Memorandum item 1.f) ¹	RCFDHK26	63,289	RCFDHK27	302	RCFDHK28	233,518	M.1.g.

1. Exclude amounts reported in Memorandum items 1.f.(1) through 1.f.(4) when calculating the total in Memorandum item 1.g.

Dollar amounts in thousands	(Column A) Past due 30 through 89 days and still accruing		(Column B) Past due 90 days or more and still accruing		(Column C) Nonaccrual		
2. Loans to finance commercial real estate, construction, and land development activities (not secured by real estate) included in Schedule RC-N, items 4 and 7, above.....	RCFD6558	0	RCFD6559	0	RCFD6560	0	M.2.
3. Loans secured by real estate to non-U.S. addressees (domicile) (included in Schedule RC-N, item 1, above).....	RCFD1248	0	RCFD1249	0	RCFD1250	0	M.3.
4. Not applicable							M.4.
5. Loans and leases held for sale (included in Schedule RC-N, items 1 through 8, above).....	RCFDC240	0	RCFDC241	0	RCFDC226	353	M.5.

Dollar amounts in thousands		(Column A) Past due 30 through 89 days		(Column B) Past due 90 days or more	
6. Derivative contracts: Fair value of amounts carried as assets.....		RCFD3529	0	RCFD3530	0

Dollar amounts in thousands			
<i>Memorandum items 7, 8, 9.a, and 9.b are to be completed semiannually in the June and December reports only.</i>			
7. Additions to nonaccrual assets during the previous six months.....	RCFDC410	NR	M.7.
8. Nonaccrual assets sold during the previous six months.....	RCFDC411	NR	M.8.

Dollar amounts in thousands	(Column A) Past due 30 through 89 days and still accruing		(Column B) Past due 90 days or more and still accruing		(Column C) Nonaccrual		
9. Purchased credit-impaired loans accounted for in accordance with FASB ASC 310-30 (former AICPA Stament of Position 03-3); ²							M.9.
a. Outstanding balance.....	RCFDL183	NR	RCFDL184	NR	RCFDL185	NR	M.9.a.
b. Amount included in Schedule RC-N, items 1 through 7, above.....	RCFDL186	NR	RCFDL187	NR	RCFDL188	NR	M.9.b.

2. Memorandum items 9.a and 9.b should be completed only by institutions that have not yet adopted ASU 2016-13.

Schedule RC-O - Other Data for Deposit Insurance and FICO Assessments(Form Type - 031)

All FDIC-insured depository institutions must complete items 1 through 9, 10, and 11, Memorandum item 1, and, if applicable, item 9.a, Memorandum items 2, 3, and 6 through 18 each quarter. Unless otherwise indicated, complete items 1 through 11 and Memorandum items 1 through 3 on an "unconsolidated single FDIC certificate number basis" (see instructions) and complete Memorandum items 6 through 18 on a fully consolidated basis.

Dollar amounts in thousands

1. Total deposit liabilities before exclusions (gross) as defined in Section 3(l) of the Federal Deposit Insurance Act and FDIC regulations.....	RCFDF236	164,499,048	1.
2. Total allowable exclusions, including interest accrued and unpaid on allowable exclusions (including foreign deposits).....	RCFDF237	7,198,492	2.
3. Total foreign deposits, including interest accrued and unpaid thereon (included in item 2 above).....	RCFNF234	7,198,492	3.
4. Average consolidated total assets for the calendar quarter.....	RCFDK652	199,789,110	4.
a. Averaging method used (for daily averaging, enter 1; for weekly averaging, enter 2).....	RCFDK653	1	4.a.
5. Average tangible equity for the calendar quarter ¹	RCFDK654	20,766,338	5.
6. Holdings of long-term unsecured debt issued by other FDIC-insured depository institutions.....	RCFDK655	0	6.
7. Unsecured "Other borrowings" with a remaining maturity of (sum of items 7.a through 7.d must be less than or equal to Schedule RC-M, items 5.b.(1)(a)-(d) minus item 10.b):			7.
a. One year or less.....	RCFDG465	534,528	7.a.
b. Over one year through three years.....	RCFDG466	16,628	7.b.
c. Over three years through five years.....	RCFDG467	63,662	7.c.
d. Over five years.....	RCFDG468	206,401	7.d.
8. Subordinated notes and debentures with a remaining maturity of (sum of items 8.a through 8.d must equal Schedule RC, item 19):			8.
a. One year or less.....	RCFDG469	0	8.a.
b. Over one year through three years.....	RCFDG470	0	8.b.
c. Over three years through five years.....	RCFDG471	0	8.c.
d. Over five years.....	RCFDG472	1,632,967	8.d.
9. Brokered reciprocal deposits (included in Schedule RC-E, Part I, Memorandum item 1.b).....	RCONG803	0	9.
Item 9.a is to be completed on a fully consolidated basis by all institutions that own another insured depository institution.			
a. Fully consolidated brokered reciprocal deposits.....	RCONL190	NR	9.a.
10. Banker's bank certification: Does the reporting institution meet both the statutory definition of a banker's bank and the business conduct test set forth in FDIC regulations? If the answer to item 10 is "YES," complete items 10.a and 10.b.....	RCFDK656	No	10.
If the answer to item 10 is "YES," complete items 10.a and 10.b.			
a. Banker's bank deduction.....	RCFDK657	NR	10.a.
b. Banker's bank deduction limit.....	RCFDK658	NR	10.b.
11. Custodial bank certification: Does the reporting institution meet the definition of a custodial bank set forth in FDIC regulations? If the answer to item 11 is "YES," complete items 11.a and 11.b.....	RCFDK659	Yes	11.
If the answer to item 11 is "YES," complete items 11.a and 11.b.			
a. Custodial bank deduction.....	RCFDK660	72,779,440	11.a.
b. Custodial bank deduction limit.....	RCFDK661	1,836,944	11.b.
1. Total deposit liabilities of the bank (including related interest accrued and unpaid) less allowable exclusions (including related interest accrued and unpaid) (sum of Memorandum items 1.a.(1), 1.b.(1), 1.c.(1), and 1.d.(1) must equal Schedule RC-O, item 1 less item 2):			M.1.
a. Deposit accounts (excluding retirement accounts) of \$250,000 or less: ¹			M.1.a.
1. Amount of deposit accounts (excluding retirement accounts) of \$250,000 or less.....	RCONF049	47,184,451	M.1.a.1.
2. Number of deposit accounts (excluding retirement accounts) of \$250,000 or less.....	RCONF050	1300278	M.1.a.2.
b. Deposit accounts (excluding retirement accounts) of more than \$250,000: ¹			M.1.b.
1. Amount of deposit accounts (excluding retirement accounts) of more than \$250,000.....	RCONF051	110,116,105	M.1.b.1.
2. Number of deposit accounts (excluding retirement accounts) of more than \$250,000.....	RCONF052	40469	M.1.b.2.
c. Retirement deposit accounts of \$250,000 or less: ¹			M.1.c.
1. Amount of retirement deposit accounts of \$250,000 or less.....	RCONF045	0	M.1.c.1.
2. Number of retirement deposit accounts of \$250,000 or less.....	RCONF046	0	M.1.c.2.
d. Retirement deposit accounts of more than \$250,000: ¹			M.1.d.

1. See instructions for averaging methods. For deposit insurance assessment purposes, tangible equity is defined as Tier 1 capital as set forth in the banking agencies' regulatory capital standards and reported in Schedule RC-R, Part I, item 26, except as described in the instructions.
 1. The dollar amounts used as the basis for reporting in Memorandum items 1.a through 1.d reflect the deposit insurance limits in effect on the report date.

Dollar amounts in thousands

1. Amount of retirement deposit accounts of more than \$250,000.....	RCONF047	0	M.1.d.1.
2. Number of retirement deposit accounts of more than \$250,000.....	RCONF048	0	M.1.d.2.
<i>Memorandum item 2 is to be completed by banks with \$1 billion or more in total assets.</i>			
2. Estimated amount of uninsured deposits in domestic offices of the bank and in insured branches in Puerto Rico and U.S. territories and possessions, including related interest accrued and unpaid (see instructions) ³	RCON5597	99,711,831	M.2.
3. Has the reporting institution been consolidated with a parent bank or savings association in that parent bank's or parent savings association's Call Report? If so, report the legal title and FDIC Certificate Number of the parent bank or parent savings association:			M.3.
a. Legal title.....	TEXTA545	NR	M.3.a.
b. FDIC Certificate Number.....	RCONA545	0	M.3.b.
4. Dually payable deposits in the reporting institution's foreign branches.....	RCFNGW43	0	M.4.
5. Not applicable			M.5.
<i>Memorandum items 6 through 12 are to be completed by "large institutions" and "highly complex institutions" as defined in FDIC regulations.</i>			
6. Criticized and classified items:			M.6.
a. Special mention.....	RCFDK663	CONF	M.6.a.
b. Substandard.....	RCFDK664	CONF	M.6.b.
c. Doubtful.....	RCFDK665	CONF	M.6.c.
d. Loss.....	RCFDK666	CONF	M.6.d.
7. "Nontraditional 1-4 family residential mortgage loans" as defined for assessment purposes only in FDIC regulations:			M.7.
a. Nontraditional 1-4 family residential mortgage loans.....	RCFDN025	CONF	M.7.a.
b. Securitizations of nontraditional 1-4 family residential mortgage loans.....	RCFDN026	CONF	M.7.b.
8. "Higher-risk consumer loans" as defined for assessment purposes only in FDIC regulations:			M.8.
a. Higher-risk consumer loans.....	RCFDN027	CONF	M.8.a.
b. Securitizations of higher-risk consumer loans.....	RCFDN028	CONF	M.8.b.
9. "Higher-risk commercial and industrial loans and securities" as defined for assessment purposes only in FDIC regulations:			M.9.
a. Higher-risk commercial and industrial loans and securities.....	RCFDN029	CONF	M.9.a.
b. Securitizations of higher-risk commercial and industrial loans and securities.....	RCFDN030	CONF	M.9.b.
10. Commitments to fund construction, land development, and other land loans secured by real estate for the consolidated bank:			M.10.
a. Total unfunded commitments.....	RCFDK676	891,525	M.10.a.
b. Portion of unfunded commitments guaranteed or insured by the U.S. government (including the FDIC).....	RCFDK677	0	M.10.b.
11. Amount of other real estate owned recoverable from the U.S. government under guarantee or insurance provisions (excluding FDIC loss-sharing agreements).....	RCFDK669	0	M.11.
12. Nonbrokered time deposits of more than \$250,000 in domestic offices (included in Schedule RC-E, Memorandum item 2.d).....	RCONK678	12,032,202	M.12.
<i>Memorandum item 13.a is to be completed by "large institutions" and "highly complex institutions" as defined in FDIC regulations. Memorandum items 13.b through 13.h are to be completed by "large institutions" only.</i>			
13. Portion of funded loans and securities in domestic and foreign offices guaranteed or insured by the U.S. government (including FDIC loss-sharing agreements):			M.13.
a. Construction, land development, and other land loans secured by real estate.....	RCFDN177	0	M.13.a.
b. Loans secured by multifamily residential and nonfarm nonresidential properties.....	RCFDN178	0	M.13.b.
c. Closed-end loans secured by first liens on 1-4 family residential properties.....	RCFDN179	260,938	M.13.c.
d. Closed-end loans secured by junior liens on 1-4 family residential properties and revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit.....	RCFDN180	0	M.13.d.
e. Commercial and industrial loans.....	RCFDN181	0	M.13.e.
f. Credit card loans to individuals for household, family, and other personal expenditures.....	RCFDN182	0	M.13.f.
g. All other loans to individuals for household, family, and other personal expenditures.....	RCFDN183	53,386	M.13.g.
h. Non-agency residential mortgage-backed securities.....	RCFDM963	0	M.13.h.
<i>Memorandum items 14 and 15 are to be completed by "highly complex institutions" as defined in FDIC regulations.</i>			
14. Amount of the institution's largest counterparty exposure.....	RCFDK673	CONF	M.14.
15. Total amount of the institution's 20 largest counterparty exposures.....	RCFDK674	CONF	M.15.
<i>Memorandum item 16 is to be completed by "large institutions" and "highly complex institutions" as defined in FDIC regulations.</i>			
16. Portion of loans restructured in troubled debt restructurings that are in compliance with their modified terms and are guaranteed or insured by the U.S. government (including the FDIC) (included in Schedule RC-C, part I, Memorandum item 1).....	RCFDL189	145,266	M.16.

3. Uninsured deposits should be estimated based on the deposit insurance limits set forth in Memorandum items 1.a through 1.d.

Dollar amounts in thousands

Memorandum item 17 is to be completed on a fully consolidated basis by those "large institutions" and "highly complex institutions" as defined in FDIC regulations that own another insured depository institution.

17. Selected fully consolidated data for deposit insurance assessment purposes:

a. Total deposit liabilities before exclusions (gross) as defined in Section 3(l) of the Federal Deposit Insurance Act and FDIC regulations.....	RCFDL194	NR	M.17.a.
b. Total allowable exclusions, including interest accrued and unpaid on allowable exclusions (including foreign deposits).....	RCFDL195	NR	M.17.b.
c. Unsecured "Other borrowings" with a remaining maturity of one year or less.....	RCFDL196	NR	M.17.c.
d. Estimated amount of uninsured deposits in domestic offices of the institution and in insured branches in Puerto Rico and U.S. territories and possessions, including related interest accrued and unpaid.....	RCONL197	NR	M.17.d.

	(Column A) Two-Year Probability of Default (PD) <= 1%	(Column B) Two-Year Probability of Default (PD) 1.01–4%	(Column C) Two-Year Probability of Default (PD) 4.01–7%	(Column D) Two-Year Probability of Default (PD) 7.01–10%	(Column E) Two-Year Probability of Default (PD) 10.01–14%	(Column F) Two-Year Probability of Default (PD) 14.01–16%	(Column G) Two-Year Probability of Default (PD) 16.01–18%	(Column H) Two-Year Probability of Default (PD) 18.01–20%	(Column I) Two-Year Probability of Default (PD) 20.01–22%	(Column J) Two-Year Probability of Default (PD) 22.01–26%	(Column K) Two-Year Probability of Default (PD) 26.01–30%	(Column L) Two-Year Probability of Default (PD) > 30%	(Column M) Two-Year Probability of Default (PD) Unscoreable	(Column N) Two-Year Probability of Default (PD) Total	(Column O) PDs Were Derived Using	
Dollar amounts in thousands																
18. Outstanding balance of 1-4 family residential mortgage loans, consumer loans, and consumer leases by two-year probability of default:															M18	
a. "Nontraditional 1-4 family residential mortgage loans" as defined for assessment purposes only in FDIC regulations.....	RCFDM964 CONF	RCFDM965 CONF	RCFDM966 CONF	RCFDM967 CONF	RCFDM968 CONF	RCFDM969 CONF	RCFDM970 CONF	RCFDM971 CONF	RCFDM972 CONF	RCFDM973 CONF	RCFDM974 CONF	RCFDM975 CONF	RCFDM976 CONF	RCFDM977 CONF	RCFDM978 CONF	M18a
b. Closed-end loans secured by first liens on 1-4 family residential properties.....	RCFDM979 CONF	RCFDM980 CONF	RCFDM981 CONF	RCFDM982 CONF	RCFDM983 CONF	RCFDM984 CONF	RCFDM985 CONF	RCFDM986 CONF	RCFDM987 CONF	RCFDM988 CONF	RCFDM989 CONF	RCFDM990 CONF	RCFDM991 CONF	RCFDM992 CONF	RCFDM993 CONF	M18b
c. Closed-end loans secured by junior liens on 1-4 family residential properties.....	RCFDM994 CONF	RCFDM995 CONF	RCFDM996 CONF	RCFDM997 CONF	RCFDM998 CONF	RCFDM999 CONF	RCFDN001 CONF	RCFDN002 CONF	RCFDN003 CONF	RCFDN004 CONF	RCFDN005 CONF	RCFDN006 CONF	RCFDN007 CONF	RCFDN008 CONF	RCFDN009 CONF	M18c
d. Revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit.....	RCFDN010 CONF	RCFDN011 CONF	RCFDN012 CONF	RCFDN013 CONF	RCFDN014 CONF	RCFDN015 CONF	RCFDN016 CONF	RCFDN017 CONF	RCFDN018 CONF	RCFDN019 CONF	RCFDN020 CONF	RCFDN021 CONF	RCFDN022 CONF	RCFDN023 CONF	RCFDN024 CONF	M18d
e. Credit cards.....	RCFDN040 CONF	RCFDN041 CONF	RCFDN042 CONF	RCFDN043 CONF	RCFDN044 CONF	RCFDN045 CONF	RCFDN046 CONF	RCFDN047 CONF	RCFDN048 CONF	RCFDN049 CONF	RCFDN050 CONF	RCFDN051 CONF	RCFDN052 CONF	RCFDN053 CONF	RCFDN054 CONF	M18e
f. Automobile loans.....	RCFDN055 CONF	RCFDN056 CONF	RCFDN057 CONF	RCFDN058 CONF	RCFDN059 CONF	RCFDN060 CONF	RCFDN061 CONF	RCFDN062 CONF	RCFDN063 CONF	RCFDN064 CONF	RCFDN065 CONF	RCFDN066 CONF	RCFDN067 CONF	RCFDN068 CONF	RCFDN069 CONF	M18f
g. Student loans.....	RCFDN070 CONF	RCFDN071 CONF	RCFDN072 CONF	RCFDN073 CONF	RCFDN074 CONF	RCFDN075 CONF	RCFDN076 CONF	RCFDN077 CONF	RCFDN078 CONF	RCFDN079 CONF	RCFDN080 CONF	RCFDN081 CONF	RCFDN082 CONF	RCFDN083 CONF	RCFDN084 CONF	M18g
h. Other consumer loans and revolving credit plans other than credit cards.....	RCFDN085 CONF	RCFDN086 CONF	RCFDN087 CONF	RCFDN088 CONF	RCFDN089 CONF	RCFDN090 CONF	RCFDN091 CONF	RCFDN092 CONF	RCFDN093 CONF	RCFDN094 CONF	RCFDN095 CONF	RCFDN096 CONF	RCFDN097 CONF	RCFDN098 CONF	RCFDN099 CONF	M18h
i. Consumer leases.....	RCFDN100 CONF	RCFDN101 CONF	RCFDN102 CONF	RCFDN103 CONF	RCFDN104 CONF	RCFDN105 CONF	RCFDN106 CONF	RCFDN107 CONF	RCFDN108 CONF	RCFDN109 CONF	RCFDN110 CONF	RCFDN111 CONF	RCFDN112 CONF	RCFDN113 CONF	RCFDN114 CONF	M18i
j. Total.....	RCFDN115 CONF	RCFDN116 CONF	RCFDN117 CONF	RCFDN118 CONF	RCFDN119 CONF	RCFDN120 CONF	RCFDN121 CONF	RCFDN122 CONF	RCFDN123 CONF	RCFDN124 CONF	RCFDN125 CONF	RCFDN126 CONF	RCFDN127 CONF	RCFDN128 CONF		M18j

Schedule RC-P - 1-4 Family Residential Mortgage Banking Activities in Domestic Offices(Form Type - 031)

Schedule RC-P is to be completed by banks at which either 1-4 family residential mortgage loan originations and purchases for resale from all sources, loan sales, or quarter-end loans held for sale or trading in domestic offices exceed \$10 million for two consecutive quarters.

Dollar amounts in thousands

1. Retail originations during the quarter of 1-4 family residential mortgage loans for sale ¹	RCONHT81	216,847	1.
2. Wholesale originations and purchases during the quarter of 1-4 family residential mortgage loans for sale ²	RCONHT82	323,367	2.
3. 1-4 family residential mortgage loans sold during the quarter.....	RCONFT04	646,796	3.
4. 1-4 family residential mortgage loans held for sale or trading at quarter-end (included in Schedule RC, items 4.a and 5.).....	RCONFT05	94,779	4.
5. Noninterest income for the quarter from the sale, securitization, and servicing of 1-4 family residential mortgage loans (included in Schedule RI, items 5.c, 5.f, 5.g, and 5.i).....	RIADHT85	8,094	5.
6. Repurchases and indemnifications of 1-4 family residential mortgage loans during the quarter.....	RCONHT86	0	6.
7. Representation and warranty reserves for 1-4 family residential mortgage loans sold:			7.
a. For representations and warranties made to U.S. government agencies and government-sponsored agencies..	RCONL191	CONF	7.a.
b. For representations and warranties made to other parties.....	RCONL192	CONF	7.b.
c. Total representation and warranty reserves (sum of items 7.a and 7.b).....	RCONM288	3,577	7.c.

Schedule RC-Q - Assets and Liabilities Measured at Fair Value on a Recurring Basis(Form Type - 031)

Schedule RC-Q is to be completed by banks that:

- (1) Have elected to report financial instruments or servicing assets and liabilities at fair value under a fair value option with changes in fair value recognized in earnings, or
(2) Are required to complete Schedule RC-D, Trading Assets and Liabilities.

	(Column A) Total Fair Value Reported on Schedule RC	(Column B) LESS: Amounts Netted in the Determination of Total Fair Value	(Column C) Level 1 Fair Value Measurements	(Column D) Level 2 Fair Value Measurements	(Column E) Level 3 Fair Value Measurements	
Dollar amounts in thousands						
1. Available-for-sale debt securities and equity securities with readily determinable fair values not held for trading ¹	RCFDJA36 34,797,059	RCFDG474 0	RCFDG475 18,038,176	RCFDG476 16,629,002	RCFDG477 129,881	1.
2. Federal funds sold and securities purchased under agreements to resell.....	RCFDG478 0	RCFDG479 0	RCFDG480 0	RCFDG481 0	RCFDG482 0	2.
3. Loans and leases held for sale.....	RCFDG483 83,442	RCFDG484 0	RCFDG485 0	RCFDG486 83,442	RCFDG487 0	3.
4. Loans and leases held for investment.....	RCFDG488 0	RCFDG489 0	RCFDG490 0	RCFDG491 0	RCFDG492 0	4.
5. Trading assets:						5.
a. Derivative assets.....	RCFD3543 2,560,029	RCFDG493 21,177,844	RCFDG494 20,956	RCFDG495 23,228,543	RCFDG496 488,374	5.a.
b. Other trading assets.....	RCFDG497 23,261,284	RCFDG498 0	RCFDG499 18,520,819	RCFDG500 4,716,265	RCFDG501 24,200	5.b.
1. Nontrading securities at fair value with changes in fair value reported in current earnings (included in Schedule RC-Q, item 5.b, above).....	RCFDF240 0	RCFDF684 0	RCFDF692 0	RCFDF241 0	RCFDF242 0	5.b.1.
6. All other assets.....	RCFDG391 73,238	RCFDG392 297,011	RCFDG395 0	RCFDG396 359,397	RCFDG804 10,852	6.
7. Total assets measured at fair value on a recurring basis (sum of items 1 through 5.b plus item 6).....	RCFDG502 60,775,052	RCFDG503 21,474,855	RCFDG504 36,579,951	RCFDG505 45,016,649	RCFDG506 653,307	7.
8. Deposits.....	RCFDF252 3,764,679	RCFDF686 0	RCFDF694 0	RCFDF253 3,165,368	RCFDF254 599,311	8.
9. Federal funds purchased and securities sold under agreements to repurchase.....	RCFDG507 0	RCFDG508 0	RCFDG509 0	RCFDG510 0	RCFDG511 0	9.
10. Trading liabilities:						10.
a. Derivative liabilities.....	RCFD3547 1,664,187	RCFDG512 20,541,703	RCFDG513 5,121	RCFDG514 21,770,948	RCFDG515 429,821	10.a.
b. Other trading liabilities.....	RCFDG516 655,374	RCFDG517 0	RCFDG518 655,374	RCFDG519 0	RCFDG520 0	10.b.

1. Exclude originations and purchases of 1-4 family residential mortgage loans that are held for investment.
1. The amount reported in item 1, column A, must equal the sum of Schedule RC, items 2.b and 2.c.

	(Column A) Total Fair Value Reported on Schedule RC	(Column B) LESS: Amounts Netted in the Determination of Total Fair Value	(Column C) Level 1 Fair Value Measurements	(Column D) Level 2 Fair Value Measurements	(Column E) Level 3 Fair Value Measurements	
Dollar amounts in thousands						
11. Other borrowed money.....	RCFDG521 262,812	RCFDG522 0	RCFDG523 0	RCFDG524 262,812	RCFDG525 0	11.
12. Subordinated notes and debentures.....	RCFDG526 936,045	RCFDG527 0	RCFDG528 0	RCFDG529 936,045	RCFDG530 0	12.
13. All other liabilities.....	RCFDG805 54,008	RCFDG806 2,483	RCFDG807 0	RCFDG808 56,491	RCFDG809 0	13.
14. Total liabilities measured at fair value on a recurring basis (sum of items 8 through 13).....	RCFDG531 7,337,105	RCFDG532 20,544,186	RCFDG533 660,495	RCFDG534 26,191,664	RCFDG535 1,029,132	14.
1. All other assets (itemize and describe amounts included in Schedule RC-Q, item 6, that are greater than \$100,000 and exceed 25% of item 6):						M.1.
a. Mortgage servicing assets.....	RCFDG536 0	RCFDG537 0	RCFDG538 0	RCFDG539 0	RCFDG540 0	M.1.a.

	(Column A) Total Fair Value Reported on Schedule RC	(Column B) LESS: Amounts Netted in the Determination of Total Fair Value	(Column C) Level 1 Fair Value Measurements	(Column D) Level 2 Fair Value Measurements	(Column E) Level 3 Fair Value Measurements	
Dollar amounts in thousands						
b. Nontrading derivative assets.....	RCFDG541 66,238	RCFDG542 297,011	RCFDG543 0	RCFDG544 352,397	RCFDG545 10,852	M.1.b.

Dollar amounts in thousands					
c. Disclose component and the dollar amount of that component:					
1. Describe component.....	TEXTG546	NR			M.1.c.1.

	(Column A) Total Fair Value Reported on Schedule RC	(Column B) LESS: Amounts Netted in the Determination of Total Fair Value	(Column C) Level 1 Fair Value Measurements	(Column D) Level 2 Fair Value Measurements	(Column E) Level 3 Fair Value Measurements	
Dollar amounts in thousands						
2. Amount of component.....	RCFDG546 0	RCFDG547 0	RCFDG548 0	RCFDG549 0	RCFDG550 0	M.1.c.2.

Dollar amounts in thousands					
d. Disclose component and the dollar amount of that component:					
1. Describe component.....	TEXTG551	NR			M.1.d.1.

	(Column A) Total Fair Value Reported on Schedule RC	(Column B) LESS: Amounts Netted in the Determination of Total Fair Value	(Column C) Level 1 Fair Value Measurements	(Column D) Level 2 Fair Value Measurements	(Column E) Level 3 Fair Value Measurements	
Dollar amounts in thousands						
2. Amount of component.....	RCFDG551 0	RCFDG552 0	RCFDG553 0	RCFDG554 0	RCFDG555 0	M.1.d.2.

Dollar amounts in thousands					
e. Disclose component and the dollar amount of that component:					
1. Describe component.....	TEXTG556	NR			M.1.e.1.

	(Column A) Total Fair Value Reported on Schedule RC	(Column B) LESS: Amounts Netted in the Determination of Total Fair Value	(Column C) Level 1 Fair Value Measurements	(Column D) Level 2 Fair Value Measurements	(Column E) Level 3 Fair Value Measurements	
Dollar amounts in thousands						
2. Amount of component.....	RCFDG556 0	RCFDG557 0	RCFDG558 0	RCFDG559 0	RCFDG560 0	M.1.e.2.

Dollar amounts in thousands					
f. Disclose component and the dollar amount of that component:					
1. Describe component.....	TEXTG561	NR			M.1.f.1.

	(Column A) Total Fair Value Reported on Schedule RC	(Column B) LESS: Amounts Netted in the Determination of Total Fair Value	(Column C) Level 1 Fair Value Measurements	(Column D) Level 2 Fair Value Measurements	(Column E) Level 3 Fair Value Measurements	
Dollar amounts in thousands						
2. Amount of component.....	RCFDG561 0	RCFDG562 0	RCFDG563 0	RCFDG564 0	RCFDG565 0	M.1.f.2.
2. All other liabilities (itemize and describe amounts included in Schedule RC-Q, item 13, that are greater than \$100,000 and exceed 25% of item 13):						M.2.
a. Loan commitments (not accounted for as derivatives).....	RCFDF261 0	RCFDF689 0	RCFDF697 0	RCFDF262 0	RCFDF263 0	M.2.a.
b. Nontrading derivative liabilities.....	RCFDG566 54,008	RCFDG567 2,483	RCFDG568 0	RCFDG569 56,491	RCFDG570 0	M.2.b.

Dollar amounts in thousands			
c. Disclose component and the dollar amount of that component:			M.2.c.
1. Describe component.....	TEXTG571	NR	M.2.c.1.

	(Column A) Total Fair Value Reported on Schedule RC	(Column B) LESS: Amounts Netted in the Determination of Total Fair Value	(Column C) Level 1 Fair Value Measurements	(Column D) Level 2 Fair Value Measurements	(Column E) Level 3 Fair Value Measurements	
Dollar amounts in thousands						
2. Amount of component.....	RCFDG571 0	RCFDG572 0	RCFDG573 0	RCFDG574 0	RCFDG575 0	M.2.c.2.

Dollar amounts in thousands			
d. Disclose component and the dollar amount of that component:			M.2.d.
1. Describe component.....	TEXTG576	NR	M.2.d.1.

	(Column A) Total Fair Value Reported on Schedule RC	(Column B) LESS: Amounts Netted in the Determination of Total Fair Value	(Column C) Level 1 Fair Value Measurements	(Column D) Level 2 Fair Value Measurements	(Column E) Level 3 Fair Value Measurements	
Dollar amounts in thousands						
2. Amount of component.....	RCFDG576 0	RCFDG577 0	RCFDG578 0	RCFDG579 0	RCFDG580 0	M.2.d.2.

Dollar amounts in thousands			
e. Disclose component and the dollar amount of that component:			M.2.e.
1. Describe component.....	TEXTG581	NR	M.2.e.1.

	(Column A) Total Fair Value Reported on Schedule RC	(Column B) LESS: Amounts Netted in the Determination of Total Fair Value	(Column C) Level 1 Fair Value Measurements	(Column D) Level 2 Fair Value Measurements	(Column E) Level 3 Fair Value Measurements	
Dollar amounts in thousands						
2. Amount of component.....	RCFDG581 0	RCFDG582 0	RCFDG583 0	RCFDG584 0	RCFDG585 0	M.2.e.2.

Dollar amounts in thousands			
f. Disclose component and the dollar amount of that component:			M.2.f.
1. Describe component			M.2.f.1.
(TEXTG586) NR			

	(Column A) Total Fair Value Reported on Schedule RC	(Column B) LESS: Amounts Netted in the Determination of Total Fair Value	(Column C) Level 1 Fair Value Measurements	(Column D) Level 2 Fair Value Measurements	(Column E) Level 3 Fair Value Measurements	
Dollar amounts in thousands						
2. Amount of component.....	RCFDG586 0	RCFDG587 0	RCFDG588 0	RCFDG589 0	RCFDG590 0	M.2.f.2.

Dollar amounts in thousands	Consolidated Bank		
3. Loans measured at fair value (included in Schedule RC-C, Part I, items 1 through 9):			M.3.
a. Loans secured by real estate:			M.3.a.
1. Secured by 1-4 family residential properties.....	RCFDHT87	0	M.3.a.1.
2. All other loans secured by real estate.....	RCFDHT88	0	M.3.a.2.
b. Commercial and industrial loans.....	RCFDF585	41,274	M.3.b.
c. Loans to individuals for household, family, and other personal expenditures (i.e., consumer loans) (includes purchased paper).....	RCFDHT89	0	M.3.c.
d. Other loans.....	RCFDF589	42,168	M.3.d.
4. Unpaid principal balance of loans measured at fair value (reported in Schedule RC-Q, Memorandum item 3):			M.4.
a. Loans secured by real estate:			M.4.a.
1. Secured by 1-4 family residential properties.....	RCFDHT91	0	M.4.a.1.
2. All other loans secured by real estate.....	RCFDHT92	0	M.4.a.2.
b. Commercial and industrial loans.....	RCFDF597	41,274	M.4.b.
c. Loans to individuals for household, family, and other personal expenditures (i.e., consumer loans) (includes purchased paper).....	RCFDHT93	0	M.4.c.
d. Other loans.....	RCFDF601	42,168	M.4.d.

Schedule RC-R Part I - Regulatory Capital Components and Ratios(Form Type - 031)

Part I is to be completed on a consolidated basis.

Dollar amounts in thousands

1. Common stock plus related surplus, net of treasury stock and unearned employee stock ownership plan (ESOP) shares.....	RCFAP742	16,040,524	1.
2. Retained earnings ¹	RCFAKW00	2,909,989	2.
<i>To be completed only by institutions that have adopted ASU 2016-13:</i>			
a. Does your institution have a CECL transition election in effect as of the quarter-end report date? (enter "0" for No; enter "1" for Yes with a 3-year CECL transition election; enter "2" for Yes with a 5-year 2020 CECL transition election.).....	RCOAJJ29	2	2.a.
3. Accumulated other comprehensive income (AOCI).....	RCFAB530	44,549	3.
a. AOCI opt-out election (enter "1" for Yes; enter "0" for No.) (Advanced approaches institutions must enter "0" for No.).....	RCOAP838	1	3.a.
4. Common equity tier 1 minority interest includable in common equity tier 1 capital.....	RCFAP839	0	4.
5. Common equity tier 1 capital before adjustments and deductions (sum of items 1 through 4).....	RCFAP840	18,995,062	5.
6. LESS: Goodwill net of associated deferred tax liabilities (DTLs).....	RCFAP841	458,000	6.
7. LESS: Intangible assets (other than goodwill and mortgage servicing assets (MSAs)), net of associated DTLs.....	RCFAP842	6,498	7.
8. LESS: Deferred tax assets (DTAs) that arise from net operating loss and tax credit carryforwards, net of any related valuation allowances and net of DTLs.....	RCFAP843	7,522	8.
9. AOCI-related adjustments (items 9.a through 9.e are effective January 1, 2015) (if entered "1" for Yes in item 3.a, complete only items 9.a through 9.e; if entered "0" for No in item 3.a, complete only item 9.f):			9.
a. LESS: Net unrealized gains (losses) on available-for-sale debt securities (if a gain, report as a positive value; if a loss, report as a negative value).....	RCFAP844	151,976	9.a.
b. Not applicable.			9.b.
c. LESS: Accumulated net gains (losses) on cash flow hedges (if a gain, report as a positive value; if a loss, report as a negative value).....	RCFAP846	36	9.c.
d. LESS: Amounts recorded in AOCI attributed to defined benefit postretirement plans resulting from the initial and subsequent application of the relevant GAAP standards that pertain to such plans (if a gain, report as a positive value; if a loss, report as a negative value).....	RCFAP847	-6,566	9.d.
e. LESS: Net unrealized gains (losses) on held-to-maturity securities that are included in AOCI (if a gain, report as a positive value; if a loss, report as a negative value).....	RCFAP848	-33,922	9.e.
f. LESS: Accumulated net gain (loss) on cash flow hedges included in AOCI, net of applicable income taxes, that relate to the hedging of items that are not recognized at fair value on the balance sheet (if a gain, report as a positive value; if a loss, report as a negative value) (To be completed only by institutions that entered "0" for No in item 3.a.).....	RCFAP849	NR	9.f.
10. Other deductions from (additions to) common equity tier 1 capital before threshold-based deductions:			10.
a. LESS: Unrealized net gain (loss) related to changes in the fair value of liabilities that are due to changes in own credit risk (if a gain, report as a positive value; if a loss, report as a negative value).....	RCFAQ258	23,942	10.a.
b. LESS: All other deductions from (additions to) common equity tier 1 capital before threshold-based deductions.	RCFAP850	13,294	10.b.

Dollar amounts in thousands		(Column A) Non-advanced Approaches Institutions		(Column B) Advanced Approaches Institutions	
11. LESS: Non-significant investments in the capital of unconsolidated financial institutions in the form of common stock that exceed the 10 percent threshold for non-significant investments.....				RCFWP851	NR 11.
12. Subtotal (for column A, item 5 minus items 6 through 10.b; for column B, item 5 minus items 6 through 11).....	RCFAP852	18,374,282	RCFWP852	NR	12.
13. Not available					13.
a. LESS: Investments in the capital of unconsolidated financial institutions, net of associated DTLs, that exceed 25 percent of item 12.....	RCFALB58	0			13.a.
b. LESS: Significant investments in the capital of unconsolidated financial institutions in the form of common stock, net of associated DTLs, that exceed the 10 percent common equity tier 1 capital deduction threshold.....			RCFWP853	NR	13.b.
14. Not available					14.
a. LESS: MSAs, net of associated DTLs, that exceed 25 percent of item 12.....	RCFALB59	0			14.a.
b. LESS: MSAs, net of associated DTLs, that exceed the 10 percent common equity tier 1 capital deduction threshold.....			RCFWP854	NR	14.b.
15. Not available					15.
a. LESS: DTAs arising from temporary differences that could not be realized through net operating loss carrybacks, net of related valuation allowances and net of DTLs, that exceed 25 percent of item 12.....	RCFALB60	0			15.a.
b. LESS: DTAs arising from temporary differences that could not be realized through net operating loss carrybacks, net of related valuation allowances and net of DTLs, that exceed the 10 percent common equity tier 1 capital deduction threshold.....			RCFWP855	NR	15.b.
16. LESS: Amount of significant investments in the capital of unconsolidated financial institutions in the form of common stock, net of associated DTLs; MSAs, net of associated DTLs; and DTAs arising from temporary differences that could not be realized through net operating loss carrybacks, net of related valuation allowances and net of DTLs; that exceeds the 15 percent common equity tier 1 capital deduction threshold.....			RCFWP856	NR	16.
17. LESS: Deductions applied to common equity tier 1 capital due to insufficient amounts of additional tier 1 capital and tier 2 capital to cover deductions.....	RCFAP857	0	RCFWP857	NR	17.
18. Total adjustments and deductions for common equity tier 1 capital ³	RCFAP858	0	RCFWP858	NR	18.
19. Common equity tier 1 capital (item 12 minus item 18).....	RCFAP859	18,374,282	RCFWP859	NR	19.

Dollar amounts in thousands			
20. Additional tier 1 capital instruments plus related surplus.....	RCFAP860	2,500,000	20.
21. Non-qualifying capital instruments subject to phase out from additional tier 1 capital	RCFAP861	0	21.
22. Tier 1 minority interest not included in common equity tier 1 capital.....	RCFAP862	0	22.
23. Additional tier 1 capital before deductions (sum of items 20, 21, and 22).....	RCFAP863	2,500,000	23.
24. LESS: Additional tier 1 capital deductions.....	RCFAP864	0	24.
25. Additional tier 1 capital (greater of item 23 minus item 24, or zero).....	RCFAP865	2,500,000	25.
26. Tier 1 capital ¹	RCFA8274	20,874,282	26.
27. Average total consolidated assets ²	RCFAKW03	199,827,776	27.
28. LESS: Deductions from common equity tier 1 capital and additional tier 1 capital (sum of items 6, 7, 8, 10.b, 13 through 15, 17, and certain elements of item 24 - see instructions) ³	RCFAP875	485,314	28.
29. LESS: Other deductions from (additions to) assets for leverage ratio purposes.....	RCFAB596	762,167	29.
30. Total assets for the leverage ratio (item 27 minus items 28 and 29).....	RCFAA224	198,580,295	30.
31. Leverage ratio (item 26 divided by 30).....	RCFA7204	10.5118%	31.
a. Does your institution have a community bank leverage ratio (CBLR) framework election in effect as of the quarter-end report date? (enter "1" for Yes; enter "0" for No).....	RCOALE74	0	31.a.

1. Institutions that have adopted ASU 2016-13 and have elected to apply the 3-year or the 5-year 2020 CECL transition provision should include the applicable portion of the CECL transitional amount or the modified CECL transitional amount, respectively, in this item.

Dollar amounts in thousands		(Column A) Amount		(Column B) Percentage	
32. Total assets *	RCFA2170	NR			32.
33. Trading assets and trading liabilities (Schedule RC, sum of items 5 and 15). Report as a dollar amount in Column A and as a percentage of total assets (5% limit) in Column B.	RCFAKX77	NR	RCFAKX78	NR	33.
34. Off-balance sheet exposures:					34.
a. Unused portion of conditionally cancellable commitments	RCFAKX79	NR			34.a.
b. Securities lent and borrowed (Schedule RC-L, sum of items 6.a and 6.b)	RCFAKX80	NR			34.b.
c. Other off-balance sheet exposures	RCFAKX81	NR			34.c.
d. Total off-balance sheet exposures (sum of items 34.a through 34.c). Report as a dollar amount in Column A and as a percentage of total assets (25% limit) in Column B.	RCFAKX82	NR	RCFAKX83	NR	34.d.

Dollar amounts in thousands			
35. Unconditionally cancellable commitments	RCFAS540	NR	35.
36. Investments in the tier 2 capital of unconsolidated financial institutions	RCFALB61	NR	36.
37. Allocated transfer risk reserve	RCFA3128	NR	37.
38. Amount of allowances for credit losses on purchased credit-deteriorated assets:			38.
a. Loans and leases held for investment	RCFAJJ30	NR	38.a.
b. Held-to-maturity debt securities	RCFAJJ31	NR	38.b.
c. Other financial assets measured at amortized cost	RCFAJJ32	NR	38.c.
39. Tier 2 capital instruments plus related surplus	RCFAP866	1,440,794	39.
40. Non-qualifying capital instruments subject to phase-out from tier 2 capital	RCFAP867	0	40.
41. Total capital minority interest that is not included in tier 1 capital	RCFAP868	0	41.
42. Allowance for loan and lease losses and eligible credit reserves includable in tier 2 capital			42.
a. Allowance for loan and lease losses includable in tier 2 capital ¹	RCFA5310	998,489	42.a.
b. (Advanced approaches institutions that exit parallel run only): Eligible credit reserves includable in tier 2 capital	RCFW5310	NR	42.b.
43. Not applicable.			43.
44. Tier 2 capital before deductions			44.
a. Tier 2 capital before deductions (sum of items 39 through 42)	RCFAP870	2,439,283	44.a.
b. (Advanced approaches institutions that exit parallel run only): Tier 2 capital before deductions (sum of items 39 through 41, plus item 42.b)	RCFWP870	NR	44.b.
45. LESS: Tier 2 capital deductions	RCFAP872	0	45.
46. Tier 2 capital			46.
a. Tier 2 capital (greater of item 44.a minus item 45, or zero)	RCFA5311	2,439,283	46.a.
b. (Advanced approaches institutions that exit parallel run only): Tier 2 capital (greater of item 44.b minus item 45, or zero)	RCFW5311	NR	46.b.
47. Total capital			47.
a. Total capital (sum of items 26 and 46.a)	RCFA3792	23,313,565	47.a.
b. (Advanced approaches institutions that exit parallel run only): Total capital (sum of items 26 and 46.b)	RCFW3792	NR	47.b.
48. Total risk-weighted assets			48.
a. Total risk-weighted assets (from Schedule RC-R, Part II, item 31)	RCFAA223	106,757,837	48.a.
b. (Advanced approaches institutions that exit parallel run only): Total risk-weighted assets using advanced approaches rule (from FFIEC 101 Schedule A, item 60)	RCFWA223	NR	48.b.

- Beginning with the June 30, 2020, report date, all non-advanced approaches institutions should report in item 18, column A, the sum of items 13.a, 14.a, 15.a, and 17, column A; all advanced approaches institutions should report in item 18, column B, the sum of items 13.b, 14.b, 15.b, 16, and 17, column B.
- Beginning with the June 30, 2020, report date, all non-advanced approaches institutions should report the sum of item 19, column A, and item 25 in item 26; all advanced approaches institutions should report the sum of item 19, column B, and item 25 in item 26.
- Institutions that have adopted ASU 2016-13 and have elected to apply the 3-year or the 5-year 2020 CECL transition provision should include the applicable portion of the CECL transitional amount or the modified CECL transitional amount, respectively, in item 27.
- Beginning with the June 30, 2020, report date, all non-advanced approaches institutions should report in item 28 the sum of items 6, 7, 8, 10.b, 13.a, 14.a, 15.a, 17 (column A), and certain elements of item 24 - see instructions; all advanced approaches institutions should report in item 28, the sum of items 6, 7, 8, 10.b, 11, 13.b, 14.b, 15.b, 16, 17 (column B), and certain elements of item 24 - see instructions.

Dollar amounts in thousands		(Column A) Percentage		(Column B) Percentage	
49. Common equity tier 1 capital ratio (Column A: item 19, column A or B, as applicable, divided by item 48.a) (Advanced approaches institutions that exit parallel run only: Column B: item 19, column B, divided by item 48.b).....	RCFAP793	17.2112%	RCFWP793	NR	49.
50. Tier 1 capital ratio (Column A: item 26 divided by item 48.a) (Advanced approaches institutions that exit parallel run only: Column B: item 26 divided by item 48.b).....	RCFA7206	19.5529%	RCFW7206	NR	50.
51. Total capital ratio (Column A: item 47.a divided by item 48.a) (Advanced approaches institutions that exit parallel run only: Column B: item 47.b divided by item 48.b).....	RCFA7205	21.8378%	RCFW7205	NR	51.

Dollar amounts in thousands			
52. Institution-specific capital buffer necessary to avoid limitations on distributions and discretionary bonus payments:			52.
a. Capital conservation buffer.....	RCFAH311	12.7112%	52.a.
b. Advanced approaches institutions and institutions subject to Category III capital standards only: Total applicable capital buffer.....	RCFWH312	12.7112%	52.b.
53. Eligible retained income ¹	RCFAH313	689,080	53.
54. Distributions and discretionary bonus payments during the quarter ²	RCFAH314	11,567	54.
55. Advanced approaches institutions and institutions subject to Category III capital standards only: Supplementary leverage ratio information:			55.
a. Total leverage exposure ³	RCFAH015	210,104,862	55.a.
b. Supplementary leverage ratio.....	RCFAH036	9.9352%	55.b.

*. For report dates through December 31, 2021, report the lesser of total assets reported in Schedule RC, item 12, as of December 31, 2019, or the current report date, which must be less than \$10 billion.

1. Institutions that have adopted ASU 2016-13 should report the adjusted allowances for credit losses (AACL), as defined in the regulatory capital rule, in item 30.a.
1. Institutions must complete item 53 only if the amount reported in item 52.a above is less than or equal to 2.5000 percent (plus any other applicable buffer if the institution is an advanced approaches institution or a Category III institution).
2. Institutions must complete item 54 only if the amount reported in Schedule RC-R, Part I, item 46.a, in the Call Report for the December 31, 2019, report date was less than or equal to 2.5000 percent (plus any other applicable buffer if the institution is an advanced approaches institution or a Category III institution).
3. Institutions that have adopted ASU 2016-13 and have elected to apply the 3-year or the 5-year 2020 CECL transition provision should include the applicable portion of the CECL transitional amount or the modified CECL transitional amount, respectively, in item 55.a.

Schedule RC-R Part II - Risk-Weighted Assets(Form Type - 031)

Institutions are required to assign a 100 percent risk weight to all assets not specifically assigned a risk weight under Subpart D of the federal banking agencies' regulatory capital rules and not deducted from tier 1 or tier 2 capital.

Dollar amounts in thousands	(Column A) Totals from Schedule RC	(Column B) Adjustments to Totals Reported in Column A	(Column C) Allocation by Risk-Weight Category 0%	(Column D) Allocation by Risk-Weight Category 2%	(Column E) Allocation by Risk-Weight Category 4%	(Column F) Allocation by Risk-Weight Category 10%	(Column G) Allocation by Risk-Weight Category 20%	(Column H) Allocation by Risk-Weight Category 50%	(Column I) Allocation by Risk-Weight Category 100%	(Column J) Allocation by Risk-Weight Category 150%	
1. Cash and balances due from depository institutions.....	RCFDD957 54,918,919	RCFDS396 0	RCFDD958 53,756,213				RCFDD959 1,117,896	RCFDS397 4,281	RCFDD960 40,529	RCFDS398 0	1.
2. Securities:											2.
a. Held-to-maturity securities ³	RCFDD961 7,834,868	RCFDS399 0	RCFDD962 6,125,419	RCFDHJ74 0	RCFDHJ75 0		RCFDD963 1,707,262	RCFDD964 2,187	RCFDD965 0	RCFDS400 0	2.a.
b. Available-for-sale debt securities and equity securities with readily determinable fair values not held for trading.....	RCFDJA21 34,772,050	RCFDS402 0	RCFDD967 25,097,883	RCFDHJ76 0	RCFDHJ77 0		RCFDD968 9,431,335	RCFDD969 0	RCFDD970 242,832	RCFDS403 0	2.b.
3. Federal funds sold and securities purchased under agreements to resell:											3.
a. Federal funds sold in domestic offices.....	RCOND971 0		RCOND972 0				RCOND973 0	RCONS410 0	RCOND974 0	RCONS411 0	3.a.
b. Securities purchased under agreements to resell.....	RCFDH171 3,760,302	RCFDH172 3,760,302									3.b.
4. Loans and leases held for sale:											4.
a. Residential mortgage exposures.....	RCFDS413 95,426	RCFDS414 0	RCFDH173 0				RCFDS415 0	RCFDS416 66,511	RCFDS417 28,915		4.a.
b. High volatility commercial real estate exposures.....	RCFDS419 0	RCFDS420 0	RCFDH174 0				RCFDH175 0	RCFDH176 0	RCFDH177 0	RCFDS421 0	4.b.
c. Exposures past due 90 days or more or on nonaccrual ³	RCFDS423 0	RCFDS424 0	RCFDS425 0	RCFDHJ78 0	RCFDHJ79 0		RCFDS426 0	RCFDS427 0	RCFDS428 0	RCFDS429 0	4.c.

Dollar amounts in thousands	(Column K) Allocation by Risk-Weight Category 250%	(Column L) Allocation by Risk-Weight Category 300%	(Column M) Allocation by Risk-Weight Category 400%	(Column N) Allocation by Risk-Weight Category 600%	(Column O) Allocation by Risk-Weight Category 625%	(Column P) Allocation by Risk-Weight Category 937.5%	(Column Q) Allocation by Risk-Weight Category 1,250%	(Column R) Application of Other Risk-Weighting Approaches Exposure Amount	(Column S) Application of Other Risk-Weighting Approaches Risk-Weighted Asset Amount	
1. Cash and balances due from depository institutions										1.
2. Securities:										2.
a. Held-to-maturity securities										2.a.
b. Available-for-sale debt securities and equity securities with readily determinable fair values not held for trading.....	RCFDH270 NR	RCFDS405 0		RCFDS406 0				RCFDH271 0	RCFDH272 0	2.b.
3. Federal funds sold and securities purchased under agreements to resell:										3.
a. Federal funds sold in domestic offices										3.a.

3. Institutions that have adopted ASU 2016-13 should report as a negative number allowances eligible for inclusion in tier 2 capital in Column B, which excludes PCD allowances.
3. For loans and leases held for sale, exclude residential mortgage exposures, high volatility commercial real estate exposures, or sovereign exposures that are past due 90 days or more or on nonaccrual.

	(Column K) Allocation by Risk-Weight Category 250%	(Column L) Allocation by Risk-Weight Category 300%	(Column M) Allocation by Risk-Weight Category 400%	(Column N) Allocation by Risk-Weight Category 600%	(Column O) Allocation by Risk-Weight Category 625%	(Column P) Allocation by Risk-Weight Category 937.5%	(Column Q) Allocation by Risk-Weight Category 1,250%	(Column R) Application of Other Risk-Weighting Approaches Exposure Amount	(Column S) Application of Other Risk-Weighting Approaches Risk-Weighted Asset Amount	
Dollar amounts in thousands										
b. Securities purchased under agreements to resell										3.b.
4. Loans and leases held for sale:										4.
a. Residential mortgage exposures.....								RCFDH273 0	RCFDH274 0	4.a.
b. High volatility commercial real estate exposures.....								RCFDH275 0	RCFDH276 0	4.b.

	(Column K) Allocation by Risk-Weight Category 250%	(Column L) Allocation by Risk-Weight Category 300%	(Column M) Allocation by Risk-Weight Category 400%	(Column N) Allocation by Risk-Weight Category 600%	(Column O) Allocation by Risk-Weight Category 625%	(Column P) Allocation by Risk-Weight Category 937.5%	(Column Q) Allocation by Risk-Weight Category 1,250%	(Column R) Application of Other Risk-Weighting Approaches Exposure Amount	(Column S) Application of Other Risk-Weighting Approaches Risk-Weighted Asset Amount	
Dollar amounts in thousands										
c. Exposures past due 90 days or more or on nonaccrual ⁶								RCFDH277 0	RCFDH278 0	4.c.

	(Column A) Totals from Schedule RC	(Column B) Adjustments to Totals Reported in Column A	(Column C) Allocation by Risk-Weight Category 0%	(Column D) Allocation by Risk-Weight Category 2%	(Column E) Allocation by Risk-Weight Category 4%	(Column F) Allocation by Risk-Weight Category 10%	(Column G) Allocation by Risk-Weight Category 20%	(Column H) Allocation by Risk-Weight Category 50%	(Column I) Allocation by Risk-Weight Category 100%	(Column J) Allocation by Risk-Weight Category 150%	
Dollar amounts in thousands											
4. Loans and leases held for sale (continued):											4.
d. All other exposures.....	RCFDS431 255,970	RCFDS432 0	RCFDS433 0	RCFDHJ80 0	RCFDHJ81 0		RCFDS434 0	RCFDS435 0	RCFDS436 255,970	RCFDS437 0	4.d.
5. Loans and leases held for investment:											5.
a. Residential mortgage exposures.....	RCFDS439 19,104,588	RCFDS440 0	RCFDH178 0				RCFDS441 469,592	RCFDS442 16,384,783	RCFDS443 2,250,213		5.a.
b. High volatility commercial real estate exposures.....	RCFDS445 83,242	RCFDS446 0	RCFDH179 155				RCFDH180 0	RCFDH181 0	RCFDH182 0	RCFDS447 83,087	5.b.
c. Exposures past due 90 days or more or on nonaccrual ⁷	RCFDS449 554,143	RCFDS450 0	RCFDS451 48,257	RCFDHJ82 0	RCFDHJ83 0		RCFDS452 0	RCFDS453 0	RCFDS454 0	RCFDS455 505,886	5.c.
d. All other exposures.....	RCFDS457 39,812,511	RCFDS458 0	RCFDS459 2,309,030	RCFDHJ84 0	RCFDHJ85 0		RCFDS460 824,361	RCFDS461 34,833	RCFDS462 36,623,787	RCFDS463 20,500	5.d.
6. LESS: Allowance for loan and lease losses.....	RCFD3123 853,142	RCFD3123 853,142									6.
7. Trading assets.....	RCFDD976 25,668,444	RCFDS466 25,668,444	RCFDD977 0	RCFDHJ86 0	RCFDHJ87 0		RCFDD978 0	RCFDD979 0	RCFDD980 0	RCFDS467 0	7.
8. All other assets ⁸	RCFDD981 6,412,501	RCFDS469 534,449	RCFDD982 1,369,020	RCFDHJ88 0	RCFDHJ89 0		RCFDD983 336,031	RCFDD984 41,929	RCFDD985 2,868,085	RCFDH185 10,138	8.
a. Separate account bank-owned life insurance											8.a.
b. Default fund contributions to central counterparties											8.b.

	(Column K) Allocation by Risk-Weight Category 250%	(Column L) Allocation by Risk-Weight Category 300%	(Column M) Allocation by Risk-Weight Category 400%	(Column N) Allocation by Risk-Weight Category 600%	(Column O) Allocation by Risk-Weight Category 625%	(Column P) Allocation by Risk-Weight Category 937.5%	(Column Q) Allocation by Risk-Weight Category 1,250%	(Column R) Application of Other Risk-Weighting Approaches Exposure Amount	(Column S) Application of Other Risk-Weighting Approaches Risk-Weighted Asset Amount	
Dollar amounts in thousands										
4. Loans and leases held for sale (continued):										4.
d. All other exposures.....								RCFDH279 0	RCFDH280 0	4.d.
5. Loans and leases held for investment:										5.
a. Residential mortgage exposures.....								RCFDH281 0	RCFDH282 0	5.a.
b. High volatility commercial real estate exposures.....								RCFDH283 0	RCFDH284 0	5.b.
c. Exposures past due 90 days or more or on nonaccrual ¹¹								RCFDH285 0	RCFDH286 0	5.c.
d. All other exposures.....								RCFDH287 0	RCFDH288 0	5.d.
6. LESS: Allowance for loan and lease losses										6.
7. Trading assets.....	RCFDH289 NR	RCFDH186 0	RCFDH290 0	RCFDH187 0				RCFDH291 0	RCFDH292 0	7.
8. All other assets ¹²	RCFDH293 1,023,195	RCFDH188 0	RCFDS470 0	RCFDS471 0				RCFDH294 0	RCFDH295 0	8.
a. Separate account bank-owned life insurance.....								RCFDH296 229,654	RCFDH297 45,931	8.a.
b. Default fund contributions to central counterparties.....								RCFDH298 0	RCFDH299 0	8.b.

6. For loans and leases held for sale, exclude residential mortgage exposures, high volatility commercial real estate exposures, or sovereign exposures that are past due 90 days or more or on nonaccrual.
7. For loans and leases, net of unearned income, exclude residential mortgage exposures, high volatility commercial real estate exposures, or sovereign exposures that are past due 90 days or more or on nonaccrual.
8. Includes premises and fixed assets; other real estate owned; investments in unconsolidated subsidiaries and associated companies; direct and indirect investments in real estate ventures; intangible assets; and other assets.
11. For loans and leases, net of unearned income, exclude residential mortgage exposures, high volatility commercial real estate exposures, or sovereign exposures that are past due 90 days or more or on nonaccrual.
12. Includes premises and fixed assets; other real estate owned; investments in unconsolidated subsidiaries and associated companies; direct and indirect investments in real estate ventures; intangible assets; and other assets.

Dollar amounts in thousands		(Column A) Totals	(Column B) Adjustments to Totals Reported in Column A	(Column Q) Exposure Amount 1,250%	(Column T) Total Risk-Weighted Asset Amount by Calculation Methodology SSFA	(Column U) Total Risk-Weighted Asset Amount by Calculation Methodology Gross-Up	
9. On-balance sheet securitization exposures:							9.
a. Held-to-maturity securities.....	RCFDS475 1,575	RCFDS476 1,575	RCFDS477 0	RCFDS478 2,656	RCFDS479 0		9.a.
b. Available-for-sale securities.....	RCFDS480 25,009	RCFDS481 24,891	RCFDS482 118	RCFDS483 57,784	RCFDS484 0		9.b.
c. Trading assets.....	RCFDS485 152,869	RCFDS486 128,669	RCFDS487 24,200	RCFDS488 84,784	RCFDS489 0		9.c.
d. All other on-balance sheet securitization exposures.....	RCFDS490 2,312,313	RCFDS491 2,312,308	RCFDS492 5	RCFDS493 559,638	RCFDS494 0		9.d.
10. Off-balance sheet securitization exposures.....	RCFDS495 2,899,919	RCFDS496 2,899,816	RCFDS497 103	RCFDS498 726,384	RCFDS499 0		10.

	(Column A) Totals From Schedule RC	(Column B) Adjustments to Totals Reported in Column A	(Column C) Allocation by Risk-Weight Category 0%	(Column D) Allocation by Risk-Weight Category 2%	(Column E) Allocation by Risk-Weight Category 4%	(Column F) Allocation by Risk-Weight Category 10%	(Column G) Allocation by Risk-Weight Category 20%	(Column H) Allocation by Risk-Weight Category 50%	(Column I) Allocation by Risk-Weight Category 100%	(Column J) Allocation by Risk-Weight Category 150%	
Dollar amounts in thousands											
11. Total balance sheet assets ¹⁴	RCFD2170 194,911,590	RCFDS500 31,577,496	RCFDD987 88,705,977	RCFDHJ90 0	RCFDHJ91 0		RCFDD988 13,886,477	RCFDD989 16,534,524	RCFDD990 42,310,331	RCFDS503 619,611	11.

	(Column K) Allocation by Risk-Weight Category 250%	(Column L) Allocation by Risk-Weight Category 300%	(Column M) Allocation by Risk-Weight Category 400%	(Column N) Allocation by Risk-Weight Category 600%	(Column O) Allocation by Risk-Weight Category 625%	(Column P) Allocation by Risk-Weight Category 937.5%	(Column Q) Allocation by Risk-Weight Category 1,250%	(Column R) Application of Other Risk-Weighting Approaches Exposure Amount	
Dollar amounts in thousands									
11. Total balance sheet assets ¹⁴	RCFDS504 1,023,195	RCFDS505 0	RCFDS506 0	RCFDS507 0			RCFDS510 24,323	RCFDH300 229,654	11.

	(Column A) Face, Notional, or Other Amount	(Column B) Credit Equivalent Amount	(Column C) Allocation by Risk-Weight Category 0%	(Column D) Allocation by Risk-Weight Category 2%	(Column E) Allocation by Risk-Weight Category 4%	(Column F) Allocation by Risk-Weight Category 10%	(Column G) Allocation by Risk-Weight Category 20%	(Column H) Allocation by Risk-Weight Category 50%	(Column I) Allocation by Risk-Weight Category 100%	(Column J) Allocation by Risk-Weight Category 150%	
Dollar amounts in thousands											
12. Financial standby letters of credit	RCFDD991 5,994,543	RCFDD992 5,994,543	RCFDD993 912,660	RCFDHJ92 0	RCFDHJ93 0		RCFDD994 714,037	RCFDD995 141,488	RCFDD996 4,167,095	RCFDS511 59,264	12.
13. Performance standby letters of credit and transaction-related contingent items	RCFDD997 3,070,039	RCFDD998 1,535,020	RCFDD999 102,284				RCFDG603 252,243	RCFDG604 52,981	RCFDG605 1,113,885	RCFDS512 13,627	13.
14. Commercial and similar letters of credit with an original maturity of one year or less	RCFDG606 227,557	RCFDG607 45,511	RCFDG608 30	RCFDHJ94 0	RCFDHJ95 0		RCFDG609 2,719	RCFDG610 1,064	RCFDG611 41,499	RCFDS513 200	14.
15. Retained recourse on small business obligations sold with recourse	RCFDG612 0	RCFDG613 0	RCFDG614 0				RCFDG615 0	RCFDG616 0	RCFDG617 0	RCFDS514 0	15.

	(Column A) Face, Notional, or Other Amount	(Column B) Credit Equivalent Amount	(Column C) Allocation by Risk-Weight Category 0%	(Column D) Allocation by Risk-Weight Category 2%	(Column E) Allocation by Risk-Weight Category 4%	(Column F) Allocation by Risk-Weight Category 10%	(Column G) Allocation by Risk-Weight Category 20%	(Column H) Allocation by Risk-Weight Category 50%	(Column I) Allocation by Risk-Weight Category 100%	(Column J) Allocation by Risk-Weight Category 150%	
Dollar amounts in thousands											
16. Repo-style transactions ²¹	RCFDS515 475,078	RCFDS516 475,078	RCFDS517 0	RCFDS518 134,394	RCFDS519 0		RCFDS520 75,584	RCFDS521 0	RCFDS522 265,100	RCFDS523 0	16.
17. All other off-balance sheet liabilities	RCFDG618 0	RCFDG619 0	RCFDG620 0				RCFDG621 0	RCFDG622 0	RCFDG623 0	RCFDS524 0	17.
18. Unused commitments: [*]											18.
a. Original maturity of one year or less	RCFDS525 15,182,432	RCFDS526 3,036,486	RCFDS527 80,186	RCFDHJ96 60,000	RCFDHJ97 0		RCFDS528 101,759	RCFDS529 42,962	RCFDS530 2,751,579	RCFDS531 0	18.a.

14. For each of columns A through R of item 11, report the sum of items 1 through 9. For item 11, the sum of columns B through R must equal column A. Item 11, column A, must equal Schedule RC, item 12.

21. Includes securities purchased under agreements to resell (reverse repos), securities sold under agreements to repurchase (repos), securities borrowed, and securities lent.

*. Excludes unused commitments to asset-backed commercial paper conduits.

	(Column A) Face, Notional, or Other Amount	(Column B) Credit Equivalent Amount	(Column C) Allocation by Risk-Weight Category 0%	(Column D) Allocation by Risk-Weight Category 2%	(Column E) Allocation by Risk-Weight Category 4%	(Column F) Allocation by Risk-Weight Category 10%	(Column G) Allocation by Risk-Weight Category 20%	(Column H) Allocation by Risk-Weight Category 50%	(Column I) Allocation by Risk-Weight Category 100%	(Column J) Allocation by Risk-Weight Category 150%	
Dollar amounts in thousands											
b. Original maturity exceeding one year.....	RCFDG624 66,796,427	RCFDG625 33,398,214	RCFDG626 496,547	RCFDHJ98 264,564	RCFDHJ99 0		RCFDG627 4,250,980	RCFDG628 43,447	RCFDG629 28,337,011	RCFDS539 5,664	18.b.
19. Unconditionally cancelable commitments.....	RCFDS540 8,072,898	RCFDS541 0									19.
20. Over-the-counter derivatives.....		RCFDS542 11,816,239	RCFDS543 20,854	RCFDHK00 0	RCFDHK01 0	RCFDS544 0	RCFDS545 5,244,634	RCFDS546 18,061	RCFDS547 6,490,784	RCFDS548 41,906	20.
21. Centrally cleared derivatives.....		RCFDS549 623,104	RCFDS550 0	RCFDS551 623,104	RCFDS552 0		RCFDS554 0	RCFDS555 0	RCFDS556 0	RCFDS557 0	21.
22. Unsettled transactions (failed trades) ²²	RCFDH191 9,567		RCFDH193 6,218				RCFDH194 0	RCFDH195 0	RCFDH196 0	RCFDH197 0	22.

22. For item 22, the sum of columns C through Q must equal column A.

	(Column O) Allocation by Risk-Weight Category 625%	(Column P) Allocation by Risk-Weight Category 937.5%	(Column Q) Allocation by Risk-Weight Category 1,250%	(Column R) Application of Other Risk-Weighting Approaches Credit Equivalent Amount	(Column S) Application of Other Risk-Weighting Approaches Risk-Weighted Asset Amount	
Dollar amounts in thousands						
16. Repo-style transactions ²⁴				RCFDH301 0	RCFDH302 0	16.
17. All other off-balance sheet liabilities						17.
18. Unused commitments: [*]						18.
a. Original maturity of one year or less.....				RCFDH303 0	RCFDH304 0	18.a.
b. Original maturity exceeding one year.....				RCFDH307 0	RCFDH308 0	18.b.
19. Unconditionally cancelable commitments						19.
20. Over-the-counter derivatives.....				RCFDH309 0	RCFDH310 0	20.
21. Centrally cleared derivatives						21.
22. Unsettled transactions (failed trades) ²⁵	RCFDH198 744	RCFDH199 625	RCFDH200 1,980			22.

24. Includes securities purchased under agreements to resell (reverse repos), securities sold under agreements to repurchase (repos), securities borrowed, and securities lent.

*. Excludes unused commitments to asset-backed commercial paper conduits.

25. For item 22, the sum of columns C through Q must equal column A.

Dollar amounts in thousands		(Column C) Allocation by Risk-Weight Category 0%	(Column D) Allocation by Risk-Weight Category 2%	(Column E) Allocation by Risk-Weight Category 4%	(Column F) Allocation by Risk-Weight Category 10%	(Column G) Allocation by Risk-Weight Category 20%	(Column H) Allocation by Risk-Weight Category 50%	(Column I) Allocation by Risk-Weight Category 100%	(Column J) Allocation by Risk-Weight Category 150%	
23. Total assets, derivatives, off-balance sheet items, and other items subject to risk weighting by risk-weight category (for each of columns C through P, sum of items 11 through 22; for column Q, sum of items 10 through 22).....		RCFDG630 90,324,756	RCFDS558 1,082,062	RCFDS559 0	RCFDS560 0	RCFDG631 24,528,433	RCFDG632 16,834,527	RCFDG633 85,477,284	RCFDS561 740,272	23.
24. Risk weight factor										24.
25. Risk-weighted assets by risk-weight category (for each column, item 23 multiplied by item 24).....		RCFDG634 0	RCFDS569 21,641	RCFDS570 0	RCFDS571 0	RCFDG635 4,905,687	RCFDG636 8,417,264	RCFDG637 85,477,284	RCFDS572 1,110,408	25.

Dollar amounts in thousands		(Column K) Allocation by Risk-Weight Category 250%	(Column L) Allocation by Risk-Weight Category 300%	(Column M) Allocation by Risk-Weight Category 400%	(Column N) Allocation by Risk-Weight Category 600%	(Column O) Allocation by Risk-Weight Category 625%	(Column P) Allocation by Risk-Weight Category 937.5%	(Column Q) Allocation by Risk-Weight Category 1,250%	
23. Total assets, derivatives, off-balance sheet items, and other items subject to risk weighting by risk-weight category (for each of columns C through P, sum of items 11 through 22; for column Q, sum of items 10 through 22).....		RCFDS562 1,023,195	RCFDS563 0	RCFDS564 0	RCFDS565 0	RCFDS566 744	RCFDS567 625	RCFDS568 26,406	23.
24. Risk weight factor									24.
25. Risk-weighted assets by risk-weight category (for each column, item 23 multiplied by item 24).....		RCFDS573 2,557,988	RCFDS574 0	RCFDS575 0	RCFDS576 0	RCFDS577 4,650	RCFDS578 5,859	RCFDS579 330,075	25.

Dollar amounts in thousands

26. Risk-weighted assets base for purposes of calculating the allowance for loan and lease losses 1.25 percent threshold.....	RCFDS580	104,308,033	26.
27. Standardized market-risk weighted assets (applicable only to banks that are covered by the market risk capital rule).....	RCFDS581	2,449,804	27.
28. Risk-weighted assets before deductions for excess allowance of loan and lease losses and allocated risk transfer risk reserve ²⁷	RCFDB704	106,757,837	28.
29. LESS: Excess allowance for loan and lease losses.....	RCFDA222	0	29.
30. LESS: Allocated transfer risk reserve.....	RCFD3128	0	30.
31. Total risk-weighted assets (item 28 minus items 29 and 30).....	RCFDG641	106,757,837	31.
1. Current credit exposure across all derivative contracts covered by the regulatory capital rules.....	RCFDG642	5,946,090	M.1.

Dollar amounts in thousands	(Column A) With a remaining maturity of One year or less		(Column B) With a remaining maturity of Over one year through five years		(Column C) With a remaining maturity of Over five years	
2. Notional principal amounts of over-the-counter derivative contracts:						
a. Interest rate.....	RCFDS582	121,443,321	RCFDS583	109,677,424	RCFDS584	38,146,297
b. Foreign exchange rate and gold.....	RCFDS585	1,091,930,835	RCFDS586	77,652,411	RCFDS587	19,834,883
c. Credit (investment grade reference asset).....	RCFDS588	4,785,891	RCFDS589	3,612,735	RCFDS590	117,200
d. Credit (non-investment grade reference asset).....	RCFDS591	5,142,715	RCFDS592	5,955,355	RCFDS593	246,483
e. Equity.....	RCFDS594	21,330,423	RCFDS595	9,501,027	RCFDS596	2,762,440
f. Precious metals (except gold).....	RCFDS597	10,340,302	RCFDS598	438,948	RCFDS599	0
g. Other.....	RCFDS600	76,109	RCFDS601	1,202	RCFDS602	0
3. Notional principal amounts of centrally cleared derivative contracts:						
a. Interest rate.....	RCFDS603	24,703,399	RCFDS604	28,168,827	RCFDS605	17,392,275
b. Foreign exchange rate and gold.....	RCFDS606	48,538,416	RCFDS607	567,820	RCFDS608	0
c. Credit (investment grade reference asset).....	RCFDS609	169,625	RCFDS610	1,050,262	RCFDS611	0
d. Credit (non-investment grade reference asset).....	RCFDS612	274,795	RCFDS613	2,389,028	RCFDS614	780,500
e. Equity.....	RCFDS615	0	RCFDS616	0	RCFDS617	0
f. Precious metals (except gold).....	RCFDS618	0	RCFDS619	0	RCFDS620	0
g. Other.....	RCFDS621	0	RCFDS622	0	RCFDS623	0

Dollar amounts in thousands

4. Amount of allowances for credit losses on purchased credit-deteriorated assets: ¹			M.4.
a. Loans and leases held for investment.....	RCFDJJ30	777	M.4.a.
b. Held-to-maturity debt securities.....	RCFDJJ31	0	M.4.b.
c. Other financial assets measured at amortized cost.....	RCFDJJ32	0	M.4.c.

27. Sum of items 2.b through 20, column S; items 9.a, 9.b, 9.c, 9.d, and 10, columns T and U; item 25, columns C through Q; and item 27 (if applicable).

1. Memorandum items 4.a through 4.c should be completed only by institutions that have adopted ASU 2016-13.

Schedule RC-S - Servicing Securitization and Asset Sale Activities(Form Type - 031)

Dollar amounts in thousands	(Column A) 1-4 Family Residential Loans	(Column B) Home Equity Lines	(Column C) Credit Card Receivables	(Column D) Auto Loans	(Column E) Other Consumer Loans	(Column F) Commercial and Industrial Loans	(Column G) All Other Loans, All Leases, and All Other Assets	
1. Outstanding principal balance of assets sold and securitized by the reporting bank with servicing retained or with recourse or other seller-provided credit enhancements.....	RCFDB705 0	RCFDB706 0	RCFDB707 0	RCFDB708 0	RCFDB709 0	RCFDB710 0	RCFDB711 0	1.
2. Maximum amount of credit exposure arising from recourse or other seller-provided credit enhancements provided to structures reported in item 1	RCFDHU09 0	RCFDHU10 0	RCFDHU11 0	RCFDHU12 0	RCFDHU13 0	RCFDHU14 0	RCFDHU15 0	2.
<i>Item 3 is to be completed by banks with \$100 billion or more in total assets.</i>								
3. Reporting bank's unused commitments to provide liquidity to structures reported in item 1 ¹	RCFDB726 0	RCFDB727 0	RCFDB728 0	RCFDB729 0	RCFDB730 0	RCFDB731 0	RCFDB732 0	3.
4. Past due loan amounts included in item 1:								4.
a. 30-89 days past due.....	RCFDB733 0	RCFDB734 0	RCFDB735 0	RCFDB736 0	RCFDB737 0	RCFDB738 0	RCFDB739 0	4.a.
b. 90 days or more past due.....	RCFDB740 0	RCFDB741 0	RCFDB742 0	RCFDB743 0	RCFDB744 0	RCFDB745 0	RCFDB746 0	4.b.
5. Charge-offs and recoveries on assets sold and securitized with servicing retained or with recourse or other seller-provided credit enhancements (calendar year-to-date):								5.
a. Charge-offs.....	RIADB747 0	RIADB748 0	RIADB749 0	RIADB750 0	RIADB751 0	RIADB752 0	RIADB753 0	5.a.
b. Recoveries.....	RIADB754 0	RIADB755 0	RIADB756 0	RIADB757 0	RIADB758 0	RIADB759 0	RIADB760 0	5.b.
<i>Item 6 is to be completed by banks with \$10 billion or more in total assets.</i>								
6. Total amount of ownership (or seller's) interest carried as securities or loans ¹		RCFDHU16 0	RCFDHU17 0			RCFDHU18 0		6.
7. Not applicable								7.
8. Not applicable								8.
9. Maximum amount of credit exposure arising from credit enhancements provided by the reporting bank to other institutions' securitization structures in the form of standby letters of credit, purchased subordinated securities, and other enhancements.....	RCFDB776 0			RCFDB779 0	RCFDB780 0	RCFDB781 0	RCFDB782 0	9.
<i>Item 10 is to be completed by banks with \$10 billion or more in total assets.</i>								
10. Reporting bank's unused commitments to provide liquidity to other institutions' securitization structures ¹	RCFDB783 0			RCFDB786 0	RCFDB787 0	RCFDB788 0	RCFDB789 0	10.
11. Assets sold with recourse or other seller-provided credit enhancements and not securitized by the reporting bank.....	RCFDB790 0						RCFDB796 0	11.
12. Maximum amount of credit exposure arising from recourse or other seller-provided credit enhancements provided to assets reported in item 11....	RCFDB797 0						RCFDB803 0	12.

1. The \$100 billion asset-size test is based on the total assets reported on the June 30, 2018, Report of Condition.
1. The \$10 billion asset-size test is based on the total assets reported on the June 30, 2018, Report of Condition.
1. The \$10 billion asset-size test is based on the total assets reported on the June 30, 2018, Report of Condition.

Dollar amounts in thousands

1. Not applicable			M.1.
2. Outstanding principal balance of assets serviced for others (includes participations serviced for others):			M.2.
a. Closed-end 1-4 family residential mortgages serviced with recourse or other servicer-provided credit enhancements.....	RCFDB804	0	M.2.a.
b. Closed-end 1-4 family residential mortgages serviced with no recourse or other servicer-provided credit enhancements.....	RCFDB805	1,449,430	M.2.b.
c. Other financial assets (includes home equity lines) ¹	RCFDA591	2,160,589	M.2.c.
d. 1-4 family residential mortgages serviced for others that are in process of foreclosure at quarter-end (includes closed-end and open-end loans).....	RCFDF699	65,913	M.2.d.
<i>Memorandum item 3 is to be completed by banks with \$10 billion or more in total assets.</i>			
3. Asset-backed commercial paper conduits: ²			M.3.
a. Maximum amount of credit exposure arising from credit enhancements provided to conduit structures in the form of standby letters of credit, subordinated securities, and other enhancements:			M.3.a.
1. Conduits sponsored by the bank, a bank affiliate, or the bank's holding company.....	RCFDB806	0	M.3.a.1.
2. Conduits sponsored by other unrelated institutions.....	RCFDB807	0	M.3.a.2.
b. Unused commitments to provide liquidity to conduit structures:			M.3.b.
1. Conduits sponsored by the bank, a bank affiliate, or the bank's holding company.....	RCFDB808	1,151,221	M.3.b.1.
2. Conduits sponsored by other unrelated institutions.....	RCFDB809	0	M.3.b.2.
4. Outstanding credit card fees and finance charges included in Schedule RC-S, item 1, column C ²	RCFDC407	0	M.4.

Schedule RC-T - Fiduciary and Related Services(Form Type - 031)

Dollar amounts in thousands

1. Does the institution have fiduciary powers? (If "NO," do not complete Schedule RC-T.).....	RCFDA345	Yes	1.
2. Does the institution exercise the fiduciary powers it has been granted?.....	RCFDA346	Yes	2.
3. Does the institution have any fiduciary or related activity (in the form of assets or accounts) to report in this schedule? (If "NO," do not complete the rest of Schedule RC-T.).....	RCFDB867	Yes	3.

Dollar amounts in thousands	(Column A) Managed Assets		(Column B) Non-Managed Assets		(Column C) Number of Managed Accounts		(Column D) Number of Non-Managed Accounts	
4. Personal trust and agency accounts.....	RCFDB868	1,321,170	RCFDB869	337,991	RCFDB870	420	RCFDB871	92
5. Employee benefit and retirement-related trust and agency accounts:								
a. Employee benefit - defined contribution.....	RCFDB872	0	RCFDB873	0	RCFDB874	0	RCFDB875	0
b. Employee benefit - defined benefit.....	RCFDB876	0	RCFDB877	0	RCFDB878	0	RCFDB879	0
c. Other employee benefit and retirement-related accounts.....	RCFDB880	48,832	RCFDB881	175,893	RCFDB882	55	RCFDB883	40
6. Corporate trust and agency accounts.....	RCFDB884	0	RCFDB885	9,355,983	RCFDC001	0	RCFDC002	1351
7. Investment management and investment advisory agency accounts.....	RCFDB886	5,575,880	RCFDJ253	0	RCFDB888	1095	RCFDJ254	0
8. Foundation and endowment trust and agency accounts.....	RCFDJ255	507,311	RCFDJ256	0	RCFDJ257	35	RCFDJ258	0
9. Other fiduciary accounts.....	RCFDB890	7,319	RCFDB891	0	RCFDB892	3	RCFDB893	0
10. Total fiduciary accounts (sum of items 4 through 9).....	RCFDB894	7,460,512	RCFDB895	9,869,867	RCFDB896	1608	RCFDB897	1483
11. Custody and safekeeping accounts.....			RCFDB898	550,254,029			RCFDB899	2465
12. Fiduciary accounts held in foreign offices (included in items 10 and 11).....	RCFNB900	0	RCFNB901	0	RCFNB902	0	RCFNB903	0
13. Individual Retirement Accounts, Health Savings Accounts, and other similar accounts (included in items 5.c and 11).....	RCFDJ259	48,832	RCFDJ260	175,893	RCFDJ261	55	RCFDJ262	40

- Memorandum item 2.c is to be completed if the principal balance of other financial assets serviced for others is more than \$10 million.
- The \$10 billion asset-size test is based on the total assets reported on the June 30, 2018, Report of Condition.
- Memorandum item 4 is to be completed by banks that (1) together with affiliated institutions, have outstanding credit card receivables (as defined in the instructions) that exceed \$500 million as of the report date, or (2) are credit card specialty banks as defined for Uniform Bank Performance Report purposes.

Dollar amounts in thousands

14. Personal trust and agency accounts.....	RIADB904	2,849	14.
15. Employee benefit and retirement-related trust and agency accounts:			15.
a. Employee benefit - defined contribution.....	RIADB905	0	15.a.
b. Employee benefit - defined benefit.....	RIADB906	0	15.b.
c. Other employee benefit and retirement-related accounts.....	RIADB907	0	15.c.
16. Corporate trust and agency accounts.....	RIADA479	2,604	16.
17. Investment management and investment advisory agency accounts.....	RIADJ315	5,699	17.
18. Foundation and endowment trust and agency accounts.....	RIADJ316	0	18.
19. Other fiduciary accounts.....	RIADA480	0	19.
20. Custody and safekeeping accounts.....	RIADB909	7,882	20.
21. Other fiduciary and related services income.....	RIADB910	0	21.
22. Total gross fiduciary and related services income (sum of items 14 through 21) (must equal Schedule RI, item 5.a).....	RIAD4070	19,035	22.
a. Fiduciary and related services income - foreign offices (included in item 22).....	RIADB912	0	22.a.
23. Less: Expenses.....	RIADC058	NR	23.
24. Less: Net losses from fiduciary and related services.....	RIADA488	NR	24.
25. Plus: Intracompany income credits for fiduciary and related services.....	RIADB911	NR	25.
26. Net fiduciary and related services income.....	RIADA491	NR	26.

	(Column A) Personal Trust and Agency and Investment Management Agency Accounts		(Column B) Employee Benefit and Retirement-Related Trust and Agency Accounts		(Column C) All Other Accounts		
	Dollar amounts in thousands						
1. Managed assets held in fiduciary accounts:							M.1.
a. Noninterest-bearing deposits.....	RCFDJ263	NR	RCFDJ264	NR	RCFDJ265	NR	M.1.a.
b. Interest-bearing deposits.....	RCFDJ266	NR	RCFDJ267	NR	RCFDJ268	NR	M.1.b.
c. U.S. Treasury and U.S. Government agency obligations.....	RCFDJ269	NR	RCFDJ270	NR	RCFDJ271	NR	M.1.c.
d. State, county, and municipal obligations.....	RCFDJ272	NR	RCFDJ273	NR	RCFDJ274	NR	M.1.d.
e. Money market mutual funds.....	RCFDJ275	NR	RCFDJ276	NR	RCFDJ277	NR	M.1.e.
f. Equity mutual funds.....	RCFDJ278	NR	RCFDJ279	NR	RCFDJ280	NR	M.1.f.
g. Other mutual funds.....	RCFDJ281	NR	RCFDJ282	NR	RCFDJ283	NR	M.1.g.
h. Common trust funds and collective investment funds.....	RCFDJ284	NR	RCFDJ285	NR	RCFDJ286	NR	M.1.h.
i. Other short-term obligations.....	RCFDJ287	NR	RCFDJ288	NR	RCFDJ289	NR	M.1.i.
j. Other notes and bonds.....	RCFDJ290	NR	RCFDJ291	NR	RCFDJ292	NR	M.1.j.
k. Investments in unregistered funds and private equity investments.....	RCFDJ293	NR	RCFDJ294	NR	RCFDJ295	NR	M.1.k.
l. Other common and preferred stocks.....	RCFDJ296	NR	RCFDJ297	NR	RCFDJ298	NR	M.1.l.
m. Real estate mortgages.....	RCFDJ299	NR	RCFDJ300	NR	RCFDJ301	NR	M.1.m.
n. Real estate.....	RCFDJ302	NR	RCFDJ303	NR	RCFDJ304	NR	M.1.n.
o. Miscellaneous assets.....	RCFDJ305	NR	RCFDJ306	NR	RCFDJ307	NR	M.1.o.
p. Total managed assets held in fiduciary accounts (for each column, sum of Memorandum items 1.a through 1.o).....	RCFDJ308	NR	RCFDJ309	NR	RCFDJ310	NR	M.1.p.

	(Column A) Managed Assets		(Column B) Number of Managed Accounts		
	Dollar amounts in thousands				
q. Investments of managed fiduciary accounts in advised or sponsored mutual funds.....	RCFDJ311	NR	RCFDJ312	NR	M.1.q.

Dollar amounts in thousands		(Column A) Number of Issues		(Column B) Principal Amount Outstanding		
2. Corporate trust and agency accounts:					M.2.	
a. Corporate and municipal trusteeships.....		RCFDB927	NR	RCFDB928	NR	M.2.a.
1. Issues reported in Memorandum item 2.a that are in default.....		RCFDJ313	NR	RCFDJ314	NR	M.2.a.1.
b. Transfer agent, registrar, paying agent, and other corporate agency.....		RCFDB929	NR			M.2.b.

Dollar amounts in thousands		(Column A) Number of Funds	(Column B) Market Value of Fund Assets		
Memoranda items 3.a through 3.g are to be completed by banks with collective investment funds and common trust funds with a total market value of \$1 billion or more as of the preceding December 31.					M.3.
3. Collective investment funds and common trust funds:					
a. Domestic equity.....	RCFDB931	NR	RCFDB932	NR	M.3.a.
b. International/Global equity.....	RCFDB933	NR	RCFDB934	NR	M.3.b.
c. Stock/Bond blend.....	RCFDB935	NR	RCFDB936	NR	M.3.c.
d. Taxable bond.....	RCFDB937	NR	RCFDB938	NR	M.3.d.
e. Municipal bond.....	RCFDB939	NR	RCFDB940	NR	M.3.e.
f. Short term investments/Money market.....	RCFDB941	NR	RCFDB942	NR	M.3.f.
g. Specialty/Other.....	RCFDB943	NR	RCFDB944	NR	M.3.g.
h. Total collective investment funds (sum of Memorandum items 3.a through 3.g).....	RCFDB945	0	RCFDB946	0	M.3.h.

Dollar amounts in thousands	(Column A) Gross Losses Managed Accounts		(Column B) Gross Losses Non-Managed Accounts		(Column C) Recoveries		
4. Fiduciary settlements, surcharges, and other losses:							M.4.
a. Personal trust and agency accounts.....	RIADB947	NR	RIADB948	NR	RIADB949	NR	M.4.a.
b. Employee benefit and retirement-related trust and agency accounts.....	RIADB950	NR	RIADB951	NR	RIADB952	NR	M.4.b.
c. Investment management agency accounts.....	RIADB953	NR	RIADB954	NR	RIADB955	NR	M.4.c.
d. Other fiduciary accounts and related services.....	RIADB956	NR	RIADB957	NR	RIADB958	NR	M.4.d.
e. Total fiduciary settlements, surcharges, and other losses (sum of Memorandum items 4.a through 4.d) (sum of columns A and B minus column C must equal Schedule RC-T, item 24).....	RIADB959	NR	RIADB960	NR	RIADB961	NR	M.4.e.

Schedule RC-V - Variable Interest Entities(Form Type - 031)

Dollar amounts in thousands		(Column A) Securitization Vehicles		(Column B) Other VIEs	
1. Assets of consolidated variable interest entities (VIEs) that can be used only to settle obligations of the consolidated VIEs:					
a. Cash and balances due from depository institutions.....	RCFDJ981	0	RCFDJF84	0	1.a.
b. Securities not held for trading.....	RCFDHU20	0	RCFDHU21	0	1.b.
c. Loans and leases held for investment, net of allowance, and held for sale.....	RCFDHU22	0	RCFDHU23	0	1.c.
d. Other real estate owned.....	RCFDK009	0	RCFDJF89	0	1.d.
e. Other assets.....	RCFDJF91	0	RCFDJF90	74,833	1.e.
2. Liabilities of consolidated VIEs for which creditors do not have recourse to the general credit of the reporting bank:					
a. Other borrowed money.....	RCFDJF92	0	RCFDJF85	0	2.a.
b. Other liabilities.....	RCFDJF93	0	RCFDJF86	3,252	2.b.
3. All other assets of consolidated VIEs (not included in items 1.a. through 1.e above).....	RCFDK030	0	RCFDJF87	0	3.
4. All other liabilities of consolidated VIEs (not included in items 2.a through 2.b above).....	RCFDK033	0	RCFDJF88	0	4.
Dollar amounts in thousands					
5. Total assets of asset-backed commercial paper (ABCP) conduit VIEs.....	RCFDJF77	0	5.		
6. Total liabilities of ABCP conduit VIEs.....	RCFDJF78	0	6.		

Optional Narrative Statement Concerning the Amounts Reported in the Consolidated Reports of Condition and Income(Form Type - 031)

Dollar amounts in thousands		
1. Comments?.....	RCON6979	No 1.
2. Bank Management Statement.....	TEXT6980	NR 2.